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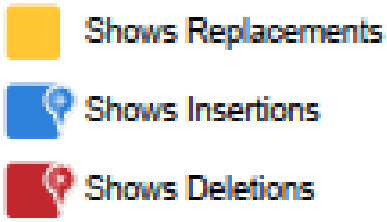

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AENC-NG-CNS-REP-0279

Norwich to Tilbury

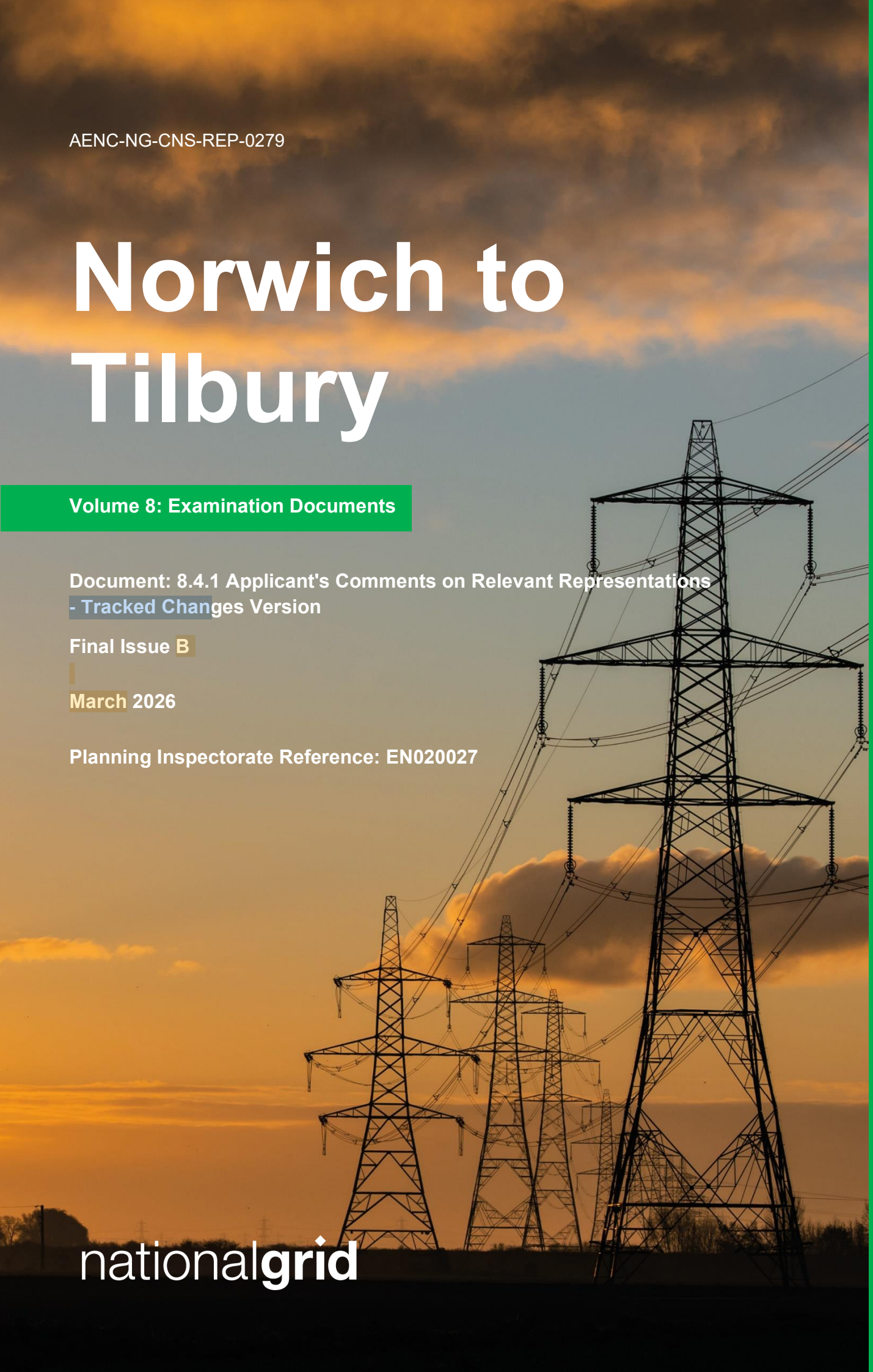
Volume 8: Examination Documents

Document: 8.4.1 Applicant's Comments on Relevant Representations - Tracked Changes Version

Final Issue B

March 2026

Planning Inspectorate Reference: EN020027



nationalgrid

Revision History

Version	Date	Submitted at
A	26 February 2026	Deadline 1
B	12 March 2026	Deadline 2

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Executive Summary

Background

National Grid Electricity Transmission is developing proposals to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury. The plans comprise a new 400 kilovolt electricity transmission connection of approximately 180 km overall length from Norwich Main Substation to Tilbury Substation via Bramford Substation, a new East Anglia Connection Node (EACN) substation and a new Tilbury North substation.

In September 2025, National Grid submitted an application for development consent seeking powers to build and operate the Project. The Planning Inspectorate accepted the application, meaning the Project would be scrutinised in the Examination phase, before a decision is made by the Secretary of State. As part of this process, the Planning Inspectorate invited Interested Parties to submit a Relevant Representation (RR) outlining the issues that they wished to be considered as part of the Examination.

Relevant Representations

The majority of the RRs that were submitted to the Examining Authority (ExA) have been broken down into the following themes, noting that individual representations may address more than one theme.

The Purpose and Structure of this Report

National Grid has reviewed and considered all of the RRs submitted to the ExA and has analysed each RR to identify key matters raised on a thematic basis. In Chapter 2 of this document, we have provided a response to these matters as grouped by theme.

National Grid has also identified a number of RRs for which a more detailed response is provided. This includes all local authorities (as defined by Section 42(1)(b) of the Planning Act 2008) and a selection of statutory and non-statutory consultee organisations. The detailed responses to these RRs can be found in Appendix A to Appendix AE.

Navigating National Grid's responses

The majority of relevant representations have been analysed and responded to on a thematic basis. To assist Interested Parties in finding the relevant responses to the points raised in their RR, we have provided a table in Appendix AF. This lists all Interested Parties who submitted a RR, the RR Examination Library reference, and where the themed responses to their points can be found in Chapter 2.

Summary of Key Themes Raised

The 3,877 RRs that were submitted to the ExA have been broken down into the following themes, noting that individual representations may address more than one theme.

Table ES1 Distribution of Relevant Representations by Theme

Themes raised	Relevant representations which raised this theme (number)	Relevant representations which raised this theme (percentage)
Land Use	1,003	26%
Safety and Security	87	2%
Alternatives	2,824	73%
Construction Impacts including Air Quality and Emissions and Noise and Vibration	932	24%
Consultation	1,359	35%
DCO and Planning Matters	615	16%
Socio-economics, recreation and tourism	665	17%
Environment including Landscape and Visual and Water Environment	3,143	81%
Historic Environment	876	23%
Needs Case	2,442	63%
Project Finance	951	25%
Property and Compensation	1,078	28%
Social Impact including Health and Wellbeing	2,425	63%
Third Party Infrastructure including Cumulative Effects	380	10%
Transport and Traffic	1,248	32%
Transmission System and Good Design	1,756	45%
Biodiversity, ecology and nature conservation	1,052	27%

Table ES2 below includes a summary of National Grid's responses to the most commonly raised themes. This summary is not a substitute for the wider report and associated documents, with detailed responses to the themes raised in the relevant representations provided in the main report.

The themes in Table ES2 have been updated for Deadline 2 in order to reflect the Initial assessment of principal issues (IAPI) specified by the Examining Authority (ExA) in Annex C of the **Rule 6 Letter [PD-005]**. Where a topic is not covered by IAPI (e.g Consultation) it has not been amended.

Table ES2 Key themes raised in Relevant Representations and National Grid's response

Theme	National Grid's high-level response
Land Use	National Grid has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routing and siting process confirms that no reasonable alternatives are available. Policy recognises that opportunities to fully mitigate impacts on existing land uses may be limited. Even so, impacts on land use and farming operations have been carefully considered and reduced as far as practicable. Construction will result in temporary disruption to some agricultural land, but land take will be strictly limited to what is necessary, and use of farmland will be minimised wherever it is safe and reasonable to do so. National Grid continues to work closely with affected landowners and farmers to understand and manage impacts on individual holdings. All temporarily used land will be reinstated, with compensation available for loss of income, and disruption during construction will be minimised through established good practice.
Alternatives	Alternatives have been fully considered throughout project 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. National Grid 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, socio-economic, 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. An offshore solution capable of matching the capacity of the proposed overhead line would require three subsea cables and substantial additional onshore infrastructure. As set out in Appendix B: **7.17 Strategic Options Backcheck and Review [APP-355]**, the total capital cost of the overhead line options (EAN 4 and EAS 2) is in the region of £895m, compared with £4,096.5m for the HVDC Offshore 1 option (2020/21 prices). Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. EN-5 also accepts that undergrounding and offshore technologies have significantly higher lifetime costs of repair and later uprating.

Theme	National Grid's high-level response
	HVDC options are also constrained by fundamental technical limitations, including the absence of commercially available HVDC circuit breakers. Without them, highly interconnected HVDC networks cannot safely accommodate power infeed above 1,800 MW under Security and Quality of Supply Standards, as a single fault would shut down the entire system. Loss of more than 1,800 MW on the National Electricity Transmission System would cause a major frequency deviation, risking a national system outage. This currently limits both the scale and interconnectivity of HVDC solutions. Other bodies are also in agreement that the shape of our proposals is reasonable and aligns with these requirements. Ofgem has authorised investment which has allowed us to progress the Project and the Project in its current form has also been given 'proceed' signals by NESO. Given the level and urgency of need for new energy infrastructure, EN-1 states that consideration of alternatives must be proportionate, and that only alternatives that can meet the objectives of the proposed development need to be considered. These objectives include security and affordability. Policy also requires consideration of whether it is realistic that alternatives could deliver the same infrastructure capacity (and address energy security, climate change and other environmental benefits) in the same timescale as our proposals. Furthermore, a delay to the Project would result in additional cost to the consumer. Annex 2 of the NESO Clean Power 2030 Report identifies that if the National Grid 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. Accordingly, and in line with EN-1 and EN-5, we have applied the starting presumption in favour of overhead lines where appropriate, reversed that presumption within designated National Landscapes, and included targeted undergrounding where justified. National Grid pursuing an offshore or HVDC alternative for this Project would be contrary to the strong presumptions set out in policy and would not allow us to meet the project objectives.
Biodiversity Net Gain (BNG)	When we submitted our application for development consent in 2025, there was no requirement for the Project to meet the mandatory requirement of 10 per cent Biodiversity Net Gain (BNG). Despite this, National Grid has committed to deliver 10 per cent BNG. All survey scopes were discussed prior to submission with the relevant consultees, and the baseline surveys can be found in our Environmental Statement.
Consultation	1.1.1 National Grid has carried out multiple rounds of consultation since 2022, considering feedback and refining our proposals at each stage. Throughout, our approach to consultation has fully complied with both statutory requirements and the statutory guidance on consultation relevant to applications for development consent (which has been developed by Government and PINS in accordance with the Gunning Principles). 1.1.2 Our job is to carefully consider the most feasible options and present proposals for public consultation. We cannot present plans for consultation that would not meet the requirements placed on us by

Theme	National Grid's high-level response
	the government and our regulator Ofgem. At each stage of consultation, we have laid out our consideration of the alternative route options and technologies. All feedback received at each stage of consultation has been considered by the Project team and, where appropriate, we have amended our proposals in response. 1.1.3 The proposals that we have chosen to consult on and develop are the ones which meet our statutory duties, including the duties imposed on us by national policy EN-1 and EN-5.
Socio-economics, recreation and tourism	1.1.1 National Grid has considered the scale and nature of employment likely to arise from the Project. 1.1.2 National Grid recognises the importance and is committed to supporting of skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes: • working with local suppliers and supporting forums, such as Chambers of Commerce • contributing to a coordinated regional approach to electricity industry jobs and skills planning • engaging with Local Authorities to understand local priorities and opportunities around skills and employment.
Health and wellbeing	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. Decades of research into the effects of Electric and Magnetic Fields (EMF), along with guidelines, policies and precautionary Government measures, have shaped National Grid's approach to designing overhead lines, substations and underground cables. Evidence of that compliance is presented in **7.8 Electric and Magnetic Field Compliance Report [APP-330]** submitted as part of the DCO application. National Grid also recognises that uncertainty while the Project is developed may cause anxiety. Through routing and design and regular engagement with residents and stakeholders, National Grid has sought to reduce potential effects on communities. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.
Landscape and visual	National Grid has undertaken a Landscape and Visual Impact Assessment (LVIA) as part of the Environmental Impact Assessment for the Project. The LVIA acknowledges that the Project would give rise to significant landscape and visual effects during both construction and operation. Mitigation measures relevant to landscape and visual effects are summarised in **Environmental Statement Chapter 13: Landscape and Visual [APP-226]**. In this context, National Grid notes that National Policy Statement EN-5 recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure.

Theme	National Grid's high-level response
	The LVIA has been undertaken by a suitably qualified and experienced assessment team, including Chartered Members of the Landscape Institute. Potential effects on landscape and visual receptors have been systematically assessed out to a distance of 3 km from the proposed development. The findings and professional judgements are presented in a clear, objective and consistent manner.
Needs Case	National Grid has a direct statutory duty to facilitate new connections and to operate and maintain a safe and secure National Electricity Transmission System. The Project is required to enable the delivery of existing connection agreements with two offshore wind farm projects and an interconnector project, through a connection to a new East Anglia Connection Node (EACN) substation. In addition, the Project would reinforce the local transmission network, which currently lacks sufficient capacity to reliably and securely accommodate the volume of electricity anticipated to connect in the future. Without this reinforcement, the network would be unable to support planned generation and interconnection in the region. The need for the Project has been tested and reaffirmed at each stage of its development. The UK Government is committed to delivering a clean electricity system by 2030, as set out in the Clean Power 2030 Action Plan. In November 2024, the National Energy System Operator (NESO) published its independent analysis on the pathways required to achieve this ambition. That analysis identifies the Project as critical to the delivery of a transmission network capable of supporting clean power pathways and meeting future energy demand. The technical need for the Project is set out in **7.17 Strategic Options Backcheck and Review [APP-355]**, while the policy justification for the Project is addressed in **5.6 Planning Statement [APP-085]**. Both documents were submitted in support of the application for development consent.
Project finance	The estimated costs for each strategic option considered by National Grid are set out in **7.17 Strategic Options Backcheck and Review [APP-355]**. This assessment reflects updated cost and technology information, together with changes in the planning and regulatory framework. Where the costs of more minor elements are unlikely to be differentiating between strategic options, these have not necessarily been included. Throughout the development of the Project, National Grid has engaged proactively with government and regulators on policy and cost considerations associated with new infrastructure. National Grid continues to monitor technological developments, actively exploring innovations and alternative technology types, which are assessed for their suitability and applicability to the Project. A range of alternative technologies has been investigated and is documented within **7.17 Strategic Options Backcheck and Review [APP-355]**. These include an offshore connection using Direct Current (DC) technology, as well as a range of onshore connection options. The onshore alternatives considered comprise increasing operational voltages on the existing network above 400 kV; Alternating Current (AC) overhead lines (an established technology); alternative pylon designs; AC underground cables; High Voltage

Theme	National Grid's high-level response
	Direct Current (HVDC) overhead lines and underground cables; and Gas Insulated Line (GIL) technology.
Property and Compensation	Property values are influenced by many factors. While National Grid recognises that visual impact may lead to perceptions of property value loss, there is no reliable evidence that environmental effects reduce house values due to the Project. Where a property owner is not directly affected by the Project, UK law does not provide compensation for a perceived fall in property value due to proximity or changes to a view. Compensation applies where land or rights are acquired under a DCO and the retained property suffers a direct loss because of the Project. In these cases, landowners may be able to claim compensation under the Compulsory Purchase Compensation Code.
Transport and Traffic	National Grid has assessed the potential impacts and mitigation measures required of the Project on traffic flow, delays and road safety and impacts on walking, cycling and horse riding on roads along the Primary Access Routes. National Grid has also undertaken a complete assessment of traffic routes being used by construction vehicles. Measures to reduce impacts on the highway network and to other road users have been assessed. It is anticipated that the coordination of road closures will be secured through Local Highway Authority Permit Schemes to minimise disruption.
Treasury Green Book	HM Treasury's The Green Book provides guidance on the appraisal of public policies, programmes and projects to ensure effective use of public funds. It is not a requirement of the Planning Act 2008, and there is no obligation for an application for development consent to include a Green Book assessment. Its use in the context of development consents is limited to public projects such as highways. That said, while not mandated, Green Book principles inform the wider regulatory and appraisal framework, including the processes overseen by Ofgem, and therefore influence how DCO applications are developed and justified. National Grid's appraisal approach is aligned with Ofgem's funding and regulatory requirements and demonstrates compliance with the economic, social and environmental objectives set out in the National Policy Statements. Throughout project development, core appraisal principles are applied to ensure decisions deliver value for money, efficiency and proportionate outcomes. National Grid is confident that its assessment and decision-making process is robust, proportionate and appropriate. This approach has been consistently tested and endorsed through previous projects, formal examination, and ultimately decisions taken by the relevant Secretary of State. A full, transparent and auditable cost model underpins the options appraisal, clearly setting out how costs have been assessed and compared across alternatives. This is available in **7.19 2023 - Strategic Options Backcheck and Review [APP- 357]** and **7.17 Strategic Options Backcheck and Review [APP- 355]** Appendix D Economic Appraisal, which sets out in transparent detail how options appraisal costs were evaluated.

Theme	National Grid's high-level response
Biodiversity, ecology and nature conservation	National Grid has sought to minimise impacts on priority habitats and statutory designated sites through careful route selection and siting of the Project. Where ecological impacts are anticipated, appropriate mitigation has been identified and secured in accordance with relevant guidance and good practice. **7.4 Outline Landscape and Ecological Management Plan (OLEMP) [APP-046]** clearly sets out all ecological mitigation measures to be implemented, including embedded, standard and additional mitigation. Following the application of mitigation, impacts are assessed as negligible, with no significant residual effects on priority habitats or designated sites. The Environment Act 2021 introduces a mandatory requirement for a minimum of 10% Biodiversity Net Gain (BNG) for development, subject to certain exemptions. While this requirement is not yet in force for Nationally Significant Infrastructure Projects (NSIPs), and the application for development consent was submitted before the requirement becomes mandatory, National Grid has nevertheless committed to delivering a minimum of 10% BNG, providing wider environmental and societal benefits as part of the Project. The ecological baseline is presented in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Survey scopes were agreed and/or discussed in advance with Natural England, the Environment Agency and relevant Local Planning Authorities prior to surveys being undertaken. The Environmental Statement assesses effects on all relevant ecological receptors, including bird collision risk, and the assessment has been undertaken in accordance with the mitigation hierarchy.

Conclusions

National Grid appreciates the time and effort taken by all Interested Parties who submitted Relevant Representations on the Project. We have carefully considered every issue raised and have provided responses to all matters identified, either through the thematic responses set out in this report or, where appropriate, through more detailed responses to specific organisations in the appendices.

While we recognise that not all Interested Parties will agree with the conclusions reached or the approach proposed, we are confident that the Project has been developed in accordance with the relevant legislative and policy framework, and that the need for the Project, the consideration of alternatives and the assessment of effects have been robustly tested.

The Examination process provides a further opportunity for these matters to be scrutinised by the Examining Authority. National Grid will continue to engage constructively throughout the Examination and remains committed to working with affected communities, stakeholders and statutory bodies as the Project progresses.

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 Relevant Representations ('RRs') made by interested parties in response to the application for development consent for the Norwich to Tilbury project ('the Project'). This document is provided at Deadline 1 of the Examination.

1.1.2 A total of 3,876 individual RRs were submitted to the Examining Authority (ExA) by the deadline of 27 November 2025. The period to respond was extended for a small number of people, one of whom responded and their relevant representation was submitted on 9 December 2025 and is addressed in this report. The ExA accepted a number of additional submissions received after the deadline, as noted in Annex F of the **Rule 6 Letter [PD-009]**. In addition, two further late submissions were accepted and published on 13 January 2026. As these later submissions are not duly made relevant representations they are not addressed in this document.

1.2 Approach to Responding to Relevant Representations

Thematic Analysis

1.2.1 The Applicant began a process to review and consider the RRs as soon as they were published on 12 December 2025. In producing this document, the Applicant has reviewed and considered all of the RRs submitted to the ExA. Given the volume of RRs submitted, however, this document does not seek to provide detailed comment on each individual RR. Rather, for the majority of the RRs the Applicant has analysed them to identify key matters raised on a thematic basis. In this document, the Applicant has provided a response to these matters and where applicable, provides a signpost to documents in the Development Consent Order (DCO) application that contain further relevant detail.

1.2.2 To identify the matters raised among the RRs, a coding framework was developed to provide a list of topics and underlying themes (codes) raised, from which the feedback can be organised. The coding framework was regularly updated to reflect any new themes and topics that were identified. The framework was applied by analysts to capture and organise the issues raised in a systematic way to ease analysis and response. The coding framework consisted of the following topics described in Table 1.1.

1.2.3 The themes in Table 1.1 and Table 2.1 in Section 2 of this document have been updated for Deadline 2 in order to reflect the Initial assessment of principal issues (IAPI) specified by the Examining Authority (ExA) in Annex C of the **Rule 6 Letter [PD-005]**. Where a topic is not covered by IAPI (e.g Consultation) it has not been amended.

Table 1.1 Coding topics

Coding Topics	Description
Land Use	Contains comments about impacts on agricultural land and its use, including farming operations and livestock.
Safety and Security	Contains comments about the impacts on airfields and airports, flight paths, and their use.
Alternatives	Contains comments suggesting alternatives to the Project, either in full (e.g. that the Project be entirely offshore or entirely undergrounded), or that elements of the Project (such as pylons or overhead lines) be changed, moved or re-routed.
Construction impacts including: air quality and emissions noise and vibration	Contains comments about disruption and impacts during the construction stage and information in **7.3 Outline Construction Traffic Management Plan (CTMP) [APP-309]** and 7.2 Outline Code of Construction Practice [APP-300]
Consultation	Contains comments about the pre-application consultation, further engagement, and general criticism of National Grid.
DCO and planning matters	Contains comments about the DCO application, and comments about compliance with legislation, HM Treasury Green Book, and national and local planning policy.
Socio-economics, recreation and tourism	Contains comments about economic opportunities and impacts, including tourism and employment.
Environment including: landscape and visual water environment	Contains comments about the environmental impact of the Project, environmental assessments undertaken, and mitigation measures.
Historic environment	Contains comments about the heritage impact of the Project and comments on the heritage assessments undertaken.
Need case	Contains comments about the Project's need case and programme, government policy, and criticism of the Project.
Property and compensation	Contains comments about property acquisition, compensation and impacts on property values.
Project finance	Contains comments about the financing, costings and cost models of the Project.
Health and wellbeing	Contains comments about the impacts and benefits of the Project to local communities, their needs and facilities.
Third-party interactions including cumulative effects	Contains comments about interactions and proximity to statutory undertakers' assets and third-party developments.
Transmission system and good design	Contains comments about particular elements of the proposed transmission system, including underground cables, overhead lines and substations.

Coding Topics	Description
Transport and traffic	Contains comments about the impact of the Project on roads, traffic, and protected paths (e.g. Public Rights of Way).
Biodiversity, ecology and nature conservation	Contains comments about the impact of Project on wildlife, habitats and species, as well as comments on Biodiversity Net Gain and ecological enhancements.

1.2.4 Many of the matters raised in RRs are similar to those submitted in response to pre-application consultation, to which the Applicant has previously responded in **5.1 Consultation Report [APP-066]**, provided with the application for development consent.

Selected Organisations

1.2.5 The Applicant has identified a number of RRs for which it is considered necessary to provide a more detailed response for the reasons set out below. This includes all local authorities (as defined by Section 42(1)(b) of the Planning Act 2008) and a selection of statutory and non-statutory consultee organisations. These 'selected organisations' primarily include either those with whom the Applicant is to enter into a Statement of Common Ground (SoCG), or for whom the submitted RR is of particular detail requiring a commensurate response. The status of each selected organisation in respect of the application, and whether they are subject to an SoCG, is provided at the start of the Applicant's response to their RR.

1.2.6 The Applicant has generally sought to replicate the RR of selected organisations verbatim in a tabular format. However, where the RR contains information which is general or descriptive (e.g. introductory text), repetitive (e.g. summarising earlier points in the RR) or directed at other parties (e.g. the ExA), this may not be included for comment by the Applicant. In an effort to keep this document concise and focused, appendices to RRs are typically summarised for comment rather than replicated in full, unless the appendix raises detailed points that are different or new to those of the main RR.

Rule 6 Letter Requirements

1.2.7 The ExA provided direction to the Applicant in Annex F of the **Rule 6 Letter [PD-009]** published on 13 January 2026 concerning the presentation and cross-referencing of its comments on RRs. The Applicant has endeavoured to meet these requests where applicable, as set out in the table below.

Table 1.2 Rule 6 Letter Request and Applicant Response

Rule 6 Request	Approach in this document
Specify the name of the party making each RR and the examination library reference	For RRs analysed and responded to under thematic analysis, the Applicant has provided a schedule in Appendix AF that identifies which RRs raised matters under each theme set out in this document. The name of the party and the RR Examination Library reference is provided. Only two RRs are not represented in Appendix
Where similar comments have been received by a number of IPs they can be grouped together, however all names and	

Rule 6 Request	Approach in this document
examination library references should still be given	AF as they did not raise any points relevant for response. These are RR-0339 (Beauchamps Farms Limited) and RR-3652 (Thomas Fairley) whose RRs were limited to confirming their intention to participate in Examination. For RRs responded to in detail, the RR party name and Examination Library reference is clearly provided at the start of each response.
Where representations have been made by APs who are listed in the book of reference [AS-018], this should be specified, and cross referenced to the land rights tracker	The Applicant has not responded separately to RRs made by persons or organisations with an interest in land or rights affected by compulsory acquisition (also known as Affected Persons or APs), except where they may also fall into the selected organisations referred to above. RRs submitted by APs are therefore reflected in the thematic analysis alongside the majority of RRs. Best efforts have been made to identify the AP RRs and these are represented in Appendix AF by their RR number and name being in **bold**. Where responses have not made clear that they are an AP nor included any information making them identifiable as an AP (or such information was redacted), it has not been possible to be certain all APs have been identified as such. We have therefore made best endeavours to link RRs from APs to the land rights tracker, however, the limitations listed above, also apply. Only RRs that have been confirmed to be from APs have been flagged as such in Appendix AF, however if any APs believe they have not been identified correctly they are encouraged to contact the Project team.
Representations made by statutory consultees should be listed separately or highlighted so that they are easily identifiable	Where a statutory consultee is responded to in detail as a selected organisation, it is made clear in the introductory text that they are a statutory consultee. Where a statutory consultee is represented in the thematic analysis, they are identified in the Appendix AF schedule with a symbol [*] against the relevant RR number.
Where a detailed or tabular RR has been submitted, responses should be presented in a comparable manner	All selected organisations have been responded to in a tabular fashion.

1.3 Terminology

1.3.1 Many of the RRs refer to significant effects arising from the Project. The Applicant has also used the term in response to RRs and seeks to clarify that in Environmental

Impact Assessment (EIA) terms, we use the term 'likely significant effect' to mean typically an environmental effect that is a serious possibility and is more than minor. Definitions are provided in each environmental topic chapter of the Environmental Statement (Volume 6 of the DCO application). A likely significant environmental effect does not mean that an effect is unacceptable in policy or other planning terms. Indeed effects can be significantly beneficial as well as significantly adverse. The mitigation hierarchy has also been applied (as defined in **6.5 EIA Approach and Method [APP-135]**) as part of the EIA, where available.

1.4 Structure of this Document

1.4.1 This document is structured as follows:

- Chapter 2 provides the Applicant's response to matters raised in the RRs as grouped by theme;
- Appendix A to Appendix AE provide the Applicant's detailed response to RRs submitted by selected organisations;
- Appendix AF provides a list of the RRs that raised points relating to each theme in Chapter 2.

2. Responses to Relevant Representations by Theme

2.1.1 This section provides the Applicant's response to themed matters raised in Relevant Representations. Table 2.1 below presents these responses, organised by topics and their underlying themes (codes), and provides the Applicant's response.

2.1.2 Please refer to Appendix AF for the schedule of RRs and their respective themes.

Table 2.1 The Applicant's responses to Relevant Representations by theme

Themes raised by topic	Summary of matters raised	National Grid's response
Land Use		
Farming impacts	Comments about Project taking away valuable agricultural land / disrupt farming operations	During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. National Grid is and will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be addressed through voluntary land agreements.
	Comments about the Project resulting in a negative impact on agricultural livestock	The Applicant is and will continue to work with all landowners including farmers and equestrian facilities who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project progresses. We would seek to work with the farming community to limit disruption where practicable. This includes providing prior warning of works which may result in the need to move livestock. Compensation claims for disturbance are considered on a case-by-case basis, if negative impact on farming operations can be proven. Particular agricultural matters can also be written into voluntary land agreements. There will also be mitigation put in place where animal grazing maybe affected. As well as possible effects on humans, possible effects of Electric and Magnetic Fields (EMFs) on various animals have been studied. No detectable effects of EMFs have been found on, for example, health, milk production, fertility, and behaviour.

Themes raised by topic	Summary of matters raised	National Grid's response
		This is confirmed in NPS EN-5(2024) which states: '*There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.*'
Safety and Security		
Aviation sector impacts	Comments about the project being routed away from nearby airfields / airports / helipads / light aircraft	**6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** provides information on the Applicant's assessment of potential impacts of the Project on aviation, including on the safety and operation of aerodromes within a 5 km radius Aviation Impact Study Area. Paragraph 15.3.49 of Appendix 15.2 explains how, during the evolution of the Project's design, the identification of potential aviation impacts resulting from the Project (including via aviation stakeholder engagement) prompted the evaluation and incorporation of design changes to minimise adverse effects, where possible, including realignment of the overhead line. **5.15 Design Development Report [APP-122]** provides further information on the consideration of aviation impacts within Project design decision-making (paras. 2.6.4 to 2.6.10 refer).
	Comments about the Project resulting in a negative impact on flight paths	**6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** recognises the Project represents a new obstacle within the proximity of aerodromes, explaining the primary aim of the Applicant's assessments as being to evaluate safety, operational and capability impacts arising as a result of potential aircraft collision with or avoidance of the obstacle, predominantly during take-off and landing approaches (paragraphs 15.3.3 and 15.3.22 refer). The assessment methodology considers flight paths and established operational procedures within its appraisal of multiple risk factors (para. 15.3.23). Appendix 15.2 further recognises adverse impacts on aviation operations can be reduced by mitigation measures including changes to operational procedures (para 15.3.51). This is in accordance with the NPS EN-1 (2024) para. 5.5.44.

Themes raised by topic	Summary of matters raised	National Grid's response
	Comments about the Project resulting in a negative impact on airfields / airports / helipads / light aircraft	**6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** provides information on the Applicant's assessment of potential impacts of the Project on aviation, including on the safety and operation of aerodromes within a 5 km radius Aviation Impact Study Area. Furthermore, **6.15 Environmental Statement Chapter 15 – Socio-economics Recreation and Tourism [APP-265]** and **6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266]** provide information on assessments of Project effects on recreational aviation sites.
Safety standards	Comments about the Project posing a safety risk to aircraft	**6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** recognises the Project represents a new obstacle within the proximity of aerodromes, explaining the primary aim of the Applicant's assessments as being to evaluate safety, operational and capability impacts arising as a result of potential aircraft collision with or avoidance of the obstacle (paragraphs 15.3.3 and 15.3.22 refer). Other risks to aircraft considered include risk of bird strike, induced wind turbulence, and potential impacts of electric and magnetic fields (EMF) on aircraft systems, resulting from the Project (paragraphs 15.3.43. to 15.3.48 refer). Appendix 15.2 explains how, during the evolution of the Project's design, the identification of potential aviation impacts resulting from the Project has prompted the evaluation and incorporation of design changes to minimise adverse risk effects, where possible, in accordance with NPS EN-1 (2024) paragraph 5.5.50. The Applicant's position is that changes have been implemented where appropriately justified by the detail and quantified extent of potential aviation impacts evidenced through assessments, recognising these impacts to be varied for each aerodrome in scope. A position that suggests any increase in aviation safety risk is unacceptable and cannot be tolerated does not adhere to the Civil

Themes raised by topic	Summary of matters raised	National Grid's response
		Aviation Authority's risk management system guidance principles[1]. The Applicant has sought operator agreement of risk acceptability (in conjunction with the implementation of design changes or agreement of alternative mitigation measures to reduce residual impacts, as appropriate), understanding operator responsibilities for aerodrome safeguarding and safety risk management. Acceptability has been agreed in several cases (**Draft Statements of Common Ground with Barnards Farm [APP-109], Brook Farm [APP-199], and Thurrock [APP-110]** aerodromes refer, as well as 8.3.34 Draft Statement of Common Ground – South Norfolk Model Aircraft Club). In instances where operators do not agree with impact assessment conclusions of acceptability, the Applicant has sought feedback on what risk thresholds would be acceptable.
	Comments about the Project not meeting aviation guidance / legislation	**6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** details the Applicant's impact assessment approach and parameters, developed to accord with aviation-specific legislation, regulation and guidance and resulting from consultation with aviation stakeholder bodies.
	Comments about the aviation safety advice for airfields received by National Grid for the Project	**6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** provides information on the Applicant's engagement and consultation with aviation stakeholders, including aerodrome operators as well as the Civil Aviation Authority Airfields Advisory Team (CAA AAT), the British Gliding Association (BGA) and the General Aviation Awareness Council (GAAC), to inform its assessment of potential aviation safety impacts of the Project. The assessments have been undertaken by the Applicant's appointed specialist aviation consultants, who have substantial expertise in operational safeguarding evaluation at aerodromes across the UK. The Applicant's position is that the risk-based, site-specific approach

[1] Civil Aviation Authority (2013) *CAP1059 Safety Management Systems: Guidance for Small, Non Complex Organisations*

Themes raised by topic	Summary of matters raised	National Grid's response
		undertaken is objective, robust and in accordance with relevant aviation sector-specific regulation, guidance and safety advice received, as well as national planning policy.
Alternatives		
Design change	Comments about pylon(s) being re-located	The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved. The outcomes and reasons for either making or not making changes are set out in various documents with individual responses set out in **5.1 Consultation Report [APP-066]** with more overarching changes in the various Design Development Reports (the most recent being **5.15 Design Development Report [APP-122]** with earlier requests covered in **APP-358** to **APP-360**).
	Comments about a section of overhead line being re-routed	The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved. The outcomes and reasons for either making or not making changes are set out in various documents with individual responses set out in **5.1 Consultation Report [APP-066]** with more overarching changes in the various Design Development Reports (the most recent being **5.15 Design Development Report [APP-122]** with earlier requests covered in **APP-358** to **APP-360**).
	Comments about the location of the proposed construction compounds / haul roads / accesses	The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved. The outcomes and reasons for either making or not making changes are set out in various documents with individual responses set out in **5.1 Consultation Report [APP-066]** with more overarching changes in the various Design Development Reports (the most recent being **5.15 Design Development Report [APP-122]** with earlier requests covered in **APP-358** to **APP-360**).
	Comments about the design of the underground cables	**2.6.1 Design and Layout Plans - Subs and Cables [APP-041]**, AENC-MMAC-ENG-DWG-0085-01, depicts the illustrative high voltage

Themes raised by topic	Summary of matters raised	National Grid's response
		cable direct buried cross section and construction easement. AENC-MMAC-ENG-DWG-0085-02 depicts the illustrative trenchless crossing standard detail. **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, paragraphs 4.8.65 to 4.8.78 provide information on the construction of the underground cables, including the standard means of installation and approach to vegetation clearance along the route. **5.15 Design Development Report [APP-122]** sets out the main changes to the routeing and siting of the Project infrastructure. The historic development of the design is captured within **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]**, **7.20 2023 - Design Development Report for the Project [APP-358]** and **7.21 2024 - Design Development Report for the Project [APP-359]**.
	Comments about aesthetic/visual redesign of pylons	The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that whilst T-Pylons may in certain locations provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take, this comes at a higher cost. The build cost is approximately 2 to 2.5 times that of an equivalently rated conventional overhead line, and the lifetime costs are around 1.6 to 1.7 times higher. The current arrangements for the oversight of funding by Ofgem require that the lowest cost acceptable design is taken forward rather than a more expensive design even where the latter is perceived to reduce the level of effect. As such, consideration of the use of T-pylons follows after establishing a need to mitigate effects of the standard lattice design and after considering the benefits of adopting a low- height lattice pylon design. T- pylons themselves are also less adaptable to varied terrains and require more substantial access infrastructure. Furthermore, while their resilience and environmental impact are comparable to

Themes raised by topic	Summary of matters raised	National Grid's response
		conventional overhead lines, they have increased carbon intensity due to construction materials used. Attention also needs to be given to the transitions between pylon types. Given it is the surrounding context that drives the need for alternative design mitigation, where this is not required along the entire route, any visual break and transition in pylon design also needs to be carefully sited. Assessment findings have concluded that, where there is not a reversal of the presumption to use overhead lines, the use of lattice pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst there may be some locations (for examples see Appendix A of **5.15 Design Development Report [APP-122]**) where there may be a design option for the use of T-pylons, the need to mitigate unacceptable effects from lattice pylons is not engaged. On this basis, T-pylons are not proposed for the Project. The Applicant does not consider that the inclusion of an alternative pylon design (such as one that looks like the Angel of the North) would further mitigate landscape and visual effects.
	Comments about altering the Project's Draft Order Limits in relation to property	The Order Limits are a combination of the permanent assets' limits of deviations and the temporary construction work areas that constitute the Project. The Order Limits represent the extents of the maximum deviation permitted for permanent and temporary features of the Project taken together as presented in the application for development consent. Table 4.3 in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** explicitly describes the details of the Order Limits and Limits of Deviation for the core components of the Project, explaining the generic widths applied and why we would require them. The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project being either moved or not moved, including the draft Order Limits. The outcomes and reasons for either making or not making changes are set out in various

Themes raised by topic	Summary of matters raised	National Grid's response
		documents with individual responses set out in **5.1 Consultation Report [APP-066]** with more overarching changes in the various Design Development Reports (the most recent being **5.15 Design Development Report [APP-122]** with earlier requests covered in **APP-358** to **APP-360**).
Existing infrastructure	Comments about the existing overhead lines being upgraded	**7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 "Needs Case" table 3.3 page 31 sets out requirements in East Anglia boundaries EC5 and EC5N. Worldwide, 400 kV systems are limited to International Electrotechnical Commission (IEC) rating of 5000 Amperes (A), continuous (for example as identified in Circuit Breaker Ratings (IEC 62271-100)). This means that all electrical equipment installed at substations is rated to this current level. This 5000 A equates to • Equates Maximum Single circuit rating of 3,465 megavolt-ampere (MVA) per circuit • (EC5N post fault) Equates Maximum Double Circuit rating of 6,930 megavolt-ampere (MVA) per double circuit (i.e. circuits either side of pylons). • (EC5 post fault) 4 circuits Maximum Circuit rating of 13,860 megavolt-ampere (MVA) two sets of double circuit post fault. Therefore, with both boundaries operating to about 300MVA of their maximum. Further uprating does not resolve the need without additional circuit infrastructure set out below • 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
	Comments about the existing overhead lines being replaced by underground cables	EN-5 requires the Applicant to operate in an efficient, coordinated and economical way[3]. To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for

Themes raised by topic	Summary of matters raised	National Grid's response
		electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. The existing electricity transmission network provides power, via the local distribution network, into the local area where it is used in homes and businesses. The need case and funding for the Project is to deliver the new network reinforcement needed, rather than to remove existing overhead lines by undergrounding them. We have identified a number of locations where we have proposed placing existing overhead lines underground. These locations are where existing 132 kV and lower voltage lattice pylon lines are crossed by the proposed 400 kV overhead line and / or mitigation of effects are considered necessary. This includes locations such as at Mellis, between Offton and Bramford Substation, to the south of Bramford Substation and near Fuller Street. Unless required for mitigation, undergrounding existing overhead lines on the transmission network would not be in accordance with NPS EN-5 (2024) and would result in substantial cost to bill payers. There may also be significant environmental impacts due to the removal works on sensitive ecological and archaeological receptors as well as constraints from either existing built form or unsuitable ground conditions. 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

Themes raised by topic	Summary of matters raised	National Grid's response
		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.
	Comments about the Project running closer to the existing overhead lines	The Applicant has considered this routeing approach over the course of the Project development most recently in **5.15 Design Development Report [APP-122]** from paragraph 2.5.24. The Applicant notes the potential for close paralleling existing overhead lines to reduce the level of effects that may arise from a new overhead line. However, where existing overhead lines are present along the proposed route, there are homes, constraints and features that mean, overall, we consider close paralleling in those areas would lead to greater effects on receptors in the area and be less compliant with the Holford Rules[2] or be less consistent with the policy to be economic and efficient.
	Comments about the Project running closer to existing transport infrastructure	The Applicant has considered this routeing approach over the course of the Project development most recently in **5.15 Design Development Report [APP-122]** from paragraph 2.5.26. The Applicant notes there could be potential benefits from infrastructure being concentrated geographically, i.e., by routeing the Project in close proximity to existing road and rail infrastructure, but does not consider these benefits arise for the whole route. Rail lines or roads potentially align (at least in part) with the general routeing of the Project. However, there are constraints and features that mean that we do not consider close paralleling will reduce environmental effects or improve compliance with the Holford Rules or be more consistent with the policy requirement to be economic and efficient. A number of residential properties, as well as hamlets, villages and towns, are present in close proximity to the existing transport infrastructure necessitating multiple diversions of an overhead line. There are also some locations where the combination of existing physical and environmental features (railway and road infrastructure, commercial and residential property, woodlands and orchards) present

[2] National Grid (1959) *The Holford Rules*

Themes raised by topic	Summary of matters raised	National Grid's response
		very substantial challenges to routeing and siting. As a result, whilst close paralleling of transport infrastructure may appear beneficial in some short sections, overall, the increased environmental effects from multiple changes of direction to enable close paralleling in those potential sections are considered greater and less compliant with the Holford Rules than those that are associated with a new route alignment.
Renewable energy sources	Comments about wind power projects (how they connect in, bringing them closer to where is needed etc)	The Energy Market is a free market where applicants apply to connect to the transmission system. The Applicant is obliged to connect any customer who applies for a connection to the National Energy System Operator (NESO). A robust holistic process to determine the best location for connection is followed to offer the customer connection. Both The Applicant and NESO are required to offer all customers a connection without discrimination. To meet the predicted doubling in electricity demand by 2050 and the Government's 2050 Net Zero target, the Government's Energy White Paper[3] predicts that '*a low cost, Net Zero consistent system is likely to be composed predominantly of wind and solar*'. The Project is currently proposed to fulfil connection offers for two offshore wind farms, North Falls and Five Estuaries which will contribute to the Government's 50 GW target. The Applicant is only responsible for the siting of its own assets, however, through working alongside the developers, the East Anglia Connection Node (EACN) Substation is positioned as close to the Five Estuaries and North Falls as technically possible, taking into account constraints such as land availability.
	Comments about solar power projects	As set out in Section 2.6 of **5.6 Planning Statement [APP-085]**, solar power has been identified by the National Energy System Operator (NESO) in its Clean Power 2030 publication[4] as having an important

[3] HM Government (2020) Energy White Paper – Powering our Net Zero Future

[4] National Energy System Operator (2024) Clean Power 2030: Our Next Steps

Themes raised by topic	Summary of matters raised	National Grid's response
		role alongside wind power in decarbonising the power sector and meeting the UK's net zero targets. The Applicant has a duty to respond to generation customers wanting to connect to the transmission network, including solar developers. Our role is to respond to the connection requirements for projects that are developed in line with Government policy to integrate them into the National Transmission System in a timely, economic and efficient manner in line with relevant policies and our duties e.g. under the Electricity Act 1989. **7.17 Strategic Options Backcheck and Review [APP-355]** provides further details on the low carbon energy (nuclear, wind farms and solar) driving the need for this Project. In relation to existing solar farms and proposed solar farms in the vicinity of the Project, **5.1 Consultation Report [APP-066]** evidences how pre-application engagement has been undertaken with developers of affected sites in developing the siting and design of the Project, whilst the cumulative effects of solar development alongside the Project are assessed in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**.
	Comments about alternative energy sources being used instead of nuclear / wind (e.g. a tidal barrier)	To meet the predicted doubling in electricity demand by 2050 and the Government's 2050 Net Zero target, the Government Energy White Paper, whilst not planning for a specific technology solution, predicts that '*a low cost, Net Zero consistent system is likely to be composed predominantly of wind and solar*' but also complementing intermittent renewables with technologies including nuclear and gas with carbon capture and storage. It states that the role of wave and tidal energy requires further commercial and technical evaluation. This is further reflected by the National Energy System Operator (NESO) in its Clean Power 2030 publication[5], which identifies that wind

[5] National Energy System Operator (2024) Clean Power 2030: Our Next Steps

Themes raised by topic	Summary of matters raised	National Grid's response
		and solar power will provide the primary contribution to achieving the Clean Power 2030 ambition, however, enabling emerging technology such as tidal stream will be important for longer-term decarbonisation. The Project will also fulfil connection offers to the Tarchon Interconnector and for two offshore wind farms - North Falls and Five Estuaries. Under its transmission licence, The Applicant has a statutory duty to respond to generation customers wanting to connect to the transmission network. As such, the Project will also provide increased capacity for future generation from various generators, including new and emerging technologies should they come forward.
	Comments about other energy saving schemes	Whilst the Applicant is continually encouraging consumers to use less energy, the modelling predictions stated in the Government's Energy White Paper[6] (EWP) suggests that the overall electricity demand could double by 2050 largely as a result of the electrification of cars and vans and the increased use of clean electricity replacing gas for heating. The EWP states that '*as a result, electricity could provide more than half of final energy demand in 2050, up from 17 per cent in 2019'* and that '*This would require a four-fold increase in clean electricity generation*'. In order to meet this demand, the Government's EWP has outlined a plan to increase energy from offshore wind to 40 GW by 2030 (target increased to 50 GW in April 2022). Notwithstanding this predicted increase in electricity demand, the Government recognises that smart technologies will need to be implemented to reduce electricity consumption, for example in buildings, the use of smart meters and appliances and energy storage. The published Clean Power 2030 report (Annex 1: Electricity demand and supply analysis[7]) calls for the widespread adoption of efficient

[6] HM Government (2020) Energy White Paper – Powering our Net Zero Future

[7] National Energy System Operator (2024) Clean Power 2030 Annex 1: Electricity demand and supply analysis

Themes raised by topic	Summary of matters raised	National Grid's response
		products and energy efficiency measures to manage the electrification of demand.
	Comments about nuclear power	To meet the predicted doubling in electricity demand by 2050 and the Government's 2050 Net Zero target, the Government Energy White Paper, whilst not planning for a specific technology solution, predicts that '*a low cost, Net Zero consistent system is likely to be composed predominantly of wind and solar*' but also complementing intermittent renewables with technologies including nuclear and gas with carbon capture and storage. Under its transmission licence, the Applicant has a statutory duty to respond to generation customers wanting to connect to the transmission network. The Applicant is not in control of where generators decide to build their generation assets, however, the Project will provide increased capacity for future generation from various generators, including new nuclear generation should it be developed.
Transmission system	Comments about the Project using T-pylons / lower height pylons	Consideration has been given to the use of low height pylons in circumstances where standard lattice pylons are 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 bulkier and denser 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 by intervening woodland. In other scenarios they can increase adverse visual effects, for example where relatively close to visual receptors without intervening filtering vegetation where they are likely to appear more noticeable in views from residential receptors. Low height lattice pylons have been proposed as necessary to reduce effects in two locations. To the north-west of Little Waltham a section of pylons north of the River Chelmer are proposed as low heights to reduce effects on the adjacent Langleys (Grade I listed building) and the adjacent registered park and garden. Feedback about 3 pylons extending south of the River Chelmer is being considered to revert to

Themes raised by topic	Summary of matters raised	National Grid's response
		standard lattice pylons. The second section of low height lattice is to the east of Thurrock airfield where the change to low height pylons alongside existing 132kV lattice pylons allows continued flying activity at Thurrock airfield. 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. The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that whilst T-Pylons may in certain locations provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take, this comes at a higher cost. The build cost is approximately 2 to 2.5 times that of an equivalently rated conventional overhead line, and the lifetime costs are around 1.6 to 1.7 times higher. The current arrangements for the oversight of funding by Ofgem require that the lowest cost acceptable design is taken forward rather than a more expensive design even where the latter is perceived to reduce the level of effect. As such, consideration of the use of T-pylons follows after establishing a need to mitigate effects of the standard lattice design and after considering the benefits of adopting a low- height lattice pylon design. T- pylons themselves are also less adaptable to varied terrains and require more substantial access infrastructure. Furthermore, while their resilience and environmental impact are comparable to conventional overhead lines, they have increased carbon intensity due to construction materials used. 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

Themes raised by topic	Summary of matters raised	National Grid's response
		pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst there may be some locations (for examples see Appendix A of **5.15 Design Development Report [APP-122]**) where there may be a design option for the use of T-pylons, the need to mitigate unacceptable effects from lattice pylons is not engaged. On this basis, T-pylons are not proposed for the Project.
	Comments about underground cables being used for the entire project and/or about the Project being offshore	EN-5 requires the Applicant to operate in an efficient, coordinated and economical way[3]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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.
	Comments about connections being brought onshore at Bradwell	In respect of alternatives routeing via the old Bradwell power station, there is an existing overhead line connection to the Bradwell B site. This has been operating at lower voltage (132 kV) and has not been

Themes raised by topic	Summary of matters raised	National Grid's response
		used for a few years and is in generally poor condition. This overhead line would need to be rebuilt, however, any rebuild to make this onward connection via Rayleigh to Tilbury is also constrained by urban development and further designations and some sections may need to be re-routed if connections were made at Bradwell. Additionally, this connection does not meet the requirement of the need case in relation to either EC5 or Sizewell Gen Group. If just forming a connection point for the customers, any connection point also requires two points of connection to the National Electricity Transmission System (NETS) (to meet compliance standards) requiring either a double overhead line through the Bradwell peninsula and onwards to separate locations or a connection back to Bramford (in addition to one towards Tilbury). A connection to Bramford would require connections to cross the Special Protection Area (SPA) designated Blackwater Estuary (3 km to 7 km tunnel likely to be required at much greater cost) as well as interact with other Special Area of Conservation (SAC) and SPA designations. The existing network through Norfolk, Suffolk and Essex would also still need to be upgraded to transport the electricity due to come onto the network in the Norwich area and provide the necessary two points of connection to the NETS. Taken together a Bradwell point of connection requires a greater amount of new infrastructure and is therefore less economic and efficient and expected to be associated with greater environmental effects. See also **5.1 - 2025 Consultation Report [APP-066]** - response code 9-2.756 and **7.20 - 2023 Design Development Report [APP-358]** - section 5.5.2-5.2.4
	Comments about alternative options that have not been consulted on	The Applicant has considered a wide range of alternative means for meeting the Project need and set these out in the Corridor and Preliminary Routing and Siting Study (CPRSS), published in support of the 2022 non-statutory consultation (**7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]**), and the 2023 and 2024 Strategic Options Backcheck and Reviews (SOBR) (**7.19 [APP-357]** and within **7.17 [APP-355]**), published in support of the

Themes raised by topic	Summary of matters raised	National Grid's response
		2023 non-statutory consultation and statutory consultation and the 2025 **7.17 Strategic Options Backcheck and Review [APP-355]**. We have also considered feedback relating to suggested alternatives and set out responses within the 2022 and 2023 non-statutory consultation, Statutory and Targeted Consultation Feedback Reports and elsewhere within this report. Our job is to carefully consider the most feasible options and present our proposals for public consultation. The Applicant cannot present an alternative for consultation that would not meet the requirements placed on us by the government and our regulator Ofgem.
Construction Impacts including Air Quality and Emissions and Noise and Vibration		
Disruption	Comments about disruption from construction e.g. air pollution, noise pollution	An Environmental Statement (ES) (Volume 6: Environmental Statement) has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017. The ES identifies and assesses the likely significant effects on the environment resulting from the construction of the Project and recommends appropriate mitigation to reduce effects. Environmental mitigation measures including those to mitigate air pollution and noise pollution have been defined within each environmental topic chapter and set out in relevant management documents submitted with the Development Consent Order (DCO) application, including **7.2 Outline Code of Construction Practice [APP-300]**, **7.3 Outline Construction Traffic Management Plan [APP-309]**, **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**.
	Comments about the damage and disruption caused by access roads	**7.2 Outline Code of Construction Practice [APP-300]** (CoCP) sets out the framework for avoiding, minimising and managing damage and disruption arising from the construction and use of access roads, haul roads and temporary access routes.

Themes raised by topic	Summary of matters raised	National Grid's response
		The principles for siting and designing access routes are set out in CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by Commitment GG33, with ecological constraints covered by Commitment B02. Measures to protect land, soils and drainage systems are addressed in CoCP Section 6 (Agriculture and Soils) and **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]**. Relevant commitments (AS01–AS03, GG06 and GG07) require pre-construction condition surveys, appropriate ground protection, maintenance of field access where practicable and reinstatement of temporary access routes following construction. Management of access road crossings and flood risk effects is addressed in CoCP Section 6 (Hydrology, Land Drainage and Flood Risk) and commitments W10–W15, which set out requirements for appropriate drainage, flood-resilient design and removal of temporary crossings where no longer needed. Potential disruption to communities, landowners and Public Rights of Way is managed through CoCP Section 6 (Socio-economics, Recreation and Tourism) and **7.6 Outline Public Rights of Way Management Plan [APP-329]**. Commitments AS03, S02, S03 and GG30 provide for maintenance of access where practicable, temporary diversions where required, clear signage and ongoing community liaison. Construction traffic associated with access roads is controlled through **7.3 Outline Construction Traffic Management Plan [APP-309]**, with commitments T01–T07, AQ01 and NV07 addressing routing, highway safety, dust, noise and ongoing maintenance of access routes. The mitigation measures and controls set out in **7.2 Outline Code of Construction Practice [APP-300]** are secured through Requirement 4

Themes raised by topic	Summary of matters raised	National Grid's response
		of Schedule 3 (Requirements) of **3.1 Draft Development Consent Order [APP-056]**.
	Comments about there being not enough information on permanent and temporary access roads and compounds for the construction	Permanent and temporary access routes and temporary compounds are distinct and are shown in the Project plans (in their proposed location and scale). **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** includes the same level of detail. Illustrative design drawings for the above are within **2.6.1 to 2.6.3 Design and Layout Plans [APP-041 to APP-043]**. **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 will access the haul roads to construction sites. **7.11 Transport Assessment [APP-333]**, submitted with the Development Consent Order (DCO) application, examines capacity, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Within the assessment of the ES and the Transport Assessment, mitigation measures are proposed to minimise likely adverse impacts.
	Comments about access to residential properties during construction	Access to residential properties during construction is secured through Commitments S02, S03, AS03 and GG30 of **7.2 Outline Code of Construction Practice [APP-300]**, which require access to be maintained where practicable, alternative access to be provided where necessary, and advance notification and liaison with affected residents. These commitments are enforced through Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**, which requires approval and implementation of a final CoCP by the host local planning authorities.
Management plans	Comments about the information included in the outline Construction Traffic Management Plan	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]**.

Themes raised by topic	Summary of matters raised	National Grid's response
		7.3 Outline Construction Traffic Management Plan [APP-309] has been developed in consultation with Local Planning Authorities and Local Planning Authorities. The Applicant will put robust measures in place to ensure the Main Works Contractor(s) adhere to the measures outlined within **7.3 Outline Construction Traffic Management Plan [APP-309]**, with the Applicant retaining overall responsibility. It is anticipated that the Main Works Contractors will implement a monitoring and reporting system to check compliance with the measures detailed in the CTMP. The proposed measures and controls within **7.3 Outline Construction Traffic Management Plan [APP-309]** include: • Working hour restrictions (secured through Requirement 7 of Schedule 3 of **3.1 Draft Development Consent Order [APP-056]**) • Pre-and post-condition surveys • Traffic management and monitoring • Defined HGV routes • HGV timing restrictions • Communication Strategy • Necessary escort, permits and traffic management for AILs • Driver Information Pack to minimise/safely manage interactions with pedestrians and cyclists. Section 6.5 of **7.3 Outline Construction Traffic Management Plan [APP-309]** details the role of the Community Liaison Officer, which is anticipated to include keeping members of the community and local businesses regularly informed of the works and any heavy traffic periods. A contact number will be provided which members of the public can use to raise any concerns or complaints about the Project. The Outline Construction Traffic Management Plan is secured through Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**.

Themes raised by topic	Summary of matters raised	National Grid's response
	Comments about the information included in the outline Construction Environmental Management Plan (CEMP)	Appropriately detailed mitigation measures proposed to avoid, reduce or offset (where possible) adverse effects as a result of the Project were identified through the EIA process, engagement with stakeholders and the iterative design process are outlined within **7.2 Outline Code of Construction Practice [APP-300]** (and its appendices) which is a typical approach taken on a Project of this scale and nature. The Outline CoCP would be developed into a 'Final' CoCP following detailed design by the Main Works Contractor(s) and submitted to relevant authorities to discharge Requirement 4 of the **3.1 Draft Development Consent Order [APP-056]**. The mitigation measures within the 'Final' CoCP would be adhered to throughout the construction phase. The Outline CoCP and 'Final' CoCP will include all relevant details that would also typically be included within a CEMP.
Consultation		
General	Comments criticising National Grid generally	The Applicant notes all comments and feedback. We are progressing with our proposals in line with our duties and all relevant polices.
	Comments about threat of further legal action against the Project (e.g. judicial review)	Should the Secretary of State (SoS) grant development consent then the Applicant is aware that certain third parties may decide to try and challenge that decision by way of judicial review. The mere right of a party to seek a judicial review is not in and of itself a sign that the decision to be reviewed (one which has not yet been made) contains any legal errors. Any potential claimant would need to secure permission from the court to bring an application for judicial review, commonly known as the 'permission stage' at which point the court would consider the merits of the claim against the relevant legal tests. It is up to the court to consider the application and determine whether the claim should be heard. The threat of a judicial review at this stage should not simply determine the outcome of the proposed Project.
	Comments about the Relevant Representations process/timescales	The relevant representations process is set out in law and followed by all applications for development consent. The approach adopted by the Applicant is no different to that taken on other NSIP projects. The

Themes raised by topic	Summary of matters raised	National Grid's response
		minimum timescale that applicants can set for relevant representations is 28 days (30 days for EIA development). In this case the length of the period was 42 days; well in excess of the statutory requirement and a length of time used by many NSIP projects.
Pre-application stage consultation	Comments about any of the Projects previous pre-application stage consultations	It is important that we take enough time for all stakeholders to consider and respond to the materials presented at consultation. At both non-statutory consultations held in 2022 and 2023, the Applicant allowed for eight weeks. At statutory consultation we allowed for 15 weeks in which to respond. The Project is aiming to be operational for 2030, which ensures we're able to connect new sources of energy to the wider electricity network and people's homes and businesses. We are always looking at how we can be more efficient and will consider feedback and comments from the public on that point.
	Comments about National Grid not considering feedback from the pre-application stage consultations	The Applicant listened to all the feedback received. Many of the changes presented at the statutory consultation were as a direct result of the information and feedback the Applicant received at the 2022 and 2023 non-statutory consultations. The Applicant has continued to listen to all feedback received during the consultation, requesting feedback on the 2024 preferred draft alignment, including pylon positions, the locations of underground cables, Cable Sealing End (CSE) compounds, the East Anglia Connection Node (EACN) Substation and the changes that were made to the route since the last consultation alongside issues of access and permanent and temporary haul roads. The Applicant also wanted to know about any concerns or questions about the proposals, or if there were any local factors that should be considered. The feedback received through the statutory consultation has informed how the proposals have been developed. Where this led to a significant change from what was presented at statutory consultation, the Applicant held targeted consultations with directly affected properties between January and April 2025. How the feedback was considered, and any changes made as a result of this, have been

Themes raised by topic	Summary of matters raised	National Grid's response
		set out in **5.1 Consultation Report [APP-066]** and in **5.15 Design Development Report [APP-122]**.
	Comments about National Grid undertaking further stakeholder engagement/consultation	The Applicant held two non-statutory consultations in 2022 and 2023 and a statutory consultation in 2024 where we presented our proposals for the Project. At each stage of consultation, we reviewed all the feedback we received and amended our proposals, where feasible, in response to this. Where necessary following statutory consultation, we held targeted consultations with directly affected properties where the alignment or access proposals have changed. We believe that this is adequate for a project of this size to allow the public time to have careful consideration and engagement with the proposals and leave meaningful feedback. In early 2026, we consulted on two small changes to our proposals. Details of the approach taken, feedback received, and how we have given regard to the feedback will be reported in the Consultation Reports submitted as part of the Proposed Change Applications. The Applicant is and will continue to work with key statutory bodies and other stakeholders, including all landowners, who may be affected by the proposals to understand the impacts on their operations and to work with them as the Project is developed. If we receive development consent, we will continue to work with relevant stakeholders and local communities to ensure information is communicated and to respond to concerns and complaints.
DCO and Planning Matters		
DCO application	Comments asking National Grid to provide further information / clarification about the documents included in the Project's application for development consent	The application for development consent has been produced in accordance with the requirements of: • Section 37(3) of the Planning Act 2008 • The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations)

Themes raised by topic	Summary of matters raised	National Grid's response
		• The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant has additionally had regard to relevant guidance including the Planning Inspectorate's Advice on the preparation and submission of application documents[8] (August 2024). In accepting the development consent application for Examination, the Planning Inspectorate (on behalf of the Secretary of State) has found it to be of a satisfactory standard. The Applicant has provided **1.3 Guide to the Application [AS-066]** which describes the content and structure of the development consent application as a whole, the purpose of each submitted document and the document referencing system. The Applicant has reviewed specific comments made regarding the contents of the development consent application in the Relevant Representations and does not consider any changes are required to its documentation. The majority of specific comments relate to queries from affected landowners. Such parties can contact the Project lands team directly to discuss if required: Norwich-Tilbury@fishergerman.co.uk or by Freephone 0808 175 3314. Alternatively, write to Norwich to Tilbury Land Team, Fisher German, The Atrium, Risby Business Park, Newmarket Road, Risby, Bury St Edmunds, IP28 6RD.
	Comments about the documents included in the Project's development consent application	As stated above, the Applicant has produced a development consent application that meets legal requirements and is in line with latest guidance, and which was determined by the Planning Inspectorate as sufficiently satisfactory to proceed to Examination. The Applicant has provided a document (**1.3 Guide to the Application [AS-066]**) which describes the content and structure of the DCO application as a whole, the purpose of each submitted document and

[8] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on the Preparation and Submission of Application Documents*

Themes raised by topic	Summary of matters raised	National Grid's response
		the document referencing system. This will be updated as further documents are produced and submitted during Examination.
	Comments acknowledging the Project's development consent application but do not have any issues to raise / advocate support the Project.	The Applicant has noted all comments made on its development consent application.
Planning policy	Comments about the Project not being compliant with local and national policy requirements	The Applicant notes the respondent's feedback. Nationally Significant Infrastructure Projects (NSIPs) of this nature are guided by National Planning Policy Statements EN-1 (2024) and EN-5 (2024). However, national planning policy in the form of the National Planning Policy Framework[9] (NPPF) and local planning policy was also considered in developing the design of the Project where possible. **5.6 Planning Statement [APP-085]** presents an appraisal of the Project's compliance with national policy including EN-1 (2024), EN-5 (2024), EN-3 (2024), the NPPF and relevant local plan policies. **5.6 Planning Statement [APP-085]** should be read in conjunction with **5.7 Policy Compliance Document [APP-086]** which sets out an analysis of the compliance of the Project with the specific relevant policies.
	Comments about the Gunning Principles not being considered properly	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a NSIP. Therefore, the Project would require consent under the Planning Act 2008. The Government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP Project for developers to follow. The authors of that guidance had specific regard to the Gunning principles as they apply to the context of NSIPs The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation.

[9] Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework*

Themes raised by topic	Summary of matters raised	National Grid's response
		A detailed response with regards to our application of the Gunning Principles can be found in **5.1 Consultation Report - Appendix N5: Legal Opinions [APP-080]**.
	Comments about the Holford Rules not being considered for pylons	The Applicant disagrees that the Holford Rules[10] have not been considered. **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (**7.20 2023 Design Development Report for the Project [APP-358]**), 2024 statutory consultation (**7.21 2024 – Design Development Report for the Project [APP-359]**) and with the application for development consent (**5.15 Design Development Report [APP-122]**), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules.
	Comments about the Horlock Rules not being considered for substations	The Applicant disagrees that the Horlock Rules have not been considered. **7.18 2022 Corridor and Preliminary Routeing and Siting Study [APP-356]** and the 2023 **[APP-358]** and 2024 **[APP-359]** Design Development Reports (DDR) (available on the Project website) and the 2025 **5.15 Design Development Report [APP-122]** published with the application for development consent, all set out how the Horlock Rules informed decision making. We use the Environmental Impact Assessment (EIA) process to inform the balance and define our

[10] National Grid (1959) *The Holford Rules*

Themes raised by topic	Summary of matters raised	National Grid's response
		proposals that we take forward, and which are also informed by feedback. We would note that application of the Horlock Rules typically involves balancing alternative solutions which can present conflicting Horlock Rules compliance albeit that all aspects have been considered.
	Comments about the National Planning Policy Framework (NPPF) not being considered properly	Paragraph 5 of the National Planning Policy Framework[11] (NPPF) makes it clear that the Framework does not contain specific policies for developments requiring development consent and that applications for development consent are to be determined in accordance with the decision-making framework set out in the Planning Act 2008: *'The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework)'.* While the National Policy Statements (NPSs) remain the primary decision-making documents, regard has been had to any other matters of importance and relevance, which include relevant policies in the NPPF. **5.6 Planning Statement [APP-085]** presents an appraisal of the Project's compliance with national policy including NPSs EN-1 (2024), EN-5 (2024), EN-3 (2024) and the NPPF. **5.6 Planning Statement [APP-085]** also identifies relevant local planning and neighbourhood planning policies and should be read in conjunction with **5.7 Policy Compliance Document [APP-086]** which sets out an analysis of the compliance of the Project with the specific relevant policies.
	Comments about HM Treasury Green Book not being considered properly	The Applicant is confident that the process we follow to identify and then assess potential strategic options is robust and the most appropriate. This has been tried and tested through numerous previous

[11] Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework*

Themes raised by topic	Summary of matters raised	National Grid's response
		projects, the formal Examination process and ultimately decided by the relevant Secretary of State. The Treasury Green Book provides guidance on the interpretation by public servants of public spending, assets and resources for projects, policies and spend from the public purse. That is not relevant for National Grid Electricity Transmission (NGET). There is no requirement in the Planning Act 2008 for developers to have to submit a Treasury Green Book assessment as part of a Development Consent Order (DCO) application. NGET is an Ofgem regulated business, with obligations to consider customer, environmental and other considerations as outlined in the Electricity Act 1989 and in its licence commitments. Consideration of the costs of a project and the funding it should receive via the regulatory settlement is the subject of a separate regulatory process, and it is not appropriate for the Planning Inspectorate, Examining Authority or the Secretary of State in their remit under the Planning Act 2008 to seek to duplicate other regimes.
	Comments about the Project hindering Councils ability to deliver on targets stated in Local Plans	The Applicant notes this comment. We have taken into consideration the location of planning applications and housing allocations in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts on housing development site, where possible. **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** and the 2025 **5.15 Design Development Report [APP-122]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **7.20 2023 - Design Development Report for the Project [APP-358]** describe the iterative development of the Project from the strategic proposal, draft alignment and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. At all stages in the development of the Project, the Applicant has taken into consideration local plan allocations (both adopted and emerging) as well as planning applications along the route. The 2025 **5.15 Design Development Report [APP-122]** and **5.6 Planning Statement [APP-085]** outline

Themes raised by topic	Summary of matters raised	National Grid's response
		where the Project has the potential to impact proposed or consented developments.
	Comments about The Energy Act 2023 not being considered properly	The Applicant has taken into consideration the Energy Act 2023 and other national legislation and policy relating to the energy sector and climate change. This is acknowledged in **5.6 Planning Statement [APP-085]**. In October 2023, the Energy Act 2023 was passed, legislating for this National Energy System Operator (NESO) to be created. NESO's Clean Power 2030 report[12] states that the Project and Sea Link are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Increased transmission capability is vital to facilitate the ambitious targets set by the Government, for secure, clean and affordable energy for the long term.
	Comments about The Electricity Act 1989 not being considered properly	Section 2.3 of **5.6 Planning Statement [APP-085]** sets out how the Electricity Act 1989 applies statutory duties to the Applicant in developing and maintaining the national electricity transmission network. These statutory duties are referenced and reflected in NPS EN-5 (2024), the relevant national policy statement for nationally significant electricity transmission infrastructure. **5.6 Planning Statement [APP-085]**, in assessing and evidencing the overall compliance of the Project with the relevant NPS and other planning policy, also sets out how the Applicant has had due consideration to its statutory duties under the Electricity Act 1989.
Socio-economics, recreation and tourism		
Economic impact	Comments about the Project resulting in a negative impact on the economy	Through the routeing and siting exercise the Applicant has sought to reduce as far as practicable impacts on businesses, recreation and tourism assets. Reduction in these impacts would be considered during the detailed design process. Effects on local businesses, recreation and tourism assets are presented within **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism**

[12] National Energy System Operator (2024) Clean Power 2030: Our Next Steps

Themes raised by topic	Summary of matters raised	National Grid's response
		[APP-265]. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption to businesses and their users. In addition, **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]** provide good practice and standard control measures to reduce and mitigate potential impacts and / or disruptions that may arise during the construction phase. The Project is anticipated to generate direct, indirect and induced employment during construction. The Applicant is committed to working with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. The Applicant is also committed to providing a coordinated regional approach to jobs and skills opportunities. This commitment is broader than the individual Project and separate to any commitments under the proposed Development Consent Order (DCO) for this Project. Post-construction job opportunities are limited given the nature of the Project, however, the Applicant will still work with Local Planning Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure the Applicant leaves a lasting positive legacy in the communities where they operate. With regard to a delivery mechanism, the above measures will be delivered as part of a community benefit package, which will look at both local and regional initiatives. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure: Guidance[13]. Beyond the individual project level, the Project is part of The Great Grid Upgrade (TGGU), the largest overhaul of the electricity grid in

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

Themes raised by topic	Summary of matters raised	National Grid's response
		generations and one of the UK's biggest engines of economic growth. In addition to supply chain growth, investment in skills and creation of high-quality jobs, TGGU will connect more secure, cleaner, home-grown energy that will stimulate national and regional growth and underpin the UK's competitiveness in a rapidly electrifying global economy. Overall, investment in Great Britain's electricity networks is set to contribute £18.4bn to GDP annually from 2024–2035.
	Comments about the Project resulting in a negative impact on tourism	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations important for leisure and tourism. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** presents an assessment on the potential impacts on tourism economy (during construction) and tourism assets (during construction and operation), including visitor accommodations. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on tourism. These include: traffic management, signage and routeing measures. These are identified within **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**, **7.2 Outline Code of Construction Practice [APP-300]** and **7.3 Outline Construction Traffic Management Plan [APP-309]**.
	Comments about employment opportunities which should be offered as part of the Project	The socio-economic effects of the Project are assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. Post construction job opportunities are limited given the nature of the development. Nevertheless, the Applicant is committed to working with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. The Applicant is also committed to providing a coordinated regional approach to jobs and skills opportunities. This commitment is broader than the individual project and separate to any commitments under the proposed DCO for this Project.

Themes raised by topic	Summary of matters raised	National Grid's response
		Post-construction job opportunities are limited given the nature of the development, however, we will still work with Local Planning Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. With regard to a delivery mechanism, the above measures will be delivered as part of our community benefit package, which will look at both local and regional initiatives. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance[14].
Environment including Landscape and Visual and Water Environment		
Environmental assessment	Comments about the approach to the Environmental Impact Assessment (EIA) process	The EIA process has been undertaken in accordance with the Infrastructure Planning (EIA) Regulations 2017. Further detail can be found in **6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135]**.
	Comments about the information provided in the Environmental Statement (ES)	Information provided within the ES has been prepared in accordance with **6.19 Scoping Report [APP-288 – APP-296]** prepared by the Applicant and submitted to the Planning Inspectorate in October 2022 together with **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate in December 2022.
	Comments about National Grid undertaking further surveys to understand the environmental impact of the Project	A detailed survey scoping exercise has been undertaken to determine the most appropriate survey type, methods and location based on a range of factors including existing records, habitat suitability and likely impacts. Survey scopes and methodologies have been discussed and agreed with the relevant stakeholders to ensure a robust baseline assessment. Further details about the environmental surveys can be

[14] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Themes raised by topic	Summary of matters raised	National Grid's response
		found in the Environmental Statement (**Volume 6: Environmental Statement**). Results of ecology surveys undertaken in 2025 were submitted and published by the Planning Inspectorate in November 2025. These surveys did not change the conclusions within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Archaeology surveys that were undertaken in 2025 were also submitted to the Planning Inspectorate in January 2026, again these surveys did not change the conclusions within **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**.
	Concern that environmental surveys are insufficient / have not taken place	A detailed survey scoping exercise has been undertaken to determine the most appropriate survey type, methods and location based on a range of factors including existing records, habitat suitability and likely impacts. Information provided within the Environmental Statement has been prepared in accordance with **6.19 Scoping Report [APP-288 – APP-296]** prepared by the Applicant and submitted to the Planning Inspectorate in October 2022 together with **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate in December 2022. Further details about the environmental surveys can be found in the Environmental Statement **[APP-123 to APP-298]**.
	Comments about access, payments and staff behaviour during surveys	The Applicant undertakes surveys over land so that we can understand any potential constraints to be considered in the Project design. We will endeavour to agree access on a voluntary basis wherever possible, and landowners/occupiers will always be afforded as much notice as reasonably practicable before access is taken. An advance payment of compensation will be made to you to compensate any losses incurred as a result of surveys. Any further losses will be dealt with on a proven loss basis. More information on how and when the Applicant pays compensation can be found in National Grid land rights strategy[15]

[15] National Grid (n.d.) Guidance on Land Rights for New Electricity Transmission Assets (England and Wales)

Themes raised by topic	Summary of matters raised	National Grid's response
		(LRS). If we are unable to agree voluntary access, but we need to undertake particular surveys to inform design, a statutory notice may be relied upon. When taking access to land through voluntary agreement, we will seek to agree in advance access routes, suitable parking areas and any other reinvent requirements. When taking access under notice this is sometimes unachievable. If a landowner or member of the public is concerned over how a site has been left on completion of a survey, they should contact the Project team. All the Applicant's contractors undertake risk assessments and follow safe systems of work as per the specific Method Statement including the requirement to leave sites in the same condition post completion of the works as they were pre-commencement of the works, regardless of technology type being constructed, which in turn will be independently reviewed by the Applicant. This Risk Assessment and Method Statement (RAMS) will follow industry standard practice.
Environmental impact	Comments about the Project resulting in a negative impact on the environment	The Applicant has sought to reduce, as far as practicable, impacts on the environment through routeing and siting and an ongoing iterative design process which has taken on board feedback at different stages of the Project. The iterative design process sought to avoid areas of highest concern, for example through changes to the route alignment or changes to the method e.g. trenchless crossings. The Applicant has engaged with a range of stakeholders (including Statutory Environmental Bodies (SEBs) and relevant Local Planning Authorities) throughout the development of the Project design and environmental assessment work. The Applicant has undertaken an Environmental Impact Assessment (EIA) for the Project. The results of this assessment are provided in the Environmental Statement (ES) (**Volume 6: Environmental Statement**) that accompanies the application for development consent. The ES identifies and assesses the likely significant effects on the environment resulting from the construction and operation (and maintenance) of the Project and recommends appropriate mitigation measures to reduce potential

Themes raised by topic	Summary of matters raised	National Grid's response
		effects. A number of mitigation measures have been incorporated into the Project design. Mitigation relevant to specific environmental topics (including Ecology and Biodiversity, Landscape and Visual and Historic Environment) are presented in the relevant ES chapters. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** contain a list of relevant good practice measures to avoid or reduce risks to habitats and species. In addition to the EIA, the Applicant has set itself a target of delivering 10% Biodiversity Net Gain (BNG) with environmental and societal benefits on all construction projects, meaning that as a result of measures taken, the biodiversity rating of the area will be enhanced by 10 % greater than prior to the construction of the Project. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Chapter 8 of the **5.6 Planning Statement [APP-085]** considers the planning balance of residual impacts against the need for the Project] in accordance with the NPS EN-1 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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

Themes raised by topic	Summary of matters raised	National Grid's response
		set out in **6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-145]** and **5.6 Planning Statement [APP-085].** EN-1 paragraph 4.1.7 provides '… *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*'. 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 in the ES 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.
	Comments about the Project resulting in a negative impact on designated sites e.g. Ramsar, SSSIs, nature reserve / Special Protection Area (SPA)	Through routeing, siting and design development, the Applicant has sought to avoid or if unavoidable reduce, as far as practicable, impacts on biodiversity and in particular features of high ecological value, such as local, national (e.g. SSSIs) and internationally (e.g. Ramsar and SPAs) designated sites. Potential direct and indirect impacts on ecological designated sites within the Study Area have been considered within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. SPA's and the associated impact on birds has also been considered within the Habitats Regulations Assessment (HRA) (**5.3 Habitats Regulations Assessment Report [APP-082]**). **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** contain a list of relevant good practice measures to avoid or reduce impacts on designated sites and include specific mitigation measures as appropriate to ensure no significant residual effects.
	Comments about only considering National Landscape	In relation to undergrounding in the National Landscape, and in line with the policy in NPS EN-5) (2024) (paragraphs 2.9.14 and 2.9.23) the Applicant has also considered (i) whether an overhead line in certain

Themes raised by topic	Summary of matters raised	National Grid's response
		locations would likely result in particularly significant landscape and visual impacts (such that due consideration should be given to the costs and benefits of feasible alternatives to the overhead line: paragraph 2.9.14); and (ii) whether there is a high potential for widespread and significant adverse landscape and/or visual impacts (such that the case for undergrounding must be considered in accordance with paragraphs 2.9.24 and 2.9.25). A Landscape and Visual Impact Assessment (LVIA) has been undertaken which assesses the likely significant landscape and visual effects from the Project within a 3 km study area, which includes the National Landscape as well as areas which are not designated. While this assessment concludes that the introduction of an overhead line may give rise to significant adverse effects (in environmental impact terms), the Applicant does not consider the Project would meet the thresholds established by paragraphs 2.9.14 and 2.9.23 of NPS EN-5 (2024). The LVIA is presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**.
	Comments about the Project resulting in a negative impact on the Dedham Vale National Landscape	An assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. The assessment concludes that there would be significant effects on the special qualities of the National Landscape during construction, as a result of the proposed underground cable. Once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The Applicant's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to '*conserve and enhance natural beauty*' in accordance with s85 of Countryside and Rights of Way Act 2000, is set out in **5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**.

Themes raised by topic	Summary of matters raised	National Grid's response
		As reported in **5.6 Planning Statement [APP-085]** Embedded mitigation has sought to minimise landscape effects as far as practicable. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of NPS EN-1 (2024) acknowledges that '*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape*' and paragraph 5.10.13, that '*all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites*'. For CNP infrastructure, '*the need case will outweigh the residual effects in all but the most exceptional cases*' (paragraph 4.1.7 of NPS EN-1 (2024)).
	Comments about the Project resulting in a negative impact on soils	The impact of the Project on soil resources and agricultural land is assessed in full in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]** provides details of the approach to soil handling which would be adopted during construction by the Main Works Contractor(s) (a requirement in the Development Consent Order (DCO) for compliance with the CoCP(s)) to protect and avoid damage to soil resources in line with the Defra Code and other good practice guidance.
	Comments about the Project resulting in a negative impact on views and landscape	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 and visual receptors along the length of the Project, up to a distance of approximately 1.5 km from the Project. Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**.

Themes raised by topic	Summary of matters raised	National Grid's response
		As reported in **5.6 Planning Statement [APP-085]** Embedded mitigation has sought to minimise landscape effects as far as practicable. The impact upon landscape character and visual amenity is an inevitable consequence of the land-use change resulting from the Project. Paragraph 5.10.5 of NPS EN-1 (2024) acknowledges that '*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape*' and paragraph 5.10.13, that '*all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites*'. For CNP *infrastructure, 'the need case will outweigh the residual effects in all but the most exceptional cases'* *(paragraph 4.1.7 of NPS EN-1 (2024)).*
	Comments about carbon footprint of the Project	The fundamental purpose of the Project is to enable the connection of low carbon generation sources. **6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131]** provides an assessment of the impact of both construction and operation of the Project on Greenhouse Gases (GHG). In addition, **7.2 Outline Code of Construction Practice Appendix H - Greenhouse Gas Reduction Strategy [APP-308]** provides the Greenhouse Gas Reduction Strategy which will be used to reduce GHG emissions. The Green House Gas Reduction Strategy presents the overarching GHG management principles and requirements to reduce and manage GHG emissions related to the Project.
Mitigation measures	Comments about mitigation measures generally, including request to be involved in mitigation measures	Mitigation measures have been designed in line with guidelines and in consultation with relevant stakeholders. The Environmental Statement (ES) (**Volume 6: Environmental Statement**) includes 11 environmental topic chapters, and each outlines the required mitigation measures to avoid, reduce and offset (if possible) adverse effects. Mitigation is also secured through Environmental Control Plans such as **7.2 Outline Code of**

Themes raised by topic	Summary of matters raised	National Grid's response
		Construction Practice [APP-300] and **7.4 Outline Landscape and Ecological Management Plan [AS-046]** which would need to be developed into final plans (in consultation with relevant stakeholders such as the Local Planning Authorities and Statutory Environmental Bodies) and discharged prior to construction commencing.
	Comments about mitigation plans / measures	Mitigation measures proposed to avoid, reduce or offset (if possible) adverse effects as a result of the Project identified through the Environmental Impact Assessment (EIA) process and the iterative design process are outlined within **7.2 Outline Code of Construction Practice [APP-300]** (and its appendices), **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, **7.3 Outline Construction Traffic Management Plan [APP-309]**, **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]**. Mitigation measures have also been discussed with relevant stakeholders before submission.
Water impact	Comments about the Project increasing flooding, including through effects on the water table	The Applicant has submitted a detailed flood risk assessment **7.9 Flood Risk Assessment [APP-331]** as part of its application for development consent. **7.9 Flood Risk Assessment [APP-331]** characterises existing sources of flood risk within the Order Limits, including from rivers, surface water and groundwater flooding. Areas at high risk of flooding have sought to be avoided, where practicable. **7.9 Flood Risk Assessment [APP-331]** assesses the impacts of the Projects during construction and operation (and maintenance) and identifies control and mitigation measures to prevent increases in flood risk from these sources. For example, in the small number of locations where pylons would be situated in fluvial floodplains, a mitigation strategy has been agreed with the Environment Agency, centring on provision of compensation floodplain storage, to ensure no increase in flood risk. Other measures would be adopted to manage surface water runoff from construction worksites and operational infrastructure, with a range of Sustainable Drainage systems (SuDS) put in place for runoff

Themes raised by topic	Summary of matters raised	National Grid's response
		collection, attenuation and treatment. The chosen SuDS would be suitable to local prevailing ground conditions and topography, preventing effects on the water table. These controls and mitigation measures are detailed in and secured through inclusion within **7.2 Outline Code of Construction Practice [APP-300]**.
	Comments about the Project resulting in a negative impact on water sources, supply, quality and drainage	Negative impacts on water sources, supply, quality and drainage would be avoided, controlled or mitigated. With regard to existing water sources and supplies commitments W04 and W05 in **7.2 Outline Code of Construction Practice [APP-300]** safeguard the integrity of these supplies. Further, negative impacts on local water sources and supplies would be prevented through the adoption of water use efficiency measures during construction of the Project (secured by commitment W16 within **7.2 Outline Code of Construction Practice [APP-300]**. A number of other commitments within **7.2 Outline Code of Construction Practice [APP-300]** (including W13, GG22 and GG32) secure that construction work site runoff and operational drainage would be controlled in terms of both runoff quantity and runoff quality, in order to prevent detriment to water quality. Further details regarding proposals for surface water management (including specified discharge rates/limits and clarifications with regards to drainage design standards) will be submitted to the examination at Deadline 1 (**8.2 Drainage Strategy [Revision A]**) Where the Project interacts with existing land drainage systems there are commitments (AS05, W14) in **7.2 Outline Code of Construction Practice [APP-300]** to maintaining the efficiency of the existing systems, with specialised drainage contractor(s) appointed to review land drainage designs and provide advice to the Applicant and the Main Works Contractor(s) during all relevant construction and reinstatement activities.

Themes raised by topic	Summary of matters raised	National Grid's response
Historic Environment		
Environmental assessment criticism	Comments about the information provided in the Environmental Statement (ES) relevant to Heritage	The baseline and impact of the Project was assessed in accordance with the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** and in accordance with professional heritage sector guidance as set out in paragraph 11.2.19. Baseline information was obtained from a variety of sources as set out in Section 11.4 of **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**. The Project has engaged with Historic England and relevant Local Planning Authorities on aspects relating to heritage, including baseline data sources, methodology for assessment and appropriate mitigation measures and to take their views into account during Project development, which are detailed in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]** and in the relevant Statements of Common Ground (**5.9 Draft Statement of Common Ground, 5.9.1-5.9.12 and 5.914**).
	Comments about the methodology used by National Grid to assess impact of the Project on heritage and/or archaeology	The impact of the Project was assessed 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]** and in accordance with professional heritage sector guidance as set out in paragraph 11.2.19. The Project has engaged with Historic England and relevant Local Planning Authorities on aspects relating to heritage, including baseline data sources, methodology for assessment and appropriate mitigation measures and to take their views into account during Project development, which are detailed in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]** and in the relevant Statements of Common Ground (**5.9 Draft Statement of Common Ground, 5.9.1-5.9.12 and 5.914**).
Heritage impact	Comments about the Project resulting in negative archaeological impacts	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment (including archaeology). The impacts of the Project on the historic environment

Themes raised by topic	Summary of matters raised	National Grid's response
		are assessed in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**. The ES Chapter includes an assessment of the potential impact on archaeology, covering the potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as vibration or change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [AS-072 – AS-076]**. Archaeological trial trench evaluation has also been undertaken for sections of the Project and is reported in **6.11.A5 Environmental Statement Appendix 11.5 – Trial Trenching Results Report [AS-078]**. In addition to the proposals in **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** sets out appropriate mitigation for archaeology. The Project has engaged with Historic England and relevant Local Planning Authorities on aspects relating to archaeology, including methodology for assessment and appropriate mitigation measures and to take their views into account during Project development, which are detailed in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]** and in the relevant Statements of Common Ground (**5.9 Draft Statement of Common Ground** (**5.9 Draft Statement of Common Ground, 5.9.1-5.9.12 and 5.914**).
	Comments about the Project resulting in a negative impact on heritage	**6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets.

Themes raised by topic	Summary of matters raised	National Grid's response
		Paragraph 7.2.57 of **5.6 Planning Statement [APP-85]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. 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. Para 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.
	Comments about the Project being routed away from heritage buildings / listed buildings / historical site	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment (including historic buildings, historic landscapes and archaeology). The impacts of the Project on the historic environment are assessed in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**. **5.15 Design Development Report [APP-122]** provides an

Themes raised by topic	Summary of matters raised	National Grid's response
		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. **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.
Need Case		
General	Comments about the Project's need case	At each key stage of the consultation and submission process the Needs Case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Transmission Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 in as set out in **Strategic Options Backcheck and Review [APP-355]**. 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).*

Themes raised by topic	Summary of matters raised	National Grid's response
		3.3.83 Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy. NPS EN-5 (2024) also states the following regarding Transmission Owners. *2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.* *2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.* 7.19 2023 - **Strategic Options Backcheck and Review [APP-357]** Appendix A Page A3 sets out the Applicants Transmission Owner Licence obligations providing detail to the duties referred to within NPS EN-5 (2024) *Condition D2: "Obligation to provide transmission services", which includes "responding to requests for the construction of additional transmission system capacity".* *Condition D3 "Transmission system security standard and quality of service" which includes "Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')"* Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS are in place. The factors above show the 2025 updated Needs Case continues to indicate the urgent need for reinforcement for both Contracted and

Themes raised by topic	Summary of matters raised	National Grid's response
		ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report was published in April 2024 and is available on the Project website. In summary, we do not accept the report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register. Furthermore, a delay to the Project would result in additional cost to the consumer. 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.
	Comments opposing the Project as currently proposed	The Applicant notes the respondent's feedback. Strategic alternatives for the Project, including underground cables and offshore cables, have been considered and are set out in the published Strategic Options Backcheck and Reviews (SOBR) published in 2023 (**7.19 [APP-357]**) and 2024 (an appendix to **7.17 [APP-355]**) and the 2025 SOBR (**7.17 Strategic Options Backcheck and Review [APP-355]**). This sets 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 (NETS). 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 a new East Anglia Connection Node (EACN) Substation. The Project would also

Themes raised by topic	Summary of matters raised	National Grid's response
		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 2030 report[16]. 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 shows a clear need for the Project.
	Comments about the future legacy of the Project	With electricity demand expected to double by 2050, Norwich to Tilbury will strengthen the electricity network across East Anglia. It will help to deliver secure, cleaner and more affordable energy to where it is needed most, including in Norfolk, Suffolk, and Essex. Norwich to Tilbury is part of The Great Grid Upgrade, the Applicant's nationwide programme to deliver secure, affordable and cleaner electricity to homes and businesses, reduce bills, and meet growing demand. The Project will provide millions of pounds in community benefit funding for areas hosting the new infrastructure. We will also work closely with wildlife experts to ensure lasting benefits for the environment, nature and biodiversity.
	Comments about Government initiatives including political motivation and green agenda	The UK Government is committed to achieving clean electricity by 2030 as set out in the Clean Power 2030 Action Plan[17]. Clean Power 2030 is considered key to accelerating and reaching net zero by 2050. This represents the latest Government policy and position on clean energy. Under its transmission licence, the Applicant has a statutory duty to respond to generation customers wanting to connect to the

[16] National Energy System Operator (2024) Clean Power 2030: Our Next Steps

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

Themes raised by topic	Summary of matters raised	National Grid's response
		transmission network, whether this be for wind, solar, nuclear, tidal or from other forms of generation.
	General criticism of the Government	This is not a matter for the Applicant.
Timescales	Comments that the Project has been designed to deliver more electricity than required	The consideration of strategic alternatives has been considered. How these have been considered is set out in the 2023, 2024 and 2025 Strategic Options Backcheck and Reviews (**7.19 [APP-357]** for 2023 and **7.17 [APP-355]** for 2025 with 2024 as an appendix to the 2025 document). The need case for the project is based on c.6 GW capacity to most efficiently deal with the transfer of power across the cited onshore boundaries. **7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 "Needs Case" table 3.3 page 31 sets out requirements in East Anglia boundaries EC5 and EC5N. Worldwide, 400 kV systems are limited to International Electrotechnical Commission (IEC) rating of 5000 Amperes (A), continuous (for example as identified in Circuit Breaker Ratings (IEC 62271-100)). This means that all electrical equipment installed at substations is rated to this current level. This 5000 A equates to • Equates Maximum Single circuit rating of 3,465 megavolt-ampere (MVA) per circuit • (EC5N post fault) Equates Maximum Double Circuit rating of 6,930 megavolt-ampere (MVA) per double circuit (i.e. circuits either side of pylons). • (EC5 post fault) 4 circuits Maximum Circuit rating of 13,860 megavolt-ampere (MVA) two sets of double circuit post fault. Therefore, with both boundaries operating to about 300MVA of their maximum. Further uprating does not resolve the need without additional circuit infrastructure set out below • EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW

Themes raised by topic	Summary of matters raised	National Grid's response
		• EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW.'
	Comments about the Projects timeline i.e. that it should be completed sooner	Under the Licence agreement the Applicant has a target date to energise the Project by the end of 2031. However, the government and NESO have expressed the desire and set out the benefits to the consumer of National Grid targeting energisation by the end of 2030. The Applicant is aiming to deliver the project in the most economic and efficient way for the consumer.
Projects Costs		
Costing approach	Comments about the costings and cost models provided for the Project and alternative options	The Applicant notes the respondent's feedback. Construction costs are included in the overall estimated costs of each strategic option. This is set out in the 2025 **7.17 Strategic Options Backcheck and Review [APP-355]** (SOBR). This document takes account of any new cost or technology information, for instance along with any other changes in the planning and regulatory framework. Where the cost of more minor elements of each strategic option are unlikely to distinguish between options, these are not necessarily included. Throughout, the Applicant has engaged with the government and our regulators regarding policy and costs for new infrastructure. The Applicant is constantly looking into new innovations and investigating alternative technology types. These are explored and assessed for suitability. Alternative technologies were investigated for the Project and are contained within the 2025 SOBR (**7.17 Strategic Options Backcheck and Review [APP-355]**). These alternative technologies included an offshore connection using Direct Current (DC) technology, and various onshore connection options including increasing operational voltages on existing network to above 400 kV; Alternating Current (AC) overhead lines (established technology); alternative pylon types; AC underground technology; High Voltage Direct Current (HVDC) overhead line and underground cables; and Gas Insulated Line (GIL). Currently, overhead

Themes raised by topic	Summary of matters raised	National Grid's response
		lines offer the most economic and efficient solution to transmit electricity over long distances. A full and transparent cost model is provided in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** and **7.17 Strategic Options Backcheck and Review [APP-355]** Appendix D Economic Appraisal, which sets out in transparent detail how options appraisal costs were evaluated.
	Comments that too much weight has been given to keeping the cost of the Project low	The Applicant notes the respondent's feedback. Cost is one of many factors that was considered in making decisions on the Project as guided by our duties under the Electricity Act 1989. The NPS EN-5 (2024) makes it clear that the Government considers overhead lines to be appropriate and acceptable in most instances. However, the Government is aware that overhead lines may not be appropriate in particularly sensitive areas. The process of appraising different identified options is undertaken using guidance (National Grid's Approach to Consenting[18]). Its aim is to ensure that decisions regarding the project's design (route, location, or technology option) are based on a full understanding and balance of the technical, socio-economic, environmental, and cost implications of each option. Once all identified options have been appraised, that or those which best meet the Applicant's statutory duties and obligations are selected as the preferred option or options. These duties include balancing the need to be economic and efficient, which includes keeping costs down in the interests of the bill-paying consumers to whom the costs are eventually passed, with a duty to have regard to preserving amenity, which includes the natural environment, cultural heritage, landscape, and visual quality. The consideration of cost within the decision-making process is therefore one of our statutory duties and is not something that we could make representation to the Office of Gas and Electricity Markets (Ofgem) to waive.

[18] National Grid (2022) Our Approach to Consenting

Themes raised by topic	Summary of matters raised	National Grid's response
	Comments that the impact of the Project has not been included in the costings (e.g. environment or compensation)	As part of **7.17 Strategic Options Backcheck and Review [APP-355]** Section 4.6, and **7.19 2023 - Strategic Options Backcheck and Review Section 5 [APP-357]** the Applicant undertook a qualitative Environmental assessment and socio-economic topics as set out in our appraisal's methodology referenced above.
	Comments that transparent costings for the Project and alternative options have not been provided	The Applicant notes the respondent's feedback. Construction costs are included in the overall estimated costs of each strategic option. This was set out in the 2024 Strategic Options Backcheck and Review (SOBR) (available as Appendix B of **7.17 Strategic Options Backcheck and Review [APP-355]**). This document takes account of any new cost or technology information, for instance along with any other changes in the planning and regulatory framework. Where the costs of more minor elements of each strategic option are unlikely to distinguish between options, these are not necessarily included. We will continue to engage with the government and our regulators regarding policy and costs for new infrastructure and will adjust our approach if necessary. A full and transparent cost model is provided in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** and **7.17 Strategic Options Backcheck and Review [APP-355]** Appendix D Economic Appraisal, which sets out in transparent detail who options appraisal costs were evaluated
People impact	Comments that impact on property value has not been included in the costings provided	The Applicant is promoting what is termed a 'Nationally Significant Infrastructure Project' (NSIP). The process by which the Project must progress through the planning process is set out in the Planning Act 2008 and associated guidance. In addition, the potential impacts of the proposal are required to be assessed under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and legislation. There is no requirement for a potential effect on property prices to be assessed or be included in the costing of options. Potential impact on

Themes raised by topic	Summary of matters raised	National Grid's response
		property prices is not a material planning consideration for the purposes of a DCO application.
	Comments about the cost to the consumer for financing the Project	The Applicant is funded by a price control mechanism which is agreed with and set by the Office of Gas and Electricity Markets (Ofgem). We pay up front the cost to build a new power transmission line. The cost is then gradually passed on to customers through their electricity bills over the next 40 years or so. The funding for these up-front costs comes from our shareholders and the institutions that lend us money. Across all our investments in our vital infrastructure, this amounts to many billions of pounds. They invest in us because they expect that we will make a sufficient profit to provide an appropriate return on their investment and eventually pay them back. This brings a major benefit to electricity bill payers as it allows the recovery of the cost of our investment to be spread out over many years, rather than having a spike in electricity bills when we build a large new transmission connection. In response to a request by Essex County Council on behalf of all host Local Planning Authorities, we agreed to fund an independent review of cost options. This review has been completed and can be found on the Project website.
Property and Compensation		
Compensation	Comments about insufficient information provided on compensation for the Project	The Applicant has confirmed in **5.1 Consultation Report [APP-066]** (Ref 9-2.950) where more information can be obtained on landowner compensation. Information on how landowners are compensated can be found in the Applicant's land rights strategy[19] (LRS), and a copy can be found on the Project website. A copy of the document has also been sent to affected landowners on several occasions, along with an invitation to discuss it with the Projects lands team. The LRS document, and the compensation payments within were reviewed and updated in 2024. If

[19] National Grid (n.d.) Guidance on Land Rights for New Electricity Transmission Assets (England and Wales)

Themes raised by topic	Summary of matters raised	National Grid's response
		a landowner would like to discuss compensation matters and how the payments in the LRS would apply to them, they can contact the Project's lands team.
	Comments about using financial compensation to go ahead with the Project	Compensation is available where prescribed by statute. Those directly affected by the Compulsory Acquisition or Temporary Possession Powers in the Order (i.e. the ordinarily landowners and those with other interests in the land required for the Project) would in principle be entitled to statutory compensation in accordance with the statutes known as 'the Compensation Code'. The Applicant may have to rely on compulsory purchase powers as a last resort, if voluntary agreements for land rights cannot be reached with landowners. We will continue discussions with landowners and try to acquire land and rights over land through voluntary agreements with landowners. In the Development Consent Order (DCO) application, the Applicant applied for compulsory purchase powers. This ensures that, if the DCO is granted, the Applicant would be able to obtain all land rights needed to construct and subsequently operate the new electricity transmission assets in a reasonable timescale where voluntary acquisition of land or rights is ultimately unsuccessful.
	Comments about impacted individuals being compensated by reduction of their electricity bills or removal of their standing charges	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.
	Comments about the existing distribution overhead lines which should be undergrounded to compensate for impacts of new overhead lines	NPS EN-5 (2024) establishes the position that the starting basis for new connections is a presumption on the acceptability of overhead lines but with this presumption reversed within designated landscapes and in certain other circumstances. The existing electricity transmission network provides power, via the local distribution network, into the local area where it is used in homes and businesses. The need case and

Themes raised by topic	Summary of matters raised	National Grid's response
		funding for the Project is to deliver the new network reinforcement needed, rather than to remove existing overhead lines by undergrounding them. We have identified a number of locations where we are proposing to place existing overhead lines underground. These locations are where existing 132 kV and lower voltage lattice pylon lines are crossed by the proposed 400 kV overhead line and / or mitigation of effects are considered necessary. Table 4.2 of **6.4 Environmental Statement - Chapter 4 Project Description [APP-130]**. This includes locations such as at Mellis, between Offton and Bramford Substation, to the south of Bramford Substation and near Fuller Street. Unless required for mitigation, undergrounding existing overhead lines on the transmission network would not be in accordance with NPS EN-5 (2024) and would result in substantial cost to bill payers. There may also be significant environmental impacts due to the removal works on sensitive ecological and archaeological receptors as well as constraints from either existing built form or unsuitable ground conditions.
	Comments about compensation for property damage resulting from the Project	Compensation applies where land or rights are acquired under a Development Consent Order (DCO) and the retained property suffers a direct reduction in value because of the Project; this is called injurious affection. In these cases, landowners may be able to claim compensation under the Compulsory Purchase Compensation Code. Where a property owner is not directly affected by the Project, UK law does not provide compensation for generalised blight (e.g., perceived fall in property value due to proximity or visual impact.
Property acquisition	Comments about National Grid does not have a discretionary purchase scheme to purchase landowners property / business	The Applicant does not currently have a discretionary purchase scheme available to the public. There is also currently no legislation in place that requires the Applicant to have a scheme in place. While we understand that our proposals may cause concerns about visual impact and about property value, UK law does not include for compensation in cases of a loss of view or changes to a view.

Themes raised by topic	Summary of matters raised	National Grid's response
		Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
	Comments about National Grid offering to purchase property where residents are impacted by the Project	Under the Compulsory Purchase Code, property owners may be able to claim compensation for any loss in value directly caused by the Project, but there is no legal obligation for the Applicant to buy properties that are not required for the Project. Statutory blight applies only in defined circumstances, such as land required as part of the proposals and forming part of the compulsory acquisition. Outside of the Statutory blight provisions, proximity to a project does not create a legal right to compensation or obligate the Applicant to purchase the property.
	Comments about the compulsory acquisition of property for the Project	Under the Compulsory Purchase Code, property owners may be able to claim compensation for any loss in value directly caused by the Project, but there is no legal obligation for the Applicant to buy properties that are not required for the Project. Statutory blight applies only in defined circumstances, such as land required as part of the proposals and forming part of the compulsory acquisition. Outside of the Statutory blight provisions, proximity to a project does not create a legal right to compensation or obligate the Applicant to purchase the property.
Property value	Comments about the Project devaluing property value	The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view.

Themes raised by topic	Summary of matters raised	National Grid's response
		Under the Compulsory Purchase Code, property owners and businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
	Comments about providing compensation for property value loss to impacted individuals	Compensation applies where land or rights are acquired under a Development Consent Order (DCO) and the retained property suffers a direct reduction in value because of the Project; this is called injurious affection. In these cases, landowners may be able to claim compensation under the Compulsory Purchase Compensation Code. Where a property owner is not directly affected by the Project, UK law does not provide compensation for generalised blight (e.g., perceived fall in property value due to proximity or visual impact.
Social Impact including Health and Wellbeing		
Community benefits	Comments about National Grid delivering social value benefits to communities that are impacted by the Project	The Government has published guidance on community funds for transmission infrastructure (Department for Energy Security and Net Zero (DESNZ), 2025). In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance[20]. 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

[20] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Themes raised by topic	Summary of matters raised	National Grid's response
		enabling powers to establish a scheme; with further regulations and secondary legislation required before it can be brought into operation.
	Comments about using local labour / contractors for the Project	The Applicant sources suppliers through competitive tender to ensure the right requirements are met. The Applicant promotes the use of local supply chain and small and medium enterprises (SMEs) through the main construction contractors they employ. The Applicant also works with schools and local authorities to encourage the next generation of engineers and help the unemployed to develop new skills. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** also states that '*The majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines. These are typically sourced from National Grid's existing pool of approved contractors. However, from experience with other National Grid projects, it is likely that a minimum of 10% of the workforce would be sourced from the local labour market.*'
	Comments about the Project only benefiting those living elsewhere	There is a need to reinforce the existing high voltage electricity network in the East Anglia region. It does not currently have the capability needed to transport reliably and securely the electricity that will be generated and connected to the electricity transmission network by 2030, while working to the required standards. The Project would benefit the UK as a whole, including the East of England, introducing transmission system upgrades that are necessary to create additional capacity to transport the clean energy generated, also introducing system resilience to provide crucial energy security for the East of England as a whole including local communities. By enabling the connection of new sources of renewable energy and by contributing to our energy security in the future, helping the country to achieve the government's Net Zero target and ensuring that the National Grid meets future power demands.

Themes raised by topic	Summary of matters raised	National Grid's response
Community impact	Comments about the Project resulting in a negative impact on residents / communities	The Applicant is a responsible developer who always has the communities they serve in mind. Therefore, they will seek to engage and work with the community to minimise disruption. The Applicant has sought to reduce potential effects on communities and residents through routeing and design, which has meant that the Project has been able to avoid sensitive receptors as far as reasonably practicable. The socio-economic effects of the Project are assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. The chapter considers how the Project might potentially impact community facilities, businesses, the local economy, recreational and tourism activity and land-uses and identifies potential mitigation measures where appropriate to reduce negative impacts. Similarly, **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** assesses the impact of the Project on both physical and mental health, including impacts associated with concerns people may have about ongoing uncertainty, the construction process, or living close to an overhead line. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. If the Project receives Development Consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email, which will remain open throughout Examination and during construction: Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) Email: contact@n-t.nationalgrid.com Write to us: FREEPOST N TO T (No stamp or further address details are required).

Themes raised by topic	Summary of matters raised	National Grid's response
		Finally, the Applicant is also preparing a community benefits package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance[21]. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.
	Comments about the Project causing communities to become encircled / surrounded by overhead lines	The alignment has been routed to achieve some separation from the existing 400 kV overhead line, such that there are no circumstances where villages and communities are encircled by infrastructure that the Applicant considers to be overbearing. Perceptions of being encircled / surrounded when viewing the Project on maps are very different from the actual local context. Separation is inevitably reduced in certain locations due to the presence of constraints to routeing and environmental features. Detailed assessment reported in the Environmental Impact Assessment (EIA) (**Environmental Statement [APP-123 to APP-298]**) identifies any measures considered to be necessary to reduce likely significant effects which would also consider the effects potentially arising from close paralleling existing 132 kV overhead line and new 400 kV overhead line infrastructure. In some locations mitigation including replacing some lower voltage infrastructure with underground cable, has been incorporated to address such potential effects. Existing overhead lines were considered as part of the baseline against which landscape and visual effects were assessed. The Landscape and Visual Impact Assessment (LVIA) is presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual**

[21] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Themes raised by topic	Summary of matters raised	National Grid's response
		[APP-226]. The visual assessment in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]** considers impacts on the visual amenity of people living and moving around communities and concludes that significant effects would be experienced up to approximately 1.5 km from the Project. 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. With regard to 'becoming encircled / surrounded by overhead lines', the RVAA identified that the Project would not block the only available view from any property, nor would it be overwhelming in views in all directions from any property.
	Comments about the Project resulting in a negative impact on food security / prices	Several factors influence food prices, including climate change, geopolitical events, supply chain disruptions etc. The DEFRA (2024) UK Food Security report states that the impacts of climate change both at home and abroad remains a pressing risk to food security. The Project is a vital part of the transition to net zero and is critical to delivering a network which supports clean power pathways by 2030, in efforts to tackle climate change and significantly reduce carbon emissions. The Project is therefore responding to a major threat to food security. **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** confirms the amount of agricultural land to be permanently impacted.
	Comments about the Project resulting in a negative impact on educational facilities	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations of education establishments. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** presents an assessment of the potential impacts on education facilities as a result of the Project. As part of the assessment, a range of measures are considered during the construction phase to reduce, where practicable, disruption to education establishments. These include traffic management, signage

Themes raised by topic	Summary of matters raised	National Grid's response
		and routing measures to ensure access or partial access can be maintained where feasible. These are identified within **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**, **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.2 Outline Code of Construction Practice [APP-300]**. The assessment concludes that there would be no significant effects on education facilities within the study area as a result of the construction and operation of the Project.
	Comments about the Project resulting in a negative impact on emergency services / health service	Through routeing and siting, the Applicant has sought to avoid and reduce as far as practicable effects on identified healthcare facilities. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** considers the potential impacts on, and access to, healthcare facilities, including emergency services, ambulances, hospitals and other NHS services associated with the construction of the Project, drawing on information from **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. No health facilities are due to be directly impacted by the Project and where road diversions are required traffic management and mitigation measures would be in place to reduce impacts. These include: traffic management, signage and routing measures to ensure access or partial access can be maintained where feasible. Further detail on proposed mitigation measures are presented in **7.3 Outline Construction Traffic Management Plan [APP-309]**, which has been produced following engagement with stakeholders including the emergency services. Regular engagement with the emergency services is ongoing.
	Comments about the Project disrupting telecommunications / broadcast signals / GPS	Radiofrequency emissions can interfere with electrical equipment, telecommunication, Wi-Fi and broadcast equipment. As detailed in **7.8 Electric and Magnetic Field Compliance Report [APP-330]**, section 3.1, these emissions are limited from overhead lines by design set out in the Applicant's Technical Specifications, including TS1 Ratings and general requirements for plant, equipment and apparatus for the

Themes raised by topic	Summary of matters raised	National Grid's response
		National Grid system, TS2.04 Generic design principles for overhead line and TS3.04.36 Insulator and insulator sets for overhead lines, which include the requirements of British Standards minimising the generation of radio interference. All the equipment used will meet the requirements in these standards, which are in place to prevent interference issues. These are the same good engineering practices that are applied to the existing transmission system assets, including existing 400 kV overhead lines, which cause no interference issues for electrical equipment, telecommunication, Wi-Fi and broadcast equipment under normal operating conditions. Therefore, we also expect no interference issues as a result of the Project. Global Positioning Systems (GPS) are increasingly being used to provide accurate position information such as in precision farming. It uses a radio receiver to receive the transmitted radio signals from a number of satellites orbiting the earth. Additional accuracy is used in differential GPS (DGPS) which involves the use of signals transmitted from a local fixed transmitter (or another satellite). Close to a pylon, there might be some degradation in GPS performance, just as there can be some degradation close to buildings and trees. The thickness of individual wires means that they do not cause a problem. Any radio interference emitted by the line is too small to have any effect. Other than that, there is no evidence of power lines interfering with GPS used in precision farming.
Health and safety impact	Comments about the Project resulting in a negative impact on mental health / wellbeing	The Applicant recognises people may have concerns about the health effects of living close to an overhead line. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. The Applicant recognises that uncertainty whilst the proposals are developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals

Themes raised by topic	Summary of matters raised	National Grid's response
		through inclusive and transparent engagement with residents, communities and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. The Applicant urges anyone with concerns to get in touch through the Norwich to Tilbury Freephone number, address or email throughout the progress of the Project: Community Helpline: 0800 915 2497 (Lines are open Monday to Friday 9:00am – 5:30pm) Email: contact@n-t.nationalgrid.com Write to us: FREEPOST N TO T (No stamp or further address details are required).
	Comments about health risks associated with the Project	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. Assessment of compliance with Electric and Magnetic Field (EMF) guidelines and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies for managing EMFs. There have been over four decades of research looking into whether EMF can cause health effects and there are no established effects below the exposure limits. When designing our overhead lines, substations and underground cables design criteria, we ensure they would not exceed those exposure limits, even when operating at 100% capacity. Additionally, the precautionary measures which the Government have adopted, are applied to the design which ensure the EMFs reduce as quickly with distance as possible. Evidence of that compliance is presented in **7.8 Electric and Magnetic Field Compliance Report [APP-330]** submitted as part of the Development Consent Order (DCO) application. The Applicant takes this issue very seriously and look to authoritative and independent scientific organisations such as the World Health Organisation (WHO) and in the UK Health Security Agency (UKHSA) to review the worldwide body of scientific evidence

Themes raised by topic	Summary of matters raised	National Grid's response
		on health. Important decisions on health are taken independently of industry, and the Applicant has followed the guidance and policies adopted by Government on advice from their scientific experts. Each of these organisations have comprehensive reviews of EMF research available to view on their websites.
	Comments about construction of the Project for health and safety of workers / operatives	The Applicant recognises that all construction activities carry inherent health and safety risks. To manage these effectively, all the Applicant's contractors are required to undertake detailed task-specific risk assessments and develop robust Risk Assessment and Method Statement (RAMS) documentation before any work begins. These RAMS set out the control measures, safe systems of work and supervision arrangements needed to ensure work is carried out safely and in accordance with industry best practice. The Applicant independently reviews and monitors these RAMS as part of its assurance processes, ensuring that contractors comply with the Applicant's safety requirements, legal obligations and recognised industry standards. This approach ensures that construction activities associated with the Project are planned, managed and delivered with safety as the highest priority for all workers and operatives on site.
	Comments about operation and maintenance of the Project for health and safety of workers / operatives	The Applicant recognises that all construction activities carry inherent health and safety risks. To manage these effectively, all the Applicant's contractors are required to undertake detailed task-specific risk assessments and develop robust Risk Assessment and Method Statement (RAMS) documentation before any work begins. These RAMS set out the control measures, safe systems of work and supervision arrangements needed to ensure work is carried out safely and in accordance with industry best practice. The Applicant independently reviews and monitors these RAMS as part of its assurance processes, ensuring that contractors comply with the Applicant's safety requirements, legal obligations and recognised industry standards. This approach ensures that construction activities

Themes raised by topic	Summary of matters raised	National Grid's response
		associated with the Project are planned, managed and delivered with safety as the highest priority for all workers and operatives on site.
	Comments about safety protocols and emergency response plans for the Project	The Applicant recognises the importance of robust safety protocols and effective emergency response arrangements for the Project. The Applicant and its contractors operate in accordance with UK Health and Safety law, including the Construction and Design Management Regulations. This ensures that construction works undertaken are planned and managed in a safe and responsible manner. As set out in **4.2 Outline Code of Construction Practice [APP-300]** (CoCP), the CoCP '*provides the preliminary framework for the principles and procedures that the Main Works Contractor(s) must implement to minimise, manage and mitigate the potential environmental impacts of construction works associated with the Project*'. In accordance with the Construction (Design and Management) Regulations 2015, the Main Works Contractor(s) must have a construction phase Safety Health and Environment (SHE) Plan agreed by the Applicant and in place prior to construction works commencing. The Applicant and its contractors work to established safety management systems, supported by site-specific Safety Management Plans, Risk Assessments and Method Statements, and Emergency Response Plans, which would be followed in the event of an incident on site. These plans are regularly reviewed and, where relevant, include procedures for technical rescues, such as those involving Mobile Elevated Working Platforms (MEWPs). These arrangements may be developed and demonstrated with the involvement of the emergency services. The majority of the Applicant's existing transmission network is constructed from overhead lines, which are a proven and reliable form of electricity transmission in the UK. Overhead lines are designed and constructed to meet current design and safety standards and to operate

Themes raised by topic	Summary of matters raised	National Grid's response
		in a range of typical and abnormal weather conditions found in the UK. Standards are regularly reviewed and any adjustments to these standards (for example with regard to climate change) would need to be applied to the entire network. At this stage no known changes are required for a new overhead line project. Unforeseen events of sufficient severity to cause damage to infrastructure are very rare in the UK but do occur. Overhead lines may be subject to adverse weather conditions such as high wind speeds and lightning strikes, and also, due to disruption from external factors such as sabotage. To reduce sabotage from the ground as far as reasonably practicable, the Applicant installs anti-climb measures such as barbed wire on pylons. However, the possibility of interference remains as pylons are typically situated in isolated locations where constant surveillance is impractical. To manage this, the Applicant undertakes intermittent surveys to monitor the condition and integrity of pylons, conductors, insulators and associated equipment. In the unlikely event that an overhead line was to be damaged, the Applicant's network-wide monitoring system would detect the fault immediately and initiate fail-safe procedures, automatically tripping the affected circuit and stopping the flow of electricity. Overhead lines are comparatively easier and more cost-effective to repair and maintain than alternative transmission technology, resulting in comparatively shorter outage durations and enabling the system to be returned to full operation more rapidly. We also undertake regular inspections of the overhead line using thermal imaging to assess damage to the overhead line from weather or other causes. This means low level damage caused would be identified and repaired prior to failure of the line.
Recreational activities impact	Comments about the Project resulting in a negative impact on leisure activities	Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure and tourism. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** presents an assessment on of the potential impacts on sports clubs, recreational land and recreational

Themes raised by topic	Summary of matters raised	National Grid's response
		routes located within the Order Limits. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption on leisure and tourism. These include: traffic management, signage and routeing measures. These are identified within **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**, **7.2 Outline Code of Construction Practice [APP-300]**; **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]**. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** also assesses the potential for disruption to recreational routes or areas of open space which may affect opportunities for physical activity; the assessment confirms that the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures as identified in **7.2 Outline Code of Construction Practice [APP-300]**, **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]**.
	Comments about the Project resulting in a negative impact on domestic horses / equestrian activities	The possible effects of Electric and Magnetic Fields (EMFs) on various animals have been studied. No proven effects of EMFs have been found in any species at levels below the guidelines. This is confirmed in NPS EN-5 (2024) paragraph 2.9.59 which states: '*There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.'* Although horses are not directly mentioned, there is no evidence to suggest they are any different to other farm animals. As well as the possible direct biological or health effects addressed above, indirect effects such as microshocks can occur as a result of electric fields. Microshocks are small spark discharges which are similar to a static shock after walking across a nylon carpet for example. The Project has been designed in accordance with the

Themes raised by topic	Summary of matters raised	National Grid's response
		principles of the Government's voluntary Code of Practice[22] to ensure these are mitigated, which include equestrian activities. Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are used for equestrian activities. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** presents an assessment of the potential impacts on equestrian centres and activities located within the Order Limits. As part of this assessment, a range of measures have been considered throughout the construction phase of the Project to minimise disruption.
Third Party Interactions including Cumulative Effects		
Other developers	Comments about the proximity of the Project to future residential and commercial development	The Applicant has obtained information on existing, under construction, consented but not built schemes as well as development proposals within the planning system. The Project design has responded to those that are confirmed through consideration of routeing. In the case of development proposals, some have been amended to be designed around our proposed infrastructure but in other cases our proposals have been amended as described in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** and **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **7.20 2023 - Design Development Report for the Project [APP-358]**. Based on known information, and in light of changes made following consideration of feedback to the 2022 and 2023 non-statutory consultations, statutory consultation, the targeted consultations, and landowner consultation, we consider our proposals are consistent with relevant policy and guidelines and the alignment designed such that it does not prevent proposed housing developments from being successfully progressed.

[22] Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2013) *Power Lines: Control of Microshocks and other indirect effects of public exposure to electric fields*

Themes raised by topic	Summary of matters raised	National Grid's response
		UK law does not prescribe minimum distances between overhead lines and homes, but any implications on landscape and visual receptors, residential amenity or from concerns about electromagnetic fields are robustly assessed as part of the Environmental Impact Assessment (EIA) and balanced as part of the decision making process.
	Comments about the Project and Draft Order Limits overlapping/conflicting with existing and proposed energy infrastructure	With regard to multiple developments proposed within East Anglia, the assessment of cumulative effects of each project in combination with other developments will be undertaken by each developer at a project level and detailed within each projects respective planning applications. The cumulative effects assessments undertaken by each project would be considered on their own merit in the context of legislative requirements as well as national and local planning policies by the relevant determining authorities, such as the respective Local Planning Authorities (LPAs) or the Secretary of State. Any such application would be considered in accordance with planning policy and material considerations, such as scale, suitability, and interaction with other Nationally Significant Infrastructure Projects (NSIPs). The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both of these wind farms are proposed to be located off the coast of East Anglia and connect into the proposed East Anglia Connection Node (EACN) Substation. Both projects involve the construction of new substations, which are proposed to be located adjacent to the EACN Substation. Project teams have worked collaboratively to reduce potential cumulative traffic effects should they be undertaken in parallel. Where there is certainty of a development (such as a new residential development, an offshore wind farm and its associated onshore equipment etc) being constructed, and there is adequate information in the public domain to understand the impacts of that development on the receiving environment, these have been considered within the

Themes raised by topic	Summary of matters raised	National Grid's response
		cumulative effects assessment of the Project. The other developments listed are included within the long list of other developments for the cumulative effects assessment. 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 intra-project cumulative effects and 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]**.
	Comments about National Grid ensuring coordination and integration of the Project with other developments and infrastructure projects	The Applicant has held a series of consultations including Non-Statutory Consultation (Spring 2022), further Non-Statutory Consultation (Summer 2023), Statutory Consultation (completed Summer 2024) and Targeted Consultations (Spring 2025), notifying and allowing interfacing third-party developments and infrastructure projects an opportunity to formally submit their views on the Project and its interactions to the Project team. Additionally the Applicant has reached out to and been engaging individually with key third-party developments and infrastructure projects throughout the Front End Engineering Design stage taking on board comments so as to mitigate the impacts to third-party developments and infrastructure as best able within the draft DCO submission. This engagement will continue throughout the Examination process and detailed design, the results of which will be evidenced within the Statements of Common Ground and a set of agreed Protective Provisions where applicable.
	Comments about cumulative impacts with developments that connect to the Project (e.g.	The multiple developments that are proposed to connect to the Project within East Anglia, are assessed within **6.17 Environmental**

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	Tarchon Interconnector, North Falls Wind Farm)	**Statement Chapter 17 – Cumulative Effects [APP-281]** including North Falls. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as a cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025, however, since the 1 April the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in ES then these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). In addition, the Tarchon Interconnector project will be required to undertake its own the cumulative assessment with other developments as part of their respective DCO application. The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both of these wind farms are proposed to connect into the proposed East Anglia Connection Node (EACN) Substation. Both projects involve the construction of new substations, which are proposed to be located adjacent to the EACN substation. Project teams have worked collaboratively to reduce potential cumulative traffic effects should they be undertaken in parallel. A full list of cumulative developments considered are detailed within the long list of other developments (**6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]**). The cumulative effects assessment also follows Planning Inspectorate's Advice Note 17 'Cumulative Effects Assessment'.
Statutory undertakers	Comments about the impact of the Project on statutory undertakers assets and apparatus	The Applicant has been developing Statements of Common Ground (SoCGs) with statutory undertakers to identify and discuss all impacts

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		to statutory undertakers assets and apparatus. The Applicant has undertaken early design engagement, including the provision of project shapefiles and scoping documents detailing all interactions, and preparation of statements with the various statutory undertakers so as to fully understand the impact and agree protection measures to mitigate such impacts to their assets and apparatus. The Applicant and its delivery contractors are currently undertaking detailed design engagement with the statutory undertakers and will continue to review and develop the SoCGs with the relevant consultees throughout the Examination stages of the Project as further mitigations are agreed.
	Comments about the protective provisions in the draft DCO are not sufficient in protecting statutory undertakers' assets and apparatus	The Applicant is seeking to negotiate agreed protective provisions for the benefit of named Statutory Undertakers for inclusion in subsequent versions of the draft DCO and will make further detailed submissions in due course on any issues that remain outstanding.
Transport and Traffic		
Construction impact	Comments about the Project impacting traffic levels in the local area caused by construction works	The construction vehicle routing strategy has been designed to minimise impacts across the highway network as set out within **7.3 Outline Construction Traffic Management Plan [APP-309]**. **7.3 Outline Construction Traffic Management Plan [APP-309]** highlights the strategy and measures to reduce impacts to other road users from construction traffic related to the Project. The Applicant has undertaken a complete and full assessment of traffic routes being used by construction vehicles. Details are contained in **7.11 Transport Assessment [APP-333]**. **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. **7.11 Transport Assessment [APP-333]** submitted with the Development

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		Consent Order (DCO) application, examines capacity, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Where required, suitable mitigation measures have been proposed or are under discussion with the Local Highway Authority/National Highways to minimise likely adverse impacts.
	Comments about local road infrastructure that is not suitable for heavy construction vehicles and machinery	The Construction Routeing Strategy is detailed within **7.3 Outline Construction Traffic Management Plan [APP-309]** and has been developed to manage the impact of construction vehicles on the Public Highway and sensitive receptors, using a combination of more suitable Local Road Network connections from the Strategic Road Network, and temporary haul roads for access along the alignment. An assessment of the suitability of each Primary Access Route was completed prior to prescribing each route to be used for HGV movements. The proposed management and mitigation relating to construction traffic to minimise impacts on the Local Road Network is set out within **7.3 Outline Construction Traffic Management Plan [APP-309]** which is secured through Requirement 4 of the **3.1 Draft Development Consent Order [APP-056]**. The Project also requires the transportation of Abnormal Indivisible Loads (AIL). The Applicant has developed specific routing proposals for AIL movements and these have been developed with engagement by the relevant stakeholders including the Local Highway Authorities and National Highways. Details about these movements are submitted in support of the Development Consent Order (DCO) application in **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]**.
	Comments about the construction traffic and activities of the Project causing vibrations to nearby buildings	An assessment of construction vibration is presented in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. The assessment considers both the potential impact upon people within buildings (i.e. disturbance), and potential damage to buildings and structures. The assessment considers relatively worst-case

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		construction methodologies and does not take account of potential mitigation. This is so that potential 'hot-spots' can be identified where there is the potential for significant adverse effects, without mitigation. The construction vibration assessment has identified 74 locations where there is potential disturbance to people within buildings from construction vibration. Of these, 72 relate to potential vibratory compaction activities which would be expected to be for a relatively short duration (i.e. less than day). The remaining two relate to potential piling activities for pylon foundation construction. With regard to potential damage to buildings and structures, the assessment highlights locations where there is a potential non-zero risk of damage. Five locations have been identified, all of which relate to potential vibratory compaction activities. In all cases, significant adverse effects, or potential structural damage, can be avoided with the use of best practicable means (BPM). This may include alternative methods, such as non-percussive/vibratory techniques. Additionally, further detailed assessments will be undertaken by the Main Works Contractor(s), as per commitment NV05 within **7.2 Outline Code of Construction Practice [APP-300]** based on their specific methodologies. Based on the findings of these assessments specific mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application – (**7.2 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306]**). The outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of **7.2 Outline Code of Construction Practice [APP-300]** includes for pre- and post- condition surveys to be conducted in such situations, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.

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	Comments about road closures resulting from the construction of the Project	**7.3 Outline Construction Traffic Management Plan [APP-309]** manages the impacts arising from temporary road closures that are required, including the provision of diversion routes where appropriate. The long-term road closure Wymondham Road in Norfolk is to be closed for longer than 18 months and the assessment of the impact of this closure is detailed in **7.11 Transport Assessment [APP-333]**. Additionally, short term road closures associated with overhead line stringing, construction of highway mitigation works, construction of bellmouth junctions and the open-cut cable swathe are expected on some of the roads, as detailed in Section 5.8.10 of **7.3 Outline Construction Traffic Management Plan [APP-309]**. It is anticipated that the coordination/planning of road closures will be secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently. Schedule 7 and Schedule 8 of **3.1 Draft Development Consent Order [APP-056]** provide locations of the Streets and PRoWs to be temporarily closed and Permanently Stopped Up and details of the proposed diversion routes.
Protected paths	Comments about the Project resulting in a negative impact on PRoWs / footpaths / cycle paths / bridleways	Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**, is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected PRoW are contained in **7.6 Outline Public Rights of Way Management Plan [APP-329]** and will be developed further into detailed, site-specific management measures and temporary diversions

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		by the Applicant and its Main Works Contractor, based on detailed design information. These will be discussed with PRoW Officers at the relevant Local Highway Authorities during preparation of the final PRoW Management Plan and will be supported by Road Safety Audits where required. The final PRoW Management Plan will be submitted to, and approved by, the relevant planning authority. Where PRoWs interact with haul roads or construction activities, appropriate safety measures such as signage, speed controls, physical segregation where required, and contractor-managed crossings will be implemented in line with **7.6 Outline PRoW Management Plan [APP-329]**. Advance signage and communication will be provided to ensure users are fully informed, and temporary PRoW closures and diversions will be coordinated with other local works to avoid concurrent impacts. All PRoWs will be reinstated as soon as practicable to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. Notwithstanding the above, the Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRoW management arrangements are developed.
	Comments about the Project resulting in a negative impact on Quiet Lane/s	Quiet lanes (minor rural roads/lanes designated to pay special attention to the needs of walkers, cyclists, runners, horse riders and other vulnerable road users, providing a shared space with protection from speeding traffic) have been given consideration as part of the Landscape and Visual Impact Assessment (LVIA), which has been undertaken as part of the Environmental Impact Assessment (EIA). The LVIA sets out the potential landscape and visual effects, including consideration of visual amenity of people travelling along quiet lanes and also impacts on landscape character which may for example be influenced by vegetation loss along quiet lanes during construction. The

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		LVIA is presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Protected Lanes are also included in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and assessed following the methodology set out in **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**. Detailed assessment is presented in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. The Applicant acknowledges the concerns regarding Quiet Lanes and the construction vehicle routing has been designed to minimise impacts across the highway network, as set out within **7.3 Outline Construction Traffic Management Plan [APP-309]**. When developing the proposed construction access routes (Primary Access Routes), sensitive receptors were considered. There is no proposed interaction with Quiet Lanes except for at cross over points, with vehicles associated with construction not travelling along Quiet Lanes. There are two instances where Quiet Lanes are used as a vehicle crossover point between two proposed site access points, to allow construction vehicles to continue along the haul road. These locations are: • Millway Lane (Palgrave) Crossover Point for bellmouth RG-B061 • Tye Lane (Bramford) Crossover Point for bellmouth RG-B115. The impacts will be temporary during the construction phase, and mitigation measures will be put in place to minimise any potential impacts; see **7.3 Outline Construction Traffic Management Plan [APP-309]**. There are a couple of instances where Quiet Lanes may need to be closed for the Overhead line conductor stringing and associated scaffold crossing protection. The closures are anticipated to be short term in nature.

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	Comments about new access roads being retained following construction for non-motorised users	Most of the access roads, which form part of the Project, are temporary and will only be used during construction, the intention being to reinstate them to their previous condition and use on completion of the Project. As these access roads are on land that will be handed back to the landowners once the Project is operational, they will not be retained unless the detailed design identifies them as providing a long-term improvement to the environment and/or land usage and this is agreed with the landowner, Lead Local Flood Authority and / or the Environment Agency (where required).
Transmission System and Good Design		
Overhead lines	Comments about the use of overhead lines / pylons	The Applicant has developed the Project in line with the relevant planning policy which is set out in the NPS EN-5 (2024). At paragraph 2.9.20 this policy sets out the strong starting presumption for the use of overhead lines for electricity network developments, a presumption which is reversed in nationally designated landscapes and certain other circumstances as set out at paragraph 2.9.23 and in NPS EN-1 (2024) regarding the setting of National Landscapes. The Applicant has therefore developed the Project in a manner consistent with the relevant policy.
	Comments about the Project resulting in noise impacts from overhead lines	Noise impacts are assessed in **6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]**. The assessment identifies and assesses the likely significant noise effects from the Project and recommends appropriate mitigation measures (in consultation with relevant stakeholders) to reduce potential effects. Operational noise from overhead lines is scoped out of the ES (Volume 6 of the DCO application), in accordance with **6.20 Scoping Opinion [APP-297]**, on the basis that a low noise conductor system is proposed. However, information on noise from overhead lines is provided in **6.14.A5 Environmental Statement Appendix 14.5 - Operational Noise from Overhead Lines (Informative) [APP-261]**,

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		which shows adverse effects are not expected, even directly underneath the line. The Project would include triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on lattice pylons) for new transmission infrastructure. Due to its geometrical configuration, the triple Araucaria design is the least electrically stressed conductor system that the Applicant uses. It is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. Pylon fittings, such as insulators, dampers, spacers, and clamps, are designed and procured in accordance with a series of National Grid Technical Specifications to reduce the potential for audible noise and wind-induced noise to occur. Operational noise from overhead lines is therefore not significant at nearby sensitive receptors under any weather conditions.
	Comments about overhead lines / pylons are an outdated / inefficient technology	The respondent's view is noted, however the Applicant must work within the confines of the relevant policy which is the current NPS EN-5 (2024). This policy makes clear that 'the Government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated Landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty)'. The majority of the Applicant's existing transmission network is constructed from pylons and overhead lines; these are a demonstrated and reliable form of electricity transmission in the UK. They are designed to meet current design and safety standards and to operate in a range of typical and abnormal weather conditions found in the UK. Standards are regularly reviewed and any adjustments to these standards (for example, with regard to climate change) would need to be applied to the entire network. The Applicant is constantly looking into new innovations and investigating alternative technology types.

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		These are explored and assessed for suitability. Alternative technologies were investigated for the Project, these included an offshore connection using Direct Current (DC) technology, and various onshore connection options including: increasing operational voltages on existing network to above 400 kV; Alternating Current (AC) overhead lines (established technology); alternative pylon types; AC underground technology; High Voltage Direct Current (HVDC) overhead line and underground cables; and Gas Insulated Line (GIL). Currently, overhead lines offer the most economic and efficient solution to transmit electricity over long distances.
	Comments about overhead lines being vulnerable to weather events	The Applicant's 400 kV overhead lines are designed to remain robust and operational in the worst weather conditions in the UK. Although overhead lines are more susceptible to disruption from lightning and high winds, the overhead line structures do include an earthwire at the top of the pylons which is designed to shield the electrical conductors from lightning strikes, in the event that a conductor is struck by lightning the electrical system has in built protection that allows millisecond speed returns to service in the event of a strike. They are also comparatively easy and cost-effective to repair and maintain compared to underground cables. The majority of the Applicant's existing transmission network is constructed from overhead lines. These are a demonstrated and reliable form of electricity transmission in the UK. They are designed to meet current design and safety standards and to operate in a range of typical and abnormal weather conditions found in the UK. Standards are regularly reviewed and any adjustments to these standards (for example, with regard to climate change) would need to be applied to the entire network. At this stage no known changes are required for a new overhead line Project. Unforeseen events of sufficient severity to cause damage to infrastructure are very rare in the UK but do occur. Overhead lines could be subject to adverse weather conditions such as high wind speeds and lightning strikes. In the unlikely event an overhead line was to be damaged, a network-wide

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		monitoring system would detect the fault almost immediately and the circuit would be tripped, and the live current stopped. At the point of repairing any damage, overhead lines are comparatively easier and more cost-effective to repair and maintain than alternative transmission technology. We also undertake regular ground-based inspections of the overhead line using thermal imaging to assess damage to the overhead line and utilise helicopters and drones equipment with high definition and thermal imaging cameras to assess damage to the overhead line from weather or other causes. This means low level damage caused would be identified and repaired prior to failure of the line
	Comments about overhead lines being vulnerable to antisocial behaviour / malicious activities	Each pylon on the Applicant's Transmission System is risk assessed in relation to vulnerability of unauthorised access. To reduce unauthorised access from the ground as far as practicable, we install anti-climb measures such as barbed wire to the bases of pylons in order to prevent access by members of the public. Clear signage is installed warning of the dangers of high voltages and regular inspections are undertaken depending of the level of vulnerability. However, the possibility of interference remains as pylons are typically situated in isolated locations where constant surveillance is impractical. At the point of repairing any damage, overhead lines are comparatively easier and more cost-effective to repair and maintain than alternative transmission technology. We also undertake regular inspections of the overhead line using thermal imaging to assess damage to the overhead line from weather or other causes. This means low level damage caused would be identified and repaired prior to failure of the line.
Substations	Comments about the location of the East Anglia Connection Node (EACN) Substation in Ardleigh	From paragraph 6.5.8 of **5.15 Design Development Report [APP-122]**, The Applicant has set out its consideration of alternative locations for the EACN substation. This sets out the reasons for continuing to prefer the EACN substation location to the east of Ardleigh. This is due to the greater effects arising from the different combinations of substation siting and connection corridor presented by the alternatives. In particular the increased number of cable corridors to make the

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		customer connections compared with the one corridor for the 400 kV requirement. An additional contributory factor is also noted in paragraph 6.5.21 of **5.15 Design Development Report [APP-122]** to be programme (which is related to contractual and licence obligations) which is a legitimate consideration in the context of a Critical National Infrastructure Project where both the capacity and timing of delivery are key aspects of the Project need case.
	Comments about the works at the existing substations at Necton, Norwich Main, Bramford, Friston and Sizewell	Whilst this project will have to undertake works to connect into existing substations, not all substations in the region require modification and have not been impacted by the DCO. At Norwich Main and Bramford substations, works largely fall within the operational boundary of the site. Necton, Friston, and Sizewell are not impacted by this project.
	Comments about the Project resulting in noise impacts from operation of substation	The assessments of operational noise from proposed substations are provided in **6.14.A3 Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259]** and **6.14.A4 Environmental Statement Appendix 14.4 - Tilbury North Substation Operational Noise Assessment [APP-260]**, and are summarised in **6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]**. The assessments indicate that significant adverse effects from operational noise from proposed substations are not expected where standard noise mitigation measures are incorporated in the design. Commitment NV21 in **7.2 Outline Code of Construction Practice [APP-300]** which is secured by Requirement 4 in the **3.1 Draft Development Consent Order [APP-056]** states that: *'The proposed new substations will include any required noise mitigation measures by design. This may include plant selection, screening, and enclosures, as appropriate.'*
	Comments about the location of the new Tilbury North Substation near Orsett in Thurrock	The Applicant has set out in Section 11.4 of **5.15 Design Development Report [APP-122]** the reasons for introducing the Tilbury North Substation as the means of connecting at Tilbury which related to

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		particular challenges from the routeing of an underground cable connection through an area containing other infrastructure and development proposals. **5.15 Design Development Report [APP-122]** also sets out from paragraph 11.4.14, the alternative sites considered for the siting of the Tilbury North Substation and the reasons for the selection of the site being taken forwards. The Applicant has continued to progress engagement to refine the details of interactions with other potentially interfacing development projects and existing interests and will update the Examining Authority about relevant details as confirmed.
	Comments about the location of construction compounds, substations and cable sealing end compounds	The Applicant has developed its proposed locations of construction compounds, substations and Cable Sealing End (CSE) compounds in line with its duties, the practicalities of construction and informed by guidance such as the Horlock Rules. The location and configuration of such sites have also been modified in some instances responding to feedback from consultation and surveys. The details of why some changes were made, and other requested changes were not set out in **5.15 Design Development Report [APP-122]** and in **5.1 Consultation Report [APP-066]**.
Underground cables	Comments about the use of underground cables	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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts.

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		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.
Biodiversity, ecology and nature conservation		
Biodiversity Net Gain	Comments about Biodiversity Net Gain (BNG) for the Project	The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for development (subject to certain exemptions), however this requirement is not yet in force for development consented pursuant to a Development Consent Order (DCO). Current indications are that it will apply to development consent applications submitted from May 2026, however this is yet to be confirmed. The Applicant has committed to deliver 10 % BNG with wider environmental and societal benefits on all construction Projects. The 10% BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. As well as avoiding and minimising our impacts to nature, the Project considers the land required for mitigation that can deliver BNG and wider environmental and societal benefits, which has been identified through Project design development. The delivery of 10% BNG would require delivery of offsite Biodiversity Units via habitat creation or enhancement actions in strategic areas, and all options have been considered in **7.1 Biodiversity Net Gain Report [APP-299]**.
	Comments about ecological enhancements as part of the Project	The Environment Act 2021 introduces a mandatory requirement for 10 % Biodiversity Net Gain (BNG) for new DCO developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10 % BNG with environmental and societal benefits on all

Themes raised by topic	Summary of matters raised	National Grid's response
		construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. As well as seeking to avoid and minimise our impacts to nature, the Project considers the land required for mitigation that can deliver BNG and wider environmental and societal benefits. The delivery of 10 % BNG would require delivery of offsite Biodiversity Units via habitat creation or enhancement actions in strategic areas, and we would consider all offsite options that are available to us. Further detail on BNG is available in **7.1 Biodiversity Net Gain Report [APP-299].**
Negative impacts	Comments about the Project resulting in a negative impact on wildlife / biodiversity / ecology	Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on wildlife / biodiversity / ecology. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken over the 2022-2025 period. The findings of which have informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats and species and mitigation measures as appropriate. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order (DCO) developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10% BNG with environmental and societal benefits on all construction projects. The

Themes raised by topic	Summary of matters raised	National Grid's response
		10% BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. As well as seeking to avoid and minimise impacts to nature, the Project considers the land required for mitigation that can deliver BNG and wider environmental benefits. The delivery of 10% BNG would require delivery of offsite Biodiversity Units via habitat creation or enhancement actions in strategic areas, and we will consider all offsite options that are available to us. Further detail on BNG is available in **7.1 Biodiversity Net Gain Report [APP-299]**.
	Comments about the Project resulting in a negative impact on species, including protected species	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on biodiversity, including protected species. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity including protected species and their associated habitats, through avoidance or mitigation. A comprehensive survey effort for a range of protected species was completed over the 2023 – 2025 period. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** assesses the effects on protected species based on this baseline information and where/if required appropriate mitigation measures are detailed. Suitable mitigation for protected species has been developed in consultation with Natural England to ensure legal compliance and best practice guidelines are adhered to. Where necessary, draft licence applications have been drafted and the Applicant is in the process of agreeing the detail within the licence documents with Natural England, in order to obtain the relevant Letters of No Impediment (LoNI). Mitigation for non-licensable protected species has been included within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.

Themes raised by topic	Summary of matters raised	National Grid's response
	Comments about the Project resulting in a negative impact on flora / plants / woodlands / protected habitats	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on biodiversity including priority grassland, wetland, woodland, and hedgerow habitats. The design process has taken account of existing biodiversity, the natural environment and, where practicable, seeks to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** assesses the effects on important ecological receptors (which includes grasslands, wetlands, woodlands and hedgerows). As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys were undertaken, the findings of which have informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order (DCO) developments (which is not yet in force and not expected until May 2026). The Applicant has committed to delivering 10% BNG with environmental and societal benefits on all construction projects. The BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. As well as seeking to avoid and minimise impacts to nature, the Project considers the land required for mitigation that can deliver BNG and wider environmental benefits. The delivery of 10% BNG will require delivery of offsite Biodiversity Units via habitat creation or enhancement actions in strategic areas, and we will consider all offsite options that are available to us. Further detail on BNG is available in **7.1 Biodiversity Net Gain Report [APP-299]**.
	Comments about the Project resulting in a negative impact on rivers / other bodies of water	Through routeing, siting and detailed design the Applicant has sought to reduce, as far as practicable, potential impacts on biodiversity including river ecology / other bodies of water.

Themes raised by topic	Summary of matters raised	National Grid's response
		The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity such as river corridor habitats, through avoidance or mitigation. The same approach has been taken to account for rivers and their floodplains, seeking to avoid or reduce the footprint of the Project within floodplains. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken, including along river corridors. The data have informed the assessment of effects on biodiversity, hydromorphology, water quality and flood risk presented in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]** and **7.10 Water Framework Directive Assessment [APP-332]**. Further, the Project has engaged with Natural England, the Environment Agency and Local Planning Authorities on aspects relating to river ecology, water quality and flood risk, as detailed in Statements of Common Ground (**5.9 Draft Statements of Common Ground [APP-089] to [APP-101] and [APP-103]**), and appropriate mitigation measures and techniques have been secured, as detailed in **7.2 Outline Code of Construction Practice [APP-300]**. The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for new Development Consent Order developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10% BNG with environmental and societal benefits on all construction projects including for river ecology. The BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitment. As well as seeking to avoid and minimise our impacts on nature, the Project includes enhancement of watercourse habitats as part of BNG mitigation. Further detail on BNG is available in **7.1 Biodiversity Net Gain Report [APP-299]**.

Appendix A.
Affinity Water Limited

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Appendix A
Affinity Water Limited

Table A1.1 outlines the Applicant's comments on the RR provided by **Affinity Water Limited [RR-0036]**. The Applicant has held a number of meetings with Affinity Water Limited during the development of the Project and has been progressing a SoCG. An updated SoCG (**8.3.5 Draft Statement of Common Ground - Affinity Water [Revision B])** is provided to the Examining Authority at Deadline 1, which reflects the latest position. National Grid has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table A1.1 Summary of comments and National Grid's response

Topic	Comments	National Grid's response
Statutory Undertakers	Affinity has no objection in principle to the Project. However, the proposed DCO would permit extensive development within areas where Affinity is responsible for providing water supply services. If made the DCO would authorise the exercise of powers over or near land in which Affinity maintains assets and/or has other rights for the purposes of discharging its statutory duties. Unchecked, the exercise of such powers in respect of Affinity's interests would cause severe detriment to it.	The Applicant has been engaging with Affinity Water to agree protective provisions for the protection of Affinity Water and its interests. That engagement is ongoing but productive.
Statutory Undertakers	Affinity has had some previous engagement with NGET, in particular around the proposed path of the high powered network and where this will overlap with Affinity's assets. However, there has been limited engagement regarding the proposed compulsory acquisition of Affinity's property included in the DCO application, and the scope of these proposals remains unclear. Affinity at present is concerned that should the DCO be made in its proposed form that it would pose a significant risk to Affinity's ability to discharge its statutory water supply duties under the Water Industry Act 1991.	The Applicant will continue to engage with Affinity Water over the coming months to address any concerns over how the Project may affect their land and what land and rights are required. In relation to concerns regarding Affinity Water's ability to discharge its statutory water supply duties, it is the Applicant's position that the acquisition of land or rights should not cause a material detriment to Affinity Water's ongoing land management.
Draft DCO	Affinity notes the "standard" set of protective provisions for the benefit of statutory undertakers contained in Part 1 of Schedule 16 to the draft DCO. However, Affinity considers these to fall short of providing it with the necessary protections. Since the application for the Order has been submitted, Affinity has engaged with NGET and a specific set of draft protective provisions are now under discussion but these have not been included in the application draft of the DCO. Affinity understands that NGET proposes to include those protective provisions and Affinity welcomes the agreement in principle to the inclusion of specific protective provisions for Affinity's benefit; however, at present the provisions under discussion still do not include a number of matters which Affinity would expect to be covered for its benefit. As such, Affinity expects further engagement from NGET to agree a version of protective provisions acceptable to Affinity. Affinity is hopeful that the parties will reach agreement swiftly on the correct form of the protective provisions to be included in the proposed DCO.	As noted in Affinity Water's comments, the Applicant has been engaging with Affinity Water to agree protective provisions for the protection of Affinity Water and its interests. That engagement is ongoing but productive.

Topic	Comments	National Grid's response
Statutory Undertakers	Other than the correct form of the protective provisions, Affinity is also concerned to work with NGET to confirm the scope of Affinity infrastructure affected. Affinity has major assets within the area of the proposed DCO, including a critical water supply at Ardleigh reservoir (which is operated by the Ardleigh Reservoir Committee, which consists of members from Affinity and Anglian Water Service Ltd) and a water treatment works (WTW). It is essential for the supply of water to Affinity's customers that Ardleigh reservoir remains in operation and is accessible to Affinity at all times. Affinity therefore objects to any proposals that could impact on the operation and access to the reservoir and WTW.	Shapefiles along with a master scoping document detailing all known Norwich to Tilbury interactions with Affinity Water assets were supplied. These interactions were further refined in collaboration with Affinity Water to agree the final extent of all interactions. Affinity Water's initial concerns around the Ardleigh Reservoir are known and triparty engagement has commenced between Affinity Water, Anglian Water and National Grid to fully convey and mitigate any impacts to existing operations at the reservoir.
Health and Safety impact	Affinity also has some general concerns around the electromagnetic effects from the high-voltage cables on some of Affinity's water mains. However Affinity is working with NGET to understand where these overlaps occur and whether there is any risk to mains. Affinity will continue these discussions with NGET.	The Applicant acknowledges its responsibility to ensure that electromagnetic effects on Affinity's assets are considered, and any resulting damaging effects are mitigated. We are working with specialist earthing and AC (alternating current) mitigation consultants who have assessed where such could occur and are working to develop a mitigation design. The solution will be developed collaboratively with Affinity Water. Engagement is ongoing.
Utilities Diversions	Affinity is also seeking the opportunity to agree the approach to be taken on cost recovery. Affinity needs clarity on when and how engagement on design and delivery of water infrastructure diversions and alterations (as well as works in the vicinity of assets to remain in situ) will take place, and how costs incurred in that process will be met.	The Applicant has provided an undertaking to Affinity Water's legal representatives to cover costs in negotiating legal agreements. We have offered further cost recovery mechanisms to Affinity Water to allow for costs incurred in detailed design and delivery engagement. Engagement with Affinity Water is ongoing.

Appendix B. Anglian Water Services Ltd

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Appendix B
Anglian Water Services Ltd

Table B1.1 outlines the Applicant's comments on the Relevant Representation (RR) provided by **Anglian Water Services Ltd [RR-0216]**. The Applicant has held a number of meetings with the Anglian Water Services Ltd during the development of the Project and has been progressing a Statement of Common Ground (SoCG) **(5.9.26 Draft Statement of Common Ground - Anglian Water [APP-113]**, which reflects the latest position. An updated SoCG will be submitted at a future deadline. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table B1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Draft DCO	PROTECTIVE PROVISIONS A copy of Anglian Water's template Protective Provisions was supplied to the Project Team and their legal representatives through the pre-application period. This matter has been raised in subsequent consultation responses and separate meetings with the Applicant, however, the opportunity to progress towards including these provisions in the draft Development Consent Order (DCO) has not been taken forward, which is disappointing. Anglian Water has welcomed further progression on this matter with the Applicant since the submission and acceptance of the draft DCO application, to include our bespoke Protective Provisions under 'Schedule 16 Protective Provisions' of the Draft Development Consent Order (DCO) [APP-056] to ensure that the necessary protections and measures are undertaken in discussion with Anglian Water when the Project moves forward to delivery.	The parties have reached a high level of agreement on the format of the Protective Provisions with Anglian Water and it is anticipated that an agreed set of Protective Provisions will be capable of being included in a subsequent version of the **3.1 Draft Development Consent Order [APP-056]**.
Draft DCO	Anglian Water is obliged at this stage to object to the inclusion of the 'standard' set of protective provisions for the benefit of statutory electricity, gas, water and sewerage undertakers contained the draft DCO (Schedule 16 Part 1). Anglian Water considers these to fall short of providing the necessary protections to our existing infrastructure within the Project order limits.	As above, the parties have reached a high level of agreement on the format of the Protective Provisions and it is anticipated that bespoke agreed Protective Provisions can be included in a subsequent version of the **3.1 Draft Development Consent Order [APP-056]**.
Project Description	Anglian Water notes that Document **5.9 Draft Statement of Common Ground Overview [APP-088]** identifies the SoCG for Anglian Water as a 'single issue' letter used for consultees with a specific area of focus. Whilst our statutory remit involves water supply, sewerage, and drainage there are specific areas of focus within our draft SoCG with the Applicant, as the scale of this linear scheme has significant implications for Anglian Water in terms of: 1. A substantial number of interfaces with our existing assets both above ground and underground. This includes the access, maintenance, operation and expansion of our water recycling centres (WRC), which may be compromised by the Project. Chapter 4 of the **Environmental Statement (ES) Project Design [APP-130]** identifies that third party utilities diversions and/or modifications will be required to facilitate the construction of the project [para. 4.1.6]. Whilst the Project has not currently identified any diversions of Anglian Water assets, this remains a point for discussion through continued engagement with the Applicant. Other measures may be required including utilities protection works when further assessment has been undertaken.	The Applicant acknowledges the interaction with a variety of Anglian Water assets and operations. The draft Statement of Common Ground (**5.9.26 Draft Statement of Common Ground - Anglian Water [APP-113]**) is a live working document that is intended to be updated by both parties as dialogue continues. The Applicant will continue engaging with Anglian Water to detail such areas of focus within the draft Statement of Common Ground.

Topic	Summary of matters raised	National Grid's response
Project Description	Figure 4.1 - Project Description - Proposed Project Design Section A Page 5 of 63 **[APP-133]** shows the impact the project has on Anglian Water's Forncett End WRC. It is noted that Table 4.4 Design scenario 2 **[APP-130]** identifies flexibility of design to ensure an alternative haul road is available to avoid a haul road through the reed beds and over the final effluent pipe on our operational land. This is one of 19 locations where design scenarios have been identified.	The Applicant is engaging proactively with Anglian Water to agree the extent of interaction between the Project and Anglian Water's Forncett End water recycling centre including agreement of the haul road routeing undertaken in delivery.
Draft DCO	2. Interfaces between the Project and our programmed investment schemes for delivery in Asset Management Period 8 (AMP8 2025-2030) including strategic water mains and schemes to meet environmental obligations at our water recycling centres. Our investments and obligations are subject to delivery by defined dates by our regulators and therefore may result in fines if not delivered on time. Anglian Water is in the early stages of design for the AMP8 projects which requires detailed evaluation of risks, opportunity and value through a programmed decision making process. Anglian Water is committed to constructive engagement with the Applicant to facilitate collaboration on the delivery of our projects that have a high probability of entering into the delivery phase through the construction period for the Norwich to Tilbury Project.	The Applicant is engaging proactively with Anglian Water to understand the extent of interaction of Anglian Water's AMP8 schemes with the Project and is committed to continued cooperation to best facilitate Anglian Water's future proposed schemes within the bounds of the Project.
Hydrology Land Drainage and Flood Risk	3. The implications for the demand for water resources (non-domestic water) through the construction phase of the project - the availability of which has not been agreed. It is currently assumed that the water supply needs of the project will be sourced from mains supply or tankered in **[ES Chapter 4 Project Design APP-130]** and [**ES Chapter 12 Hydrology Land Drainage and Flood Risk APP-221]**.	The appointed Main Works Contractor(s) would provide additional information to Anglian Water on the non-domestic water needs of the Project as this information becomes available during the detailed design stage of the Project. The **5.5 Consents and Licences Required Under Other Legislation [APP-084]** stipulates that Water Connections Agreement applications would be submitted by the appointed contractor for supply of mains water, should the Project receive development consent and prior to relevant works.
Hydrology Land Drainage and Flood Risk	Whilst Anglian Water has a statutory duty to supply water for domestic purposes (e.g., drinking water, hand-basins, toilets and showers) for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers), there is no legal duty to provide water for non-domestic usage (e.g., agri-food production or car washes, concrete batching plants) where it might put at risk our ability to supply water for domestic purposes. When a site is designated as an NSIP, we will do our utmost to provide the water required for your project. However, this is subject to a director level review within Anglian Water and can take some time to approve. In some instances, even NSIPS may ultimately be refused their requested non-domestic water request. Anglian Water has adopted a 'Non-Domestic Water Requests Policy' which states that requests over 20m3/day will be declined. However, for Nationally Significant Infrastructure Projects that are requesting over 20m3/day of non-domestic water (as defined above) for a scheme, a Water Resource Assessment (WRA) must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth. It is noted in Document **7.2 Outline Code of Construction Practice [APP-300]** that water connections agreement for the supply of	This position is noted and the Applicant acknowledges that commitment W16 in the **7.2 Outline Code of Construction Practice [APP-300]** is limited to the monitoring and efficient use of water during the Project's construction. A Water Resources Assessment would be submitted by the appointed Main Works Contractor(s), informed by information from the detailed design of the Project and Water Connections Agreement applications would be submitted as noted in **5.5 Consents and Licences Required Under Other Legislation [APP-084]**.

Topic	Summary of matters raised	National Grid's response
	mains water will be required from the relevant water company (Table 5.1). Anglian Water has advised the Applicant of the need to submit a WRA to determine whether sufficient non-domestic water will be available to supply temporary construction compounds with concrete batching plants that will require more than 20m3/day. Commitment reference W16 in the CoCP is insufficient to secure non-domestic water supply requirements.	
Draft DCO	4. Surface and foul water drainage arrangements given the draft DCO supplemental powers include the discharge of water to any public sewer. Whilst Document **7.2 Outline Code of Construction Practice [APP-300]** states that no intentional discharge of site run-off to watercourses, drains, including highways drainage systems, or sewers without appropriate treatment and agreement of the appropriate authority (GG22 and GG32), Anglian Water would seek to ensure we are consulted as a drainage authority on a Surface Water Management Plan to discharge the relevant requirement of the DCO.	The Applicant is committed to engage with Anglian Water in relation to the Surface Water Management Plan. Commitment GG22 within the Outline CoCP has been updated with the following text, which will be submitted into the Examination at Deadline 2: *'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. A variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding, shall be adopted as specified in the Surface Water Management Plan, and where identified as necessary during inspections, audits and in response to incidents. Construction drainage measures will be developed liaising with the Lead Local Flood Authorities (LLFAs) and statutory undertakers including Anglian Water (where relevant), with ongoing dialogue during implementation of the measures. There will be no intentional discharge of site runoff to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority (except in the case of an emergency).'*
Land	**The Book of Reference [APP-064]** does not include reference to some of our land interests within the Project order limits, which include a right of way to one of our pumping stations and a deed granting Anglian Water the right to lay and maintain a sewer. This information will be passed to the Applicant's Land Team for review and inclusion as necessary.	The Applicant acknowledges that the **4.3 Book of Reference [APP-064]** does not currently record certain Anglian Water land interests located within the Project Order Limits, including the right of way providing access to a pumping station and the deed conferring rights to lay and maintain a sewer. This information will be referred to the Applicant's Land Team for review, and the **4.3 Book of Reference [APP-064]** will be updated as appropriate to ensure all relevant interests are accurately and comprehensively reflected.
Draft DCO	Anglian Water will continue to engage with the Applicant regarding the compulsory acquisition of land and rights as outlined in section 8.4 (Statutory Undertakers and Utilities) of **Document 4.1 Statement of Reasons [APP-059]**. As inferred in this section discussions have commenced on crossing locations with our underground assets, AC interference, and bespoke Protective Provisions (as referenced above). Anglian Water welcomes the need for ongoing constructive dialogue with the Applicant to pursue mutually agreeable solutions and agreeing appropriate mitigation - to be recorded as appropriate in the Statement of Common Ground.	Noted. The Applicant will continue dialogue with Anglian Water to seek to resolve the concerns identified here.

Appendix C.

Babergh District Council and Mid Suffolk District Council

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Appendix C
Babergh District Council and Mid Suffolk District Council

Babergh District Council and Mid Suffolk District Council are both 'host authorities' as part of the Project falls within their geographical jurisdictions. The Applicant has provided comments on the Relevant Representation (RR) provided jointly by **Babergh District Council [RR-0314]** and **Mid Suffolk District Council [RR-2540]**.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (**5.9.6 Draft Statement of Common Ground - Babergh and Mid Suffolk District Council [Revision B]**), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

The RR submitted did not include paragraph numbers and therefore the Applicant has added a Row ID for ease of reference.

Table C1.1 Summary of comments and National Grid's response

Row ID	Topic	Comment	National Grid's response
1.	Air quality	The Council is content with the Air Quality assessments and concur with the findings of the National Grid report (ref AENC-ARC-ENV-REP-0034) that the impact of the scheme both during operation and delivery are sufficiently minimal to not impact on our Local Air Quality Management obligations and as such we have no cause to challenge the position held by National Grid.	The Applicant notes this comment.
2.	Ecology and biodiversity	The ecological survey scope and execution are considered comprehensive and appropriate for the scale of the project. Stakeholder consultations were conducted with Natural England and the Environment Agency regarding survey methods.	The Applicant notes this comment. The 2025 surveys have now been completed and no significant changes to the ecological assessment as submitted have been identified.
3.	Ecology and biodiversity	Although 12.5% of the Order Limits are still undergoing surveys, the missing data is expected by November 2025 and is not anticipated to significantly alter current assessments.	The 2025 surveys have now been completed and no significant changes to the ecological assessment as submitted have been identified.
4.	Environmental impact	Impact Assessments Middle Wood Offton SSSI is the only SSSI within the Order Limits and is assessed as having negligible residual impact with mitigation. Bramford Meadows and Needham Lake LNRs are similarly assessed. County and Local Wildlife Sites within the Order Limits are predicted to experience minor, reversible impacts during construction, with negligible residual impacts post-mitigation. Operational phase impacts on designated sites are assessed as negligible.	The Applicant notes this comment.
5.	Ecology and biodiversity	Some protected species assessments remain incomplete. Further surveys are required for species such as bats, badgers, and water voles. The assumption that Natural England licences will ensure neutral or beneficial outcomes is questioned due to limited post-mitigation monitoring. Additional pre-DCO surveys, such as climbing inspections for bat roosts, are recommended to support proportionate mitigation planning.	Updated ecology survey reports that include the 2025 survey data were submitted to the Planning Inspectorate in November 2025. This included an update to **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and the following appendices: • **6.8.A13 Environmental Statement Appendix 8.13: Otter and Water Vole Report [AS-039]** • **6.8.A1 Environmental Statement Appendix 8.1: Habitat Report [AS-028]** • **6.8.A7 Environmental Statement Appendix 8.7: Breeding Bird Report [AS-030]** • **6.8.A9 Environmental Statement Appendix 8.9: Bat Roost Report [AS-034]** • **6.8.A10 Environmental Statement Appendix 8.10: Bat Activity Report [AS-036]** • **6.8.A15 Environmental Statement Appendix 8.15: Badger Report [AS-043]**.

Row ID	Topic	Comment	National Grid's response
			Required mitigation and monitoring for European Protected Species and badgers have been agreed with Natural England through the draft licence process, to ensure no detrimental impact to conservation status. The bat roost survey scope was agreed with Natural England in advance of surveys being undertaken. Aerial inspections/emergence surveys would be undertaken following detailed design when it is clear which trees with potential bat roosting features would be impacted by the Project. A reasonable worst case assessment for bat roost loss has been assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**.
6.	Mitigation measures	Mitigation is categorised as Embedded, Standard, and Additional. While mitigation measures are thorough, their effectiveness depends on proper implementation. Risks include errors in exclusion zone management, licence compliance, and vegetation reinstatement. A 5-year monitoring period is deemed insufficient, and a failure rate should be factored into compensation planning.	**7.4 Outline Landscape and Ecological Management Plan [AS-046]** outlines clear roles and responsibilities to ensure compliance with the Development Consent Order (DCO) documents submitted. Compliance with the final version of these documents will be a Requirement of the DCO and therefore it would be a criminal offence for the Applicant not to comply. 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 [AS-046]** which includes like for like replacement or consideration of alternative species based on site by site conditions and the reasons for failure.
7.	Biodiversity Net Gain (BNG)	National Grid has committed to a non-mandatory BNG scheme aiming for a 10% habitat unit increase. While positive, details on off-site habitat creation and long-term management in BMSD areas remain unresolved. BNG should be designed to benefit targeted species groups alongside habitat improvements.	The Applicant has committed to delivering at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits, despite it not yet being mandatory for Nationally Significant Infrastructure Project applications. The exact number and location of off-site biodiversity units required would be determined following detailed design and a re-run of the statutory biodiversity metric. The Applicant is committed to delivery of off-site BNG units through third party providers, with sites registered on the Natural England register, to ensure reliable delivery. Long-term management of these off-site BNG habitats would fall to the third party providers in line with the habitat management plan for the specific site. Following delivery of BNG, the Applicant would submit a BNG Verification Report to the Local Planning Authorities, confirming that BNG has been delivered.
8.	Ecology and biodiversity	Ecological Clerk of Works (ECoW) ECoW oversight is critical to ensuring mitigation success. The oCoCP and oLEMP outline ECoW responsibilities, but lack detail on qualifications, decision-making authority, and monitoring protocols. Further commitments are recommended to ensure high-quality ecological supervision throughout construction.	The Applicant's commitment to ensure compliance with all ecological mitigation measures is detailed within **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The final Code of Construction Practice and final Landscape and Ecological Management Plan would be completed post consent by the relevant Main Works Contractor(s) and would include additional details as the detailed design and construction programme would be known.
9.	Ecology and biodiversity	The ecological surveys and impact assessments are generally robust and well-executed. However, reliance on post-DCO surveys and mitigation implementation across a large project area introduces risks. Enhanced ECoW oversight and additional pre-consent surveys are advised to ensure lawful and effective ecological protection.	**7.4 Outline Landscape and Ecological Management Plan [AS-046]** clearly outlines the roles and responsibilities around ecological supervision and oversight. All pre-consent survey methodologies and scope of survey were agreed with Local Planning Authorities and/or Natural England. The results of the bat surveys undertaken to date are sufficient to provide an assessment of impact on roosting bats within **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026],** as agreed with Natural England. Further bat aerial inspections/emergence surveys would be undertaken following detailed design, as part of the pre-commencement survey package of works.
10.	Land contamination	The Council confirm that the Land Contamination report (ref. AENC-ARC-ENV-REP-0036) is sufficient in its approach and is in line with current guidance in providing an iterative approach to land contamination. National Grid remain committed to investigating a small number of potentially contaminated sites along the development corridor as would be expected and the council will review these when available. There are no objections to the position held by the National Grid from the perspective of land contamination.	The Applicant notes this comment.

Row ID	Topic	Comment	National Grid's response
11.	Water impact	There is no reference to the Bathing Water designation of the River Stour at Sudbury and the need to ensure that this designation is maintained.	The Project would not generate any specific Bathing Water-related pollutants and poses a very low risk of any detriment to this designation.
12.	Health & safety impact	A site-specific risk assessment calculating the maximum possible levels of non-ionizing radiation at the nearest residential properties at various floor levels has not been submitted. This information is necessary to appropriately assess the potential for exposure to electromagnetic radiation against the current guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and RF EMF Guidelines 2020 limits. The levels must be when all equipment, both existing and proposed, are operating at maximum power. A valid ICNIRP certificate must also be submitted. The EMF emissions should not exceed limits within the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2024), including set the ICNIRP guidelines (or any subsequent updates) and any alterations should be approved in writing in advance by the relevant authority.	**7.8 Electric and Magnetic Field Compliance Report [APP-330]** details the electric and magnetic field (EMF) assessment for the Project, demonstrating compliance with the requirements of National Policy Statement (NPS) EN-5 (2024) in line with the requirements of the government's Code of Practice Power Lines: Demonstrating compliance with EMF public exposure guidelines[23]. This demonstrates that when directly under the overhead lines or directly above the underground cables the ICNIRP exposure limits are not exceeded. Any offset from the overhead line or cables reduced the EMF levels significantly ensuring compliance at any distance from the assets. No residential properties are located closer than 30 metres to the overhead line over the entire Project. At this distance, the EMFs on the second floor of a property (3.5 metres above ground) would be 0.55 kV/m and 10.94 µT using the maximum continuous operation conditions as an example, but any building height would comply with the ICNIRP exposure limits detailed in NPS EN-5 (2024), 30m from the overhead line. All other EMFs in residential properties along the overhead line route would be less than these values due to the additional distance. For underground cables, increasing the vertical distance reduces the EMFs further, so the details noted in Chapter 6, Section 6.3 of **7.8 Electric and Magnetic Field Compliance Report [APP-330]** represent a worst-case exposure situation and compliance. The document **'7.8 Electric and Magnetic Field Compliance Report' [APP-330]** is our formal submission of compliance with the ICNIRP limits and can be used as evidence of compliance for the entire Project.
13.	Mitigation measures	National Grid (NG) categorises mitigation into Embedded, Standard, and Additional measures. Embedded mitigation is integrated into the project design, while Standard measures apply during the construction phase. NG states that Additional mitigation is not required, although the wording in the Environmental Statement is ambiguous.	The three categories of mitigation are defined in **6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135]**. Additional mitigation is defined as '*mitigation measures over and above embedded and standard mitigation measures to reduce environmental effects...*'. **6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208]** states in paragraphs 11.6.10 and 11.6.11 that additional mitigation for the Project is required, and that the additional mitigation includes mitigation secured through the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. All mitigation for historic buildings or historic landscapes would, however, be secured through the measures set out in embedded and standard mitigation.
14.	Mitigation measures	Recommendations include: • Clarify embedded mitigation details, especially where Mid-level harm is identified. • Expand standard mitigation definitions (e.g., 'appropriate' replacements). • Establish a communication mechanism (e.g., hotline) for owners of historic buildings affected by construction vibration.	Review of the assessment identified 12 listed buildings in Babergh and Mid Suffolk where a mid less than substantial harm conclusion has been reached **(6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215])**. **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 feasibility and risks, cost and programme amongst other factors. 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 [AS-046]**. Specifically, this means:

[23] Department of Energy and Climate Change (2012) *Power Lines: Demonstrating compliance with EMF public exposure guidelines. A voluntary Code of Practice*

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			• 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. **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** did not identify any heritage assets in Babergh and Mid Suffolk that would be impacted by the Project.
15.	Construction impact	Five buildings were identified as potentially affected by compaction-related vibration (none in Babergh). No buildings are at risk from piling vibration. The councils recommend proactive monitoring and stakeholder engagement.	The five locations identified as being potentially affected by compaction-related vibration assume relatively worst-case assumptions for vibration generation. Further detailed assessments would be undertaken by the Main Works Contractor(s), as per commitment NV05 of **7.2 Outline Code of Construction Practice [APP-300]** based on their specific methodologies. Based on the findings of these assessments specific mitigation measures would be identified, if required, and incorporated into the Outline Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the development consent application **(7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306])**. The Outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of the **7.2 Outline Code of Construction Practice [APP-300]** includes for pre- and post-condition surveys to be conducted in such situations, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.
16.	Heritage impact	Designated Heritage Assets – Mid Suffolk (Section B) NG identified Mid-level Less Than Substantial Harm (LTSH) to several assets including Offton Castle (Scheduled Monument), Church of St Mary (Barking), Roydon Hall, Barn NW of Roydon Hall, and Creeting Hall. Lower LTSH was identified for other Grade I and II* buildings, and two Conservation Areas (Badley Church Green and Mellis).	The Applicant notes this comment.
17.	Environmental assessment criticism	Disagreement noted: NG assessed no harm to Hall Farmhouse and adjacent barn (Mellis CA), but the council suggests Low LTSH due to setting changes.	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 [APP-208]** and in accordance with professional heritage sector guidance: The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[24]. Hall Farm House (1181726) and Barn About 30 m West of Hall Farm House (1032806) are located on the north-west edge of Mellis Conservation Area. **6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208]** concludes a minor adverse impact for construction and no change for operation. At their nearest, pylons would be c.900 m north-west of the assets. Between pylon RG108 (1.5 km west-south-west of the assets) and pylon RG102 (1 km north of the assets), the Project would replace an existing run of slightly smaller pylons (PKF16–24). At a distance of almost 1km the assessment concluded that the slight difference in height would not be noticeable. Also, the greater span of the new pylons means that two fewer pylons would be required, reducing impact further. The Project, therefore, is confident in its assessment of harm with regard to these assets.

[24] Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

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18.	Historic environment	Designated Heritage Assets – Babergh (Section C) NG identified Lower LTSH to Wenham Castle (Scheduled Monument), Burstall Church, Little Wenham Castle, and several Grade II* and Grade II buildings. Stratford St Mary Conservation Area was assessed with Lower LTSH during construction only. Babergh District Council broadly agrees with NG's assessments.	The Applicant notes this comment.
19.	Historic environment	Designated Heritage Assets – Non-Designated Heritage Assets (NDHAs) NG did not assess setting impacts for NDHAs of Low or Negligible Value, citing lack of significant effects. The councils dispute this approach, referencing EN-1 National Policy Statement which requires consideration of NDHAs where significance merits it. This omission prevents a balanced judgement as required by policy.	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 [APP-208]**. 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) '*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*' 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.
20.	Historic environment	The councils support many of NG's assessments but raises concerns regarding ambiguity in mitigation language, lack of detail on alternatives and embedded measures, omission of NDHA setting assessments, and specific disagreements on a few assets (e.g., Hall Farmhouse). A detailed tabular summary of affected assets, harm levels, and agreement status is appended to the original letter.	Please refer to rows 13 and 14 for our response regarding mitigation; row 19 regarding non-designated heritage assets settings assessments; and, row 17 for our response regarding Hall Farmhouse.
21.	Flood risk	The Flood Risk Assessment (FRA) doesn't appear to include the surface water data from the latest publish national flood maps. The 2025 update of the national flood maps has resulted in some significant changes to surface water risk data within the districts which may be material to the assessment and conclusion within the FRA.	The Applicant confirms that the **7.9 Flood Risk Assessment [APP-331]** was informed by the 2025 update of the National Flood Maps, including those datasets for fluvial and surface water flood risk.
22.	Flood risk	The sequential test is carried out by the decision maker, based on information provided by the applicant. The submitted FRA acknowledges that parts of the development are in flood zone 3 and other areas affected by sources of flooding. The FRA does not discuss the catchment for, or an assessment of reasonably available alternative sites as required by the sequential test.	A detailed assessment of alternatives is presented in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. This chapter sets out the routeing and siting methodology applied and summarises the corridor options appraisal carried out for the route corridors and substation siting. As detailed in section 3.5 of the report, flooding was one of the range of environmental and socio-economic topics that were factored into the final route selection process (alongside technical and cost factors).
23.	Flood risk	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 (NPPF para 175).	While this is noted, commitment W07 within the **7.2 Outline Code of Construction Practice [APP-300]** is intended to secure that in areas at higher risk of flooding, work sites are laid out in accordance with the sequential approach, i.e. siting assets that are most vulnerable to flooding in the areas at lowest risk of flooding and building in the necessary resilience. It is therefore intended to both reduce the risks of flooding to the Project and avoid increases in flood risk off-site. The sequential test is addressed in Section 5.1 of the **7.9 Flood Risk Assessment [APP-331]**, which concludes that the Project complies with the test.

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24.	Flood risk	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.	Commitment W19 within the **7.2 Outline Code of Construction Practice [APP-300]** secures that the proposed Wenham Grove (previously referred to as Little Wenham) Cable Sealing End compound would be positioned within the defined Limits of Deviation in Flood Zone 1, avoiding Flood Zone 3.
25.	Flood risk	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.	This paragraph is included within **7.9 Flood Risk Assessment [APP-331]**. The conclusion regarding the operational impacts of the proposed third party infrastructure works is drawn as the works largely entail the undergrounding of existing assets, described in further detail in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. During operation of the Project there would therefore be no associated impediment to existing surface water flow paths and no creation of newly impermeable land cover, and therefore no impact on surface water flood risk.
26.	Flood risk	The NPPF requirement for development to be safe for its lifetime without increasing flood risk elsewhere it vitally important to protect property, highway safety and the environment. The Councils defer to the Environment Agency as to whether the applicant's statement that compensatory storage proposals would ensure there would be no increase in flood risk elsewhere is realistic, practicable and acceptable.	Noted. The Applicant has engaged with the Environment Agency to agree requirements in terms of compensation storage proposals. Details are provided in the **7.9 Flood Risk Assessment [APP-331]** and this mitigation measured is secured via commitment W17 in the **7.2 Outline Code of Construction Practice [APP-300]**.
27.	Landscape and visual	The proposals do not comply with EN-1 paragraph 4.3.4, which requires applicants to demonstrate how significant negative effects are avoided, reduced, mitigated, or compensated. No compensation is offered for residual adverse landscape and visual effects.	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]**. Whilst compensation is part of the mitigation hierarchy, EN-1 or EN-5 do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. 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'.* 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. 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 CNP 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. The above aligns with the Bramford to Twinstead (BTNO) 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.
28.	Landscape and visual	The Environmental Statement (ES) acknowledges significant adverse visual and landscape effects during both construction and operation phases. These effects extend up to 1.5 km from the project line, and potentially further due to open landscapes and cumulative impacts.	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 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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

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			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-145]** and **5.6 Planning Statement [APP-085].** EN-1 paragraph 4.1.7 provides '… 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'. 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 Babergh District Council and Mid Suffolk District 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.
29.	Landscape and visual	While valued landscape criteria are included, assessments are flawed and conducted at district level rather than site-specific. Important local features such as river valleys and historic greens are undervalued. The Holford Rules and lack of local designation have led to under-recognition of landscape quality.	The Landscape and Visual Impact Assessment (LVIA) is reported in included 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 Guidelines for Landscape and Visual Impact Assessment[25]. The approach to making judgements on the value of landscape receptors is set out on pages 12–18 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**. Judgements on landscape value are reported in the Annex to **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[26]. This defines landscape value as '*the relative value or importance attached to different landscapes by society on account of their landscape qualities*' (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.
30.	Landscape and visual	The Landscape and Ecological Management Plan includes only 3:1 tree replacement, which is considered reinstatement rather than compensation. A strategic landscape compensation package is recommended to address permanent adverse effects.	The Landscape and Visual Impact Assessment (LVIA) set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** is based on the vegetation clearance assumptions set out in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and presented on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 - APP-055]**. Habitat removed during the construction would be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. The Applicant would prioritise replanting within the Order Limits, although off-site provision may be required. The Applicant's position regarding landscape compensation is set out in row 27.
31.	Cumulative effects	Intra-project cumulative effects are not assessed for landscape, ecology, or historic receptors. Inter-project cumulative effects, particularly with Bramford to Twinstead, are significant but lack mitigation. A compensatory funding package is advised.	The intra-cumulative effects assessment has been undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and the **6.20 Scoping Opinion [APP-297].** For intra-project effects, common receptors were identified (which included a review of landscape, ecology and historic receptors) and assessed within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The inter-project effects assessment identifies significant cumulative effects on landscape and agricultural land; the proposed mitigation is set out in the **7.2 Outline Code of Construction Practice [APP-300]** and

[25] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

[26] Landscape Institute (2021) *Technical Guidance Note 02/21 Assessing landscape value outside national designations*

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			the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Significant cumulative effects are predicted during construction and operation (and maintenance) owing to the potential presence of construction works in the landscape, the introduction of additional overhead lines in the landscape connecting into Bramford Substation and the cumulative loss of agricultural land. The Applicant's position regarding landscape compensation is set out in row 27.
32.	Landscape and visual	The project affects multiple Landscape Character Types (LCTs). Operational impacts are underestimated, especially in open and undeveloped areas. Effects extend beyond 1.5 km and alter perceptual qualities such as tranquillity and sense of place.	The Landscape and Visual Impact Assessment set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and accompanying **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** sets out a robust and consistent methodology, with clear, transparent criteria and assessment grades, in line with the Guidelines for Landscape and Visual Impact Assessment[27] and the Clarification Notes. The approach and methodology was presented to and discussed with statutory consultees as recorded in relevant Statements of Common Ground **(5.9.1 – 5.9.12 [APP-089 to APP-100])**. The judgements were informed by detailed desk and field studies, and the findings are supported by detailed explanations within **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. 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]**. Relevant spot checks of the assessment have been made, and at this time, no need for amendments have been identified.
33.	Landscape and visual	The LVIA includes 206 viewpoints but lacks coverage beyond 1.5 km in several areas. Visual effects are significant across most Visual Receptor Areas (VRAs), with insufficient mitigation for overhead lines and pylons. Additional wireframes and compensation are recommended.	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed and agreed with relevant Local Planning Authorities, as set out in the relevant Statements of Common Ground **(5.9.1 – 5.9.12 [APP-089 to APP-100])**. A number of viewpoints suggested by Local Planning Authorities were 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 Landscape and Visual Impact Assessment (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. Baseline photography was captured from all assessment viewpoints and is shown alongside visualisations of the Project in **7.12 Visualisations [APP-343 to APP-351]**. The locations of all viewpoints are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual receptors and Viewpoints [APP-243]**. This includes a number of viewpoints located between 1–1.5 km and some beyond 1.5 km. The visualisations from each of the viewpoints have been produced to assist stakeholders and the Examining Authority with understanding the likely effects of the Project on landscape character and views / visual amenity. 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. These are also presented in the **7.12 Visualisations [APP-343 to 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. The Applicant's position regarding landscape compensation is set out in row 27.
34.	Landscape and visual	The representations identify significant adverse landscape and visual impacts from the N2T project. The current mitigation and compensation measures are inadequate. A strategic compensation scheme and reassessment of landscape value and visual effects are essential to address the long-term impacts.	The Applicant has addressed these points individually in the response above. The Applicant reiterates its position that the residual environmental effects identified by Babergh District Council and Mid Suffolk District 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. Furthermore, as set out in row 27, the Applicant considers that strategic landscape compensation is not required, a position that is in accordance with the NPS and EIA Regulations.

[27] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

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35.	Noise and vibration	The Councils remain concerned regarding the lack of clarity in the use of the term 'significant' in respect of noise and vibration as the documents do not identify which legislation this refers to.	Significant effects are defined in Section 4 of **6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]** and are based on applicable guidance.
36.	Noise and vibration	NV03: In certain instances where construction noise and/or vibration may cause a significant adverse effect at nearby noise sensitive receptors, applications for prior consent under Section 61 of the Control of Pollution Act 1974 may be submitted to the relevant planning authority to ensure that Best Practicable Means are applied to control noise and vibration impacts.	The Applicant notes this comment.
37.	Noise and vibration	For nighttime noise the identifying legislation must include LAFmax so as to not exceed World Health Organisation guidelines on the disturbance of sleep from all aspects of the works taking place between 23:00 and 07:00.	Night-time construction noise impacts have been assessed in accordance with the appropriate standard, BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise (BS 5228-1)[28], as detailed in Section 4 of **6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]**. The assessment uses the 'ABC' method from BS 5228-1, comparing predicted average (LAeq,T) construction noise levels at nearby noise sensitive receptors against the lower night-time threshold of 45 dB LAeq,T. BS 5228-1 notes that there is no direct relationship between average and maximum (LAmax,F) sound levels and provides only average sound level data for the majority of the plant items in its library (Annexes C and D of BS 5228-1), with maximum sound levels only provided for some items. However, typical maximum levels are generally 5–15 dB higher than the average levels, depending on the activity. Steady-state works tend to be at the lower end of this range, while percussive or impulsive activities are at the higher end. This is supported by BS 5228-1 guidance, which indicates that LA01,T values (sound level exceeded for 1% of the time, thus approaching the maximum) are typically 5–11 dB above average sound levels for percussive piling, depending on the strike rate. Typical maximum sound levels are expected to be marginally higher, hence the 5 to 15 dB range. Based on this, if average night-time construction noise levels are at the threshold of 45 dB LAeq,T, maximum levels would likely fall between 50 and 60 dB LAmax,F, with steady-state works (which are expected at night, with no impulsive activities proposed) closer to the lower end. The World Health Organization (WHO) Guidelines for Community Noise[29] recommend that for a good night's sleep, external maximum noise levels should not exceed 60 dB LAmax,F more than 10–15 times per night (or 45 dB indoors, assuming a 15 dB reduction through a partially open window; closed windows would reduce sound levels further). Therefore, predicted maximum levels from night-time construction activities are expected to remain below the WHO guideline of 60 dB LAmax,F, and thus would not pose a significant risk of sleep disturbance.
38.	Socio-economics	Impacts on skills and tourism have not been fully assessed. The Councils expect National Grid to coordinate their projects in the region to secure benefits for and investment in local businesses and employment networks. Critical national infrastructure must not only deliver the Government's energy objectives but also deliver sustainable societal and economic impacts in the regions that are hosting them.	Impacts on tourism have been assessed within the Environmental Statement (ES), in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** (see paragraphs 15.7.2 to 15.7.19) and in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and the **6.20 Scoping Opinion [APP-297]**. The assessment on skills is not an Environmental Impact Assessment (EIA) matter in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** or the **6.20 Scoping Opinion [APP-297]** and therefore is not discussed in the ES. Separate to the EIA process, the Applicant is committed to providing a coordinated local and regional approach to community benefits.

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

[29] World Health Organization (1999) *Guidelines for Community Noise*

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			The government has published its guidance on Community Funds for Transmission Infrastructure[30]. 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 the developing electricity network. This would be delivered outside the development consent process, as it 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 guidance. Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the EIA.
39.	Socio-economics	It is welcomed that the Wider Study Area has been expanded to include Ipswich, Norwich and West Suffolk, but it is unclear whether there has been any direct engagement with these authorities to understand their position in relation to the potential impact of this proposal, specifically in relation to impact on the visitor economy, community and economy, particularly during construction when access is likely to be restricted.	Ipswich Borough Council, Norwich City Council and West Suffolk Council were consulted as part of statutory consultation in 2024 (as outlined in **5.1 Consultation Report [APP-066]**) and had the opportunity to review and comment on the Preliminary Environmental Information Report which outlined preliminary impacts on visitor economy and community and economy in their areas. Engagement was also sought with Ipswich Borough Council, Norwich City Council and West Suffolk Council during the preparation of the Environmental Statement in March 2025. Ipswich Borough Council requested a copy of the Technical Note shared with them previously outlining the scope and methodology of the Socio-economics, Recreation and Tourism assessment; however, they have not provided a response following the issue of the Technical Note to them in June 2025. West Suffolk Council confirmed that they have no comment to make on the Project and Norwich City Council did not respond to the request for engagement.
40.	Design change	The proposal still doesn't appear to take into account the difference in assessment of impact between the areas where pylons are proposed, undergrounding is proposed, or where the haul road is to be constructed. The applicant makes reference to the assessment matrix as a justification that a differentiated approach has been taken to assessing the impact of overgrounding or undergrounding but no clear assessment has been made to this effect and the impact of the construction of the haul road has not been referenced.	EN-5 requires the Applicant to operate in an efficient, coordinated and economical way[31]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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. Impact assessment considers all aspects of the proposed development, including the overhead line, undergrounding, and haul road, as an integrated whole, rather than as isolated elements. The impacts assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** include, but are not limited to, the loss of assets. A consistent methodology, as detailed in the assessment matrix set out in Table 15.3: Magnitude of impact and description of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**, has been applied across the entire Project to ensure all potential effects are comprehensively identified and assessed.
41.	Socio-economics	Some data is not broken down by District, including the employment sector classifications and skills levels. There is a huge variation in this data across the region and it would be preferable if this data wasn't amalgamated in this way.	All baseline data gathered as part of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** has been broken down to District / Borough Council level, including data on occupational group (Table 15.9: People in employment by major occupational group), skills (Table 15.10: Skills and qualifications held by working aged people (16-64)), and industrial group (Table 15.11:

[30] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*

[31] [1] Electricity Act 1989, Section 9

Row ID	Topic	Comment	National Grid's response
			Employment by broad industrial group). Data at this level is considered appropriate and proportionate for an assessment of this nature and enables assessment of impacts on the local economy and employment. This approach is based on professional judgement, engagement with Local Planning Authorities and knowledge of previous similar projects, including the Bramford to Twinstead Reinforcement.
42.	Socio-economics	Chapters 6 and 11 have not been considered in relation to socio-economic impacts. This is concerning as impacts on visitor economy of restricted access or other impact on listed buildings, heritage assets or historic landscapes or impacts of severance of farmland on productivity of the farm business during construction period or siting of pylons (although this is partially referenced in 6.8.7 and 6.8.8) has not been considered as part of the ES.	The Applicant recognises that heritage assets, historic landscapes and farming can contribute to the visitor economy. Whilst impacts on the visitor economy are assessed specifically in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**, impacts on heritage assets, historic landscapes and farming are considered in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** and **6.11 Environmental Statement Chapter 11 – Historic Environment [APP-208]** of the Environmental Statement (ES). Assessments have been undertaken in accordance with the **6.19 Scoping Report [APP-188 - APP-296]** and **6.20 Scoping Opinion [APP-297]** and following guidance as appropriate. Potential effects are comprehensively assessed within the relevant chapter of the ES to maintain clarity and avoid duplication of assessment. Potential impacts on farm businesses are included in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**; potential impacts on listed buildings, heritage assets and historic landscapes are presented in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]**.
43.	Health and wellbeing	The baseline for Health and Wellbeing has not included the impact of the project on our non-resident population (including tourists) or specific indicators of deprivation including access to services or affordability which are particularly poor in Babergh district.	The Health and Wellbeing assessment is presented in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. The Health and Wellbeing assessment has focused on the local population. Aspects that may affect tourists specifically include impacts relating to physical activity and access to open space which have also been assessed in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. Impacts on tourism and tourist facilities are assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. The Health and Wellbeing assessment **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** has been informed by baseline data including the Index of Multiple Deprivation (IMD). The IMD comprises multiple deprivation domains, which include barriers to housing/services and income.
44.	Mitigation measures	It is noted that the stated mitigation on diversions is limited to public rights of way rather than assessing impact of restrictions on public transport, healthcare, education or other access to services and this needs to be addressed.	Impacts arising from road closures and / or diversions relating to driver delay and potential delays experienced by bus passengers are described in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** considers specifically where restrictions may impact access to social infrastructure (e.g. public transport, healthcare, education and other community services).
45.	Water impact	There is reference to potential contamination of waterways during construction, but no reference to specific mitigation needed in the River Stour to maintain the bathing water designation, particularly during construction.	Designated bathing waters are monitored largely for two types of bacteria and bathing water quality is heavily impacted by point sources (Combined Sewer Overflows and Wastewater Treatment Works discharges) and land management practices, e.g. application of slurries and other fertilisers). As noted in the response to item 11, due to its nature, the Project would not generate any specific Bathing Water related pollutants, therefore no specific mitigation measures are required. A raft of more general pollution control measures are secured through inclusion in the **7.2 Outline Code of Construction Practice [APP-300]**.
46.	Health and wellbeing	The conclusion that effects would be not significant in relation to health and wellbeing is not accepted.	Whilst it is noted that the Council do not accept the conclusions in relation to the health and wellbeing assessment, the Applicant considers that the assessment has been undertaken in line with appropriate guidance agreed with local authorities (e.g. IEMA and WHIASU) and is a robust and proportionate assessment for a scheme of this nature, informed by best practice and professional judgment.
47.	Socio-economics	There is no reference to the socio-economic impacts of visitors not travelling to the area because of the landscape damage and disruption and the loss of trade and income that this could result in.	The assessment of potential impacts on the visitor economy is described in **6.15 Environmental Statement Chapter 15 - Socioeconomics, Recreation and Tourism [APP-265]**. While it is acknowledged that there are significant residual visual changes, construction traffic noise and changes in journey and amenity at particular locations anticipated as a result of the Project, these effects are not expected to affect the Wider Study Area as a whole and are unlikely to deter visitors or substantially alter the appeal of the destination for tourists.

Row ID	Topic	Comment	National Grid's response
48.	Health and wellbeing	The conclusion that no significant health and wellbeing effects are likely to be experienced by a proportion of the local population as a result of how the project may affect the setting of homes, businesses and / or culturally or ecologically important community assets is not accepted.	The Applicant considers that the health and wellbeing assessment presented in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** is a robust and proportionate assessment undertaken in accordance with appropriate guidance, best practice and professional judgment. Chapter 10 acknowledges that there would be a minor adverse impact on both the general population and vulnerable groups as a result of changes to visual amenity during the operation (and maintenance) phase of the Project; whilst there are likely to be individuals who experience adverse mental health and wellbeing impacts associated with visual change, this is not considered to be at a significant scale or to disproportionately affect health deprived populations. The assessment of how the Project may affect the setting of culturally important assets (designated and non-designated heritage assets) is described in **6.11 Environmental Statement Chapter 11 – Historic Environment [APP-208]**. Significant impacts have been identified in relation to the setting of both designated and non-designated heritage assets along the Project route, with appropriate mitigation where appropriate. Similarly, the assessment of how the Project may affect ecologically important community assets (which may include designated sites such as Local Nature Reserves) is contained within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity Revision B [AS-026]**. The chapter concludes that, following the application of appropriate mitigation, there would be no significant residual effects on designated sites during the operation (and maintenance) phase of the Project. Again, both Chapter 11 – Historic Environment and Chapter 8 – Ecology and Biodiversity have been undertaken in line with appropriate guidance and standards.
49.	Mitigation measures	There is no mitigation of the impact that trenchless crossings within the National Landscape to cross the River Stour would have on the leisure use of the river, biodiversity or recreation and tourism.	The assessment of the trenchless crossing at the River Stour is detailed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**, Table 15.23: Residual construction effect on recreational land and Table 15.29: Residual operation (and maintenance) effect on recreational land. The assessment considers potential impacts on river access, recreational use, and tourism during both construction and operation (and maintenance) phases. It concludes that, due to the nature of the trenchless crossing method, no disruption to river access or recreational activities is anticipated. As such, specific mitigation measures are not considered necessary. With regard to biodiversity, a separate assessment is included within **6.8 Environmental Statement Chapter 8 - Biodiversity and Ecology [AS-026]** where potential impacts and appropriate mitigation measures are outlined.
50.	Traffic and transport	The traffic and transport impacts of the proposed development have the potential to be significant for residents, businesses and the environment of the districts. The Councils defer to the comments of Suffolk County Council as Highway Authority in the technical aspects of these matters and wish to highlight concerns that management plans should be effective in mitigating unacceptable impacts, especially having regard to the significant potential for cumulative effects on the local highway network arising from the coterminous delivery of a number of NSIP and other large-scale developments across Suffolk, many of which require the transportation of equipment by Abnormal Indivisible Loads which are disruptive.	The Applicant has produced two documents, **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311],** which detail the mitigation for impacts arising from the construction of the Project. The Main Works Contractor will prepare a detailed Construction Traffic Management Plan (CTMP) that will be substantially in accordance with the Outline CTMP. The Applicant will submit the detailed CTMP to Suffolk County Council for approval post consent. In addition, the Applicant has developed an Abnormal Indivisible Load (AIL) Access Strategy **(7.3 Outline Construction Traffic Management Plan – Appendix A - AIL Access Strategy [APP-310]),** which details the AIL transport requirements and the assessment of suitable routes. All AIL movements will be coordinated through the Electronic Service Delivery for Abnormal Loads (ESDAL) system and in partnership with the Local Highway Authorities, to reduce disruption where possible.
51.	Traffic and transport	There is a significant risk relating to impacts on journey times and distances for private and commercial vehicle occupants that hasn't been assessed, particularly in relation to access to healthcare, education or employment or impacts on services including passenger transport, mail and retail delivery vans, ambulances, fire etc.	Junction modelling was undertaken to assess the likely impact that the increase in traffic as a result of the Project would have in combination with committed developments at key junctions on or connecting to the Primary Access Routes. Where required, suitable mitigation measures have been proposed or are under discussion with Suffolk County Council and National Highways, to reduce the impact on journey times as presented within **7.11 Transport Assessment [APP-333]**. Furthermore, **7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311])** states that

Row ID	Topic	Comment	National Grid's response
			workers will be encouraged to car share or undertake flexible working practices where practicable. This aims to provide an opportunity to further reduce the number of construction vehicles through each junction.
52.	Other developers	The sheer number of energy generation, storage, stability and transmission proposals located in the eastern region and within the districts makes the need for a coordinated, strategic approach to energy development critical in order to effectively assess cumulative impacts and to safeguard the interests of host communities and environments. One such significant opportunity is available in enabling enhanced connectivity, generation and storage capacity for Freeport East at Gateway 14 and the wider Stowmarket area. Failure to give appropriate consideration of the opportunities to decarbonise industrial users, and enable effective and optimised delivery of the Freeport would arguably be negligent on the part of National Grid, as a responsible corporate entity. Therefore, the councils consider potential benefits, through appropriately coordinated delivery of interrelated energy projects and network infrastructure, could include improved connectivity for Freeport East at Gateway 14 as well as other commercial operations and interests in the area, enabling decarbonisation and other green energy objectives for these sites and affected communities.	The Applicant develops the Transmission System and progresses reinforcement in response to a formal process of connection applications (from developers), connection offers (from the National Energy System Operator) and signed connection agreements. As such we are not able to shape proposals to respond to uncertainty associated with anticipated or foreseeable demand and at the time of writing no such connection agreements were signed for projects around Gateway 14. We nonetheless considered routes close to Gateway 14 that were raised in feedback but considered them to be less preferred due to greater effects on residents in Creeting St Peter. The Project focuses specifically on supporting and enhancing the 400 kV transmission system in the area (as described in the 2025 Strategic Options Backcheck Report **(7.17 Strategic Options Backcheck and Review [APP-355])**); any connection to local generation or distribution systems would be considered via an appropriate network connection application. Other energy developments that are proposed and come forwards in the future within the eastern region would be subject to their own consenting and / or approval process which would likely need to provide their own cumulative assessment and implement any appropriate mitigation to avoid, prevent, reduce and / or offset (where relevant and appropriate) adverse effects on communities and the environment.
53.	Cumulative effects	The councils disagree that no cumulative effects are likely for health & wellbeing or socioeconomics, as the applicant states.	The cumulative effects assessment has been undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and the **6.20 Scoping Opinion [APP-297]** which follow the Planning Inspectorate's Advice Note 17 Cumulative Effects Assessment[32].
54.	Farming Impacts	Both districts are predominantly agricultural in nature with a significant number of food and fuel crop producing operations. Recognising the government's repeated statement of the need to protect best and most versatile agricultural land, the councils have concerns regarding the impact of the development on agricultural operations which must be safeguarded and the potential for resultant land sterilisation which must be appropriately mitigated.	During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. The Applicant has sought to minimise impacts on Best and Most Versatile land and proposes to implement mitigation measures to protect soil resources **(5.6 Planning Statement [APP-085])**. Temporary disruption to farming operations during construction would be reduced through good practice, such as: maintaining/providing alternative access and water supplies, reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04, and AS05 within the **7.2 Outline Code of Construction Practice [APP-300]**). All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project, as stated in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**.
55.	Farming Impacts	The application documents acknowledge the potential for restrictions to agricultural activities over or adjacent to buried cables and beneath overhead lines but no mitigation of this effect is described, rather, compensation agreements are proposed. The Councils are concerned that the project has the potential to restrict the effective undertaking of agricultural operations across such a large area.	**6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** notes that all land required temporarily would be reinstated, and effects on farming operations during the construction phase would be managed through compensation agreements to allow landowners to claim for loss of income as a result of the Project (which lie outside of the Environmental Impact Assessment process). More information about compensation and how it is applied can be found in the National Grid Land Rights Strategy document. Landowners can also refer to the compensation code which applies to landowners directly affected by the Compulsory Acquisition or Temporary Possession Powers and would in principle be entitled to statutory compensation in accordance with the statutes known as the Compensation Code.

[32] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment*

Row ID	Topic	Comment	National Grid's response
			During operation, as stated in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, there would be some restrictions in relation to buried cables. Given the depth of the cables, this relates to the planting of trees which would be restricted over, or within 10 m of, underground cables. This would not restrict standard agricultural operations, including land drainage which would be reinstated by the end of the construction programme.
56.	Draft DCO	The councils acknowledge the external legal advice on the draft development consent order sought by Suffolk County Council, as set out in that party's relevant representation.	The Applicant notes this comment.
57.	Draft DCO	Sch 4 1(1) 28 days for decision is not practicable. The councils request a minimum of 35 days to be consistent with the Bramford to Twinstead 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 Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of the Applicant. In each instance, the **3.1 Draft Development Consent Order [APP-056]** allows for the relevant decision-making authority and the undertaker to agree 'such other period' as may be appropriate in the circumstances. Likewise, 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. Although a longer 35 day period is used on the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, 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. 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.
58.	Draft DCO	Similarly, Sch 4 2(2) and (3). The councils request a minimum of 7 business days to be consistent with the Bramford to Twinstead consent.	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.
59.	General	The councils consider the Norwich to Tilbury project, as part of the wider Great Grid Upgrade, to be an appropriate opportunity to enable delivery of sustainably planned local generation and storage for focused local distribution and consumption to meet the government's priorities for a decarbonised economy and to contribute to the challenge of fuel poverty.	National Grid has a statutory duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS). 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 a new East Anglia Connection Node (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 2030 report published in November 2024. The needs 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 gene. It is not within National Grid's remit to enable delivery of sustainably planned local generation and storage for focused local distribution and consumption.
60.	Other Developers	*Bramford substation* Given the volume and nature of reasonably foreseeable development at and around the Bramford substation a strategic approach to the project design and delivery, having regard to the cumulative impacts and interactions with other developments in the area, is considered necessary to minimise impacts on the	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

Row ID	Topic	Comment	National Grid's response
		surrounding communities, public safety, landscape, heritage and highway network. A strategic approach to project design, in a similar way as has emerged as part of Norwich to Tilbury with the North Falls and Five Estuaries projects, is necessary to coordinate the scheme with other relevant and reasonably foreseeable development projects in the area in order to minimise impacts and maximise potential benefits to be realised from such significant and disruptive works. As well as the impacts of consented and reasonably foreseeable developments, the councils have concerns regarding the potential for the project to result in further uncoordinated development seeking to connect to Bramford substation and the new East Anglia Connection Node.	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 effects with the two generation customers support a co-ordinated and cooperative approach that lowers overall costs and environmental effects. There is however no basis to require the Applicant to consider an overarching plan for undefined third party speculative future developments. Other unknown future development that comes forwards and seeks to connect into Bramford Substation would be subject to its own consenting and / or approval process which would likely need to provide its own cumulative assessment and implement any appropriate mitigation to avoid, prevent, reduce and / or offset (where relevant and appropriate) adverse effects on the environment.
61.	Cumulative effects	The councils disagree that no cumulative effects are likely for health & wellbeing or socio-economics, as the applicant states.	The cumulative effects assessment has been undertaken in accordance with the **EIA Scoping Report (6.19 Scoping Report [APP-288-APP-296])** and the **EIA Scoping Opinion (6.20 Scoping Opinion [APP-297])** which follow the Planning Inspectorate's Advice Note 17 'Cumulative Effects Assessment'.
62.	Health & safety impact	Bramford substation In particular, the councils expect NGET to demonstrate measures are in place to protect residents, amenity, businesses, the highway network, landscape and environment having regard to the need to safeguard access to the sub station in the interest of resilience of the transmission network as critical infrastructure.	The Applicant remains committed to acting as responsible developer and will always strive to deliver our projects with the interest of the communities we serve in mind. Following a thorough assessment, the access to Bullen Lane has been incorporated into our Project traffic management strategy. We will make every effort to manage vehicle movements in a way that minimise disruption to daily life, while maintaining safe and reliable access for local residents and businesses for the duration of our construction activities. Equally important is the need to maintain uninterrupted access to the Bramford Substation. This is essential for routine operational activities, scheduled maintenance and emergency interventions, all which underpin the resilience of the electricity transmission network. Bramford Substation plays a critical role in supporting energy security across the East of England, and we are committed to ensuring that this function is never compromised. We appreciate the significance of these considerations and will continue to work collaboratively to balance Project delivery with community needs and infrastructure integrity.
63.	Overhead lines	Bramford to Dedham Vale National Landscape Babergh District Council welcomes the proposed funding of a feasibility study for the removal/rationalisation of existing 132kV overhead lines east of Bramford Substation.	The Applicant notes the respondent's feedback.
64.	Community benefits	The councils recognise the emerging position from government towards a package of recommendations for community benefits from electricity transmission infrastructure development, including the Bill Discounts Scheme. If the districts' communities are to host this development NGET should offer a reasonable, proportionate and practicable package of community benefits, outside the scope of the necessary and expected mitigation and compensation measures for the DCO.	The Government has published guidance on community funds for transmission infrastructure (Department for Energy Security and Net Zero (DESNZ, 2025). In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025).
65.	Control documents	It is imperative that, should the project be consented, delivery and maintenance activities are adequately and appropriately controlled through the prior approval of clear, precise and enforceable control documents in order to protect the amenity and wellbeing of the districts' communities.	Schedule 3 of the **3.1 Draft Development Consent Order [APP-056]** contains the draft Requirements proposed for incorporation if the application for development consent were granted. A number of draft Requirements include elements which would require the submission of, and approval by, the relevant Local Planning Authority prior to the commencement of the Project as well as those that the Applicant must comply with during construction.

Row ID	Topic	Comment	National Grid's response
			The requirements secure mitigation commitments from the Environmental Statement, provide the mechanism for agreeing detailed design where necessary, provide legal certainty and compliance controls, and provide practical controls for the construction and operation phase. The draft Requirements will be subject to examination and may, as a result, be amended.

Appendix D.
Basildon Borough Council

nationalgrid

Appendix D
Basildon Borough Council

Basildon Borough Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the Relevant Representation (RR) provided by **Basildon Borough Council [RR-0335]**.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (**5.9.12 Draft Statement of Common Ground - Basildon Borough Council [Revision B]**), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table D1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Cumulative Effects	The route has a direct impact on the Dunton Hills proposal. Dunton Hills Garden Village is a cross-boundary allocated strategic housing site in Brentwood and runs along the boundary of Basildon, and is directly impacted by the Norwich to Tilbury route. It is dealt with directly by a separate dedicated application.	The Applicant has considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. We consider it possible for the overhead line to co-exist with the housing proposals and the Applicant has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village (DHGV) housing proposals. No alternative connection route is appropriate to either east or west due to the extent of urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. The Applicant also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. The Applicant continues to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the Applicant's position is that the Project will not impede or inhibit the development of DHGV.
Planning Policy	Dunton Hills Garden Village (DHGV) is an allocated strategic housing site (Policy R01) in the Brentwood Local Plan adopted on 23rd March 2022 to deliver circa 4000 new homes together with associated infrastructure. This allocation was identified to meet the majority of Brentwood's housing need, within the Plan period and beyond. In support of this policy objective, Brentwood Borough Council approved the Dunton Hills Supplementary Planning Document in January 2023 (SPD). Brentwood is in the process of reviewing its adopted Local Plan accordingly. Basildon is in the process of preparing a New Local Plan to guide future development and Basildon also made a joint Expression of Interest to the New Towns Task Force earlier this year. This illustrates future growth potential in this area, which will look to Basildon as the largest sub-regional town centre in the area and one of the largest economies in Essex, as a focus for redevelopment. It is imperative that Norwich to Tilbury does not impede or inhibit growth potential for Basildon and the surrounding areas.	The Applicant considers it possible for the overhead line to co-exist with the housing proposals and has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village housing proposals. No alternative connection route is appropriate to the east or west due to extensive urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. We also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. We continue to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the Applicant's position is that the Project will not impede or inhibit growth potential. National Grid is aware of the emerging Basildon Local Plan and has made representations on the emerging plan on Regulation 18 Consultations (November 2024 and November 2025). Whilst responding primarily on matters pertaining to emerging allocations H11 and E5, National Grid sought to confirm that there should be no reason why the allocations referred to cannot be successfully developed alongside the Norwich to Tilbury Project.
Cumulative Effects	To understand the potential viability implications of the Norwich to Tilbury route on Dunton Hills Garden Village, a Viability Impact of N2T on Dunton Hills Garden Village, Stage B Report was commissioned and issued by Savills in August 2025. It states: "Provisional assessment suggests that the introduction of overhead pylons has a material impact on residual land value with a reduction in the order of £17.5m to a policy compliant scheme (Assumes no additional cost associated with pylon infrastructure).	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. This includes **5.1 Consultation Report [APP-066]**, **5.15 Design Development Report [APP-122]**, **7.17 Strategic Options Backcheck and Review [APP-355]**, **7.18 2022 - Corridor and Preliminary Routeing 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**

Topic	Summary of matters raised	National Grid's response
	It is recommended that further sensitivity analysis be used to review the impact of changes to both development revenue and costs. At this stage we would advise that viability is held under continuous review to reflect any changes in the underlying assumption base pending the outcome of viability negotiations between the Applicant and Council. The appraisal work carried out is able to form the basis for additional sensitivity in helping to determine scheme viability and the level of planning obligations which may be reasonably supported." The marginal viability of the proposed development of Dunton Hills Garden Village (DHGV) could impact the provision delivery of affordable housing and necessary infrastructure. As such we request that viability reviews are regular, and reflect any changes in the underlying assumptions.	**Development Report for the Project [APP-359]** and **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**. The Applicant has adequately considered any potential impact of the Project on DHGV, in line with National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024) and the Holford Rules, and it does not consider that it will result in any significant impact with regard to the viability of the development. This position is supported by the Relevant Representation submitted by the new landowner, LIH Dunton Hills Limited **[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.
Cumulative Effects	Additionally, as the marginal viability of the proposed development of Dunton Hills Garden Village (DHGV) could impact the provision delivery of affordable housing and necessary infrastructure, we request that all means to mitigate the impact of the OHP scheme be pursued, including the securing of an underground solution to minimise the viability and deliverability of, both, DHGV and adjacent Basildon Local Plan housing (H11) site, which is also designed to meet the Garden City standards. It should also be understood that this housing allocation forms part of the wider growth ambition of Basildon Borough Council in our intent to meet the Government's revised Standard Method of housing allocation. Norwich to Tilbury must not inhibit the community development potential for Basildon.	The Applicant has considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. The Applicant considers it possible for the overhead line to co-exist with the housing proposals and has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village housing proposals. No alternative connection route is appropriate, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. We also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. We continue to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the Applicant's position is that the Project will not impede or inhibit the community development potential.
Needs Case	The Applicants assert that the project is required to be delivered by 2030 to meet Government targets and contract and/or licensing requirements. Conversely, the independently commissioned (Essex, Suffolk and Norfolk County Councils) Hiorns report (November 2023) suggested that having regard to the realities of when connection of new generation sources to the transmission network was likely to be required, an exceedance of current or committed transmission network capacity (including the Bramford to Twinstead Reinforcement which is currently underway) was not likely before 2035.	At each key stage of the consultation and submission process the Needs Case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Transmission Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 in as set out in **Strategic Options Backcheck and Review [APP-355**]. The timing and urgency for electricity infrastructure is referred to within The Overarching National Policy Statement for Energy (EN-1) *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.* The National Policy Statement for Electricity Networks infrastructure (EN-5) 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.*

Topic	Summary of matters raised	National Grid's response
		2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested. **7.19 2023 - Strategic Options Backcheck and Review [APP-357] Appendix A Page A3** sets out the Applicants Transmission Owner Licence obligations providing detail to the duties referred to within The National Policy Statement for Electricity Networks infrastructure (EN-5) Condition D2: *"Obligation to provide transmission services",* which includes *"responding to requests for the construction of additional transmission system capacity".* Condition D3 *"Transmission system security standard and quality of service"* which includes "*Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')"* Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS are in place. The factors above show the 2025 updated Needs Case continues to indicate the urgent need for reinforcement for both Contracted and ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report was published in April 2024 and is available on the Project website. In summary we do not accept the Report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register. Furthermore, 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.
Landscape and Visual	The current application proposes predominantly 50m high lattice pylons, with targeted AC undergrounding in the Dedham Vale National Landscape. As such, the scheme as put forward would have very significant impacts including landscape and visual.	The Applicant notes this comment. The Landscape and Visual Impact Assessment set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement - Chapter 13: Landscape and Visual [APP-226]**.
Alternatives	If indeed the timing for the network reinforcement is less acute as suggested in the Hiorns report, The Council consider that alternative schemes to the current lattice pylons scheme should be explored in more detail (such as off-shore and High Voltage Direct Current undergrounding) to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme, and if so, put forward at pace to achieve the required network reinforcement instead of the submitted scheme. In order to be satisfied that the Applicant has properly considered alternatives, the Examining Authority will need to consider evidence about the timing of delivery of the project, and whether the Applicant's position is robust.	Please refer to the Applicant's response above, regarding the timing for network reinforcement and the Hiorns report. On the broader question of alternatives, the development of the Project from consideration of alternative 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. This includes **5.1 Consultation Report [APP-066]**, **5.15 Design Development Report [APP-122]**, **7.17 Strategic Options Backcheck and Review [APP-355]**, **7.18 2022 - Corridor and Preliminary Routeing 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]** and **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**. Alternatives in the context of the Environmental Impact Assessment Regulations have been described in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**. We have been consistent in our consideration of the evidence in the context of the relevant policy and made changes to the Project in terms of technology choice, routeing and siting.
Socio-economics Recreation and Tourism	Basildon Council 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	**6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** sets out the assessment on businesses (Table 15.22, Table 15.28 and **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]**), local economy (paragraph 15.7.2 to 15.7.12), local services (Table 15.21 and Table 15.27) and tourism economy (paragraphs 15.7.15 to 15.7.19)

Topic	Summary of matters raised	National Grid's response
	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.	which were undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**. Construction effects on businesses are predicted to range from moderate adverse to minor adverse; local economy range from negligible to minor beneficial; local services with minor adverse; and tourism economy with negligible adverse with mitigation in place. Operational effects on businesses are predicted to range from moderate adverse effects to neutral effects; and neutral effects on local service. The assessment of cumulative effects on the local economy is set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** (paragraph 17.5.63) which concludes cumulative effects on socio-economics, recreation and tourism would not be significant.
Socio-economics Recreation and Tourism	It is essential that National Grid proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. A coordinated approach to infrastructure planning and delivery, including co-location and alignment with other schemes, will be vital to reducing adverse effects and maximising socio-economic benefits for the region. The potential socio-economic impact of the Norwich to Tilbury proposal is substantial. This development forms part of a wider cluster of NSIPs in and around Essex, which are critical to achieving national net zero targets and supporting post-pandemic economic recovery. Given the acute national and local skills shortages, the employment and skills benefits—both during construction and operation—are significant and must be fully recognised and planned for. We support the calls by Essex County Council to request National Grid to provide detailed labour market demand data as early as possible. This will allow for timely coordination with local education and training providers, enabling the development of targeted upskilling programmes and reducing the risk of workforce shortages that could delay project delivery. Also, the request that the applicant should actively engage with relevant partners to mitigate risks associated with skills shortages and consider opportunities for shared apprenticeships, traineeships, and collaborative training programmes across concurrent projects. A strategic approach that considers the wider infrastructure pipeline will help maximise social value and ensure long-term benefits for the local workforce.	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. **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** concludes that the Project would not give rise to significant adverse socioeconomic effects in relation to employment or workforce requirements. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four-year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors or large-scale regeneration schemes. Post- construction job opportunities are limited given the nature of the development. The Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes: • Working with local suppliers and supporting forums, such as Chambers of Commerce • Contributing to a coordinated regional approach to electricity industry jobs and skills planning • Engaging with Local Authorities to understand local priorities and opportunities around skills and employment. These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.
Alternatives	Basildon Council's preferred strategic option is that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHLs) and pylons along its entire length. Basildon, along with ECC considers that option could deliver the best outcome in the interests of safeguarding the amenities of communities and the environment. It is noted that the independent review of the project, the outcome of which was published in the Hiorns Smart	EN-5 requires the Applicant to operate in an efficient, coordinated and economical way[33]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer

[33] Electricity Act 1989, Section 9

Topic	Summary of matters raised	National Grid's response
	Energy Network Report (November 2023) ("the Hiorns Report"), described the Offshore Solution as a credible alternative to that proposed by the Applicant. ECC accepts that this would be a more expensive solution than the Onshore Solution with OHLs, although it would be less expensive than an Onshore Solution with High Voltage Alternate Current ("HVAC") cables.	underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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. As set out above in this table, our response to the findings of the Hiorns Smart Energy Report was published in April 2024 and is available on the Project website[34] and reflects that the Hiorns Report did not take account of National Policy Statements or Transmission Licence Obligations.
Alternatives	In addition, were the timescale for delivery of the Norwich to Tilbury Project to be extended because of less need for transmission capacity in the future, this would provide a greater window within which to consider the viability of alternate solutions to deliver the necessary capacity.	The Applicant has continued to review the Need Case (which encompasses both capacity and programme aspects) over the course of the Project and confirmed the continuing validity prior to the submission of the development consent application. This is explained in Section 2.4 of the **5.15 Design Development Report [APP-122]** with further detail in **7.17 Strategic Options Backcheck and Review [APP-355]**. The Applicant notes that other strategic options may be deliverable but sets out in Chapter 2 of the **5.15 Design Development Report [APP-122]** why these are not progressed. This includes very substantial constraints costs to be borne by the consumer for late delivery, As such we do not agree with the respondent that a greater time window is available and consider the Project as defined to be the appropriate means to address the Need Case consistent with planning policy and our Regulatory requirements.
Cumulative Effects	The Applicant has not adequately addressed the likely significant impact of the Project on the Dunton Hills Garden Village ("DHGV").	**6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** presents an assessment of cumulative effects based on agreed methodology in **6.19 Scoping Report [APP288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**. Dunton Hills Garden Village is assessed within **6.17.A3 Environmental Statement Appendix 17.3 – Inter-Project Cumulative Effects [APP-284]** which concludes significant adverse effects on landscape and visual, agriculture and soils and the historic environment. Significant effects are anticipated owing to landscape and visual effects due to the scale of construction of both sites and the presence of both projects following construction, the agricultural land take required for both projects and the cumulative effect from both projects on a Grade II listed building (1208245).Mitigation is outlined in **7.2 Outline Code of Construction Practice [APP-300]** and **7.3 Outline Landscape and Ecological Management Plan [AS-321].** 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. 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 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-145]** and **5.6 Planning Statement [APP-085].** EN-1 paragraph 4.1.7 provides '… 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'.

[34] National Grid (2024) *National Grid Electricity Transmission Hiorns Report Response*

Topic	Summary of matters raised	National Grid's response
		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 Basildon 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.
Planning Policy	The Applicant has not properly taken this into account in route selection, contrary to Holford Rule 7. ECC provided the Applicant with evidence of the Garden Community Principle and of analysis by Savills (referred to in this submission) that the pylons and overhead lines are likely to have a materially adverse effect on residential values and residual land value (circa £17.5m reduction), with consequential risks to the delivery of affordable housing and essential infrastructure at DHGV and other emerging sites.	The Applicant considers it possible for the overhead line to co-exist with the housing proposals and has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the housing proposals. No alternative connection route is appropriate, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. We also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. We continue to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the Applicant's position is that the Project will not risk the delivery of affordable housing and essential infrastructure at DHGV and other emerging sites. The Applicant is considering the information presented in the Savills report and will submit a response to that to the Examining Authority in due course.
Alternatives	We believe that alternative solutions, including undergrounding or different pylon design, should have been assessed in line with the mitigation hierarchy and principles of good design in NPS EN-1 and EN-5.	The Applicant has set out above how the Project has been developed in accordance with its duties under the Electricity Act and with the relevant EN-5 policies on undergrounding. The development of the Project from consideration of alternative strategic options (offshore, onshore underground High Voltage Direct Current, etc.) through to alternative pylon types and detailed siting of individual elements has been comprehensively set out in documents published in support of consultation and the development consent application. This includes **5.1 Consultation Report [APP-066]**, **5.15 Design Development Report [APP-122]**, **7.17 Strategic Options Backcheck and Review [APP-355]**, **7.18 2022 - Corridor and Preliminary Routeing 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]** and **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**. Alternatives in the context of the Environmental Impact Assessment Regulations have been described in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**. 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].** 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. 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'*. 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 CNP presumption in section 4.2 of EN-1, as set out above in this table.
Cumulative Effects	It is our view that this current preferred alignment fails to mitigate locally significant effects on DHGV and surrounding allocations and thereby undermines the planned delivery of housing and infrastructure in Brentwood, Basildon and Thurrock.	The Applicant considers it possible for the overhead line to co-exist with the housing proposals at DHGV and has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the housing proposals. No alternative connection route is appropriate, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. We also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. We continue to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the Applicant's position is that the Project will not risk the delivery of housing and infrastructure at DHGV and other emerging sites.

Topic	Summary of matters raised	National Grid's response
		6.17.A3 Environmental Statement Appendix 17.3 – Inter-Project Cumulative Effects [APP-284] following the application of the mitigation hierarchy concludes there would be residual significant adverse effects on landscape and visual, agriculture and soils and the historic environment on the Dunton Hills Garden Village allocation. The Project has complied with policy requirements and therefore there is no requirement to consider further mitigation. 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, as set out above in this table. This concludes, in summary, that the residual environmental effects identified by Basildon 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.

Appendix E.
Braintree District Council

nationalgrid

Appendix E
Braintree District Council

Braintree District Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the **Relevant Representation (RR) [RR-0383]** provided by Braintree District Council.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (**5.9.9 Draft Statement of Common Ground – Braintree District Council [Revision B]**), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table E1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
General	1.7. In terms of an overall position on the NSIP, the Council currently object to the application owing to a lack of sufficient information as detailed within the relevant representations below.	The Applicant notes this comment.
Need case	2.2. The Council has previously raised concerns regarding uncertainties surrounding the timeframes for planned future connections stated by the Applicant. Furthermore, the Council requested that a further review of the contracted electricity generation was provided to assess whether the contracted position, and the readiness of projects to connect to the electricity network as planned, is robust. By so doing, this would either reaffirm the need and timescale for the planned Norwich to Tilbury reinforcement, or provide a greater window within which to consider the viability of alternative solutions to deliver the necessary electricity network capacity, as stated in the draft Statement of Common Ground [APP-097]. 2.4. In relation to the general need case for the project, the Hiorns Smart Energy Networks Report concluded that the case for the NSIP project focused solely on the contracted energy generation position to identify the maximum requirement for additional transmission capacity in East Anglia. The report also identified that it is extremely unlikely that all of the contracted energy generation projects would come forward and/or connect at the volumes stated or dates contracted. As a result, the report concluded that there was scope for further analysis of potential options, including a potential offshore HVDC link, and it could not be concluded that the submitted NSIP proposal was the best option of all reasonable alternatives. 2.5. The Applicant responded to that report in April 2024 suggesting that it could not delay its reinforcement of the transmission network beyond 2030 without breaching its contractual and licence obligations. While the Council accept the relevance of those contractual and licence obligations and acknowledge the licence obligations placed upon the Applicant, the Council considers that a further review of the contracted electricity generation is needed (as per the above), to confirm the actual need and timescale for the planned Norwich to Tilbury network reinforcement.	At each key stage of the consultation and submission process the Needs Case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Transmission Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 in as set out in **Strategic Options Backcheck and Review [APP-355]**. The timing and urgency for electricity infrastructure is referred to within The Overarching National Policy Statement for Energy (EN-1) *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.* The National Policy Statement for Electricity Networks infrastructure (EN-5) 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.* **[APP-357] Appendix A Page A3** sets out the Applicants Transmission Owner Licence obligations providing detail to the duties referred to within The National Policy Statement for Electricity Networks infrastructure (EN-5). Condition D2: *"Obligation to provide transmission services",* which includes *"responding to requests for the construction of additional transmission system capacity".* Condition D3 *"Transmission system security standard and quality of service"* which includes "*Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')"* Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS are in place.

Topic	Comment	National Grid's response
	2.6. In this case, the Council does not believe that the Applicant has provided any new evidence or sensitivity testing to refute the conclusion of the Hiorns report, that in fact the network reinforcement offered by the Norwich to Tilbury project is not needed by 2030. While the Council has had regard to the Transmission Entry Capacity (TEC) Register, the Council considers it essential that in determining what future expansion or increased capacity/connectivity is required, more transparency is required about the assumptions as to the status of the contracted connections and what future generation connections are actually likely to be ready to connect to the transmission network by 2030. The Council consider that the Applicant should not restrict the justification for network expansion solely on the ESO contracted position.	The factors above show the 2025 updated Needs Case continues to indicate the urgent need for reinforcement for both Contracted and ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report was published in April 2024 and is available on the Project website. In summary we do not accept the Report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register. Our response to the findings of the Hiorns Smart Energy Report was published in April 2024 and is available on the Project website. And reflects that the Hiorns Report did not take account the requirements set out in the National Policy Statements EN-1 and EN-5 nor Transmission Owner Licence Obligations set out above. 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.
Alternatives	2.7. The current application proposes predominantly 50m high lattice pylons, with targeted AC undergrounding in the Dedham Vale National Landscape. As such, the scheme as put forward would have very significant impacts, most notably in landscape and visual terms. If indeed the timing for the network reinforcement is less acute as suggested in the Hiorns report, the Council consider that alternative schemes to the current lattice pylons scheme should be explored in more detail (such as off-shore and High Voltage Direct Current undergrounding) to ascertain whether they would achieve better environmental outcomes than the current submitted scheme. If so, alternative options could be put forward at pace to achieve the required network reinforcement instead of the submitted scheme.	The Applicant has set out its response regarding the Hiorns report above in respect of paragraphs 2.2 to 2.6 of the RR and does not agree that timing for network reinforcement is 'less acute' than 2030. NPS EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way[35]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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. In relation to the Council's preference for HVDC specifically, National Grid considered such alternatives in the **2023 Strategic Options Backcheck and Review [APP-357],** with all on-shore alternatives of AC overhead Line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC on-shore 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 **Chapter 15 [APP-357]** the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. 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 1800MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault.

[35] Electricity Act 1989, Section 9

Topic	Comment	National Grid's response
		Losing more than 1800MW 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.
Landscape and visual	4.1. The development would have a significant longstanding impact on landscape and visual receptors in the Braintree District. 4.2. Landscape receptors include: • LCA B4: Gosfield Wooded Farmland • LCA B1: Central Essex Farmlands • LCA C6: Blackwater and Brain Valley 4.3. The Environmental Statement (ES) predicts significant landscape effects for each of the landscape character areas during construction, year 1 and year 15. The Council consider this assessment to be correct.	The Applicant notes this comment.
Landscape and visual	4.4. Direct landscape effects are due to result from the removal of existing landscape features and loss of agricultural land, as well as a perceived increase in 'wirescape' elements within a relatively rural area (including new pylons and cable sealing end compounds). 4.5. Construction effects will be magnified by the need for temporary compounds and additional access arrangements, as well as the presence of machinery and material stockpiles.	The approach to the identification of effects is set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**). Direct landscape effects and construction effects are discussed as part of the assessment in **6.13 Environmental Statement Chapter 13: Landscape and Visual [APP-226]**, **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 to 4 [APP-229 to APP232]**.
Landscape and visual	4.6. In terms of visual receptors, these are: • VRA E1 Coggeshall • VRA E2 Feering and Rivenhall • VRA E3 Kelvedon • VRA E4 Silver End • VRA E5 Black Notley and White Notley • VRA E6 Terling and Witham 4.7. In terms of visual value, susceptibility, and sensitivity of these receptors, a more generalist or generic approach has been used, as opposed to categorising groups by activity. This means that it is difficult for the ES to be specific about visual value and susceptibility, and therefore sensitivity. 4.8. In any case, significant visual effects are predicted for five of the six identified visual receptor areas within the district from construction, year 1 and year 15, with the only exception being residents within Kelvedon. This is agreed and further emphasises the scale and nature of the considerable visual change proposed across parts of the Braintree District, which in some areas would include both the proposed Norwich to Tilbury line alongside the existing 400kv Pelham to Rayleigh line.	The approach to the identification of Visual Receptor Areas (VRA) is set out in paragraph 13.4.8 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 locations of all VRAs are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]**. 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 '*A range of receptor sensitivities were identified within each VRA*' and that the '*assessment takes into consideration the highest sensitivity identified*'. This allows for consideration of a worst-case scenario and prevents underplaying judgements of visual effects.
Landscape and visual	4.9. In terms of residential visual amenity, the LVIA [APP-233] examined visual effects on 10no. groups or individual properties within the Braintree District. Of these, 2no. properties were	**6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 & APP-234]** was prepared in line with the Landscape Institute's 'Technical Guidance Note 2/19 Residential Visual Amenity Assessment'[36].

[36] Landscape Institute (2019) Residential Visual Amenity Assessment (RVAA) Technical Guidance Note 2/19

Topic	Comment	National Grid's response
	identified as potentially experiencing effects that may breach residential visual amenity (E7 West Ford Farm Cottage and E8 Whiteheads Farm). In both instances, further assessment concluded that amenity would not be breached. However, the Council are concerned about the visual amenity of E7 and E8, especially taking into account Limits of Deviation (LOD), which as drafted, enable placement of pylons anywhere in the order limits (which in the case of E7 and E8 are adjacent to their residential boundaries). Indeed, the LOD as proposed allow lateral and/or longitudinal variations within the Order Limits, with further flexibility as to vertical limits (height above, and depth below, ground). Any re-positioning of the pylons from the positions shown could have a greater effect on visual receptors, with seemingly little safeguards to prevent or other mitigate any additional harm of/to those visual receptors. 4.10. Furthermore, it is noted that the LVIA does not identify a single breach of residential visual amenity across the full length of the route from Norwich to Tilbury. While the Council hasn't assessed other City/District/County areas, this does seem highly unlikely given the nature of the project and the LOD. Owing to all of the above, it is requested that the issue of residential visual amenity, in the context of LOD, is explored further by the ExA in an issue specific hearing.	Worst-case scenarios, where a proposed pylon and/or overhead line could be repositioned 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. The garden of property E7 – West Ford Farm Cottage currently lies approximately 152 m from pylon TB93 along the 'centreline of work'. The dwelling lies approximately 165 m away. The worst-case scenario would be the movement of pylon TB93 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 68 m from the property's garden and 87 m from its dwelling (but, importantly, not 'adjacent' to the residential boundary as is stated in Braintree Borough Council's Relevant Representation). It must be additionally noted that in this scenario the pylon is likely to be located slightly further from the property than the measurements given as it would be the pylon's conductors, that hang from it, that would be positioned on the outer extremities of the LoD. In this worst-case scenario the Project would 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. The garden of property E8 – Whiteheads Farm, currently lies approximately 126 m from pylon TB98 along the 'centreline of work'. The dwelling lies approximately 165m away. The worst-case scenario would be the movement of pylon TB98 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 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). It must be additionally noted that in this scenario the pylon is likely to be located slightly further from the property than the measurements given as it would be the pylon's conductors, that hang from it, that would be positioned on the outer extremities of the LoD. In this worst-case scenario the Project would be 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.
Landscape and visual	4.11. In terms of mitigation in the Braintree District, this is limited to sensitive routing and siting of the alignment and Order Limits as well as mitigation planting around the cable sealing end compound. Owing to their size, height and visual prominence, pylons cannot be mitigated, therefore to minimise landscape and visual impacts alternative solutions would be required such as undergrounding. As such, without a drastic change to the proposals, the impacts of the pylons cannot be mitigated. 4.12. Overall, the proposed development would have a longstanding significant (adverse) landscape and visual impact on Braintree District and these impacts should not be underestimated by the ExA when considering the overall planning balance.	The Landscape and Visual Impact Assessment (LVIA), included in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** recognises that there will be significant adverse landscape and visual effects of the Project during its construction and operation (and maintenance). 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 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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.

Topic	Comment	National Grid's response
		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-145]** and **5.6 Planning Statement [APP-085]**. EN-1 paragraph 4.1.7 provides '… *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*'. 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 Braintree District 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.
Ecology and Biodiversity	5.1. The development would have a considerable impact on vegetation in the Braintree District. 5.2. The Arboricultural Impact Assessment (AIA) [APP-236] sets out that within the Braintree District Council area, the following High and Moderate quality trees and groups would require removal, or are constrained by the proposals: • 8 trees proposed for removal with 4 stated as having the potential to be affected/managed. • 1 group to be removed, 25 part-removed, 1 affected/managed. • 12 trees retained with protection measures. • 3 tree groups retained with protection measures. 5.3. It is understood that the above list does not take into account Category C or lower quality vegetation, which is reported to require the removal of canopy totalling 19,028sq.m. However, the Council are not able to confidently interpret what the categories of the removals are based upon, or indeed complete our own independent assessment of the category of each tree/hedge/group, owing to the lack of information contained on the accompanying plans. Further information is required for the tree removals/impacts particularly the reference numbers for the trees on the plans, so that a full assessment can be made of any likely losses.	Section 13.3.8 of **6.13.6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]**, confirms the exclusion of Category C trees is in line with the agreed scoping method, as per **6.20 Scoping Opinion [APP-297]**. The canopy area of Category C trees has been included within Table A13.6.1. Volume 2 plans (**2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**) show tree loss for the current alignment as it progresses into detailed design. Commitment reference B13 in **7.4 Outline Landscape and Environmental Management Plan [AS-046]** states a tree survey will inform construction exclusion zones as a result of any changes to the baseline.
Ecology and Biodiversity	5.4. In addition, the Council consider that Requirement 8 (retention and removal of trees, woodland and hedgerows) of the Development Consent Order (DCO) [APP-056] should be strengthened to include the submission of arboricultural method statements and tree retention plans that include root protection areas. As it is currently drafted, all that is required is a plan which shows what is to be retained and removed; this does not give any further underlying important information about how the trees are to be protected, such as root protection areas and arboricultural method statements. The Requirement wording is similar to that of the Bramford to Twinstead NSIP (PINS reference: EN020002) and there have been numerous difficulties at the Discharge of Requirement stage trying to resolve issues of tree/hedge protection and removal.	**6.13.6 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 [AS-046]** for further information. Section 7 of **7.4 Outline Landscape and Environmental Management Plan [AS-046]** makes reference to the production of an Arboricultural Method Statement (AMS) 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 **6.13.6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]**. Commitment reference B13 in **7.4 Outline Landscape and Environmental Management Plan [AS-046]** states a tree survey will inform construction exclusion zones (informed by root protection areas) as a result of any changes to the baseline.

Topic	Comment	National Grid's response
Ecology and Biodiversity	5.5. In addition to the above, the Council consider that there should be an element of due diligence built into Requirement 8 to minimise hedgerow and tree loss as far as possible by optimising routing and access designs at the appropriate stage. It has become apparent that during the Bramford to Twinstead Discharge of Requirements, there have been extensive and, in the Council's opinion, excessive hedgerow and tree losses (i.e. more than was reasonably foreseen and/or reasonably required to facilitate the development). This due diligence would (or should) also result in less disturbance to rural residents by minimising loss/removal and, in turn, reduce road closures necessary to carry out the removal etc.	Section 13.1.16 of **6.13.6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]** states that '*during detailed design the impacts to trees are likely to reduce*'. There are numerous commitments set out in **7.2 Outline Code of Construction Practice [APP-300]** that seek to minimise impacts to vegetation, for example commitment B13 states '*There will be a refinement post-consent, that within the provisions of the Outline LEMP (document reference 7.4) aims to further reduce vegetation losses prior to pre-commencement.*'
Ecology and Biodiversity	5.6. Any replacement planting needs to be in the right place with the right species mix, be disease-resistant and have suitable provisions in place for aftercare, particularly in respect of watering, to help ensure that any new planting survives. Consideration should also be given to securing replacement planting as soon as possible.	Section 9.2 of **7.4 Outline Landscape and Environmental Management Plan [AS-046]** provides details of landscape reinstatement plans including aftercare. Replacement planting will occur at the earliest opportunity and no later than the first available planting season after that part of the authorised development is first brought into operational use.
Ecology and Biodiversity	5.7. Changes to the order limits during the pre-application stage have enabled the retention of veteran tree T820 which is welcomed. However, there are various operations within the root protection area of this tree. Veteran trees are sensitive to changes in ground conditions, so this veteran tree (and any other veteran trees) will need sufficient protection during the construction phase of the development. This only adds further weight to the strengthening of Requirement 8 to include additional details of tree protection during construction.	Table 7.1 of **7.4 Outline Landscape and Environmental Management Plan [AS-046]** references design refinement and the requirement for protective measures set out in **7.2 Outline Code of Construction Practice [APP-300]**. **7.4 Outline Landscape and Environmental Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** states '*108 veteran trees and all veteran tree groups will be retained with appropriate mitigation measures in place*.'
Ecology and Biodiversity	5.8. Ancient Woodland's Rivenhall Thick and Mann Parson Wood have been shown within the Outline Landscape and Ecological Management Plan as having minor removals required to facilitate the scheme. This is accepted in principle subject to the same comments above.	The Applicant notes this comment.
	5.9. As part of their compensatory package, the Applicant is committing to replacement tree planting on a 3:1 ratio, meaning that for every one tree which is lost, three will be planted. The mechanism to secure this tree planting is however yet to be agreed and discussions are ongoing with the Council and the Applicant. Consideration should also be given to the use of CAVAT (Capital Asset Value for Amenity Trees) in assess losses and what compensatory planting ratio could be used.	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** (LEMP) **[AS-046]** which 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 final LEMP (if provided within Environmental Areas) or the Reinstatement Planting Plan 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, offsite provision may be required. Any offsite tree planting required as a result of this commitment will be secured via a legal agreement. The comments are noted regarding Capital Asset Value for Amenity Trees (CAVAT); however, the Applicant is not undertaking this assessment given the 3:1 commitment.
Ecology and Biodiversity	5.10. Notwithstanding the mechanism, replacement tree planting should utilise stock size of a minimum of 10-12cm girth and be sourced from a suitably bio secure tree nursery. An adequate programme of maintenance and aftercare to ensure successful establishment comply with British Standard BS8545 is essential.	Planting Schedules are included in **7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324]**. These include indicative planting lists and sizes, with proposals for the inclusion of some Select Standard trees (10 to 12 cm girth, 3.0 to 3.5 m height, clear stem 1.75 to 2 m). A mix of sizes are suggested to provide diversity in terms of growth stages and sizes. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** provides details on the approach to planting and aftercare in Sections 9 and 10. Further details will be provided in the final LEMP(s).

Topic	Comment	National Grid's response
Arboriculture	5.11 Overall, while the Council acknowledge the information submitted within the reports, further information is required for a full assessment of the arboricultural impacts in the Braintree District, as well as strengthening to Requirement 8	The arboricultural assessment **in 13.6: Arboricultural Impact Assessment [APP-236]** is sufficient and appropriate in supporting the application at this stage as the scheme progresses into detailed design. Section 8.2.3 of **7.4 Outline Landscape and Environmental Management Plan [AS-046]** (Outline LEMP) confirms that following detailed design and prior to construction, relevant surveys will be undertaken to reduce removal of trees/hedgerows as far as practicable, recorded as mitigation measure GG14 within **7.2 Outline Code of Construction Practice [APP-300]**. In addition, the Outline LEMP confirms all construction elements likely to impact on retained trees will be addressed within an Arboricultural Method Statement to be produced following detailed design and agreed with the relevant Local Planning Authorities prior to construction activity commencing.
Ecology and Biodiversity	6.1. The Council consider that the scope of survey results presented is generally comprehensive and compatible with the survey methodology as was presented within the PEIR. There are however areas of survey which are still ongoing, and final conclusions will not be able to be reached until a full dataset is provided (some of which is expected to be submitted prior to examination).	Survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.
Ecology and Biodiversity	6.2. Residual impact assessments should be more transparent by providing assessments of predicted impacts in the short - medium terms and not just long term.	The impact assessment, which includes short, medium and long-term impacts, is detailed within in the *'Pathway to Effect and Significance of Effect*' column of Table 8.23 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The residual effects column identifies how the receptor is affected in the long term with mitigation in place, in line with the assessment methodology agreed at the scoping stage.
Ecology and Biodiversity	6.3. The Order Limits within Braintree District include only one 'Important' hedgerow as defined by wildlife and landscape criteria under the Hedgerow Regulations 1997. This is however not to diminish the importance of retaining as many trees and hedgerows as possible (as per arboricultural section above).	Noted. There are numerous commitments set out in **7.2 Outline Code of Construction Practice [APP-300]** that seek to minimise impacts to vegetation, for example, commitment B13 states '*There will be a refinement post-consent, that within the provisions of the Outline LEMP (document reference 7.4) aims to further reduce vegetation losses prior to pre-commencement.*'
Ecology and Biodiversity	6.4. Some potential impacts on protected species are not yet fully measured and would be required to do so post consent. However, impacts on bats need to be assessed before a lawful decision is reached. Further information is required to give reasonable confidence in the assessment of the impact on bats and whether the proposed mitigation would be appropriate. While climbing will not be possible for every tree, further bat surveys should be possible to allow for a data-based estimation of the percentage of the PRF-M (Preliminary Roost Features - potential) trees that evidently (or very likely) support a significant level of bat roosting and will be lost to this NSIP project.	The bat roost survey scope was agreed with Natural England in advance of survey being undertaken. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** includes a reasonable worst-case assessment of impacts on potential roost features. Barbastelle bats are the rarer bats in the area that could be affected by the Project and so targeted surveys have been undertaken to confirm whether these bats are roosting in trees affected by the Project including aerial surveys, emergence, back-tracking and radio tracking. Where roosts have been confirmed for barbastelle bats the route was amended to avoid these roosts. 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, will be employed under licence to ensure no impact on the favourable conservation of bats.
Ecology and Biodiversity	6.5. In terms of mitigation, the reliabilities of the residual ecological impact predictions stated within the ES Chapter 8, Table 8.23 are dependent upon the correct execution of the prescribed 'Standard' and 'Additional' mitigation measures. However, phrases of "where practicable" (and other proviso-type equivalents) are included in multiple of the mitigation measures / environmental commitments. This means that any provisos to applying mitigation will be open to subjective interpretation of necessity and could therefore see varying degrees of diligence.	The mitigation measures are to be delivered through the implementation of **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The use of the phrase *'where practicable*' provides the flexibility required for a project of this scale at this point in the Project. Once detailed design has been developed, the Final Landscape and Ecological Management Plan and Code of Construction Practice would provide more certainty on any exceptions.
Ecology and Biodiversity	6.6. Suitably qualified Ecological Clerk of Works (ECoW) should therefore be employed for the project to ensure that the mitigation is correctly applied. A further commitment is therefore required to ensure that any employed ECoW is in fact suitably qualified. Given the scale of this proposed development is as large as it is,	The Ecological Clerk of works (ECoW) would be suitably qualified based on industry good practice. Protected species specialists would also be used where required as identified within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.

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	the negative consequences from the poor execution of mitigation could become cumulatively significant.	
Biodiversity Net Gain (BNG)	6.7. In terms of Biodiversity Net Gain (BNG), this is something which is being offered by the Applicant despite it not being mandatory for NSIP's at the time of submission. While this is welcomed, details remain to be resolved as to where off-site habitat creation will be, how this will be secured and who will be responsible for its ongoing management and monitoring. Discussions continue.	The Applicant has committed to delivering at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits, despite it not yet being mandatory for Nationally Significant Infrastructure Project applications. The exact number of off-site BNG units required will be determined following detailed design and a re-run of the statutory biodiversity metric. The Applicant is committed to delivery of off-site BNG units through third-party providers, with sites registered on the Natural England register, to ensure reliable delivery. Long-term management of these off-site BNG habitats will fall to the third-party providers in line with the habitat management plan for the specific site.
Ecology	6.8 Overall, further surveys are required before the Council can be satisfied that all ecological impacts can be suitability mitigated, while the implementation of mitigation measures needs further work and refinement.	Survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** submitted to the Planning Inspectorate in November 2025. All other survey scopes were agreed / discussed prior to submission with Natural England and / or Local Planning Authorities and no further surveys or changes to survey scopes were suggested. Mitigation was also discussed with Natural England / Local Planning Authorities through the consultation process and **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** includes a reasonable worst-case assessment of impacts on potential features.
Historic environment	7.1. The development would have considerable impacts on heritage assets in the Braintree District.	The historic environment assessment has concluded less than substantial harm to designated and non-designated heritage assets. The assessment has not concluded any substantial harm to heritage assets.
Historic environment	7.2. The project area is split into sections. However, there is no distinction within the Applicant's assessment tables on heritage assets between Districts which results in difficulty determining the effect on individual local authorities. Notwithstanding the above, the ES appears to identify harm to 57 designated heritage assets within Braintree District. This includes inter alia the scheduled monuments at Coggeshall Abbey and Cressing Temple, six Grade I buildings (four at Coggeshall Abbey, two at Cressing Temple) and six Grade II* buildings (Houchin's Farm, Feeringbury Manor and Feeringbury Manor Barn, Newneys Farm, Troys Hall and Rivenhall Place). 7.3. The Council would record here that Grade I buildings are of exceptional interest (and account for ~2.5% of all listed buildings) and Grade II* buildings are particularly important buildings of more than special interest (and account for less than 6% of all listed buildings). The remaining identified 45 Grade II listed buildings are also of special interest. The number and prevalence of listed buildings identified as being harmed by the NSIP proposal are those that form a rich cultural heritage and built-form within this part of rural Essex.	7.2 - **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** are split by District. Braintree is Section E. 7.3 – Assessment of value and description of setting are detailed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**.
Historic environment	7.4. There are no designated heritage assets within the Order Limits, however there many instances where the Order Limits contains areas of land which form part of the setting of designated heritage assets or are in close proximity. 7.5. The heritage harm would be mid-level less than substantial for over 30 designated heritage assets, while the remaining harm would be less than substantial at the lower end for the other assets.	Descriptions of setting are detailed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. 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. In addition, as the Project is classified as critical national priority as set out in section 4.2 of NPS EN-1 (2024) there is a presumption that it 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 EN-1.
Historic environment	7.6. In terms of non-designed heritage assets, the effects of the proposed development on the setting and significance of built non-designed heritage assets have not been carried out by the	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 [APP-208]**. Those

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	Applicant. This omission is significant and requires further clarification to be provided by the Applicant.	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 '*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*'; and in several places there is reference to detail being proportionate to the importance/significance of the heritage asset. The Project therefore considers that it has appropriately complied with relevant policy in the EN-1 regarding assessment of impacts to non-designated heritage assets.
	7.7. The embedded and standard mitigation measures are acceptable in principle. However, in terms of standard mitigation measures, HO6 should be 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 Applicant notes that embedded and standard mitigation measures are acceptable in principle. 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 Pan [APP-321]**. 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.
	7.8. In addition, standard mitigation measure HO7 should be expanded 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 monitor effects.	**6.12 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** did not identify any heritage assets in Braintree that would be impacted by the Project.
	7.9. It is agreed that in many cases, the introduction of measures such as additional planting to screen the proposed development in views from, towards and including built heritage assets would not be desirable where it would have the effect of curtailing or truncating views across an open agrarian landscape setting which contributes to the understanding of an asset's historic function such as a Manor house or farmhouse associated with the surrounding fields and which helps reveal its architectural interest.	Noted.
	7.10. Embedded mitigation measures should be increased at the following assets: • The group at Feeringbury Manor (1306710), including Barn (1123829) • Monks Farm Cottages (1171147) • Pound Farmhouse (1123812) • Hungry Hall Farm (1123868) • The group at Westocks Farm (1168106)	During the operational phase of the Project, Feeringbury Manor and associated buildings, Monks Farm Cottage, Hungry Hall Farmhouse and Westocks Farmhouse are assessed to experience minor adverse (not significant) effects (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]**) and lower less than substantial harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**) and therefore no further mitigation is considered necessary. During the operational phase of the Project, Pound Farmhouse is assessed to experience moderate adverse (significant) effects (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]**) and mid less than substantial harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). As the assessment concludes that only the

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		tops of pylons would likely be visible as a result of existing screening from its garden, no further mitigation was considered appropriate in this location. **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.
	7.11. In all instances, positioning the Order Limits, associated access roads and pylons further away from the listed buildings than proposed would be beneficial, better retaining the current undeveloped, agricultural qualities of their settings and their existing landscape context. 7.12. Where sections of hedgerow are to be removed, as well as other landscape changes, the Order Limits and draft DCO allow for a level of flexibility/variation within the setting of these assets which could have a variable impact. It would be beneficial therefore if detailed landscaping proposals are provided by the application in the areas surrounding the buildings listed in 7.6 above, in order that these can be assessed specifically by the Council and agreed. 7.13. Following 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 Council would request further details 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.	7.11 – See response to 7.13. 7.12 – Details of onsite tree and hedgerow replacement planting will be provided in accordance with the final LEMP (**7.4 Outline Landscape and Environmental Management Plan [AS-046]**) which is secured by Requirement 4 within the draft Development Consent Order (DCO) (**3.1 Draft Development Consent Order [APP-056**]) and subject to approval by the relevant LPAs. 7.13 – Review of the assessment identified 34 listed buildings in Section E/Braintree where a mid less than substantial harm conclusion has been reached for the construction phase impacts (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). As these impacts would be temporary and the construction-related elements of the Project would be reinstated following completion of construction 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 feasibility and risks, cost and programme amongst other factors.
Historic environment	7.14. Regarding additional mitigation measures, the document reads: "11.6.10 As a result of the assessment within this ES, as defined in Section 11.7, additional mitigation is required. Any mitigation for historic buildings or historic landscapes would be secured through the measures set out in embedded and standard mitigation above." 7.15. The Council consider this is ambiguous. It may meant to read 'additional mitigation is not required'. Equally, the Applicant may (fairly) be accepting that 'mitigation is required' (so the word additional should be deleted). Clarification is required on this point.	The existing phrasing is correct and indicates that mitigation for historic buildings and historic landscapes is accounted for in embedded and standard mitigation. Additional mitigation requirements have been identified over and above those set out in embedded and standard mitigation for archaeology, for which paragraph 11.6.11 provides further detail (**6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]**).
Historic environment	7.16. Overall, the development would result in less than substantial harm to 57 designated heritage assets and this harm cumulatively is considerable and must be given appropriate weight in the overall planning balance.	A cumulative assessment was undertaken, as set out in **6.17 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.
Historic environment	8.1. The scheme has potential to impact on a number of known and, as yet unknown, archaeological deposits within the Braintree District.	See responses to 8.4-8.7 below.

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Historic environment	8.2 The Environmental Statement submitted with the application provides further details on the known heritage assets within Essex [APP-209 Document 6.11.A1 Environmental Statement Appendix 11.1 - HE Baseline Report], including two scheduled monuments whose setting may be impacted by the scheme; Coggeshall Abbey (1018865) and Cressing Temple (1002122).	The Applicant notes this comment.
Historic environment	8.3 Despite positive pre-application engagement between the Council and the Applicant team, there remains three areas of concern. 8.4. A programme of geophysical survey and archaeological trial trenching was proposed for areas identified as High Priority due to either design constraints and/or the presence of archaeological remains of potential high significance. To date, of the 6 geophysical surveys proposed within Braintree District, only one has been fully completed. An archaeological evaluation was proposed which has not been completed.	Fieldwork has been ongoing since submission of the application for development consent and now the vast majority of the priority geophysical survey areas are complete. Access has been attempted for all priority survey areas. Any incomplete areas are a result of access not being granted. Trial trenching has also been ongoing and one of the priority areas (Site 012 - Area 50) has been trenched and an interim report has been produced. The council have been kept informed of progress through monthly meetings and on-site monitoring visits for the trial trenching. These results will be submitted into the examination as Supplementary Environmental Information.
Historic environment	8.5. Without a completed programme of archaeological evaluation to establish archaeological potential and inform a robust mitigation strategy, the scheme risks causing avoidable harm to the Historic Environment. An Outline Archaeological Mitigation Strategy (OAMS) and Outline Written Scheme of Investigation (OWSI) has been submitted (APP-328 Document:7.5). The document still needs to clarify the scope and extent of further evaluation required prior to any agreed 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 has been submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information which the council are aware of. At this stage approximately 3000 trial trenches and 1440 ha of geophysical survey have been completed. The phase 2 stage of the geophysical survey and trial trenching will continue in 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 Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination period in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**) already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
Historic environment	8.6. Archaeological mitigation measures are secured through Requirement 5 in the Draft DCO. Should the scheme be granted based on the current levels of evaluation, any DCO condition should explicitly allow for a separate evaluation stage of archaeological work, before securing a detailed investigation stage as mitigation.	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.
Historic environment	8.7. Lastly, in relation to the EIA assessment, it considers the known non-designated heritage assets to be of medium, low and negligible value however without geophysical survey and intrusive evaluation the value of the known and, as yet, unknown archaeological deposits cannot be determined.	The assessment presented in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]** has taken a precautionary approach and assessed non-designated heritage assets where there is potential for archaeology, even if this had not been confirmed by field evaluation. This situation is common for all types of development. There are measures in place through Requirement 5 of **3.1 Draft Development Consent Order [APP-056]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of**

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		Investigation [APP-328] to secure agreement of any further evaluation and/or mitigation prior to the start of works and which provides protection for currently unknown archaeology.
Historic environment	8.8. The Council request that the following additional information is to be submitted: • Submission of all archaeological fieldwork data in a report format prior to the determination of the application • Plan of all completed fieldwork and areas of future evaluation identified and included within the OWSI/OAMS	All completed interim reports and one assessment report (Site 001) for trial trenching were submitted with the application for development consent (**6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213]**). Further interim reports and assessment reports for priority trial trenching areas and the final report for the Phase 1 priority areas geophysical survey were submitted in the Supplementary Environmental Information in January 2026. The assessment reports for the Phase 2 geophysical survey and trial trenching 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 Supplementary Environmental Information also includes a Project-wide figure indicating the progress of the priority evaluation areas (**6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [APP-219]**. The Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination period in consultation with the Local Planning Authority Archaeological Advisors, which will include figures detailing the completed and planned evaluation.
Historic environment	From previous experience where agreement on the OWSI has not been reached at the determination stage of the project, this has led to a significant underestimate of the scope and level of archaeological fieldwork that would be considered appropriate by the Local Authority advisors in order to discharge Requirements. This can cause serious delays and have a significant cost implication for the scheme/project.	The Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination period in consultation with the Local Planning Authority Archaeological Advisors to reach agreement on a final version of the document before the close of examination. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required.
Historic environment	8.10 Overall, further assessment/evidence is required before the Council can be satisfied that archaeological features would not be unduly impacted by the proposals.	The assessment presented in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]** has taken a precautionary approach and assessed non-designated heritage assets where there is potential for archaeology, even if this had not been confirmed by field evaluation. This situation is common for all types of development. There are measures in place through Requirement 5 of **3.1 Draft Development Consent Order [APP-056]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** to secure agreement of any further evaluation and/or mitigation prior to the start of works and which provides protection for currently unknown archaeology. In addition, archaeological evaluation (geophysical survey and trial trenching) has been ongoing since the submission of the application for development consent. The results of the fieldwork up to the end of December was submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information. The assessment reports for the Phase 2 geophysical survey and trial trenching 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]**.
Noise and vibration	9.1. The construction impacts associated with this project have the potential to have significant noise and vibration impacts on residents and businesses in the Braintree District and beyond.	The Applicant does not agree with this statement. The assessment provided in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** indicates that no significant effects from noise or vibration, during either the construction or operational phases, are expected in Braintree District. Additionally, only one significant effect from noise, in relation to construction traffic noise, is expected for the Project as a whole.
Noise and vibration	9.2. This is in part owing to the excessive construction hours put forward by the Applicant which are 07.00 and 19.00 Monday to Friday and 07.00 and 17.00 on Saturdays, Sundays, bank holidays and other public holidays (as set out in Requirement 7(1) of the draft Development Consent Order (dDCO).	The Applicant does not agree with this statement. Although working periods outside of the 'daytime' periods identified in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise[37], as detailed in Section 4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** are more sensitive to noise during the 'daytime' period (hence their lower threshold for potential significant effects), works during these periods would not directly lead to a significant adverse effect. Consideration of the sensitivity of the working period would be required as part of the application of Best Practicable Means as per commitment NV01 within **7.2 Outline Code of Construction Practice [APP-300]**.

[37] 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

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Noise and vibration	9.3. Not only are the construction hours excessive, dDCO Requirement 7(5) would allow for start up and close down activities up to 1 hour either side of the core working hours, with no decibel (db) limit on noise. Finally, there are numerous operations which can be completed outside of the core working hours listed in Requirement 7(4). 9.4. These construction hours, alongside the start-up and close down provision and those activities outside of constructions hours, are far in excess of what the Council would consider to be reasonable and allow no real respite for Noise Sensitive Receptors (NSRs). Moreover, the severity of the construction hours especially at weekends has the potential to understate the significance of effect at Noise Sensitie Receptors (NSRs).	The proposed construction core working hours, activities which can take place outside of the core working hours and the provision for start up and close down activities are available in full in Schedule 3 of **3.1 Draft Development Consent Order [APP-056]** (draft DCO). The working hours are secured through Requirement 7 of Schedule 3 of **3.1 draft DCO [APP-056]**. **3.1 draft DCO [APP-056]** permits a limited range of activities to take place outside the core working hours where this is necessary to ensure public safety, engineering integrity, network reliability, or compliance with third-party requirements, and to minimise overall disruption. 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 nights or weekends to maintain safety and reduce disruption. Provision is also made for the continuation of works to a safe stopping point, the completion of works delayed by severe weather, emergency activities, security monitoring, and necessary survey works. Mechanical and electrical installation works undertaken within completed and enclosed buildings are expected to result in minimal external effects and can proceed outside core hours without significant effects on nearby receptors. The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters that include the core working hours for the construction phase of the Project. **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 [APP-300]**, significant effects from 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. The Applicant therefore considers the provision for start up and close down activities and activities that can commence outside of 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 [APP-300]**.
Noise and vibration	9.5. For example, the NSR located off Old Mill Lane (Threadkells), to the southeast of Coggeshall Hamlet has been identified as a 'Medium' magnitude of impact in terms of construction noise before mitigation. The receptor appears to be approximately 140m from a proposed pylon location (TB78). From Table A14.1.2, Pylon construction noise would be between 60dB – 66dB at the NSR. This could potentially be greater than +5 dB above the ABC category threshold during the weekend and therefore a 'Large' magnitude of impact. This argument could be applied to other NSRs across the route.	This interpretation is partially correct. However, the assessment of weekend construction works within **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** of the ES includes two key assumptions which mean this interpretation is not applicable in practice. 1. Mitigation is assumed for weekend works Weekend and bank holiday periods are more sensitive than weekdays, reflected in the lower threshold of 55 dB LAeq,T (compared to 65 dB for weekdays). The weekday assessment assumes no mitigation as a worst case to identify 'hot-spots' where mitigation is required to avoid significant adverse effects. Applying this assumption to weekends would overstate impacts. Instead, the weekend assessment assumes a reasonable 10 dB attenuation from mitigation, meaning the same 'hot-spot' locations identified for weekdays without mitigation are the same as those for weekends with indicative mitigation (because the difference between the thresholds is also 10 dB). 2.Temporal restrictions, considered as part of Best Practicable Means, are applied where thresholds could still be exceeded with mitigation. This ensures that significant adverse effects do not occur during weekend periods. Implementing mitigation would ensure that significant adverse effects would not occur in this situation, or others like it, as follows:

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		• The Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within **7.2 Outline Code of Construction Practice [APP-300]** • Based on the outcome of these assessments, specific mitigation measures would be identified and implemented. These measures would be documented in the Noise and Vibration Management Plan (NVMP) which will be updated from **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]** submitted as part of the Development Consent Order (DCO) application • Should the resultant construction noise levels exceed the noise level threshold for potential significant effects during any proposed working period (be it 'normal' daytime periods or otherwise), with the inclusion of all practicable mitigation measures, temporal restrictions would be required to either avoid works during that period at that location, or if works during this period cannot be avoided, limit the duration of the works such that the effect is not significant. Such situations may be managed through applications for prior consent under Section 61 of the Control of Pollution Act 1974, though consultation between the Main Works Contractor(s) and the local authority.
Noise and vibration	9.6. In addition, the ES chapter appears to have based its assessment from the locations of the pylons as shown on the works plans. However, this does not appear to also take into account LOD, which as drafted in the dDCO (Article 5 (a)), allow for the deviation from the lines or situations shown on the works plans within the defined order limits. As such, in the example of the receptor on Old Mill Lane, the pylon could in theory be 50m away to the edge of the order limits. There are also other examples of this. As such, it is not apparent that the ES has considered the worst-case scenario for construction noise impacts so the level of effects could be higher than predicted.	The main construction noise and vibration assessment considers the proposed locations of the pylon working areas, as shown on **6.4.F1 Environmental Statement Figure 4.1: Proposed Project Design [APP-133]**. However, the Limits of Deviation (LoD) for overhead lines (and associated pylons) is considered in Section 9 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. It is stated and agreed that movement within the LoD would lead to changes in construction noise and vibration levels (increasing if movement is towards noise sensitive receptors (NSRs), and reducing if further away), without mitigation. However, the mitigation measures would vary accordingly to ensure that significant effects are avoided and adverse effects minimised in line with policy (EN1, Noise Policy Statement for England, the NPPF and Planning Practice Guidance for Noise). It should also be considered that the LoD includes the conductors and the associated conducted swing, as shown in **2.6.2 Design and Layout Plans – Overhead Lines [APP-042]**. As such, in practice, pylons could not be constructed on the outer extremities of the LoD. There are additional constraints, such as roads and buildings, that fall within the LoD due to the conductor span, but where pylons could not be built, as well as pylon location constraints at 'bends' in the route that then inform the locations of subsequent pylons. As such, pylon locations are considerably more constrained in practice than is indicated by the LoD. The LoD has been reviewed and there are no locations where movement towards the edge of the LoD, towards NSRs, would lead to any likely significant adverse effects with the implementation of standard mitigation measures. Furthermore, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within **7.2 Outline Code of Construction Practice [APP-300]** for each specific pylon location, based on its proposed location within the LoD following detailed design processes. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented for each pylon such that significant adverse effects are avoided. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]** submitted as part of the Development Consent Order (DCO) application.
Noise and vibration	9.7. The Council therefore consider further assessment is required to understand the true construction impacts experienced by NSR's. This is pertinent because there may be scenarios where construction activities need to be limited at specific pylon locations. An example of this can be found within the Bramford to Twinstead Development Consent Order, Requirement 7(5) (page 65) (PINS Reference EN020002). Buffer zones should be considered around pylons near sensitive NSR's.	The Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within **7.2 Outline Code of Construction Practice [APP-300]**. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]** submitted as part of the Development Consent Order (DCO) application. These measures may include such restrictions at

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		some locations, if they would avoid significant adverse effects. This same principle has been proposed on other recent National Grid projects, including Bramford to Twinstead and Sea Link.
Noise and vibration	9.8. In addition, the Council consider that at the very worst case, the Norwich to Tilbury construction hours should follow that of Bramford to Twinstead, which are less generous at: 07.00 and 19.00 Monday to Friday and between 08.00 and 17.00 on Saturdays, Sundays and Bank Holiday (one hour later start at the weekend). It should be noted that the Council objected to these working hours at the time of the Bramford to Twinstead NSIP examination.	The proposed core construction working hours for the Norwich to Tilbury Project have been developed to provide necessary flexibility to deliver a complex, largely linear, nationally significant electricity transmission scheme. This flexibility is essential to: • Maintain programme resilience • Respond to weather disruption and access constraints • Coordinate with system outages and asset owners • Avoid prolonging the overall construction period. The Applicant acknowledges the Council's reference to the Bramford to Twinstead project and notes that the Secretary of State accepted construction working hours of 07:00–19:00 on weekdays and 08:00–17:00 at weekends and Bank Holidays for that scheme, despite objections raised during examination. However, it is important to recognise that Bramford to Twinstead differs materially from Norwich to Tilbury in terms of scale, length, construction sequencing and interface constraints. Norwich to Tilbury is significantly longer in extent and involves a greater number of workfronts, which increases the need for flexibility in programming and shift patterns. NPS EN-1 (2024) provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Paragraph 4.11.4 of the EN-1 also confirms that transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure. As set out within **5.6 Planning Statement [APP-085]**, the Project is CNP Infrastructure. The Applicant's position remains that the proposed construction working hours are appropriate and necessary for the delivery of this CNP Project and they are supported by environmental assessment and secured mitigation.
Noise and vibration	9.9. Furthermore, the Council consider that a noise limit should apply to the start up and close down hours at the nearest NSR's – this should be a maximum of 50db and precedent for this is again found in the Bramford to Twinstead DCO Requirement 7(4) (page 65).	There are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and as detailed in Section 4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**.
Noise and vibration	9.10. Finally, in respect of piling (Requirement 7(2)) this restriction should apply to all piling operations (as per Bramford to Twinstead DCO) and not just percussive piling as proposed by the Norwich to Tilbury dDCO.	The Applicant notes the restrictions on the Bramford to Twinstead project. However, such a restriction should be borne out of assessment outcomes, to avoid significant adverse effects rather than blanket restrictions which in some cases may be unnecessary. The assessment of construction noise and vibration detailed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** indicates that there are no likely significant adverse effects from any construction activity, including piling, with the implementation of best practicable means (BPM) to reduce effects. The Applicant would find it helpful if BCC could provide justification to support the reasoning for this comment specific to the Norwich to Tilbury Project.
Noise and vibration	9.11. Standard noise screening reduction of 10dB is shown for fixed plant. However, paragraph 14.7.6 of the ES chapter 14 states that "for the purposes of this assessment, no specific mitigation (such as screening) is included", this needs to be clarified. 10dB is the maximum reduction applied for screening, details of how this will be provided and maintained is not shown.	This comment relates to the inclusion of screening in some plant items in **6.14.A1 Environmental Statement Appendix 14.1 – Construction Noise and Vibration Data [APP-257]**. It is correct that a 10 dB reduction was applied to some fixed plant items, such as generators. However, the inclusion of this screening mitigation does not affect the overall activity noise level. This is because noise from items such as generators, even in an unmitigated scenario, is substantially lower than that from other plant associated with the same activities, and therefore does not materially increase the combined noise level. Additionally, the worst-case activity for each construction phase is considered in the assessment. The outcome is therefore the same irrespective of the inclusion of this screening. However, such items would be expected to be screened, but the outcome of the assessment is not dependent on that being the case.
Noise and vibration	9.12 Overall, the construction phase of the development will have significant noise and disturbance impacts and the Council are concerned that the impacts at NSR's have not been fully	The Applicant does not agree with this statement. The assessment provided in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** indicates that no significant effects from noise or vibration, during

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	assessed. As such, the Council require additional information to be submitted before this issue can be considered further.	either the construction or operational phases, are expected in Braintree District. Additionally, only one significant effect from noise, in relation to construction traffic noise, is expected for the Project as a whole. Additionally, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within **7.2 Outline Code of Construction Practice [APP-300]**. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the Development Consent Order (DCO) application – **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]**. The NVMP would be a working document and would be made available to the Local Planning Authority. Additionally, some aspects of construction noise and vibration may be managed through applications for prior consent under Section 61 of the Control of Pollution Act 1974, though consultation between the Main Works Contractor(s) and the Local Planning Authority.
Air quality	10.1. The construction impacts associated with this project have the potential to have significant effects on air quality for residents and businesses in the Braintree District and beyond.	Following the implementation of mitigation discussed in **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]** and **7.2 Outline Code of Construction Practice [APP-300]** construction impacts would have no significant effect.
Air quality	10.2 The ES assessment assumes that construction dust effects would occur across the full extent of the order limits. Likewise it is assumed where there is uncertainty regarding the scale of earthworks that a 'large' magnitude applies. These are a worst-case approach but are considered appropriate in the circumstances to reduce uncertainty and capture the fullest possible extent of impacts.	The Applicant notes this comment.
Air quality	10.3. The PM2.5 target values in Table 7.1 of ES Chapter 7: Air Quality need to be amended, as these are currently quoted incorrectly. This section should state that the current limit value is 20 µg/m3, with an interim target value of 12 µg/m3 to be achieved by 31/01/2028 and a target values of 10 µg/m3 to be achieved by 31/12/2040.	This has been addressed within **8.1 Errata List [Revision A]**.
Air quality	10.4 Baseline conditions throughout the study area are reported to be good, with concentrations of NO2, PM10 and PM2.5 well below the relevant objectives/target values.	The Applicant notes this comment.
Air quality	10.5 There are some predicted significant dust impacts in the absence of site specific mitigation. However, the residual impacts following the implementation of mitigation at high-risk sites is expected to be not significant. This is agreed but is contingent on the proposed mitigation being fully implemented.	The council's position is noted. There is scope in **7.2 Outline Code of Construction Practice [APP-300]** for agreeing location-specific mitigation measures once construction activities and locations are further developed with the Main Works Contractor(s). This outline management plan would be fully developed based on detailed design information to be provided by the Main Works Contractor(s). The final version would be submitted for approval in accordance with Requirement 4 (construction management plans), in Schedule 3 of **3.1 Draft Development Consent Order** [APP-056] prior to commencement of development. Requirement 4 (construction management plans) secures the implementation of mitigation. This process ensures that detailed design is developed with clear alignment to the principles and procedures within the Outline CoCP.
Air quality	10.6. Meteorological input data has been obtained for 2023 for a single recording station (Stansted Airport). Due to the length of the project route, it is likely that no single recording station would be representative of the whole study area and thus representative stations could be selected based on locality – for example, section E (Braintree District Council) may be better represented by data from Andrewsfield Recording Station which is located	Whilst the geographic extent of the study is noted, the use of data from a single meteorological station is considered to be proportionate given the low predicted pollutant concentrations and low risk of causing air quality objective exceedances, as noted by the Council. Any change or addition of meteorological data sites is not considered to materially affect the conclusions of the study.

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	further east than Stansted. It is noted however (and the Council are prepared to concede) that given that the assessment results are well below the objective levels, it is unlikely that this would change the overall conclusions of the assessment even if it did result in minor changes to the reported concentrations.	
Construction impacts	10.7. It is recognised that there is some uncertainty regarding Nonroad Mobile Machinery (NRMM) emissions associated with the project; the proposed mitigation measures appear appropriate although their likely effect cannot be quantified. The Council have previously suggested that mention could be made of siting of Nonroad Mobile Machinery (NRMM) and ensuring it is compliant with emissions regulations within the Outline Code of Construction Practice (OCoCP). This however has not been implemented and it is suggested the OCoCP is updated to include this. Notably it is included in the Dust Management Plan (DMP). The Council would recommend that section AQ02 in the OCoCP be amended for consistency across related documents	**7.2 Outline Code of Construction Practice Appendix D Outline Dust Management Plan [APP-304]** outlines the measures to be taken to minimise emissions from the use of NRMM with commitments set out in Annex A of the document. As the Local Planning Authority recognises, paragraph A.1.7 confirms that the Project will be carried out in accordance with legislation relevant to generators. Reference to being in accordance with legislation is not included within **7.2 Outline Code of Construction Practice [APP-300]** at AQ02, but instead under GG19 which states that '*Plant and construction vehicles (not including construction worker private vehicles) will conform to relevant applicable standards for vehicle type which will be defined in the CoCP*.' It then goes on to list potential, appropriate standards, including those for NRMM. It is considered that commitment GG19 addresses the concern expressed by the Local Planning Authority about compliance with emission regulations.
Air Quality	10.8 Overall, the general approach to assessing impacts on air quality is accepted, with significant impacts anticipated without suitable mitigation. There are however some points of further refinement / clarification required as set out above.	The Applicant notes this comment.
Contaminated Land, Geology and Hydrogeology	11.1. The data used to inform judgements of baseline conditions needs further clarification and justification. A review of the Contaminated Land Geology and Hydrogeology ES Chapter [APP-181] Section 9.4.2 did not identify a reference to the source(s) of information utilised to identify potentially contaminative previous land uses, although reference to NLS mapping is included in the Biography of the ES chapter. However, Section 9.1.6 of the accompanying Baseline Information and Preliminary Contamination Risk Assessment [APP-182] does make reference to historical Ordnance Survey maps from Envirocheck reports as sources of information but for 'parts of the route' only. As above, the baseline condition data sources require further clarity.	11.1 - The list within paragraph 9.4.2 in **6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]** states the sources of information used to inform the baseline assessment, which include georeferenced historical Ordnance Survey maps from the National Library of Scotland and historical Ordnance Survey maps from Envirocheck reports generally for areas of anticipated undergrounding. This is also included within **6.9.A1 Environmental Statement Appendix 9.1 Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**.
Contaminated Land, Geology and Hydrogeology	11.2. Although the Council would generally agree with the low risk rating awarded to all identified sources of contamination within Section 5 of the site, it is prudent to ascertain the scope of the assessment carried out and the specific information upon which the various low risk ratings were based i.e. did any of the 10No. referenced Envirocheck reports relate to the Section 5 area under BDC's jurisdiction? Further clarity is needed and requested from the Applicant	**6.9.A1 Environmental Statement Appendix 9.1 Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** describes the various sources of information used to inform the assessment for all sections of the Project (including that parts of the Project under Braintree District Council's jurisdiction). The Envirocheck reports were obtained to provide additional information in areas of significant undergrounding/ trenchless crossings and therefore they do not cover Section E (Braintree).
Contaminated Land, Geology and Hydrogeology	11.3 The Council agree with the conclusion of the ES that, in the absence of significant construction activities and associated groundworks within the BDC area (denoted as 'Section E' by the reports), the impacts upon groundwater receptors from minor works such as the construction of access tracks is unlikely to be significant.	11.3 – The Applicant notes this comment. 11.4 - The list within paragraph 9.4.2 in **6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]** states the sources of information used to inform the baseline assessment, which include georeferenced historical Ordnance Survey maps from the National Library of Scotland and historical Ordnance Survey maps from Envirocheck reports generally for areas of anticipated undergrounding. This is also included within **6.9.A1 Environmental Statement Appendix 9.1 Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**.

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	11.4. In summary, the Council note that several of the queries relating to contaminated land, geology and hydrogeology made at PEIR review stage have been addressed by the subsequent ES chapter and that the nature and severity of the risks and impacts identified are generally appropriate. It would however be prudent to establish what sources of information were used to assess risks and impacts within the BDC area and whether this was of appropriate detail. Further information on how potential impacts from Unexploded Ordnance (UXO) would be assessed should also be sought.	The Project falls under the Construction (Design and Management) Regulations 2015 (CDM Regulations). These regulations place specific duties on clients, designers and contractors so that health and safety is considered throughout the life of a project, from its inception to its subsequent final demolition and removal. Under the CDM Regulations, designers are required to avoid foreseeable risks (including UXOs/UXBs) so far as reasonably practicable, by eliminating hazards from the construction, maintenance, and proposed use and demolition of a structure, reducing risks from any remaining hazard, and giving collective safety measures priority over individual measures. Specific 'UXO Threat Assessment' reports have been completed for the Project and they have informed the outline design in accordance with the embedded mitigation measures. The Applicant's assessment of levels of UXO risk across the Project (Low to Medium) based on historical bombing records and ground conditions, with mitigation measures tailored to each risk zone. The mitigation measures proposed within these reports would be followed during construction activities by the Main Works Contractor(s).
Agriculture and Soils	12.1. The development has the potential to have considerable impacts on agricultural land and soils owing to its predominantly rural location.	During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, was a consideration in the route selection process, as outlined in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. Disruption and temporary loss of land from production during construction would be managed through the measures outlined in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**, including reference to compensation agreements. During operation, most agricultural activities will be able to continue. As set out in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**, any limitations to activities over buried cables or under overhead lines would be dealt with through compensation agreements.
Agriculture and Soils	12.2. The predicted Agricultural Land Classification (ALC) approach is robust and provides a greater level of accuracy than having to rely on provisional ALC data. The ability to ground truth the predicted model adds to the robustness of the assessment. There are however some aspects of this approach that may need to be clarified: • The size of area that this method was used for should be clearly started as it is misleading within the assessment. A review of the data shows it has been used for more than two thirds of the site. • The final ALC mapping units look to have been drawn based on the final output of the predictive model alone as the ALC grade for many of the surveyed points has been changed to fit the ALC grade of surrounding predicted ALC points. The ALC grades forming actual surveyed points should have greater weighting in the drawing of final ALC mapping units.	As presented in **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]** and **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**, predictive Agricultural Land Classification (ALC) mapping was undertaken on a 100 m grid across the entire Order Limits, including points where auger surveys had been undertaken. This approach allowed for predictive ALC grading in areas where detailed surveys were not possible, as well as analysis of the accuracy of the predictions (comparing predictive grades against surveyed grades). ALC surveys were undertaken within the Order Limits, along the central alignment; out of a total of 1,877 survey points, 1,011 comprise detailed site surveys and 866 comprise a predictive assessment. Figure A6.1.1 Detailed Agricultural Land Classification within **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]** included an error whereby the surveyed ALC grades were not visible on the ALC map. As a result, it appeared that the final ALC mapping units were derived solely from the predictive model, which was not the case. The ALC mapping units were informed by both survey data and predictive modelling. This error has been corrected, and Figure A6.1.1 Detailed Agricultural Land Classification has been updated in **8.1 Errata List [Revision A]**.
Agriculture and Soils	12.3. The assessment of Agricultural Land and Soil follows recognised assessment methodology, and the Council are in agreement in the outcome of the significance of the assessment. The assessment of temporary impacts does need further clarification as it is unclear whether the agricultural land assessed as permanent land loss has been included within the land total for the temporary land loss. If it has been included, then the assessment is overestimating the magnitude of temporary impacts, however this would not impact on the significance of the effect.	**6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** details the total extent of the Order Limits as 3,755 ha. It was calculated that 3,461 ha of agricultural land would be temporarily removed from agricultural production during construction, while a further 203.1 ha would be lost permanently during operation (including 172.7 ha which is Best and Most Versatile (BMV) agricultural land); the remainder of the Order Limits comprises urban and non-agricultural land. The Applicant can confirm that the permanent loss of agricultural land has not been included within the assessment of temporary land loss.
Agriculture and Soils	12.4. There are no details provided of how the ALC mapping has been used in the micro-siting of permanent infrastructure or	Detailed Agricultural Land Classification (ALC) mapping shown on **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]**, was not available during the route optioneering stage.

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	routing of the transmission network. Comment should be made on whether ALC grade has been considered.	However, during route optioneering, the impacts on agricultural land (including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time) were a consideration alongside all other constraints in the route selection process as outlined in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**.
Agriculture and Soils	12.5. The ALC survey has been carried out following the correct methodology and follows the industry guidance for reporting. There are some areas where the quality of the assessment and approach can be questioned. This is mainly with the number of profile pits for the size of the site and the data collected from these pits. The profile pits are key aspects of the soil survey that are required to accurately determine soil structure and stone content which are critical for wetness and draughtiness limitation calculations. The use of auger borings on their own may miss key characteristics.	As stated in **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]**, the detailed Agricultural Land Classification (ALC) surveys were undertaken in line with the revised ALC guidelines by competent soil scientists following the British Society of Soil Science (BSSS) Professional Competency in Soil Science No.2 - Agricultural Land Classification - England and Wales. A total of 16 soil pits were dug and assessed covering the representative soil types and cross checked with best available data, including descriptions of structure for soil associations and soil series. Undertaking further soil pits was constrained by landowner access issues but it is considered the information gathered is sufficient to support the land grade assessments.
Agriculture and Soils	12.6. The majority of the Councils previous comments have been addressed within the Outline Soil Resource Plan (SRP) with only one comment around the assessment of soil plasticity prior to works commencing. It is best practice to ensure soils are only handled when in the correct state, with only exceptional circumstances for when this is not the case. A change to the SRP is therefore required.	**7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [AP-303]** states in Section 1.7 that soils shall be handled when they are in a dry and friable state or have passed the test for soil plasticity. The Outline Soil Resource Plan also states that handling soils in a plastic or frozen state should only occur in some exceptional cases (for example due to engineering constraints). In such cases, location-specific methods would be agreed with the Soil Scientist prior to work commencing. As such no update to the Outline Soil Resource Plan is required.
Traffic and transport / Agriculture and Soils	12.7. Any temporary haul routes should be designed in such a way to avoid damage to agricultural land, especially any drainage measures which may have been implemented by the landowner. The Council's experience with regard to the Bramford to Twinstead NSIP is that the haul routes appear to be excessive in number and have resulted in excessive hedgerow removal, which could potentially be avoided. In addition, Requirement 10 (reinstatement schemes) should be strengthened to ensure that temporary haul routes are required to be removed following completion of construction. 12.8. The Council request that the Applicant discuss these matters further with the affected landowners should the DCO be made.	The construction of temporary haul roads and storage of excavated materials is detailed within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** with an illustrative detail showing a typical haul road cross section with separated topsoil and subsoil storage included in **2.6.3 Design and Layout Plans - Traffic and Transport [APP-043]**. Haul roads need to be routed adjacent to the proposed works (e.g. the overhead line and underground cable alignments). The haul roads have been routed, where practicable, to minimise impacts on agricultural land (including known private drainage measures), hedgerows and trees but without significantly increasing the route length (which adds additional stone and therefore vehicle movements) and taking cognisance of the above constraint. Details regarding vegetation clearance requirements for the haul road are in paragraph 4.8.37 to 4.8.41 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The Applicant continues to engage and discuss site-specific constraints relevant to the detailed design and construction methodology with affected landowners. Requirement 10 of the **Draft Development Consent Order [APP-056]** secures the reinstatement of land used temporarily for construction, which includes land used for temporary haul roads, to a condition suitable for its former use unless otherwise agreed with the relevant planning authority. The reinstatement obligation includes the removal of temporary works, save for those items specifically excluded for safety, engineering or operational reasons (e.g., foundations below 1.2 m, permanent drainage, ground stabilisation works, or permanent infrastructure associated with the authorised development). Accordingly, the Applicant considers that the reinstatement of temporary haul routes is already secured through the existing Requirements framework, and that no further amendment to Requirement 10 is necessary. Landowners are encouraged to provide as much information as early as possible in relation to any private supplies, drainage and irrigation systems on their land so these can be factored in at the detailed design stage of the Project ahead of construction starting on site, and are asked to raise such information at any meeting with the Applicant lands team who will keep a record and pass on any information. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [AP-303]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored (i.e., for temporary haul routes) to its previous condition, or as agreed with the landowner.

Topic	Comment	National Grid's response
Agriculture and Soils	12.9 In summary, while the Council are generally accepting of the ALC mapping data and soil handling measures, there are some further clarifications required as set out above.	The Applicant notes this comment.
Cumulative effects	13.1. The Norwich to Tilbury development has potential cumulative effects with other projects in the region, notably with regard to construction impacts (disturbance to residents and demands on the labour force), landscape and visual (with existing infrastructure including the Pelham to Rayleigh 400kv Line), and public health (pedestrians, cyclists and horse riders). 13.2. In the Braintree District, this NSIP project would overlap / intersect with a number of projects in the construction stage and/or operational stage. This includes larger projects such as Bramford to Twinstead NSIP (construction phase), the existing Pelham to Rayleigh 400kV overhead line (operational phase), the new Rivenhall Incinerator (construction and operational phase) and a recent draft allocation of 5000 houses to the north of Kelvedon (operational phase). 13.3. It would also directly interact/intersect with more smaller projects including: • The approved solar farm at Land East of Littlebury Coggeshall Road Feering (construction and operational phase), • 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]), • Bradwell Quarry (construction and operational phase), • The approved solar development at Land West of Park Road Rivenhall, Cressing Farm equestrian facilities, and the recently consented solar farm at Land South West of Cressing Temple Witham Road Cressing (construction and operational phase) 13.4. Overall, the cumulative intra-project and inter-project effects have the potential to have significant impacts and this will need to be fully assessed by the ExA.	An inter-project cumulative effects assessment has been undertaken for the Project and is presented in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** which includes disturbance to residents and demands on labour force, landscape and visual effects, public health, pedestrians, cyclists and horse riders). Further detail of each development noted by Braintree is provided in the bullet points that follow: • Bramford to Twinstead is considered within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** • The Pelham to Rayleigh 400 kV development is not considered in the cumulative assessment as it comprises re-furbishment works (i.e. replacement of existing components) undertaken by permitted development, would involve minimal construction works • Rivenhall Incinerator is considered within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** • The draft allocation for 5,000 new homes to the north of Kelvedon – This has not been considered as a decision to promote to site by Braintree Council was made in September 2025 – post submission of the DCO application. The Project used a cut-off date of 1 April 2025 to confirm the long list of developments considered within the cumulative assessment. However, since the 1 April the Applicant has been undertaking a monthly review of planning registers 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 ES then these would be published into the Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate) • The approved solar farm at Land East of Littlebury Coggeshall Road Feering is considered within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** • A proposed up-to 600 dwelling parker land development at Land South West of Coggeshall Road Kelvedon is considered within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** • There are multiple applications at Bradwell Quarry. Two of which are currently live. 24/00390/ECC is considered within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** and ESS/28/25/BTE would be considered as per the draft allocation for 5,00 new homes as above • An approved solar development at Land West of Park Road Rivenhall, Cressing Farm equestrian facilities, and the recently consented solar farm at Land South West of Cressing Temple Witham Road Cressing is considered within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281].** An intra-project cumulative effects assessment has been undertaken for the Project and is also presented in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281].**
Draft DCO	14.1. The Council was offered an opportunity by the Applicant to review a version of the draft Development Consent Order (dDCO) ahead of the submission (albeit noting that there were some omissions). The Council, 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. Furthermore, it appears from the Development Consent Order as submitted **[APP-056]** that many of the comments provided do not appear to have been considered, and no explanation has been offered. 14.2. While the Council will continue to engage with the Applicant regarding the DCO, there continue to be a number of issues which require resolution before any order can be made. In setting out these issues which are summarised below, the Council draw	The Applicant is grateful for the authorities' comments on **3.1 Draft Development Consent Order [APP-056]** and had regard to these when preparing the draft Development Consent Order for submission. The Applicant awaits the detailed comments in the Local Impact Report and will continue to engage with the authority.

Topic	Comment	National Grid's response
	on their experience with the Bramford to Twinstead (B2T) DCO (PINS reference: EN020002) as well as local requirements and circumstances. The Council intend to provide an in-depth response within its Local Impact Report on these points. The Council may also suggest additional requirements be added to the DCO.	
Draft DCO	14.3. **Article 2 "Pre-commencement Operations" –** amendments to definition to bring in line with Bramford to Twinstead DCO, but also exclude those operations which the relevant planning authority considers give rise to a materially new or different environmental effect.	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.
Draft DCO	14.4. **Article 2 Control Documents –** excludes a Construction Environmental Management Plan, Materials and Waste Management Plan, Noise and Vibration Management Plan. Clarity should be provided on which documents will cover the scope of these documents.	**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 [APP-300]**. **7.2 Outline Code of Construction Practice [APP-300]** 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].**
Draft DCO	14.5. **Article 2 "Environmental Statement" –** the Council request that any supplemental Environmental Statement submitted to discharge Requirements is added to the set of certified documents to ensure there is a central repository for all relevant environmental material.	The definition of Environmental Statement in Article 2 of **3.1 Draft Development Consent Order [**APP-056**]** includes any supplemental or additional information and any environmental statement submitted for the purposes of complying with and/or discharging the Requirements, therefore the proposed change is not necessary.
Draft DCO	14.6. **Article 2 "Maintain"** – needs to be clear who decides whether the maintenance would give rise to any materially new or materially different environmental effects.	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.
Draft DCO	14.7. **Article 4 – Maintenance of authorised development –** request a mandatory obligation on Undertaker to maintain ('shall') and also to decommission and remove parts of the authorised development which become obsolete.	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.
Draft DCO	14.8. **Article 5 – Limits of Deviation –** amendments to limits of vertical deviation from 6m to 4m (as per B2T DCO).	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].
Draft DCO	14.9. **Article 14 – Power to alter layout etc of streets –** request notification as planning authority in relation to such works.	Notification of any works to alter the layout, etc. of streets would become disproportionately onerous on the Applicant along the entire route of the Project. It would also add to the administrative load for each relevant street authority. For these reasons, the Applicant does not consider this to be appropriate or practical in the circumstances of this Project.
Draft DCO	14.10. **Article 17 – Accesses –** request notification as planning authority in relation to such works. If Undertaker is to have consenting role, seek extension of time limits for response to 35 days in line with B2T DCO.	Notification of any works to accesses would become disproportionately onerous on the Applicant along the entire route of the Project. It would also add to the administrative load for each relevant street authority. For these reasons, the Applicant does not consider this to be appropriate or practical in the circumstances of this Project. As previously noted, the Applicant's position is that 28 days (or such other period as agreed by the relevant street authority and the undertaker) is appropriate and proportionate for a Project of critical national priority.

Topic	Comment	National Grid's response
Draft DCO	14.11. **Article 20 – Discharge of Water –** to the extent relevant to BDC, deemed consent should be issued after 35 days as per B2T DCO.	As previously noted, the Applicant's position is that 28 days (or such other period as agreed by the person receiving the application for consent and the undertaker) is appropriate and proportionate for a Project of critical national priority.
Draft DCO	14.12. **Article 21 – Protective Works –** relevant planning authority to be consulted where any such works outside order limits are required in case separate planning permission necessary.	**3.1 Draft Development Consent Order [APP-056]**, once granted, will provide the relevant planning consent for these protective works. The Applicant would notify owners and occupiers of the land prior to exercising certain rights under Article 21 (Protective Provisions), except in the case of emergency.
Draft DCO	14.13. **Article 50 – Felling and lopping of trees –** request advance notice for those proposed tree works which are outside Order limits (i.e. near/ overhanging) and consent of planning authority prior to any necessary work to ensure appropriate controls.	Article 50 (Felling or lopping) 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. 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. In particular, Article 50(2) 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, shrub, shrubbery or hedgerow, or important hedgerow, when exercising its powers under this article. 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 Net Zero Target of 2030, is not unnecessarily delayed by matters outside the control of the Applicant.
Draft DCO	14.14. **Article 51 – Trees subject to Tree Preservation Orders –** 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 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).	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. 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 Net Zero Target of 2030, is not unnecessarily delayed by matters outside the control of the Applicant.
Draft DCO	14.15. **Article 56 – Safeguarding –** recommendation that all time limits are expressed in business days for consistency across the dDCO.	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.
Draft DCO	14.16. **Schedule 1 – Authorised Development –** 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' to bring the text in line with that at Schedule 3 paragraph 1(4) but also the definition of "maintain" (Article 2). Correct typo in preamble to Work 32. The relevant planning	The Applicant does not agree that the words '*in the opinion of the relevant planning authority*' should be added to paragraph (u) of the Associated Development section of Schedule 1 of **3.1 Draft Development Consent Order [APP-056]**. A range of works could fall into this paragraph and it would be a disproportionate burden on both the Applicant and the relevant authority if the Applicant had to seek their opinion on the materiality of any new or different environmental effects in each case which could in turn frustrate the delivery of the Project within the necessary programme. The Applicant would welcome clarification on the typo referred to in the preamble to Work No. 32.

Topic	Comment	National Grid's response
	authority should be notified of works carried out for the avoidance of doubt.	It is not clear for which works the relevant planning authority would welcome notification. The Applicant is conscious of the potential for significant additional administrative burden, both on the Applicant and the relevant authority.
Draft DCO	14.17. **Schedule 3 – Paragraph 3(2) –** add "for approval" at end of text at Art 3(2).	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. Doing so could severely delay the delivery of the Project.
Draft DCO	14.18. **Schedule 3 – Paragraph 6 –** for consistency 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.	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]**.
Draft DCO	14.19. **Schedule 3 – Paragraph 7 – Construction Hours –** the hours of work need amending (as per Section 9 Noise of this report) and relevant planning authority to be notified of any working outside of core hours.	The Applicant has responded to this point in relation to noise and vibration at paragraph 9.3 of this RR, above. The proposed core working hours allow for efficient delivery while maintaining safeguards to manage noise and other impacts. 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. The Applicant does not consider it justified to amend the core working hours. There are a number of instances within Requirement 7 that ensure the relevant authority's consent is sought to work outside of the core working hours. Beyond this, the Applicant does not consider it to be practical to notify the relevant authorities, especially, for example, those that involve a continuation of works that began during core working hours.
Draft DCO	14.20. **Schedule 3 – Paragraph 12 – Design of Buildings –** for consistency and in the interests of sound planning principles, the wording "general accordance with" should be amended to "in substantial accordance with."	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]**.
Draft DCO	14.21. **Schedule 4 – Discharge of Requirements – Paragraph 1 –** longer period of time required for discharge owing to complexities of scheme. This should be 35 days at the very minimum. Consider consistent use of business days rather than days for calculating consent periods.	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 Net Zero 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. In each instance, **3.1 Draft Development Consent Order [**APP-056**]** allows for the relevant decision-making authority and the undertaker to agree '*such other period*' as may be appropriate in the circumstances. Likewise, 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.

Topic	Comment	National Grid's response
		Although a longer 35 day period is used on The National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, 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. The Applicant is committed to continued proactive and proportionate engagement with host Local Authorities and statutory consultees to support the efficient and timely determination of post-consent submissions. The discharge of Development Consent Order Requirements will build directly on the extensive pre-application engagement and the Examination process, through which the principle, scope and controls for the Project will have been thoroughly considered. By the point of consent, the intent of the Requirements, the parameters of the authorised development, and the mitigation framework secured through the DCO and Environmental Statement will be well understood and familiar to the relevant authorities. Post-consent submissions will therefore focus on the detailed implementation of agreed measures, rather than introducing new concepts or untested mitigation. The Applicant will continue to engage with authorities on draft submissions where appropriate, helping to clarify expectations and reduce the likelihood of iterative amendments. In this context, a 28 day determination period is considered reasonable and proportionate, allowing sufficient time for review while avoiding unnecessary delay to a Critical National Priority electricity network project. The proposed period reflects the certainty provided by the preapplication and Examination processes and supports efficient delivery in line with national policy objectives.
Draft DCO	14.22. **Schedule 4 – Discharge of Requirements – Paragraph 2 –** longer period of time required (minimum of 7 business days) to enable consultees to identify whether further information is required. To the extent that the Council as discharging authority is obliged to consult with third parties, an amendment to require the Applicant to serve relevant paperwork on the relevant Requirement Consultee at the same time as serving on the Council would enable efficient use of time (this happens to some extent on B2T DCO).	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 1(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. The Applicant considers that the existing drafting provides appropriate flexibility, but is committed to agreeing pragmatic ways of working with host authorities, and will continue to engage on these matters throughout Examination. The Applicant has been, and continues to be, committed to collaborative working with the relevant authorities.
Draft DCO	14.23. **Schedule 4 – Discharge of Requirements – Paragraph 3 –** fee needs to be updated in line with latest planning fee guidance.	The Applicant will update this figure in the next draft of the DCO.
Draft DCO	14.24. It is noted that no Soil Management Plan Requirement is proposed. This should be included.	**7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]** is controlled by Requirement 4 of Schedule 3 to **3.1 Draft Development Consent Order [APP-056]**. The definition of Code of Construction Practice in Article 2 includes its appendices.
Community benefits	15.2. While community benefits are not part of the overall planning balance, it needs to be appropriately considered by the Applicant in light of published Government guidance. Funding should be given to those projects within the Braintree District, that benefit local residents affected by the proposals owing to the longstanding impacts of the development. The Council invites further discussion and information from the Applicant in this regard.	The Government has published guidance on community funds for transmission infrastructure (Department for Energy Security and Net Zero (DESNZ), 2025). In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025).
Traffic and transport	15.3. The Council support the comments of Essex County Council regarding the impacts on Public Rights of Way (PRoW). It's likely that the development will require the closure in part, or in full, of Public Rights of Way (PRoW) and it's critical that these routes are, firstly, re-provided (insofar as possible) and, secondly, disrupted or close is little as necessary.	The overall strategy, as set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**, is to maintain access along 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.
Socio-economics	15.4. The Council support the comments of Essex County Council regarding the socio-economic impacts of the development. There	The Applicant has responded to comments raised by Essex County Council. Socio-economic impacts on the local economy, including impacts on local businesses, residents and the tourism sector are assessed in **6.15**

Topic	Comment	National Grid's response
	should be a strong preference to use local companies and materials for this NSIP project.	**Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265].** The chapter concludes that there would be no significant impacts on the local economy as a result of the Project. However, the Applicant will work with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance[38].
Traffic and transport	15.5. During construction the impact of the development on the highway network will be considerable. The Council therefore supports the comments of Essex County Council regarding the highway and transportation impacts of the development.	**7.11 Transport Assessment [APP-333]** and **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** detail the assessment completed on the highway network and the proposed impact of the Project. **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.3 Outline Construction Worker Travel Plan [APP-311]** detail the proposed management and mitigation of these effects. In relation to highway junction impacts, suitable mitigation measures have been proposed in **7.11 Transport Assessment [APP-333]** and **7.3 Outline Construction Traffic Management Plan [APP-309]** or are under discussion with Essex County Council and National Highways.

[38] Department for Energy Security and Net Zero (2025) *Guidance - Community funds for transmission infrastructure*

Appendix F. Brentwood Borough Council

nationalgrid

Appendix F
Brentwood Borough Council

Brentwood Borough Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the **Relevant Representation (RR) [RR-0391]** provided by Brentwood Borough Council.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (**5.9.11 Draft Statement of Common Ground – Brentwood Borough Council [Revision B]**), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table F1.1 Summary of comments and National Grid's response

Topic	Comments	National Grid's response
Alternatives	2. While BBC recognises the national need for grid reinforcement, it considers that the submission of this DCO (Development Consent Order) application is premature because credible alternatives have not been fully assessed. The Council objects to the application on this basis and urges the Applicant to undertake a comprehensive appraisal of options that could deliver the required capacity with significantly reduced environmental and community impacts. In particular, the Council seeks further investigation of a coordinated offshore solution and High Voltage Direct Current (HVDC) undergrounding, both of which were identified in the ESO East Anglia Network Study as viable alternatives. These options should be evaluated transparently, with robust cost-benefit analysis and consideration of planning, environmental, and socio-economic implications before progressing with an overhead line solution.	NPS EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way[39]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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. National Grid considered alternatives in the **2023 Strategic Options Backcheck and Review [APP-357],** with all on-shore alternatives of AC overhead Line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC on-shore 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 **Chapter 15 [APP-357]** the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. 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 1800MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800MW 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.

[39] Electricity Act 1989, Section 9

Topic	Comments	National Grid's response
Planning policy	3. Dunton Hills Garden Village (Policy R01, Brentwood Local Plan, adopted March 2022) is a strategic housing-led allocation for approximately 4,000 homes and associated infrastructure. It is critical to meeting Brentwood Borough's housing and infrastructure needs and forms part of the Homes England Garden Communities Programme. In support of this strategic allocation BBC approved the Dunton Hills Supplementary Planning Document in January 2023 (SPD). 6. In the Councils statutory consultation and targeted consultation response, together with Essex County Council and Basildon Borough Council, the Council highlighted the locally significant effects arising from the proximity of the proposed pylons and overhead power lines to the proposed residential development. 7. Formulation and examination of the adopted Brentwood Local Plan, including the allocation of DHGV, pre-date the pre-application process for the Norwich to Tilbury proposals and the applicant was made aware of DHGV by BBC and Essex County Council partners during the first round of non-statutory consultation in 2022. 8. This important strategic site allocation should therefore have been fully taken into account to inform the evolution of the transmission project. In so doing, the Applicant should have given significant weight to the effect of the pylon route on the overall deliverability of these new homes at DHGV [Dunton Hills Garden Village] as well as the impact on the viability of the development which needs to both deliver affordable housing and supporting infrastructure, consistent with the TCPA Garden City principles and Policies RO1 & RO2 of the Brentwood Local Plan.	The Applicant has carefully considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. The Applicant considers it possible for the overhead line to co-exist with the housing proposals and has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village (DHGV) housing proposals. No alternative connection route is appropriate to either east or west due to the extent of urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. The Applicant also shared its guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. The Applicant continues to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground/Heads of Terms position. On this basis the Applicant's position is that the Project will not impede or inhibit the development of DHGV.
Planning policy	9. Brentwood Borough Council considers that: The Applicant has not adequately assessed the impact of the proposed alignment on the deliverability and viability of DHGV, contrary to Holford Rule 7 and NPS EN-1 and EN-5. The proposals undermine Garden Community principles and the design quality required by Policy R01 and R02 of the Brentwood Local Plan.	The Applicant has carefully considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. The Applicant considers it possible for the overhead line to co-exist with the housing proposals and has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village (DHGV) housing proposals. Holford Rule 7 states that '*Approach urban area through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, carefully assess the comparative costs of undergrounding*'. No alternative connection route is appropriate, as described in **5.15 Design Development Report [APP-122]** an alternative route to the west of West Horndon was considered and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. The area is not the subject of any designations relevant to change the presumption in favour of overhead line as set out in National Policy Statement (NPS) EN-5 (2024). Additionally, the alignment does not directly restrict development on any areas that are not already constrained by the safety zone around the gas pipeline. In light of the planning policy support for overhead line in areas not subject to particular designations, and the effect on development area of underground cables, it is considered that an overhead line is the appropriate design technology in this location and that requests to use underground cable past this development are not justified by policy. It is the Applicant's position that NPS EN-5 (2024) confirms that the routeing of overhead lines near to residential property is not, as a point of principle, unacceptable. It is also noted that there are detailed design opportunities

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		(including as outlined in National Grid's 'Design guidelines for development near pylons and overhead lines'[40] which includes 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 Dunton Hills Garden Village where detailed design is to be completed. The Applicant continues to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground/Heads of Terms position.
Land and property	9. Evidence commissioned by Essex County Council (Savills) indicates that overhead pylons could reduce residual land value by approximately £17.5m, materially affecting viability and the ability to deliver affordable housing and infrastructure.	Both planning and valuation case studies demonstrate that there is significant evidence of successful developments in the vicinity of overhead lines. 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. This includes **5.1 Consultation Report [APP-066]**, **5.15 Design Development Report [APP-122]**, **7.17 Strategic Options Backcheck and Review [APP-355]**, **7.18 2022 - Corridor and Preliminary Routeing 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]** and **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**. The Applicant has adequately considered any potential impact of the Project on DHGV, in line with National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024) and the Holford Rules, and it does not consider that it will result in any significant impact with regard to the viability of the development. This position is supported by the Relevant Representation submitted by the new landowner, LIH Dunton Hills Limited (EN020027-000610). 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. The Applicant is however considering the information presented in the Savills report and will submit a response to that to the ExA in due course.
Landscape and visual	10. Collaborative feedback from Historic England has shaped the DHGV Framework Masterplan and SPD, establishing key view corridors that connect the natural landscape with listed heritage assets, including St Mary's Church, the historic farmstead, and All Saints Church. The positioning of pylon TB226 will significantly compromise these intentional view corridors, contrary to the SPD and Holford Rule 7. Despite BBC raising this concern during non-statutory and statutory consultations, the Applicant has not addressed this unacceptable impact.	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 DHGV 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 buildings nor on the DHGV.
Land and property	11. BBC is concerned over the absence of any baseline assessment undertaken by NGET in relation to the impacts of overhead line and pylon technology at DHGV and the lack of application of the mitigation hierarchy, including compensation, to the likely locally significant effects arising from those impacts to the principles of the Garden Village and viability of this strategic housing allocation, including its supporting infrastructure.	The Applicant has considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. The Applicant considers it possible for the overhead line to co-exist with the housing proposals and the Applicant has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village (DHGV) housing proposals. No alternative connection route is appropriate to either east or west due to the extent of urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. The Applicant also shared our guide for developers which

[40] National Grid: Design guidelines for development near pylons and overhead lines: https://www.nationalgrid.com/document/330626/download

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		identifies opportunities to closely position housing in the immediate vicinity of the alignment. The Applicant continues to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the Applicant's position is that the Project will not risk the delivery of affordable housing and essential infrastructure at DHGV and other emerging sites. The consideration of residual effects in the planning balance is set out in more detail below, in relation to paragraph 26 of the RR, whilst specific consideration of landscape compensation is set out in more detail in response to paragraph 27 of the RR below.
Underground cables	12. BBC shares Essex County Council's position to continue to seek measures which mitigate the impact of the overhead powerlines and to secure an underground solution to minimise the viability and deliverability of both 13. If undergrounding is not feasible, alternative pylon designs and robust mitigation must be considered. 14. The Council requests that the Applicant: • Demonstrates how the scheme will avoid or mitigate these impacts, including consideration of alternative alignments or undergrounding. • Provides clear commitments within the DCO to safeguard the delivery of DHGV and associated infrastructure. • Engages jointly with Brentwood, Essex, and Basildon to agree measures that protect strategic growth objectives.	The Applicant has carefully considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. We consider it possible for the overhead line (which is the technology supported by policy in National Policy Statements (NPS) EN-1 (2024) and EN-5 (2024) for connections in areas outside designated landscapes) to substantially co-exist with the housing proposals and have sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the housing proposals. As set out in **5.15 Design Development Report [APP-122]**, we have considered application of the mitigation hierarchy. In Section 10.4 we concluded that no alternative connection route is available. At Paragraphs from 2.5.7 to 2.5.11 we report on the consideration of alternative pylon types but do not consider there is a need to move away from the use of lattice pylons. Section 10.4 of **5.15 Design Development Report [APP-122]** also considered that, despite not being required by policy, the use of underground cable would lead to a direct loss of development area in contrast with the proposed overhead line design. We continue to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground position. We also noted with interest that a representative of Brentwood Borough Council stated at the planning committee that viability was not affected by the Project.
Cumulative effects	*Cumulative Impacts* 17. BBC is concerned about the cumulative impacts arising from the Norwich to Tilbury project being delivered alongside other major developments, notably DHGV and the Lower Thames Crossing (LTC). The co-location and overlapping construction timeframes of these schemes are likely to amplify adverse effects across multiple receptors, including traffic, noise, and community amenity.	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]**. The assessment includes cumulative effects with the Lower Thames Crossing and Dunton Hills Garden Village. No significant effects were concluded for traffic and transport, noise or socio-economics with the Lower Thames Crossing. No significant effects were concluded for traffic and transport, noise or socio-economics with Dunton Hills Garden Village.
Cumulative effects	18. 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. In particular, there is no information on the phasing of the Norwich to Tilbury project, which is essential to minimise disruption and manage cumulative effects on host communities.	Image 4.1 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** presents the Project's indicative construction phasing, to be refined as part of the detailed design. Section 7 of **7.11 Transport Assessment [APP-333]** assesses the temporary impacts related to the Project's construction traffic flows on the transport network and identifies mitigation. In addition, **7.3 Outline Construction Traffic Management Plan [APP-309]**, Sections 2.4 and 6.6 detail National Grid's commitment to coordinating street works and traffic management with other developments, to minimise impacts. Traffic management is proposed to be coordinated through the Permit Schemes of the Local Highway Authorities.
Traffic and transport	19. The Council also reiterates concerns raised during statutory consultation regarding the wider Brentwood Southern Growth Corridor, which includes DHGV and Brentwood Enterprise Park. These strategic developments, combined with the proposed transmission infrastructure, present significant risks to the local road network and access arrangements. The Council requests that the Applicant explore alternative access options aligned with the phasing of DHGV to reduce harm and maintain safe and efficient operation of the local highway network.	All known developments that might impact the Primary Access Routes (PARs) using the local highway network were identified and considered in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and **7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]**. The Dunton Hills Garden Village (DHGV) was included within the review of committed developments, but was excluded from the assessment given the operational phase would not coincide with the peak year construction activity for the Project. Details on construction programmes and flows were not available. Brentwood Enterprise Park is located approximately 6 km from the nearest PAR. Flows from this development are unlikely to be significant on the PAR given the surrounding highway network and access to the strategic road network. This development was therefore not included within our assessments. Image 4.1 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** presents the Project's indicative construction phasing, to be refined as part of the detailed design. As part of the detailed design, the

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		phasing of Norwich to Tilbury and DHGV will be considered together. Furthermore, **7.3 Outline Construction Traffic Management Plan [APP-309]**, Sections 2.4 and 6.6 detail National Grid's commitment to coordinating street works and traffic management with other developments, to minimise impacts. Traffic management is proposed to be coordinated through the Permit Schemes of the Local Highway Authorities.
Cumulative effects	20. BBC considers that the cumulative impacts of these projects have not been adequately assessed in accordance with NPS EN-1 and EN-5 and requests that the Examining Authority require the Applicant to provide a robust cumulative effects assessment and commit to enforceable phasing and mitigation measures within the DCO.	The Applicant notes Brentwood Borough Council's comments regarding the Dunton Hills Garden Village and Brentwood Enterprise Park projects. 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]**.
Cumulative effects	21. BBC acknowledges the changes to the proposals at Haverings Grove made during National Grids targeted consultation, including the undergrounding of approximately 2km of the existing UKPN 132kV line, the repositioning of pylons TB209 to TB211, and the relocation of the temporary construction laydown area. These measures were welcomed in principle as they reduce cumulative visual effects, move infrastructure further from some residential properties, and lessen potential ecological impacts, including avoiding tree removal near St James' Wood Local Wildlife Site. 22. However, despite these refinements, the Council maintains its objection to the proposed alignment in this locality. The routing of the 400kV overhead line along the northern, western, and southern boundaries of Haverings Grove creates a harmful severing effect, acting as an imposing physical barrier between the settlement and Hutton. The proximity of the transmission line to residential properties at this 'pinch point' exacerbates the adverse impact on local amenity and community cohesion.	Please refer to the Applicant's response to paragraph 2 of the RR in relation to its compliance with national policy on the use of overhead lines. The Applicant, through the routeing and siting exercise, has sought to reduce the impact on landscape character and visual amenity. Measures to reduce such effects have included the use of underground cables in the areas of highest amenity value such as the Dedham Vale National Landscape and its setting and careful consideration of siting of infrastructure and pylons. Projects of this nature are required to assess the potential environmental impacts of the proposals, report on those, and set out proposed mitigation, in an Environmental Statement (ES) in accordance with the relevant Environmental Impact Assessment (EIA) Regulations. The EIA started early in the process, and, in that respect, a considerable amount of assessment work was undertaken to allow preliminary judgements to be made about the design and routeing of the Project. This is set out in various publications including **5.1 Consultation Report [APP-066]** and **5.15 Design Development Report [APP-122]**, with feedback helping shape the Project proposals. 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 up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The assessment of effects on views from Havering's Grove are described in relation to Visual Receptor Areas (VRA) as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The assessment of effects on VRA G2 Billericay West is found on page 264 onwards and VRA G3 Brentwood East on page 267 onwards.
Mitigation Measures	23. The Council reiterates its request for serious consideration of alternative solutions, including re-routing or undergrounding, to mitigate these impacts. In addition, concerns remain regarding the suitability of proposed access routes for construction compounds, which risk unacceptable disruption to local agricultural operations. BBC seeks reassurance that these access arrangements have been fully assessed and that appropriate mitigation will be secured through enforceable requirements within the DCO.	The location is not designated nor within the setting of a designated landscape and therefore does not engage with the tests in National Policy Statement (NPS) EN-5 (2024) in a way that justifies the adoption of underground cable. The additional effects due to the increased scale of the 400 kV pylons compared with the 132 kV pylons do not justify the additional consequences (cost and effects) of a change to underground cable. The effects of the Project on agricultural land, including the proposed temporary and permanent access routes, have been assessed within **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**, with appropriate mitigation measures proposed, including commitments AS03, AS04, and AS05, and recorded within **7.2 Outline Code of Construction Practice [APP-300]**.
Landscape and visual	24. BBC has reviewed the Environmental Statement (ES) Chapter 13: Landscape and Visual Impact Assessment (LVIA) and considers that the proposed overhead line will result in unacceptable and unmitigated landscape and visual harm within the Borough. 25. Visual effects: The ES acknowledges significant adverse effects within 0.5 km of the overhead line, but the Council considers that major adverse impacts will extend up to 1 km and moderate adverse effects up to 1.5 km, particularly in open, semi-	The Local Planning Authority's position is noted, but the Applicant would point out that National Policy Statement (NPS) EN-5 (2024) specifically guides to overhead line being the strong starting presumption for new connections and that none of the route within the Borough meets the criteria set out in NPS EN-5 (2024) to justify a change from this technology. The Applicant confirms that the LVIA does report significant visual effects during operation within 1.5 km of the proposed overhead line in Brentwood. This is set out in full detail in the assessment of visual effects within the following Visual Receptor Areas (VRA) in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment - Part 1 of 4 [APP-229]**, as summarised below:

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	enclosed landscapes such as the Brentwood Hills and Dunton Settled Claylands. Even beyond these distances, the cumulative effect of multiple pylons and the continuous overhead linear character of the project will industrialise rural landscapes and erode scenic beauty, tranquillity, and sense of place, contrary to GLVIA3 guidance and National Policy Statement EN-1	• VRA G1 Ingatestone and Fryerning – major and significant (adverse) within 0.5 km, moderate and significant (adverse) between 0.5 km and 1.5 km; • VRA G2 Billericay West – major and significant (adverse) within 0.5 km, moderate and significant (adverse) between 0.5 km and 1.5 km; • VRA G3 Brentwood East - moderate and significant (adverse) within 0.5 km; • VRA G4 Ingrave and Herongate – major and significant (adverse) within 0.5 km, moderate and significant (adverse) between 0.5 km and 1.5 km; and • VRA G5 Little Burstead – major and significant (adverse) within 0.5 km, moderate and significant (adverse) between 0.5 km and 1.5 km. Significant effects on landscape character are identified within the Brentwood Hills Landscape Character Area (LCA) during operation as set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. A review of these judgements has been made and no need for amendments have been identified. Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240].** There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the **LVIA 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].** The consideration of residual effects in the planning balance is set out in more detail below, in relation to paragraph 26 of the RR.
Landscape and visual	26.Policy: • EN-1 Paragraph 5.10.6: Projects should minimise harm to the landscape and provide reasonable mitigation. The proposed overhead line does not achieve this. • EN-1 Paragraph 4.3.4: Significant adverse effects must be avoided, reduced, mitigated, or compensated. No compensation is offered for residual landscape and visual harm. • EN-1 Paragraph 4.6.1: Environmental net gain should be pursued. No strategic enhancement or compensation is proposed	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 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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-145] and 5.6 Planning Statement [APP-085]**. EN-1 paragraph 4.1.7 provides '*… 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*'. 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. The matter of landscape compensation is considered below in response to paragraph 27 of the RR.
Landscape and visual	27. The Council notes that the proposals fail to follow the mitigation hierarchy by offering no meaningful compensation for residual harm. Replacement planting on a 3:1 basis is reinstatement, not compensation. BBC therefore seeks that a	Please refer to the Applicant's response to paragraph 2 of the RR in relation to its compliance with national policy on the use of overhead lines.

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	significant strategic landscape compensation package be put in place as part of the submission, or a significant strategic financial compensation package be put in place as a side agreement to offset the landscape and visual harm across the route of the overhead line.	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].** Whilst compensation is part of the mitigation hierarchy, EN-1 or EN-5 do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. 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'. 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. 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 CNP 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. The above aligns with the Bramford to Twinstead (BTNO) 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.
Landscape and visual	28.Key concerns: • LCA D2: Brentwood Hills – semi-enclosed hills, high sensitivity, major adverse effects up to 1 km. • LCA 13: Dunton Settled Claylands – wholly impacted; incompatible with Dunton Hills Garden Village vision for a sustainable garden community. • VRA G1 Ingatestone & Fryerning – significant adverse effects on PRoW (St Peter's Way) and heritage settings • VRA G4 Ingrave & Herongate – major adverse effects on Thorndon Country Park and Dunton Hills Garden Village	The Applicant notes this comment.
Underground cables	29. BBC objects to the proposed overhead line alignment […] and requests that the Examining Authority secure enforceable requirements within the DCO for undergrounding in sensitive locations (particularly Brentwood Hills and DHGV)	Paragraphs 2.5.5 and 2.5.6 of **5.15 Design Development Report [APP-122]** set out the circumstances for the selection of connection technology. This identifies the strong starting presumption set out in National Policy Statement EN-5 (2024) for overhead lattice pylons and the circumstances where a change, and progression up the mitigation hierarchy, may be considered. Not only do those circumstances not arise (i.e. the areas are not designated landscapes nor effects at a level considered to be unacceptable) but a change to underground cable would lead to a reduction in the developable area as set out in Paragraph 10.4.5 of **5.15 Design Development Report [APP-122]**.
Landscape and visual	29. The Council […] a strategic compensation package as a minimum. The Council requests that the Examining Authority secure enforceable requirements within the DCO for […] a strategic landscape compensation package to offset residual harm.	Please refer to the response to paragraph 27 of the RR above.
Historic environment	30. BBC has reviewed the ES Chapter 11: Historic Environment and associated appendices. The Council considers that the proposed overhead line will result in unacceptable harm to the	**6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets.

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	setting of designated and non-designated heritage assets within the Borough, contrary to EN-1 policy requirements.	Paragraph 7.2.57 of **5.6 Planning Statement [APP-85]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. 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. Para 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.
Historic environment	31. Designated Heritage Assets: The ES identifies less than substantial harm to the significance of multiple designated assets in Brentwood, including: • 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. Harm is assessed as lower less than substantial during both construction and operational phases. 32. The Council agrees with the classification but considers that the cumulative effect of pylons, haul roads, and associated infrastructure will materially degrade the historic setting of these assets.	31 - Noted. 32 - 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 as set out in Paragraphs 17.5.49 to 17.5.52.
Historic environment	33. Non-Designated Heritage Assets (NDHAs): The ES does not assess the setting impacts on non-designated built heritage assets, including locally listed buildings and historic farmsteads, contrary to EN-1 paragraphs 5.9.7 and 5.9.33. This omission prevents a balanced judgment on harm and significance.	All non-designated heritage assets were assessed to determine their value in accordance with **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 [APP-208]**. 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. National Policy Statement (NPS) EN-1 (2024) provides instructions regarding the Applicant's assessment in Paragraph 5.9.9: '*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*'. 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. The historic environment thematic group meeting held on 27 February 2025 was principally focused on the updated **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, which was shared with all historic environment stakeholders on 13 February 2025, and had been produced in accordance with the approach of not including a written settings assessment for non-designated heritage assets of low and negligible value. This element of the methodology was briefly discussed during the meeting and no objections were raised.

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Historic environment	34.Key Concerns: • Lack of assessment for NDHAs and locally listed buildings. • Potential vibration impacts on historic structures during construction. • Incompatibility with Dunton Hills Garden Village vision, which includes historic landscape features • No additional mitigation beyond embedded and standard measures; no compensation for residual harm.	See response to 35 below.
Historic environment	35. Requests to Examining Authority: The Council requests that the Examining Authority secure enforceable requirements within the DCO to address heritage concerns. Specifically, BBC seeks a full assessment of setting impacts on non-designated heritage assets and locally listed buildings, enforceable commitments for vibration monitoring and a clear communication protocol for owners of sensitive structures, and design changes or undergrounding near Ingatestone Hall and DHGV to protect historic settings. In addition, the Council requests that a strategic heritage mitigation and compensation package be secured to offset residual harm to designated and non-designated assets.	All non-designated heritage assets were assessed to determine their value in accordance with **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 [APP-208]**. 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. National Policy Statement (NPS) EN-1 (2024) provides instructions regarding the Applicant's assessment in Paragraph 5.9.9: '*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*'. 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 The assessment in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** did not identify any heritage assets in Brentwood that would be impacted by the Project. Given that the council do not disagree with the conclusions of assessment there is no policy requirement to consider further design changes near Ingatestone Hall or Dunton Hills Garden Village (DHGV). Design change has been considered as set out in **5.15 Design Development Report [APP-122]**, which 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. Factors relevant to requested changes 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. Embedded, standard and additional mitigation is already proposed for the historic environment, as set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208]** and proposals in **7.2 Outline Code of Construction Practice [APP-300]**, **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. Neither National Policy Statement EN-1 (2024) nor the National Planning Policy Framework (2025) make reference to a requirement for compensation for any harm to heritage assets.
Historic environment	36.Summary Position: BBC objects to the proposed overhead line alignment within its administrative area due to unacceptable harm to heritage assets and failure to comply with EN-1 policy requirements. The Council seeks undergrounding in sensitive areas and enforceable heritage mitigation measures as a minimum.	See responses regarding the historic environment above.
Traffic and transport	37. BBC acknowledges Essex County Council's role as the Highways Authority but wishes to record its concerns regarding the potential impacts of construction traffic on local roads and communities. The proposed use of rural routes, including Tilbury Road (A128), raises serious amenity and safety issues for residents, particularly at Mill Cottages and other sensitive	**7.3 Outline Construction Traffic Management Plan [APP-309]** details the construction routeing strategy and use of Primary Access Routes. The A128 (Tilbury Road) is proposed to be used for Abnormal Indivisible Loads (AILs) and is not prescribed as a Primary Access Route. Each proposed route has undergone a route assessment selection process, to make sure that the route is suitable, with mitigation where required, to facilitate and manage the levels of construction traffic proposed. **7.3 Outline Construction Traffic Management Plan [APP-309]** details the proposed coordination with other Nationally Significant Infrastructure Projects and

Topic	Comments	National Grid's response
	locations. The Council is also concerned about cumulative impacts with other major projects, including DHGV and the Lower Thames Crossing, which risk overwhelming the local network.	developments, to coordinate traffic management across the projects. Within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** no significant effects on sensitive receptors were found as a result of the increase in traffic from the Project.
Traffic and transport	38. BBC supports Essex County Council's position and requests that the Examining Authority require enforceable commitments for a robust Construction Traffic Management Plan, including clear routing strategies, restrictions on HGV movements during peak periods, and a programme of road condition surveys with agreed intervention levels. The Council also seeks assurances that haul roads will be decommissioned and land restored to its former condition, particularly where it affects Green Belt land.	The applicant has prepared **7.3 Outline Construction Traffic Management Plan [APP-309]** which includes details of proposed management and mitigation measures associated with construction traffic. It also includes a list of items which have been deemed as non-compliance and will be picked up through the monitoring of the construction programme, by those named as holding roles within Section 3 of the document. This non-compliance includes: • Failing to display an identifier • Construction workers overspill parking on the public highway • Construction traffic operating outside the agreed hours • Heavy Goods Vehicle (HGV) drivers not adhering to the agreed routes • HGVs drivers parking or waiting on the highway in inappropriate locations. The non-compliance procedure is detailed in Section 6.3 of **7.3 Outline Construction Traffic Management Plan [APP-309]**. **7.3 Outline Traffic Management Plan [APP-309]** also details the proposed pre- and post-construction surveys for routes used by construction HGVs and AIL movements and will be discussed with each Local Highway Authority. Section 5.4 of **7.3 Outline Construction Traffic Management Plan [APP-309]** sets out a clear routeing strategy involving the use of designated Primary Access Routes (PARs), which **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** has assessed. Section 5.4 also contains proposals regarding construction route signage. The haul roads are set to be removed at the end of the construction programme (Paragraph 5.4.5 of **7.3 Outline Construction Traffic Management Plan [APP-309]**). **7.2 Outline Code of Construction Practice [APP-300]** commitment GG07 notes that '*Land used temporarily will be reinstated where practicable to its pre-construction condition and use (or a condition discussed with the landowner), in line with the Outline LEMP* [**7.4 Outline Landscape and Ecological Management Plan [AS-046]**].'
Traffic and transport	39. The proposed overhead line and associated construction works will cause significant severance and disruption to key routes, including the Essex Way and St Peter's Way, which are integral to recreation and tourism in the Borough. The Council is concerned that the ES does not provide sufficient detail on reinstatement standards or legacy improvements.	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 Essex, including Essex Way and St Peter's Way, that would be subject to closure without diversion and there would be no severance of the overall network as a result of the Project. 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.
Traffic and transport	40. BBC requests that the Examining Authority secure enforceable commitments for a comprehensive Public Rights of Way Management Plan, including measures to minimise severance during construction, guarantee timely reinstatement to a high standard, and deliver enhancements to the network where feasible.	Requirement 4 within Schedule 3 of **3.1 Draft Development Consent Order [APP-056]** ensures that a detailed Public Right of Way (PRoW) Management Plan, based on **7.6 Outline PRoW Management Plan [APP-329]** submitted as part of the Development Consent Order application, must be submitted to, and approved by, the relevant planning authorities prior to the commencement of works. The overall strategy, as set out in **7.6 Outline PRoW Management Plan [APP-329]**, is to maintain access along 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. 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.

Topic	Comments	National Grid's response
		The same document also confirms that, upon completion of construction, all PRoWs temporarily affected by the works will be reinstated to their original alignment and condition, notwithstanding that, where appropriate and subject to agreement with the relevant Local Highway Authority and landowners, there may be opportunities for some temporary mitigation measures to be retained on a permanent basis.
Construction impact	41. Core working hours: BBC is concerned that the proposed core working hours, 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on weekends and public holidays, are excessive and will cause unacceptable disruption to residents. These hours significantly exceed standard working hours for construction, which typically restrict weekend and holiday working to protect amenity. Extended hours will increase noise, traffic, and general disturbance in sensitive rural and residential areas, particularly near Haverings Grove. The Council requests that the Examining Authority require alignment with local standards and impose enforceable restrictions on working hours to minimise harm to public amenity.	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday to Friday: 07:00 to 19:00 • Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700 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]** (draft DCO). The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters. This includes the core working hours for the construction phase of the Project. The Noise and Vibration assessment (**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 [APP-300]** (Outline CoCP), significant effects from noise and vibration during the construction phase are not anticipated. The measures set out within the Outline CoCP will be secured via Requirement 4(1)(a) (Construction Management Plans) of **3.1 draft DCO [APP-056]** within the final CoCP. The Traffic and Transport assessment (**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**) assessed the impact of construction traffic on sensitive receptors. The assessment concluded that, with the embedded mitigation and controls set out in **7.3 Outline Construction Traffic Management Plan [APP-309]** (Outline CTMP), significant effects are not anticipated. The measures set within the Outline CTMP will be secured via Requirement 4(1)(b) (Construction Management Plans) of **3.1 draft DCO [APP-056]** within the final CTMP. For further context, 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 mean that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provide essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and public holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. Any blanket restrictions on weekend and public holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. 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 [APP-300]**, including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26),

Topic	Comments	National Grid's response
		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).
Air quality	42. Air Quality: BBC is concerned that the proposed construction activities, including the movement of heavy goods vehicles, haul road operations, and extended working hours, will lead to increased emissions and dust generation, adversely affecting local air quality. These impacts are likely to be most pronounced near sensitive receptors such as residential areas, schools, and recreational spaces, particularly around Havering Grove. While the ES identifies mitigation measures, the Council considers these insufficient given the scale and duration of the works. The Council requests that the Examining Authority secure enforceable commitments for robust air quality management, including continuous monitoring at agreed locations, dust suppression measures, and restrictions on vehicle idling, to ensure compliance with national air quality objectives and protect public health.	The mitigation measures specified are aligned with industry standard best practice Institute of Air Quality Management construction dust guidance[41] and are considered appropriate for the level of dust risk impact anticipated from the Project which are secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]**. There is scope in **7.2 Outline Code of Construction Practice [APP-300]** for agreeing location specific mitigation measures once construction activities and locations are further developed by the Main Works Contractor(s), within the final Code of Construction Practice.
Noise and vibration	43. Noise: The ES acknowledges that significant adverse noise effects will occur during construction, particularly near haul roads, compounds, and pylon sites. BBC considers that the mitigation proposed is insufficient given the proximity of works to residential areas and recreational spaces. Extended working hours will exacerbate these impacts, reducing opportunities for respite and affecting health and wellbeing. The Council requests that the Examining Authority secure robust noise control measures, including enforceable limits, continuous monitoring, and clear commitments to provide temporary noise barriers where appropriate.	The Applicant does not agree with this statement. The assessment provided in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** indicates that no significant effects from noise or vibration, during either the construction or operational phases, are expected in the Brentwood Borough Council area. Additionally, only one significant effect from noise, in relation to construction traffic noise, is expected for the Project as a whole.
Noise and vibration	44. Vibration: BBC notes that the ES identifies potential vibration impacts on sensitive structures during construction, including listed buildings and historic farmsteads. While mitigation measures are referenced, the Council is concerned about the lack of detail on monitoring and response protocols. Vibration can cause structural damage and distress to residents if not properly managed. The Council requests that the Examining Authority require enforceable commitments for pre-construction condition surveys, real-time vibration monitoring, and a clear communication protocol for affected property owners to report concerns and seek remedial action.	The five locations identified as being potentially affected by compaction-related vibration assume reasonable worst-case assumptions for vibration generation. Further detailed assessments will be undertaken by the contractor, as per commitment NV05 of **7.2 Outline Code of Construction Practice [APP-300]** (secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]**) based on their specific methodologies. Based on the findings of these assessments specific mitigation measures will be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which will be updated from **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** (Outline NVMP)). The Outline NVMP includes protocols for vibration monitoring in situations where there is potential for damage to buildings or structures. Additionally, commitment NV04 of **7.2 Outline Code of Construction Practice [APP-300]** includes for pre- and post-condition surveys to be conducted in such situations, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works.
Ecology and biodiversity	45. [The council reference key issues with] ES Appendix 13.6 identifies 28 trees and 25 groups to be partially removed within Section F (Chelmsford & Brentwood) and 30 trees and 10 groups within Section G (Brentwood & Basildon). • Veteran trees: T566 flagged for removal; six others (T662, T646, T797, T909, T1045, T1131) may be impacted. Justification for removal is unclear. • Ancient woodlands adjacent to Brentwood include Thorndon Country Park, Botneyhill Wood, Ashen Shaw, and Rainbow	Paragraph 8.2.3 of the Outline Landscape and Ecological Management Plan (LEMP) (**7.4 Outline Landscape and Ecological Management Plan [AS-046]**) 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 [APP-300]**. The reported Ancient Tree Inventory veteran tree, recorded as T566 in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**, is located within the working area of existing infrastructure and is currently reported as removed as a worst-case. Its location and proximity to existing infrastructure is shown on Sheet 175 of 352 in Annex D of **13.A6 Environmental Statement Appendix 13.6 -**

[41] Institute of Air Quality Management (2024) *Guidance on the assessment of dust from demolition and construction*.

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	Wood. These are irreplaceable habitats with high biodiversity value. NG proposes 3:1 replacement planting, but this is reinstatement not compensation and lacks detail on stock size, biosecurity, and aftercare.	**Arboricultural Impact Assessment [APP-236]**. Paragraph 13.1.16 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** confirms that changes resulting from detailed design are likely to reduce overall impacts to trees. Any potential impacts to ancient woodland have been assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. As irreplaceable habitat, a bespoke mitigation solution for each specific ancient woodland has been developed and set out in detail within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**. The Applicant has separately made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within the Outline LEMP (**7.4 Outline Landscape and Ecological Management Plan [AS-046]**) which is secured by Requirement 4 within the draft Development Consent Order (DCO) **(3.1 Draft Development Consent Order [APP-056])**. Details of on-site tree planting will be provided in accordance with the final LEMP (if provided within Environmental Areas) or the Reinstatement Planting Plan secured under Requirement 9 of the **3.1 Draft Development Consent Order [APP-056]**. The Project will prioritise the replanting for individual trees within the Order Limits, however off-site provision may be required. Any off-site tree planting required as a result of this commitment will be secured via a legal agreement. The Outline LEMP **(7.4 Outline Landscape and Ecological Management Plan [AS-046]**) provides details on the approach to planting and aftercare in Sections 9 and 10. Further details will be provided in the final LEMP(s). The on-site planting provided under the 3:1 commitment is considered to comprise mitigation with any off-site requirement comprising compensation.
Ecology and biodiversity	46. Policy Conflict: • EN-1 requires avoidance and mitigation for irreplaceable habitats; loss of ancient woodland and veteran trees cannot be adequately compensated. • BS5837 compliance is claimed but not evidenced; Arboricultural Method Statement missing. 47. Summary Position: BBC objects to the removal of veteran trees and any direct or indirect impact on ancient woodland within its administrative area. The Council considers that the proposed mitigation is inadequate and fails to comply with EN-1 policy requirements for irreplaceable habitats. While National Grid proposes a 3:1 replacement planting ratio, this constitutes reinstatement rather than compensation and lacks detail on stock size, biosecurity, and aftercare.	46. Noted with regards to Overarching National Policy Statement (NPS) for Energy (EN-1 (2024)). Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** 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 [APP-300]**. Section 7 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** makes reference to the production of an Arboricultural Method Statement (AMS) following detailed design and to be agreed with the relevant Local Planning Authorities prior to construction activity commencing. This is also referenced in Paragraph 13.4.14 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**. 47. Where practicable, ancient woodland has been avoided through careful routeing and siting. There are five ancient woodlands where direct/indirect impacts are unavoidable, as the proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or 15 m root protection zone. However, these impacts have been minimised, assessed with **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026],** and appropriate mitigation set out in detail within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**. This document sets out clear mitigation measures required at each of the five woodlands to ensure no significant long-term residual effects and to ensure compliance with regard to ancient woodland and the wording within the NPS EN-1 (2024). 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 [AS-046]** 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 [APP-300]**. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** provides details on the approach to planting and aftercare in Sections 9 and 10. Further details will be provided in the final Landscape and Ecological Management Plan(s). The on-site planting provided under the 3:1 commitment is considered to comprise mitigation with any off-site requirement comprising compensation.

Topic	Comments	National Grid's response
Ecology and biodiversity	48. The Council therefore requests that the Examining Authority secure enforceable commitments for a full Arboricultural Method Statement, justification for any veteran tree loss, and appropriate compensation measures. Replacement planting must meet minimum standards, including 10–12 cm girth stock sourced from biosecure nurseries and maintained in accordance with BS8545. In addition, the Council seeks a strategic tree and woodland compensation package beyond reinstatement to offset residual harm.	Paragraph 13.1.8 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** requires an Arboricultural Method Statement (AMS) to be prepared. This is also reflected within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Commitment LV05 of **7.2 Outline Code of Construction Practice [APP-300]** also confirms that relevant tree protective principles would be detailed within an AMS. As detailed in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, the Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. Other tree habitat including scrub and woodland (area habitats) are assessed and mitigated through the Biodiversity Net Gain metric and captured within **7.1 Biodiversity Net Gain Report [APP-299]**. Planting Schedules are included in **7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324]**. These include indicative planting lists and sizes, with proposals for the inclusion of some Select Standard trees (10 to 12 cm girth, 3.0 to 3.5 m height, clear stem 1.75 to 2 m). A mix of sizes are suggested to provide diversity in terms of growth stages and sizes. Mitigation and compensation measures for ancient woodland and veteran trees are detailed within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** and will be refined following detailed design and with final details agreed under the final Landscape and Ecological Management Plan(s) secured under Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**. Replacement planting will be undertaken in accordance with the measures set out in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The mitigation and compensation measures proposed in relation to tree planting are considered appropriate.
Ecology and biodiversity	49. Key Issues • ES Chapter 8 survey coverage is incomplete (e.g., otter and water vole only 65% reported; bat roost inspections pending). • Priority habitats and important hedgerows will be lost; mitigation relies heavily on post-consent measures. • Hazel dormouse confirmed in Margaretting (Chelmsford) but connectivity loss could affect Brentwood's ecological network. • Reliance on "where practicable" clauses and short 5-year monitoring period risks mitigation failure. • Biodiversity Net Gain (BNG) commitment positive but off-site provision unclear for Brentwood.	Additional survey results from 2025 (including otter, water vole and bat roost inspections) are presented within Revision B of Environmental Statement Chapter 8: Ecology and Biodiversity **(6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026])** which was submitted to the Planning Inspectorate in November 2025. The Applicant has prioritised the reduction of impacts on priority habitats and features of high ecological value (including native hedgerows) through careful routeing and siting. Further details outlining the approach to routeing and siting in relation to priority habitats, ancient woodland, designated wildlife sites, and other features of high ecological value can be found in Section 4.3 (Corridor and Preliminary Routeing and Siting Study) and Section 5.3 (Whole Route Feedback) of **7.21 2.24 Design Development Report for the Project [APP-359].** On completion of works all areas of temporary construction impacts would be subject to replacement planting, replanting the habitat type that was lost. For the relatively small areas of permanent habitat loss, additional planting has been proposed within Environmental Areas surrounding the permanent National Grid asset. Illustrative landscape designs for these areas have been provided within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. As agreed with Natural England there would be no significant connectivity loss for hazel dormouse around Margaretting during the construction period. Impacts to suitable dormouse habitat in Margaretting are limited to a temporary gap in hedgerow and woodland habitats, to facilitate the construction haul road. The size of the gap would be a maximum of 12 m wide and therefore not cause fragmentation of dormouse habitat. Connected hedgerows around the sites would remain and dormouse would travel more than 12 m across open ground. All dormouse habitats would be reinstated following the completion of the works. Mitigation measures would be delivered through the implementation of the Outline Code of Construction Practice (CoCP) **(7.2 Outline Code of Construction Practice [APP-300])** and the Outline Landscape and Ecological Management Plan (LEMP) **(7.4 Outline Landscape and Ecological Management Plan [AS-046])**. The use of the phrase 'where practicable' provides the flexibility required for a project of this scale at this point in the Project. Once detailed design has been developed, the final LEMP and CoCP would provide more certainty on any exceptions. The Applicant has committed to a five-year aftercare period which is considered sufficient and standard for Development Consent Order projects of this nature. The Applicant has also committed to a 30-year

Topic	Comments	National Grid's response
		aftercare period at the proposed Environmental Areas in line with the commitments made within **7.1 Biodiversity Net Gain Report [APP-299]**. The Applicant has committed to delivering at least 10% BNG with wider environmental and societal benefits, despite it not yet being mandatory for Nationally Significant Infrastructure Project applications. The exact location of the off-site BNG sites would be determined following detailed design (post-consent) when the exact number of off-site units required has been determined. **7.1 Biodiversity Net Gain Report [APP-299]** includes the order of priority for off-site locations.
Ecology and biodiversity	50. Policy Conflict: EN-1 requires robust mitigation and compensation; current reliance on post- consent surveys and vague commitments is inadequate.	Where practicable, ancient woodland has been avoided through careful routeing and siting. There are five ancient woodlands where direct/indirect impacts are unavoidable, as the proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or 15 m root protection zone. However, these impacts have been minimised and appropriate mitigation set out in detail within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**. This document sets out clear mitigation measures required at each of the five woodlands to ensure no significant long-term residual effect and to ensure compliance with regard to ancient woodland and the wording within the Overarching National Policy Statement for Energy (EN-1 (2024)). 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])** will be refined following detailed design and any compensation agreed with regards to veteran trees.
Ecology and biodiversity	51. BBC considers that the ecological assessment relies too heavily on incomplete surveys and post-consent mitigation, creating uncertainty about the scale of impacts on protected species and priority habitats. While the commitment to BNG is welcomed, the Council is concerned that off-site provision for Brentwood is unclear and that the proposed five-year monitoring period is insufficient to ensure successful habitat establishment.	Updated ecology survey reports that include the 2025 survey data were submitted to the Planning Inspectorate in November 2025. This included an update to **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** and the following associated appendices: • 6.8.A13 ES Appendix 8.13: Otter and Water Vole Report [AS-039] • 6.8.A1 ES Appendix 8.1: Habitat Report [AS-028] • 6.8.7 ES Appendix 8.7: Breeding Bird Report [AS-030] • 6.8.A9 ES Appendix 8.9: Bat Roost Report [AS-034] • 6.8.A10 ES Appendix 8.10: Bat Activity Report [AS-036] • 6.8.A15 ES Appendix 8.15: Badger Report [AS-043]. The Applicant has committed to a five-year aftercare period which is considered sufficient and standard for Development Consent Order projects of this scale. 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]**.
Ecology and biodiversity	52. The Council requests that the Examining Authority require completion of bat roost surveys, including climbing inspections, prior to determination, and secure enforceable commitments for robust mitigation for protected species and priority habitats. The Council also seeks clear requirements for qualified Ecological Clerks of Works with defined authority to oversee compliance during construction. Finally, Brentwood requests that a strategic biodiversity compensation package and BNG delivery within the Borough be secured, with monitoring extending beyond five years to ensure long-term success.	The bat roost survey scope was agreed with Natural England in advance of surveys being undertaken. For the majority of the route, aerial inspections/emergence surveys would be undertaken following detailed design when it is clear which trees with potential bat roosting features would be impacted by the Project. In areas of highest risk for potential barbastelle bat roosts, surveys of these trees/woodland blocks were undertaken over the 2024/2025 survey season. Where barbastelle roosts were confirmed, the route has been amended to avoid these roosts. The results of the surveys in 2025 have been provided in an updated Environmental Statement (ES) Chapter 8: Ecology and Biodiversity **(6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026])** and updated ES Appendix 8.9: Bat Roost Report **(6.8.A9 ES Appendix 8.9: Bat Roost Report [AS-034])**. The Ecological Clerk of Works (ECoW) would be suitably qualified based off the industry good practice. Protected species specialists would be used where required as identified within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Biodiversity is not bound by local authority area and therefore off-site Biodiversity Net Gain 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 Biodiversity Net Gain sites will be selected based on a range of factors including proximity to

Topic	Comments	National Grid's response
		the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others. 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]**.
Ecology and biodiversity	53. BBC has reviewed the ES Chapter 8: Ecology and Biodiversity and remains concerned about the adequacy of mitigation for impacts on habitats and species within the Borough. While the ES identifies embedded and standard measures, the Council considers that the scale of the project and reliance on post-consent surveys creates uncertainty about the effectiveness of mitigation. Priority habitats, hedgerows, and mature trees will be lost, and the potential for cumulative impacts with other infrastructure projects is significant. The Council notes that BNG is proposed, which is welcomed in principle, but there is no clarity on how off-site habitat creation will benefit Brentwood or how long-term monitoring will be secured beyond the proposed five-year period.	All ecological impacts on habitats and protected species have been assessed in full within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Where impacts are anticipated, appropriate mitigation has been set out in line with good practice and relevant guidelines. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** clearly sets out all ecological mitigation measures to be implemented including embedded, standard and additional mitigation. Where post-consent surveys are required, generally these are required due the need for more recent survey data to update those surveys already undertaken and are a standard requirement of a project of this scale due to the length of the planning and construction programme. A Cumulative Effects assessment has been undertaken which includes all important ecology features and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. This assessment did not identify any significant cumulative effects. The Applicant has committed to delivering at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits, despite it not yet being mandatory for Nationally Significant Infrastructure Project applications. The exact number of off-site BNG units required will be determined following detailed design and a re-run of the statutory biodiversity metric. The Applicant is committed to delivery of off-site BNG units through third-party providers, with sites registered on the Natural England register, to ensure reliable delivery. Long-term management of these off-site BNG habitats will fall to the third-party providers in line with the habitat management plan for the specific site.
Ecology and biodiversity	54. BBC requests that the Examining Authority require enforceable commitments for robust ecological mitigation and compensation, including completion of outstanding surveys for protected species prior to determination, delivery of BNG within Brentwood where feasible, and monitoring extending beyond five years to ensure successful habitat establishment. The Council also seeks clear requirements for qualified Ecological Clerks of Works with defined authority to oversee compliance during construction and prevent harm to sensitive habitats and species.	The mitigation measures are secured through **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]** which are also secured through Requirement 4 of **3.1 Draft Development Consent Order [APP-056]** that will need to be discharged. Additional survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated Environmental Statement Chapter 8: Ecology and Biodiversity **(6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026])** which was submitted to the Planning Inspectorate in November 2025. The Applicant has committed to delivering at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits, despite it not yet being mandatory for Nationally Significant Infrastructure Project applications. The exact location of the off-site BNG sites will be determined following detailed design (post-consent) when the exact number of off-site BNG units required has been determined. **7.1 Biodiversity Net Gain Report [APP-299]** includes the order of priority for off-site locations. The Applicant has committed to a five-year aftercare period which is considered sufficient and standard for Development Consent Order projects of this scale. The Applicant has also 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]**. The Ecological Clerk of Works (ECoW) would be suitably qualified based off industry good practice. Protected species specialists would also be used where required as identified within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Community Benefits	*Community Benefits* 55. Social Value: BBC acknowledges the national importance of the Norwich to Tilbury project but is concerned that the proposals fail to clearly articulate tangible benefits for local communities hosting the infrastructure. While the applicant refers to skills development and regional employment opportunities, there is no commitment to deliver measurable outcomes such as apprenticeships, local supply chain engagement, or community	The Government has published guidance on community funds for transmission infrastructure (Department for Energy Security and Net Zero (DESNZ, 2025). In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025).

Topic	Comments	National Grid's response
	investment within Brentwood. The Council also notes the absence of detail on how the Government's proposed electricity bill discount scheme and wider community benefit funds will be implemented locally. 56. BBC requests that the Examining Authority require enforceable commitments for a comprehensive social value strategy, including local employment and training targets, support for community facilities, and transparent delivery of community benefit funds to offset the significant visual and amenity impacts of the scheme.	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. With regard to skills and employment specifically, please see the response to paragraph 57 below.
Socio-economics	57. Economy, Skills and Tourism: BBC recognises the national importance of the Norwich to Tilbury project but is concerned that the application does not provide clear commitments to deliver economic benefits within the Borough. While references are made to regional employment and skills development, there is no enforceable strategy to secure local jobs, apprenticeships, or supply chain opportunities for Brentwood businesses. The Council also notes the potential negative impact on the visitor economy, particularly at Thorndon Country Park and other recreational assets, due to prolonged construction activity, visual intrusion, and disruption to public rights of way. 58. BBC requests that the Examining Authority require the applicant to prepare and implement a Local Economic and Skills Plan, including measurable targets for local employment, training, and procurement, alongside measures to mitigate adverse impacts on tourism and leisure facilities.	Socio-economic impacts on the local economy, including impacts on local businesses, residents and the tourism sector are assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265].** The chapter concludes that there would be no significant impacts on the local economy as a result of the Project. Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalents (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. This is considered to not be a significant number of construction employment when compared with other sectors. Given these considerations, a DCO requirement for a Skills and Employment Strategy would not be proportionate or necessary for the Project. However, the Applicant will work with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. Post-construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance Socio-economic impacts on the local economy, including impacts on local businesses, residents and the tourism sector are assessed **in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265].** The chapter concludes that there would be no significant impacts on the local economy as a result of the Project.
Draft DCO	60. The Council acknowledges that the draft Order broadly follows the structure of previously approved DCOs. However, 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.	In preparing the draft Development Consent Order (DCO) (**3.1 Draft Development Consent Order [APP-056]**), recent precedents have been followed and guidance in Advice Note 15[42] and Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects[43] has been taken into account and complied with. The Applicant has considered each article and the provisions of each schedule to the draft DCO on a Project-specific basis and by reference to the issues relevant to the relevant article or schedule. The structure and content of the draft DCO is referenced extensively throughout the application documents, and any material change to the structure of the document in particular would require updating a very significant amount of the application documentation and cannot be supported on that basis given the scale of the application that has to be examined in the examination period.
Draft DCO	61. A number of issues remain unresolved. First, the timeframes set out for discharging requirements must allow sufficient opportunity for the Council to undertake necessary checks, consult stakeholders, and respond appropriately. Secondly, 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 Council is also concerned about the	1. 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 Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. 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

[42] Planning Inspectorate (2018) *Advice Note Fifteen: drafting Development Consent Orders*.

[43] Department for Levelling Up, Housing and Communities (2024) *Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects*.

Topic	Comments	National Grid's response
	proposed disapplication of the Hedgerows Regulations 1997 under Article 50. Before this can be agreed, the Applicant must provide a proper assessment of the impact on protected hedgerows and demonstrate how these will be safeguarded.	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. In each instance, the **3.1 Draft Development Consent Order [APP-056]** allows for the relevant decision-making authority and the undertaker to agree 'such other period' as may be appropriate in the circumstances. Likewise, there is scope within Paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the draft Development Consent Order (DCO) (**3.1 Draft Development Consent Order [APP-056]**) to extend the 28-day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within Paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question. 2. The Applicant is unclear as to the concern raised in the second point. The authorised development and associated development are described in Schedule 1 to the draft DCO. The authorised development is further shown on **2.3 Works Plans [APP-017 to APP-024]**. In addition, the Applicant submitted **5.14 Details of Associated Development, with references to documents [APP-121]** with its application, which delineates the authorised development and the associated development. The limits of deviation are set out in Article 5 (limits of deviation) to the draft DCO (**3.1 Draft Development Consent Order [APP-056]**), are shown on the Works Plans and in the table of parameters at the back of the Works Plans for each section. 3. Hedgerow surveys in line with the Hedgerows Regulations 1997 have been undertaken across the route. Details of these hedgerow surveys have been presented within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**. All native species hedgerows are considered to be Habitats of Principal Importance and are to be safeguarded. Impacts to hedgerows have been minimised as far as possible. Measures to safeguard hedgerows are presented within **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and therefore the Applicant is satisfied that there will be sufficient protections in place for hedgerows, even with the disapplication of the Hedgerow Regulations 1997.
Draft DCO	62. As highway authority for the borough, Essex County Council has raised detailed concerns regarding protective provisions, and Brentwood supports the need for robust measures to ensure the integrity of the local highway network. Similarly, the draft Requirements require further discussion, particularly in relation to construction hours, piling, and noisy works. Communities must have appropriate periods of respite from intrusive construction activity. For transparency and accountability, the Council strongly encourages the inclusion of a Register of Requirements within the DCO, similar to that adopted for the Lower Thames Crossing, to ensure ongoing fairness and clarity throughout the project's delivery.	The Applicant notes that Essex County Council has raised comments on the protective provisions and the Applicant has responded to these directly. The Applicant notes the authority's comments regarding the Requirements and awaits further detailed comments. 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 planning condition discharge applications. Therefore, the Applicant does not consider it necessary or proportionate for it to maintain a composite public Register of Requirements.

Appendix G. United Kingdom Oil Pipelines Limited (UKOP) and British Pipeline Agency (BPA)

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Appendix G
United Kingdom Oil Pipelines Limited (UKOP) and British Pipeline Agency (BPA)

Current position between the Applicant and British Pipeline Agency

Since submitting our application for development consent, the Applicant) has continued engagement with the BPA as agent for UKOP (the owner of the Thames to Buncefield Multifuel Pipeline ('the Pipeline')). As a result of this engagement, the Applicant is proposing to incorporate a design change into the Project that seeks to address the concerns raised in BPA's Relevant Representation (RR) **[RR-0413]**. This design change is referred to as 'Change Request 1' and is detailed in **9.1 Notification of proposed change to DCO application – Change Request 1 (Bulphan) [AS-049]** that was submitted to the Examining Authority (ExA). On 12 December 2025 the Applicant formally notified the ExA that it intends to apply to make a change to the application. It is anticipated that Change Request 1 will be submitted to the ExA towards the end of March 2026 once the Applicant has completed its consultation on Change Request 1 and finalised the Proposed Change Application.

Change Request 1 would result in an increase in the Order Limits to facilitate the mitigation works required for the protection of the Pipeline, west of Langdon Hills Golf Club. The proposed measures are likely to involve the installation of anti-corrosion earthing strips parallel to, and along, an approximately 2.7 km length of the Pipeline, along with the installation of surface-mounted monitoring equipment units. Temporary working and laydown areas will also be required. This proposed change responds to feedback concerning accelerated corrosion on the Pipeline as a result of provision of the overhead line in this vicinity, received from the BPA.

Typically, these works would be delivered under the asset owner's statutory powers. However, neither the BPA nor UKOP is a statutory undertaker that benefits from such powers. Therefore, the Applicant intends the installation and future maintenance of the required mitigation works to be authorised pursuant to **3.1 Draft Development Consent Order [APP-056]**. The Applicant understands that UKOP and BPA support that approach.

The Order Limits are to be increased as a consequence of the proposed change to allow for the delivery of the required mitigation works. The Applicant will in the first instance attempt to negotiate and secure voluntary agreements with affected landowners wherever possible. Heads of Terms for voluntary acquisition are being prepared and issued to landowners to facilitate this process. This includes rights necessary for construction, operation, and maintenance of mitigation works associated with the Pipeline. The Applicant will apply for powers of compulsory acquisition and temporary possession over the additional land intended to be brought within the Order Limits in case those negotiations are unsuccessful in order that the necessary mitigation works can be delivered to protect the Pipeline. These powers will be justified as necessary and proportionate to deliver the Project and associated mitigation works and where appropriate, include extinguishment or suspension of private rights under modified provisions of the Compulsory Purchase Act 1965. The Applicant is therefore engaging with landowners of

affected land parcels to explain the requirement for additional land and to seek the consent of those landowners to the inclusion within the draft DCO of compulsory acquisition powers for new land rights in respect of the land affected by the proposed change.

The Applicant has undertaken a review of the proposed change against all topics forming part of the Environmental Impact Assessment (EIA) to determine whether the proposed change would result in any new or materially different likely significant effects beyond those reported in the Environmental Statement (ES). The review concluded that the proposed change is not likely to affect the overall assessment and conclusions with respect to the likely significant effects presented within the ES **[APP-123 to APP-287, AS-026 to AS-045 and AS-068 to AS-083]**. Further information on the likely effects of the proposed change will be submitted with the Proposed Change Application.

The Applicant held a targeted consultation on Change Request 1 between 19 January 2026 and 23 February 2026. The Applicant will review and have regard to feedback received on the proposed change following the close of the targeted consultation period. Feedback received will be responded to in a Consultation Report that will accompany the Applicant's Proposed Change Application to the ExA. The Applicant intends to submit its Proposed Change Application towards the end of March 2026.

The change proposed has been discussed and is agreed with the BPA.

G.1 The Applicant's response to the British Pipeline Agency

Table G1.1 below summarises the Applicant's comments on the RR provided by the **BPA [RR-0413]**.

Table G1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
Property acquisition	1.5 Summary Concerns 1.5.1 While BPA does not object to the Application in principle, it does have significant concerns around the proposed approach to the proposed acquisition of land and rights in their current form. Consequently, its position to the dDCO is currently one of objection and it reserves its position in terms of making further representations in respect of the matters outlined in this relevant representation.	The Applicant agrees with the need for the proposed mitigation set out by the BPA in Paragraph 1.5.2(b). Therefore, as noted in the introductory text above, the Applicant is proposing to incorporate a design change ('Change Request 1') to accommodate the proposed mitigation into the Project (see **9.1 Notification of proposed change to DCO application - Change Request 1 (Bulphan) [AS-049]** for further details). Change Request 1 has been discussed and agreed with the BPA. The Order Limits are to be increased as a consequence of the change proposed, with powers of compulsory acquisition and temporary possession to be sought by the Applicant over the additional land intended to be brought within the Order Limits. The Applicant is engaging with landowners of affected land parcels to explain the requirement for additional land and to seek the consent of those landowners to the inclusion within the draft DCO of compulsory acquisition powers for new land rights in respect of the land affected by the proposed change. The Applicant has responded to the other points (Paragraphs 1.5.2(a) to (g) raised by the BPA below.
Draft DCO	1.5.2 A summary of the concerns (discussed in greater detail at paragraph 6 hereof is as follows: (a) The proposed acquisition of rights in the dDCO to enable UKOP to safeguard its Pipeline by installing the Proposed Mitigation (defined at paragraph 4.8 below) are significantly outside Order limits. (b) A failure to guarantee the installation and long-term retention / upkeep of the Proposed Mitigation would result in damage to the Pipeline due to accelerated corrosion and comprises a level of unacceptable risk (inter alia) to: (i) the public and the environment due to the potential of rupture and leakage; and (ii) the safety and security and resilience of the country's Nationally Significant Fuel Infrastructure (c) We query the adequacy and lawfulness of the rights proposed to deliver the Proposed Mitigation and protect the Pipeline as embedded in the dDCO at Article 21(**APP-056**, page 21-23); (d) We are concerned there is a potential deficiency of consultation requirements with affected landowners; (e) The scope (physical and temporal) of the proposed protective works power within the dDCO is to our knowledge unprecedented; (f) We query the ability of the Order to deliver key rights in land which can be registered in the name of UKOP and transferred to successors / shared with operators; and (g) The Environmental Impact Assessment is potentially defective in its scope in circumstances where the Protective Works are not secured (As mentioned above we are in ongoing negotiation with the Applicant in respect of looking to secure said Protective Works)	
6.10 Environmental Statement Chapter 10 - Health and	4.1 BPA manages and operates the Pipeline (being part of the network that supplies Heathrow and Gatwick Airports with jet fuel)	Noted. The Applicant agrees with the need for the proposed mitigation as set out by the BPA. Therefore, as noted in in the introductory text above, the Applicant has notified the ExA of its intention to submit a Proposed Change Application to incorporate a design change to accommodate the proposed mitigation into the Project (see **9.1**

Topic	Comment	National Grid's response
Wellbeing (Final Issue A)	and part of which is shown coloured blue, yellow, orange and red on the plan at paragraph 2 above. 4.2 We will refer to the plan at paragraph 2 throughout as "the Location Plan". 4.3 UKOP is the owner of the Pipeline. 4.4 The Pipeline is due to be crossed by overhead power cables pursuant to the Norwich to Tilbury DCO (being promoted by the Applicant) and said cables are shown as a green line on the Location Plan ("The Order Works"). 4.5 BPA has been engaging with the Applicant since March 2023, in order to seek to agree the scope of the proposed mitigation (see the timeline at pages 26 to 53 (inclusive) of the Bundle). If the Proposed Mitigation is not carried out, the risk of AC corrosion to the Pipeline is significant. This scenario has been modelled (by ERM as engineers for and on behalf of the Applicant) as likely to substantially exceed the British Standard Safety requirements by a factor of 46 times (Please see Figure 3.2 of the Applicant's commissioned ERM report at page 59 of the Bundle). This in turn would cause damage to the Pipeline and risk rupture and leakage from the pipeline and comprise a breach of paragraph 15 of the Pipeline Safety Regulations 1996 and could lead (inter alia) to damage to the environment and a risk to public safety. These cables should therefore not be energised until the Proposed Mitigation has been installed and is operational and the necessary proprietary rights relating thereto have been granted to UKOP and its agents, operators and successors.	**Notification of proposed change to DCO application - Change Request 1 (Bulphan) [AS-049]** for further details). The change proposed has been discussed and agreed with the BPA.
Mitigation measures	4.6 Engineers for the Applicant and UKOP have agreed that substantial surface and subsurface mitigation works are required to safeguard the Pipeline (and by extension the environment) from the corrosion risk created by the AC current interference which will be caused by the cables comprising part of the Order Works, once energised. 4.7 The Applicant's engineers advise that the Proposed Mitigation should be carried out to around 2.5 km of the Pipeline (this area is shown for indicative purposes only between the orange arrows on the Location Plan). 4.8 The Applicant and BPA/UKOP have now agreed the principles and scope of the mitigation work required, (see paragraph 4.6 and the redacted ERM report at pages 57 - 62 of the Bundle) (together "the Proposed Mitigation") albeit the full details (including methodology, cost recovery and access and egress) remain to be agreed as part of the protective provisions and necessary related asset protection arrangements which BPA/UKOP hope to agree with the Applicant in short order. 4.9 The majority of the Proposed Mitigation is not included within the Order limits and an indicative only plan (showing the Pipeline as a red line vis a vis the Order limits) is shown below:	Change Request 1 would result in an increase to the Order Limits of the Project to facilitate the works required for the protection of the existing Thames to Buncefield Multifuel Pipeline (see in the introductory text above and **9.1 Notification of proposed change to DCO application - Change Request 1 (Bulphan) [AS-049]** for further details).
Underground cables	5. Location of the Pipeline (Red Line) vis a vis the Order limits	Noted. As detailed above, Change Request 1 would result in an increase to the Order Limits of the Project to facilitate the works required for the protection of the existing Thames to Buncefield Multifuel Pipeline. The proposed measures are likely to involve the installation of anti-corrosion earthing strips parallel to, and along, an

Topic	Comment	National Grid's response
	5.1 The Location Plan [*provided with the RR*] colour codes the current proposal suggested by the Applicant's engineers (ERM) for 'sacrificial' zinc earthing strips to be laid parallel to and either side of the Pipeline, one metre apart and the installation of surface mounted monitoring equipment units with surface to subsurface cabling to monitor the interference and corrosion rate of the Pipeline as follows: 5.1.1 Blue Lines: No zinc strips 5.1.2 Yellow Lines: 2 x parallel zinc strips (a total of 2 metres either side of the Pipeline) 5.1.3 Orange Lines: 6 x parallel zinc strips (a total of 6 metres either side of the Pipeline) 5.1.4 Red lines: 8X parallel zinc strips (a total of 8 metres either side of the Pipeline) 5.1.5 Points marked "Connection 1-19" show the position of the proposed monitoring equipment units Please note that working and laydown compounds for such works together with access and egress for vehicles and heavy infrastructure and machinery will also be required albeit the details of these are still being discussed and agreed.	approximately 2.7 km length of the existing pipeline, along with the installation of surface mounted monitoring equipment units. Areas for temporary working and laydown areas have been considered and allowed for in the design of the mitigation works. The change proposed has been discussed and agreed with the BPA.
Mitigation measures	5.2 Our client is disappointed that despite the length of the negotiations between the parties, and the attempts by BPA/UKOP to front-load agreement on the practical aspects of the crossing (as required by the Government's Guidance on Linear Infrastructure Projects) and the undisputed necessity for significant mitigation for the Pipeline to take place, the Application (and the Order limits therein contained) were submitted without including the majority of the land required to deliver and retain such mitigation. UKOP did request over a month prior to submission (when the extent of the proposed Order limits were first shared) that the Order limits be extended to include the mitigation land but BPA/UKOP was informed that this was not possible. In the light of that position we are of the view that this matter is best resolved by the Applicant formally applying to amend their DCO application to secure delivery of the necessary temporary and permanent land rights to enable delivery of the Protective Works.	The Applicant has continued to engage with the BPA on this matter. On 12 December 2025, the Applicant formally notified the ExA of its intention to extend the Order Limits of the Project to facilitate the works required for the protection of the existing Thames to Buncefield Multifuel Pipeline and seek to address the concerns raised by the BPA (see in the introductory text above and **9.1 Notification of proposed change to DCO application - Change Request 1 (Bulphan) [AS-049]** for further details).
Statutory undertakers	5.3 UKOP has eight 999-year leases which are affected by the Order Works. These are all on slightly different terms but typically these do not include a surface demise or allow installation of infrastructure defined as "the pipeline" at a depth shallower than 3" and include a corollary permission for the landlord to disturb the land for agricultural purposes without consent. These provisions conflict with the need for a surface demise for the monitoring equipment and surface to subsurface rights to install cables and mitigation infrastructure. 5.4 By way of example, we have included one of the affected UKOP leases at pages 4 – 17 of the Bundle. While the definition of "Pipe-line" in this lease does at clause 10 (page 10 of the	Noted

Topic	Comment	National Grid's response
	Bundle) include "any protective material and equipment constructed or laid on or about or adjacent to the Pipeline" and Paragraph (1) of the First Schedule allows the Tenant the "uninterrupted rights to enter on foot and with vehicles and with machinery upon a working width of up to forty feet embracing the pipe-line […] to lay and construct the pipe-line" that right is subject to the requirement that the pipe-line be laid "at a sufficient depth below the general level of the surface land as not to interfere with normal agricultural operations and in any event not less than three feet below the general level of the surface of the land". In our view this would preclude the installation / retention of surface mounted monitoring equipment and surface to sub-surface monitoring cabling. We await confirmation as to whether the zinc strips could be installed at a depth great enough to comply with the "agricultural operations" depth requirement.	
Mitigation measures	5.5 UKOP requires temporary and permanent rights to install, retain, repair, replace and maintain the Proposed Mitigation for a term coextensive with the residue of its lease terms. They include access rights and working compounds wider than current easement widths as well as surface mounted AC mitigation pillars and monitoring posts. 5.6 As the Proposed Mitigation is not within Order limits, nor contained within the UKOP lease rights, the Applicant cannot, at present, guarantee that the necessary rights to install and maintain them can be delivered under the dDCO.	Change Request 1 would result in an increase to the Order Limits that would facilitate the necessary temporary and permanent rights for the Proposed Mitigation. As noted above, the change proposed, and how it facilitates the Proposed Mitigation, has been discussed and agreed with the BPA.
Property acquisition	5.7 The Applicant's solicitors have proposed that the necessary rights required by UKOP outside Order land are obtained by private treaty. While our clients are very happy to work towards facilitating this, there is no guarantee that landowners will engage (or will do so in a timely and reasonable manner) as there is currently no threat that compulsory purchase powers can be exercised over their land and therefore our clients need to ensure that the necessary rights can (if needed) be guaranteed to be obtained via the Order powers.	Although the Applicant will seek to agree all the required rights under voluntary agreement, there will be provisions within the **draft DCO [APP-056]** for compulsory acquisition powers. It remains the Applicant's intention and preference to negotiate and secure voluntary agreements for the land and rights required to install and maintain the mitigation works. However, and as with the remainder of the Project proposals, the Applicant must necessarily still seek powers to compulsorily acquire all necessary rights and other interests in order to ensure delivery of the required mitigation works should it not prove possible to secure the necessary land rights by negotiated acquisition. Additional powers of compulsory acquisition and temporary possession are therefore intended to be sought as part of the change application described above, including over the area of land brought within the Order Limits. The Applicant considers that the power to compulsorily acquire rights and other interests in the land affected by the proposed mitigation works is both necessary and proportionate in order to facilitate the installation, operation and future maintenance of the same. Those powers will be relied upon by the Applicant and/or UKOP to the extent that equivalent land rights cannot be secured through voluntary negotiation with affected landowners.
Draft DCO	5.8 The Applicants solicitors have sought to draft the dDCO in such a way so as to include rights for UKOP outside the Order Limits. 5.8.1 Article 6(1) relates to the sharing of the benefit of the Order with UKOP (albeit not with its successors, agents or operators) (see page 11 of the **APP-056**); and 5.8.2 Paragraph 3.10.4 of the Explanatory Memorandum refers to the need to be able to share rights with UKOP (see page 16 of the **APP-057**); and 5.8.3 Article 21 sets out the circumstances in which the "UKOP protective works" may be carried out, the proposed duration of	The Applicant proposes to seek such powers of temporary possession and compulsory acquisition as are necessary to ensure delivery of the required mitigation works. It is intended that those powers would be exercisable by the Applicant and/or UKOP. The Applicant has consulted BPA as to the form of rights which would be capable of being acquired pursuant to those powers.

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	such rights and the ability of landowners to challenge such rights (see pages 21 – 23 of the **APP-056**).	
Mitigation measures	5.8.4 For reasons set out in paragraph 6 below, BPA does not believe that the rights as currently drafted are sufficient to deliver either the physical mitigation works required to keep the Pipeline safe nor the land rights needed to retain, operate, repair, replace and renew the same.	
Environmental assessment	5.9 The Applicant has not included the risks associated with the crossing of the Pipeline within its Environmental Statement. This is on the basis that once the Proposed Mitigation has been constructed and is operational, it is not considered that the risks are sufficient to warrant inclusion pursuant to the requirements of Regulations 4 and 5 and Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This does not, however, take into account that the Applicant may not be able to deliver the rights required for the Proposed Mitigation.	A stand alone major accidents and disasters Environmental Statement (ES) chapter was proposed to be scoped out of the Environmental Impact Assessment (EIA) in **6.19 Scoping Report [APP-288 to APP-296]**. The Planning Inspectorate (on behalf of the Secretary of State) formally adopted **6.20 Scoping Opinion [APP-297]** on 14 December 2022 confirmed that a separate major accidents and disasters ES chapter could be scoped out of the EIA, however, the scoping opinion stated '*The Inspectorate considers that the potential for the Proposed Development to be vulnerable to or cause major accidents at crossings of watercourses and transport infrastructure, and at buried gas pipelines, should also be assessed in the relevant aspect chapters'* Although not a buried gas pipeline, **7.2 Outline Code of Construction Practice [APP-300]** commits within GG11 that *'The Project would be designed to comply with design safety standards including NETS SQSS and the suite of National Grid Policies and processes which contain details on design standards required to be met'* which would ensure no significant effects on the pipeline.
Project Finance – Costings approach	5.10 The Proposed Mitigation is likely to cost a significant amount of money and it is understood that the Applicants agree in principle to pay for the Proposed Mitigation which will be carried out by a contractor appointed by BPA/ UKOP, although are at the current date no contractual provisions securing this in place with the Applicant.	BPA will be compensated for all reasonable and efficiently incurred costs associated with the installation of the mitigation works. Discussions are currently ongoing to finalise an asset protection agreement formalising the agreement reached between the parties concerning the delivery of the mitigation.
Draft DCO	6.1 Acquisition of Rights Outside Order Limits and Scale of Works / Consultation Requirements 6.1.1 BPA are concerned that the dDCO seeks to authorise the acquisition of temporary and permanent rights for extensive protective works (including large-scale open cut excavation) on land significantly outside the Order limits. The relevant landowners have not been included within the scope of consultation of the dDCO which raises questions of lawfulness. 6.1.2 While section 120 of the Planning Act 2008 confers broad powers in terms of the content of a DCO, including protective provisions, we are concerned that the current drafting exceeds the proper limits of what can be authorised outside Order limits—especially as the rights are to be granted "in perpetuity" and with deemed planning permission. We therefore reserve the right to expand our representations on this point, (as indicated above we are in active discussions with the Applicant concerning the best way to secure the Protective Works). As also indicated above we believe this is best done by the Applicant formally applying to amend their DCO application to secure delivery of the temporary and permanent land rights to enable delivery of the Protective Works. 6.2 Precedent and Scope of Protective Provisions	As set out in the introductory text above, the Applicant has notified the ExA of its intentions to submit a Change Application for Change Request 1 to facilitate the mitigation works required. The Applicant proposes to seek such powers of temporary possession and compulsory acquisition as are necessary to ensure delivery of the proposed mitigation. It is intended that those powers would be exercisable by the Applicant and/or UKOP. The Applicant has consulted BPA, affected landowners and other stakeholders as to the form of rights which would be capable of being acquired pursuant to those powers. In preparing the Proposed Change Application for Change Request 1, the Applicant has had regard to the Planning Inspectorate's Guidance: Nationally Significant Infrastructure Projects: Changes to an Application After it has been Accepted for Examination[44] and The Infrastructure Planning (Compulsory Acquisition Powers) Regulations 2010 (CA Regulations). Relevant landowners have been consulted as part of the targeted consultation on Change Request 1 between 19 January 2026 and 23 February 2026 and will continue to be engaged as part of the change application process in accordance with the Planning Inspectorate Guidance and the CA Regulations.

[44] Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Change to an Application After it has been Accepted for Examination. https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-changes-to-an-application-after-it-has-been-accepted-for-examination

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	6.2.1 The dDCO relies on precedents such as the Thames Tideway DCO and others. However, many of these precedents are materially narrower, being limited to buildings within Order limits or to specifically listed assets. The present dDCO seeks to go further by allowing protective works to any land, buildings, structures, apparatus or equipment within or beyond Order limits, so long as "affected" by the development, and (as above) by conferring (in our view) a right to retain such works and access them "in perpetuity". 6.2.2 While there are DCO precedents supporting the application of protective works powers beyond Order limits, these have generally been more limited in scope and duration and BPA are concerned that these issues may prevent the delivery of the Proposed Mitigation and the associated temporary and permanent land rights through the dDCO as it is currently proposed and be vulnerable to challenge.	
Draft DCO	6.3 Ability of the Order to deliver rights in land which can be registered and transferred 6.3.1 We are unclear how the perpetual rights purportedly created outside the Order limits could result in a valid legal title in land, capable of being registered and tracked through changes of ownership. Furthermore, the current drafting does not enable UKOP to transfer the benefit of the protective works rights to a successor in title, nor does it adequately provide for operators or agents to hold such rights independently, although latter could potentially be addressed through revised drafting in the Order and as indicated previously we are in discussion with the Applicant as to the best way to secure these works. 6.3.2 This raises significant practical concerns regarding the long-term operability and enforceability of the rights, particularly in the context of future sales or changes in operatorship and the residue of the relevant Pipeline lease terms (which are all over 900 years). The lack of clarity on registration and transferability could undermine the security and effectiveness of the protective works regime. Again for these reasons we are of the view that this matter is best resolved by the Applicant formally applying to amend their DCO application to secure delivery of the temporary and permanent land rights to enable delivery retention and maintenance of the Protective Works.	The Applicant has notified the ExA of its intentions to submit a Change Application for Change Request 1 to facilitate the mitigation works required. The Applicant proposes to seek such powers of temporary possession and compulsory acquisition as are necessary to ensure delivery of the proposed mitigation.
6.5 Environmental Statement Chapter 5 - EIA Approach and Method (Final Issue A)	6.4 Potentially defective Environmental Impact Assessment (EIA) 6.4.1 The Environmental Statement for the dDCO has "scoped out" the potential impacts on the UKOP Pipeline on the basis that the proposed mitigation will be delivered and retained. However, there is genuine uncertainty as to whether the dDCO can guarantee the delivery and permanence of the mitigation, given the legal and practical issues outlined above.	The Applicant has notified the ExA of its intentions to submit a change application for Change Request 1 to facilitate the mitigation works required. A review of the proposed change against all topics forming part of the Environmental Impact Assessment (EIA) has been undertaken to determine whether the proposed change would result in any new or different likely significant effects beyond those reported in Volume 6 Environmental Statement (ES) **[APP-123 to APP-287]**. This review has concluded that the proposed change is not likely to affect the overall assessment and conclusions with respect to the likely significant effects presented within the ES. In undertaking this review, the Applicant has also considered again the topics that were previously scoped out as separate ES chapters of the as agreed in **6.20 Scoping Opinion [APP-297]** for the Project, issued on behalf of the Secretary of State on 14 December 2022. Taking account of the nature of the additional works proposed and the implementation of mitigation measures already set out in the ES **[APP-123 to APP-287, AS-026 to AS-045**
Environmental assessment	6.4.2 The EIA Regulations require that likely significant effects on the Environment be assessed pursuant to the requirements of Regulations 4 and 5 and Schedule 4 of the Infrastructure Planning	

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	(Environmental Impact Assessment) Regulations 2017. Where the mitigation measures cannot be guaranteed, the Environmental Statement should assess the unmitigated or reasonably foreseeable worst case result. The current approach is, therefore, in our view, insufficiently robust given the uncertainties regarding the legal deliverability and permanence of the mitigation rights (which will need to be coextensive with the land interests attaching to the Pipeline).	**and AS-068 to AS-083]**, this review has concluded that there would be no significant effects on these topics as a consequence of Change Request 1 and therefore, those topics would not need to be scoped in for further assessment. Further information on the likely effects of the proposed change will be submitted with the Proposed Change Application 1.
Draft DCO	6.5 Strategic and Procedural Concerns 6.5.1 Given the above, BPA and UKOP cannot be assured that the dDCO, as currently drafted, will secure the delivery and permanent retention of the necessary mitigation. The potential failures in consultation and the extent of rights sought present risks as to the lawfulness and operability of the dDCO.	For the reasons set out above, the Applicant considers that Proposed Change Application 1 is capable of addressing, in full, the strategic concerns raised by BPA and UKOP. Further, and taking account of the proposed change, the Applicant does not consider there to be any grounds upon which the lawfulness of **3.1 Draft Development Consent Order [APP-056]** can be called into question.
Draft DCO	6.6.1 If the dDCO cannot guarantee: (a) the ability for UKOP to install Proposed Mitigation (together with any other necessary works required to protect the Pipeline from the Order Works); and/or (b) the granting to UKOP (to benefit its agents, operators and successors) of the necessary property rights (ancillary to and no materially less favourable than its existing rights) in respect of the matters in (a). then there is a significant and unacceptable risk that the Order Works would damage the Pipeline which in turn could result in harm to the Environment, the public and Nationally Critical fuel supply to key assets such as the airports. 6.6.2 We remain willing to consider and work with the Applicant to agree suitable protective provisions to address the above concerns and (in parallel) to negotiate with landowners in terms of obtaining necessary land rights by private treaty.	The Applicant considers that Proposed Change Application 1 addresses BPA's concerns. The change proposed has been discussed and agreed with the BPA. The Applicant continues to engage with the BPA on these matters. Both parties are working together on the necessary land rights and protective provisions and other arrangements for delivery of the mitigation works to be included in an asset protection agreement between the parties.
Draft DCO	6.6.3 In conclusion BPA/UKOP cannot support the draft Order in its current form and would ask the Planning Inspectorate not to submit the dDCO for approval until its legitimate concerns have been addressed and the Pipeline has been adequately safeguarded and protective provisions agreed. It is the position of BPA/UKOP that this is best achieved by way of a formal application by the Applicant to amend their DCO application.	

Appendix H. Chelmsford City Council

nationalgrid

Appendix H
Chelmsford City Council

Chelmsford City Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the Relevant Representation (RR) provided by **Chelmsford City Council [RR-0545]**.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (**5.9.10 Draft Statement of Common Ground - Chelmsford City Council [Revision B]**), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table H1.1 Summary of comments and National Grid's response

Topic	Comments	National Grid's response
Alternatives	3.3 CCC objects to the Norwich to Tilbury pylon proposal. Our objection is based on the following grounds: 3.3 (I) The preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons. 3.3(II) CCC recognises that this option would need to be delivered at pace and without risk to national net zero, renewable energy and decarbonisation targets, and energy security.	The Applicant notes Chelmsford City Council's preference. NPS EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way[45]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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.
Landscape and visual	3.3(III) CCC consider that the presence of overhead lines and approximately 30-50m high pylons would be visually harmful and would result in unnecessary harm to heritage, landscape, ecology and residential amenity across the Chelmsford City Council administrative area.	The Applicant acknowledges that there the Project would result in some residual environmental effects. 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 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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-145]** and **5.6 Planning Statement [APP-085]**. EN-1 paragraph 4.1.7 provides *'… 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'.* 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.

[45] Electricity Act 1989, Section 9

Topic	Comments	National Grid's response
		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.
Need case	3.4 CCC accept that the network reinforcement offered by the proposal is needed to accommodate the additional planned electricity generation in the East Anglia region. It would also assist in the decarbonisation of the UK's energy supply and help deliver the Government targets of net zero by 2050. 3.5 CCC previously raised concerns in responses to consultation regarding the uncertainties surrounding the timeframes for planned future connections stated by the National Grid Electricity Transmission (NGET). By way of background, an independent report, known as the Hiorns Report (The East Anglia Transmission Network Reinforcement Report by Hiorns Smart Energy Networks (2023) was commissioned jointly by Essex County Council, Suffolk County Council and Norfolk County Council. The report reviewed the need and timing for additional capacity out of the East Anglia region and considered the need against a range of credible generation scenarios to assess the robustness of the need case. 3.6 The Hiorns Report concluded that the case for the Norwich to Tilbury proposal focused solely on the contracted energy generation position to identify the maximum requirement for additional transmission capacity in East Anglia. The report identified that it is extremely unlikely that all of the contracted energy generation projects would come forward and/or connect at the volumes stated or dates contracted. As a result, the report concluded that there was scope for further analysis of potential options, including a potential offshore High Voltage Direct Current (HVDC) link, and it could not be concluded that the NGET proposal was the best option. 3.7 NGET responded to that report in April 2024 suggesting that it could not delay its reinforcement of the transmission network beyond 2030 without being in breach of its contractual and licence obligations. Whilst these obligations are acknowledged, credible alternatives such as an offshore centred approach or High Voltage Direct Current (HVDC) undergrounding, delivered at pace, to minimise onshore infrastructure in Essex should continue to be fully explored.	At each key stage of the consultation and submission process the Needs Case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Transmission Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 in as set out in **Strategic Options Backcheck and Review [APP-355].** The timing and urgency for electricity infrastructure is referred to within The Overarching National Policy Statement for Energy (EN-1) *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.* The National Policy Statement for Electricity Networks infrastructure (EN-5) also states the following regarding Transmission Owners**:** *2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.* *2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.* **7.19 2023 - Strategic Options Backcheck and Review [APP-357] Appendix A Page A3** sets out the Applicants Transmission Owner Licence obligations providing detail to the duties referred to within The National Policy Statement for Electricity Networks infrastructure (EN-5) Condition D2: *"Obligation to provide transmission services",* which includes *"responding to requests for the construction of additional transmission system capacity".* Condition D3 *"Transmission system security standard and quality of service"* which includes "*Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')"* Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS are in place. The factors above show the 2025 updated Needs Case continues to indicate the urgent need for reinforcement for both Contracted and ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report was published in April 2024 and is available on the Project website. In summary we do not accept the Report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register. Furthermore, 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

Topic	Comments	National Grid's response
		in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.
Alternatives	3.8 The application proposes predominantly 50m (approx.) high lattice pylons and overhead lines. The proposal would have very significant and harmful impacts including those upon landscape, historic environment and residential amenity. If the timing for the network reinforcement is less acute as suggested in the Hiorns report, CCC considers that alternative schemes to the proposed lattice pylons scheme, such as off-shore and High Voltage Direct Current (HVDC) undergrounding, should be explored in more detail to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme. 3.9 CCC reiterate that its preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons. CCC recognises that this option would need to be delivered in a timely manner, and without risk to national net zero, renewable energy generation and decarbonisation targets and energy security. The Hiorns report described the offshore solution as credible and concluded the offshore option would be less expensive than the onshore option with HVAC cables.	The Applicant has set out its response regarding the Hiorns report above in paragraph 3.4-3.7 and does not agree that timing for network reinforcement is 'less acute' than 2030. Please refer to the Applicant's response to paragraphs 3.1 and 3.2 of the RR in relation to its compliance with national policy on the use of overhead lines. In relation to the Council's preference for HVDC specifically, National Grid considered such alternatives in the **2023 Strategic Options Backcheck and Review [APP-357],** with all on-shore alternatives of AC overhead Line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC on-shore 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 **Chapter 15 [APP-357]** the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. 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 1800MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800MW 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.
Landscape and visual	5.6 The proposal would introduce vast incongruous features of industrial character into a rural landscape, which would have harmfully impact upon the landscape and historic environment. The pylons and overhead lines would be visually noticeable and prominent.	Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240].** There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226**]. The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Planning policy	5.7 The pylons would be between approximately 30-50 metres high, rising higher to about 56 metres accounting for the Limits of Deviation. Together with other elements of the proposal including overhead lines, any buildings, enclosures, boundary fencing or operational equipment, they do not fall within any of the exceptions in paragraph 154 of the National Planning Policy Framework (NPPF) or the relevant policies in the Adopted Chelmsford Local Plan.	The **2.3 Works Plans - Section F [APP-022]** and **Section G [APP-023]** include a table of parameters which identifies that the tallest pylon (infrastructure height above foundation) in Chelmsford is within Section F and is 60.7 m (TB158). 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. The **5.6 Planning Statement [APP-085]** submitted with the application for development consent, includes an assessment of the Project against Green Belt planning policy (as contained in National Policy Statement EN-1 (2024) and the National Planning Policy Framework (2025). Notwithstanding the above, the NPS EN-1 (2024) paragraph 4.2.16 sets out that where a project is CNP Infrastructure '*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*'. NPS EN-1 (2024) paragraph

Topic	Comments	National Grid's response
		4.2.17 identifies that this assumption includes where development is within a Green Belt and requires very special circumstances to justify development.
Planning policy	5.11 From a spatial element, the proposal would introduce substantial development into the area in terms of ground cover and built form that would diminish the openness of the Green Belt spatially. Visually, the landscapes that would be affected by the proposal are often undeveloped, rural landscapes where intervisibility can be quite high due to being either large scale flat or gently undulating landscapes or where the scale and height of the pylons and overhead wires mean the effect is an industrialisation of the countryside.	To facilitate the Project, it would be necessary to route through the Metropolitan Green Belt. The Applicant has considered the effects on the Green Belt and all of the options connecting into Tilbury identified in the **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** would result in new and upgraded infrastructure in the Green Belt. 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. Many of these connections are by way of overhead lines. By their nature, electricity transmission infrastructure (overhead lines) within the Green Belt is inevitable due to the need to transport energy around the country and the need to avoid the most built-up areas around our towns and cities. 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. 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. The **5.6 Planning Statement [APP-085]** submitted with the application for development consent, includes an assessment of the Project against Green Belt planning policy (as contained in National Policy Statement EN-1 (2024) and the National Planning Policy Framework (2025). Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].**
Planning policy	5.12 The proposal would conflict with the purposes of including land within the Green Belt. In terms of encroachment, the proposal would place a large number of pylons and associated infrastructure within an extensive number of fields within the countryside. Although maintaining some separation between them, the pylons and associated infrastructure would fundamentally alter the appearance of the fields and landscape that they would be sited within it. These would alter from a sequence of open green spaces to spaces accommodating large industrialised development that would result in encroachment, in contradiction of a Green Belt purpose. 5.13 The proposal, as inappropriate development, would by definition be harmful to the Green Belt. It would result in encroachment and moderate harm to the openness of the Green Belt in both visual and spatial terms. The proposed development would conflict with national and local planning policies. These seek to resist inappropriate development and only allow engineering operations that would preserve openness and not conflict with the purposes of including land within the Green Belt. All harm to the Green Belt carries substantial weight. 5.14 The very special circumstances put forward by NGET would need to be considered alongside any other identified harm arising	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. Notwithstanding the above, even if the overhead lines were considered to be inappropriate development (which is not accepted by the Applicant as set out in **5.6 Planning Statement [APP-085]**), it is nevertheless considered that there are very special circumstances which justify their acceptability. Paragraphs 7.3.497 to 7.3.537 of the **5.6 Planning Statement [APP-085]** consider the Project's compliance with Green Belt policy. The assessment concludes that the overhead line infrastructure should be considered to be an engineering operation and as such should not be regarded as inappropriate development in the Green Belt. The **5.6 Planning Statement [APP-085]** details the Very Special Circumstances applicable in this instance to justify inappropriate development. In addition, paragraph 4.2.17 of National Policy Statement EN-1 (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*'.

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	from the scheme, acknowledging that the proposal is inappropriate development.	
Agriculture and soils	5.16 Paragraph 5.11.26 of NPS EN-1 states that applicants should seek to minimise the direct effect of a project on the existing use of a site and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction.	The Applicant has taken into consideration the location of existing and proposed land use in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts, where possible. **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** and the **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **7.20 2023 - Design Development Report for the Project [APP-358]** describe the iterative development of the Project from the strategic proposal to the draft alignment, and documents the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. Whilst National Policy Statement EN-1 (2024) (paragraph 5.11.23; although the comment refers to paragraph 5.11.26 it is assumed that this should refer to paragraph 5.11.23) does note that there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site, as set out in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** potential impacts on land use and agricultural operations have been taken into account and minimised where practicable. Soil management measures to be implemented during construction, to protect the soil resource, are detailed in the **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]**. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, or as agreed with the landowner.
Landscape and visual	5.17 CCC consider that proposals within the rural area should protect the identified character, beauty and appearance of the countryside. 5.18 There are two aspects of the proposal that have potential to cause an effect on visual amenity and landscape character. These are the activities and elements of the proposal that would affect the fabric of the site landscape, and the activities and visual characteristics of the elements that would be visible from the surrounding locality. 5.19 The proposal would introduce lattice pylons ranging from 30 - 50 (approx.) metres in height, overhead lines and associated infrastructure in the countryside. Accounting for the Limits of Deviation, the height of the pylons could increase to approximately 56 metres in places. The landscapes affected by the proposal are often undeveloped, rural landscapes where intervisibility can be quite high due to being either large scale flat or gently undulating landscapes or where the scale of the pylons and overhead wires means the effect is an industrialisation of the countryside. 5.20 The proposal would lead to a harmful change in the identified character and appearance of the landscape, which would lead to a change in the character and quality of the landscape. It would lead to harmful visual intrusion, through the siting of high large-scale industrialised features that cannot be fully mitigated against. The proposal would lead to the harmful loss of the character and beauty of the countryside.	The Landscape and Visual Impact Assessment set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. A full summary of effects on landscape character areas and landscape character types is provided in Table A13.2.73 of **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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. Please refer to the Applicant's response to paragraph 5.6 of the RR above, regarding the 'industrialisation' of the landscape in rural areas.

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Landscape and visual	5.21 The Green Wedge is a unique designation in Chelmsford and has a multi-functional role providing opportunities for cycling and walking as well as being a wildlife corridor. 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[46] as Green Wedge. Please refer to the Applicant's response to paragraph 5.6 of the RR above, regarding the 'industrialisation' of the landscape in rural areas.
Historic environment	5.23 Little Waltham and Great Waltham are both picturesque villages with high quality vernacular historic buildings set within rural landscapes. Non-significant impacts are also identified to many listed buildings within the setting which should be considered cumulatively as they form part of an area of high heritage sensitivity, along with Langleys. The proposal would impact upon a number of non-designated heritage assets within the vicinity of the route. 5.24 The Council assess the impacts to Great Waltham (CA55) and Little Waltham (CA56) as moderate and thus significant for the purposes of the ES, which will be set out within the Local Impact Report. There is only one other location on the entire 184km route where permanent significant impacts are identified affecting any Conservation Area. Langleys Registered Park and Garden (1000241) is the only RPG where there are agreed moderate and thus significant for the purposes of the ES. 5.26 Langleys has an isolated rural setting, which makes an important contribution to its significance. The introduction of pylons within the setting of the house and garden would irreversibly destroy the unique and irreplaceable historic environment, leading to significant adverse heritage impacts which are not adequately mitigated.	The assessment in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** concluded lower less than substantial harm for Great Waltham and Little Waltham conservation areas during construction and operation phases of the Project. The Applicant still considers this assessment to be appropriate for the reasons set out in the assessment. The Council and Applicant are in agreement regarding the impact to Langleys Registered Park and Garden.
Historic environment	5.27 The proposal would also irreversibly destroy the unique and irreplaceable historic environment within Great Waltham and Little Waltham. Whilst some of the harm identified is at the low level, cumulatively there would be an extensive impact.	The Project has assessed the potential impact on designated and non-designated heritage assets in accordance with the **6.19 Scoping Report [APP-288 – APP-296]**, **6.20 Scoping Opinion [APP-297]**, the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]**, and professional heritage sector guidance as set out in paragraph 11.2.19 of that chapter. 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. In addition, as the Project is classified as critical national priority as set out in Section 4.2 of National Policy Statement (NPS) EN-1 (2024) there is a presumption that it will meet the test for public benefit that outweighs harm, even if substantial harm were identified, as set out in paragraphs 4.2.15 to 4.2.17 of NPS EN-1 (2024). 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 located within Chelmsford as set out in paragraphs 17.5.49 to 17.5.52.
Landscape and visual	5.28 In landscape and visual impact terms, there are concerns regarding the wider impact of the pylons and overhead line on the historical landscape setting associated with Langleys. The introduction of pylons would likely degrade the setting by forming a backdrop of pylons behind the building within the wider landscape.	Please refer to the Applicant's response to paragraph 5.6 of the RR above, regarding the 'industrialisation' of the landscape in rural areas. The landscape and visual assessment presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse landscape and visual effects resulting from the introduction of the above ground elements of the Project, including overhead lines and pylons, in the valley area between Little Waltham and Great Waltham, to the east of Langleys Registered Park and Garden (RPG). Effects are localised

[46] Chelmsford City Council (2020) *Chelmsford Local Plan: Our Planning Strategy 2013 to 2036*

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	5.29 The proposal would be introduced into a location where views are otherwise absent of overhead lines resulting in a major and significant adverse effects by the introduction of industrialised features. The siting of the pylons and overhead lines within the gap between the two Defined Settlements of Great Waltham and Little Waltham would lead to the introduction of high industrialised features that would be at odds with the rural character and appearance of the area.	and contained within the valley area close to the alignment due to the presence of existing mature vegetation, including woodland strips on the edge of Langleys and mature trees to the west of Little Waltham. The valley area is sparsely settled with low lying fields and scattered mature trees that border the River Chelmer, and is crossed by a small network of rural lanes and roads. The B1008 bypass runs roughly parallel to the east of the alignment and to the west of Little Waltham. The bypass influences the localised character of the valley area east of Langleys RPG. Whilst the ES reports major significant adverse effects within 0.5 km of the Project, for the reasons set out above, widespread significant landscape and visual effects are not anticipated at this location. With regard to heritage assets, the assessment in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** concluded lower less than substantial harm for Great Waltham and Little Waltham conservation areas during construction and operation phases of the Project. The Applicant still considers this assessment to be appropriate for the reasons set out in the assessment. The assessment concluded mid less than substantial harm during construction and operation to Langleys RPG. On the basis of other representations from the Council below we understand the Council and Applicant are in agreement regarding the impact to Langleys RPG. The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Landscape and visual	5.30 There would be close and sometimes open views of the proposal from local receptors, from residential properties along several roads/lanes, the Public Rights of Way (PRoW) network and from scattered properties where pylons would appear very prominent and seen in full against the sky. Pylons would appear stacked behind each other in some views. The visual effect would be particularly noticeable from less vegetated sections such as Chatham Hall Road, with much of the pylon's structure prominently visible against the sky.	The assessment of visual effects considers effects on the visual amenity of people and is presented in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The LVIA recognises that there will be significant visual effects of the Project during construction and operation (and maintenance), including in the area near Chatham Hall Lane close to Little Waltham and Great Waltham. The appendix sets out the assessment for visual receptor areas (VRA) including VRA F3: Great Waltham and VRA F4: Little Waltham, which are relevant to this comment. The assessment notes that there would be close and sometimes open views of the Project near these pylon locations (near the B1008, Chatham Hall Lane and Chelmsford Road). At greater distances from the pylons at this location, the assessment notes views are more likely to be screened or filtered due to existing strips of riparian vegetation along the watercourses, woodland strips and tree lines on the edge of the Registered Park and Garden at Langleys, and therefore reduce visual effects on receptors. The **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]** (RVAA) was prepared in line with the Landscape Institute's Technical Guidance Note 2/19 Residential Visual Amenity Assessment[47]. The RVAA recognises that the Project would have a large magnitude of effect upon the visual amenity of the residents of some of the properties in the Chelmsford City Council administrative area. In all such cases, following the required more detailed assessment, it was found that the Project would not block the only available view from any property, would not be overwhelming in views in all directions from any, would not be unpleasantly encroaching upon any, and would not be inescapably dominant in views from any. Consequently, the Project was not found to breach the 'residential visual amenity threshold' of any property in this area.
Landscape and visual	5.31 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. The cumulative effect of multiple pylons and the continuous overhead linear nature of the project, means that the collective impacts would create an overall significant adverse effect at both construction and operation.	**6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]** identifies effects on VRA F4: Little Waltham. This assessment states that there would be a high magnitude of visual effects within 0.5 km at both construction and operation, including views from the western edge of Little Waltham, reducing to medium within areas of settlement at Little Waltham where views are likely to be screened in places. This would result in a major and significant (adverse) effect on receptors within 0.5 km, reducing to moderate and significant (adverse) within Little Waltham. The assessment states that close views would be experienced from some scattered properties including from the northern and western settlement edges of Little Waltham, though intervening vegetation and landform would provide some screening in places. Built form within

[47] Landscape Institute (2018) *Technical Guidance Note 2/19 Residential Visual Amenity Assessment*

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		Little Waltham would screen many views towards the Project from within the settlement. The visual assessment reports a worst-case scenario. The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Alternatives	5.32 In its Targeted Consultation Response, CCC presented the following three options with respect to the siting of the route between Great Waltham and Little Waltham. (I) CCC's preferred option is that alternative mitigation in the form of underground cabling should be used for this section. 5.32(II) Alternatively, different alignment should be chosen with further consideration being given to relocating the route to the north of Great Waltham and Little Waltham. Details of this route can be found at page 58, figure 5.13, Indicative alternative route of the Norwich to Tilbury Design Development Report June 2023. 5.32(III) III. Finally, upon exhausting the above options, regard should be given to the introduction of T pylons along this part of the route. These have a visually different character and appearance that may contribute to a mitigation strategy to limit the landscape and heritage issues listed above. A full impact assessment of the use of T pylons should be undertaken to determine the suitability of this proposal. 5.33 These options have been discounted by NGET and have not been taken forward. CCC reiterates that its preferred options for Great Waltham and Little Waltham are those set out above. CCC disagrees with NGET's discounting due to the identified harm that the proposal would have upon the area. To address CCC's concerns, NGET have proposed siting lower height pylons between Great Waltham and Little Waltham	The Applicant notes Chelmsford City Council's preference but is required to develop proposals in line with national policy and its regulatory requirement. The **5.15 Design Development Report [APP-122]** paragraphs 2.5.5 to 2.5.6 set out the strong starting presumption in National Policy Statement EN-5 (2024) for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. This considered around Great and Little Waltham: alternative route alignments (from paragraph 9.2.2 of the **5.15 Design Development Report [APP-122]**); other pylon types (from paragraph 9.2.8); and the use of underground cable (from paragraph 9.2.17). Alternative routes were considered less preferred (fifth bullet paragraph 9.2.4), the use of a number of low height lattice pylons was beneficial (paragraph 9.2.16) but the costs and effects of underground cable are not justified (paragraph 9.2.23).
Historic environment	5.34 Pylons TB136 to TB142 are proposed as lower height pylons of approximately 30 metres height. Whilst the lower height pylons limit their visibility above trees when seen in the context of tree belts, they would have a similar or greater visual presence in exposed locations due to their wider stance and thicker structural sections. 5.35 The lower height pylons would reduce the extent of visibility from Grade I listed Langley's house and its immediate gardens. Yet the wider stance and heavier frame of the lower height pylons would have a greater visual presence in the context of the southern part of Great Waltham Conservation Area and the designated and non-designated heritage assets in this area. Cumulatively the greater harm to the other heritage assets and on landscape mean that the proposed mitigation strategy is inadequate. 5.36 - Pylons TB140 – TB142 5.36 The Limits of Deviation include flexibility for three of the low (c.30m) height pylons at TB140-TB142 to be increased in height	Pylons TB136 to TB142 would be between 36 m and 42 m in height. Further detail is provided in the Table of Parameters in **2.3 Works Plans - Section F [APP-022]**. The Landscape and Visual Impact Assessment is presented in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The assessments of visual receptor areas VRA F3 Great Waltham (paragraph 13.9.31) and VRA F4 Little Waltham (paragraph 13.9.44) both note that '*In views from the closest visual receptors where there is limited or no intervening screening or landform, low height lattice pylons are likely to be more noticeable due their wider stature, use of thicker steel lattice sections and therefore bulkier appearance*.' The Landscape and Visual Impact Assessment set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. A full summary of effects on landscape character areas and landscape character types is provided in Table A13.2.73 of **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. The Great Waltham Conservation Area lies within the Landscape Character Area C5: Chelmer Valley where significant adverse landscape effects are reported within 1.5 km of the Project as a result of the introduction of the above ground elements of the Project, including overhead lines and proposed pylons.

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	by up to 18m to 48 metres. This flexibility offers the opportunity to reduce the three pylons to two full height pylons, moving pylon TB141 further away from the edge of Great Waltham Conservation Area and the non-designated heritage asset Windmill House.	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 heritage assets located within Chelmsford as set out in paragraphs 17.5.49 to 17.5.52. The assessment in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** concluded lower less than substantial harm for Great Waltham and Little Waltham conservation areas during construction and operation phases of the Project. The Applicant still considers this assessment to be appropriate for the reasons set out in the assessment. The assessment concluded mid less than substantial harm during construction and operation to Langleys Registered Park and Garden (RPG). The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects, such as those summarised above, are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
	5.37 The introduction of full height pylons and the omission of one pylon could potentially reduce the level of heritage harm and CCC request that the matter is explored further, with visualisations and plans provided for further assessment.	Design change has been considered as set out in the **5.15 Design Development Report [APP-122]**, which 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. Factors relevant to requested changes 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. Visualisations produced for statutory consultation and targeted consultation have already been considered to inform the design development in this location, specifically with reference to potential impacts on Langleys Grade I listed building, Langleys Grade II RPG and Great Waltham and Little Waltham conservation areas. As set out in the **5.15 Design Development Report [APP-122]**, the Project assessment concluded that the low height pylons and their locations were preferred for historic environment as they reduced visibility from a greater proportion of Langleys Grade II RPG and Great Waltham and Little Waltham conservation areas.
Ecology and biodiversity	5.38 The proposal would lead to a considerable removal of trees, hedgerows and planting and has potential to impact upon Veteran trees which are irreplaceable habits. There is deep concern regarding the amount of vegetation proposed for removal. Pylons TB139 and TB140 would be sited close to the Conservation Area, which contains valued trees which could be removed should the proposal be granted.	The Environmental Statement is based on a reasonable worst-case scenario of vegetation loss, based on the overhead line and underground cable design presented on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]**. Following detailed design (post-consent) it is anticipated that the amount of vegetation loss would be reduced. The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts where practicable. Paragraph 13.1.16 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** states that during detailed design the impacts to trees are likely to reduce. There are numerous commitments set out in **7.2 Outline Code of Construction Practice [APP-300]** that seek to minimise impacts to vegetation, for example commitment B13 states *'There will be a refinement post-consent, that within the provisions of the* [**7.4 Outline Landscape and Ecological Management Plan [AS-046]**] *aims to further reduce vegetation losses prior to pre-commencement.*' The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** also includes our approach for veteran trees. The **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** provides further detail on the management of irreplaceable habitats including veteran trees. In addition, the working areas (for pylon TB139) are reduced in the design to avoid impact to Langleys Deer Park.
Ecology and biodiversity	5.39 The proposal would represent increased and harmful pressures on woodlands, trees, hedgerows and Local Wildlife Site(s) and sufficient mitigations and buffers would need to be provided. Where harm is unavoidable arboricultural compensatory measures should be delivered to offset harm. Loss to trees and woodland that has not been appropriately justified or mitigated at	The Environmental Statement is based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. Following detailed design (post-consent) it is anticipated that the amount of vegetation loss would be reduced and impacts to local wildlife sites minimised as far as practicable. The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** both include commitments to ensure the mitigation hierarchy is applied, with

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	this stage in time. There is no appropriate mitigation for the loss of irreplaceable habitats.	the priority of avoiding impacts to habitats including woodlands, trees and hedgerows, where practicable. Irreplaceable habitats, including ancient woodland and veteran trees, are addressed in detail within the **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**.
Community Impact	5.40 The siting of pylon TB141 adjacent to Windmill House would have a harmful and unacceptable impact upon the occupant's amenities, both visually and spatially, where the pylon would have an overbearing and dominant impact upon the property.	A **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]** (RVAA) has been prepared. The RVAA includes an assessment of the residential visual amenity impact upon Windmill House. It was prepared in line with the Landscape Institute's Technical Guidance Note 2/19 Residential Visual Amenity Assessment[48]. The RVAA recognises that due to its proximity to the property and the current views experienced from the dwelling and its curtilage, the Project would likely bring about a large magnitude of effect to the visual amenity of its residents. The Project would introduce new built elements and layering of pylons within available views from three directions of the property. The RVAA identifies, however, that the Project (including pylon TB141) would not have such an overbearing and dominant impact on the views from the property that the effect on visual amenity would be unacceptable. This is based on the tests set out in paragraph 13.2.26 of the RVAA, whereby 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. Consequently, the Project was not found to breach the 'residential visual amenity threshold' of this property. The RVAA has assessed the Project based upon the stated Limits of Deviation set out in the **3.1 Draft Development Consent Order [APP-056]**. The vertical Limits of Deviation (as indicated in the 'Upward extent of vertical limit of deviation (m)' column of the table at the back of the **2.3 Works Plans – Section F [APP-022]**) allow the currently proposed 'low height' pylons between TB140 and TB143, inclusive, to be amended to 'full height' pylons. Should this occur, TB142 would be omitted from the Project, and TB141 moved to a position further away from Windmill House than is shown on **2.3 Works Plans – Section F [APP-022]**. The adverse change of heightening TB140 and TB141 upon the residential visual amenity of Windmill House would be negated by both TB141 being further away from the property and there being fewer nearby pylons in the available views from it.
	5.41 Whilst debates regarding the effect of Electro Magnetic Fields (EMF's) are deferred to the ExA, a precautionary approach is to site the pylons and wires as far away from possible from residential properties.	National Policy Statement EN-5 (2024) sets out the government's policies regarding electric and magnetic fields (EMFs) from electricity infrastructure. As detailed in the **7.8 Electric and Magnetic Field Compliance Report [APP-330]**, the government requirements include both exposure limits and precautionary measures, ensuring the EMFs reduce as quickly with distance as possible from the proposed overhead line. Compliance with the EMF requirements, including the precautionary measures are detailed in the **7.8 Electric and Magnetic Field Compliance Report [APP-330]**. In addition to compliance with EMF policies, routeing and siting of the proposed overhead line has included the principle of maximising where possible, the distance between overhead lines and residential properties.
Noise	5.42 The close siting of pylon TB141 adjacent to Windmill House mean that it could be exposed to the effects of a low frequency hum known as Corona Discharge. NGET's own document "Design Guidelines for development near pylons and high voltage overhead power lines" states that it is possible for the developer to mitigate significantly the effects of noise from an existing overhead line by attention to site layout and design of new developments, for example by including landscaping or by placing the noise sensitive elements away from the line. These principles should be applied to the siting of pylon TB141 with regard to Windmill House.	Operational noise from the overhead line was scoped out of the Environmental Statement on the basis that a low noise conductor system is proposed. Based on the proposed conductor system, adverse effects are not expected, even directly underneath the line. Although scoped out, further information on noise from the proposed overhead line is provided in **6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines (Informative) [APP-261]**.

[48] Landscape Institute (2018) *Technical Guidance Note 2/19 Residential Visual Amenity Assessment*

Topic	Comments	National Grid's response
Design Change	5.43 In combination with the comments regarding the heritage impacts of the lower height pylons identified above, CCC request that the pylon is relocated away from the boundary with Windmill House as part of a comprehensive package of mitigation measures.	The Applicant identified the potential for this beneficial change at Windmill House following consideration of the feedback to targeted consultation as set out in the **5.15 Design Development Report [APP-122]** at paragraph 9.2.16. This change can be achieved by reverting to standard lattice pylons south of the River Chelmer (one fewer pylon is required allowing the move away from the property). We are concluding the checks noted in that text and will confirm at a subsequent Deadline.
Alternatives	5.44 NGET's position that additional mitigation measures are not possible is unconvincing. There is a compelling case to find an alternative route, underground or use T-pylons for this section of the proposal. Additional mitigation options have not been fully explored, including landscaping and heritage compensation measures. It is a matter of agreement that the alternative route option between Pleshey and Great Waltham would have a reduced impact on the historic environment and it is essential that adequate mitigation is provided.	The Applicant notes Chelmsford City Council's preference but is required to develop proposals in line with national policy and its regulatory requirement. The **5.15 Design Development Report [APP-122]** paragraphs 2.5.5 to 2.5.6 set out the strong starting presumption in National Policy Statement EN-5 (2024) for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. This considered, around Great and Little Waltham, alternative route alignments (from paragraphs 9.2.2 of **5.15 Design Development Report [APP-122]**), other pylon types (from paragraph 9.2.8) and the use of underground cable (from paragraph 9.2.17). Alternative routes were considered less preferred (fifth bullet paragraph 9.2.4), the use of a number of low height lattice pylons was beneficial (paragraph 9.2.16) but the costs and effects of underground cable are not justified (paragraph 9.2.23).
Landscape and visual	5.45 The proposal would lead to construction impacts that would involve the considerable removal of trees, hedgerows and planting. Their removal would have a noticeable impact upon setting. Whilst in theory, replacement mitigation replanting could limit this impact, in practice, it would take many years to mature to a level where the pre-existing conditions would be reinstated. The effect would not be experienced by residents within the area as a temporary loss of planting	The landscape and visual assessment set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** is based on the vegetation clearance assumptions set out in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and presented on the **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 – APP-055]**. Habitat removed during the construction would be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**). The Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. The tree planting strategy would prioritise replanting within the Order Limits, although off-site provision may be required. **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** describes the approach taken in the assessment. Effects are considered during construction, at year 1 of operation and at year 15, with likely maturity of planting being a consideration when judging the effect. The magnitude of effect judgement takes into account whether the effects are short or long term in duration, as set out in the Guidelines for Landscape and Visual Impact Assessment[49].
Historic environment	5.46 Where harm is unavoidable heritage compensatory measures should be delivered. This should include repair of listed buildings and/or associated built and landscape features to offset harm to setting. This would be essential at Langleys; where there are a number of structures and features within the Registered Park and Garden, as well as the outbuildings and the house. The proposal could offset harm to setting by providing funded repairs.	5.46 – Embedded, standard and additional mitigation is already proposed for the historic environment, as set out in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** and proposals in the **7.2 Outline Code of Construction Practice [APP-300]**, **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. Neither the National Policy Statement EN-1 (2024) or the National Planning Policy Framework (2025) refer to a requirement for compensation for any harm to heritage assets.
Landscape and visual	5.47 The proposed mitigation proposed does not adequately limit the harm on the historic environment, the sensitive landscape, ecology and residents that reside within it. CCC object to the proposal due to lack of sufficient mitigation and appropriate compensation.	The Applicant's position on heritage compensation specifically is set out above in response to paragraph 5.46. Please refer to the response to paragraph 5.125 of the RR below in relation to landscape compensation.
EIA	5.48 The Environmental Statement (ES) is a key tool in assessing the significance of harm on an application and Chelmsford City Council's main concern is to ensure that the proposal would not lead to unacceptable major and / or moderate adverse harm.	Noted.

[49] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

Topic	Comments	National Grid's response
	5.49 A full consideration of the ES will be undertaken as part of the Final Local Impact Report. This will include reference to the following topics. • Agriculture and Soils • Contaminated Land, Geology and Hydrogeology • Hydrology, Land Drainage and Flood Risk 5.50 CCC defers to the relevant Authorities such as the Local Lead Flood Authority (LLFA) and the Minerals and Waste Authority with regard to their Relevant Representations. 5.51 Comments on Ecology, Archaeology and Landscape and Visual effects have been prepared in consultation with Essex County Council Place Services.	
Air quality	5.52 There appears to be a mistake within the air quality documents. CCC believes that the monitoring station CM1 that is referred to is our Chignal St James monitoring station and not Thurrock Council's.	The Applicant acknowledges this error and it has been amended within the **8.1 Errata List [Revision A]**.
Ecology and biodiversity	5.53 The ecological impact assessments have a heavy reliance on either the quality execution of surveys to be completed post DCO consent and/or the proper implementation of mitigation measures across a very large construction works area and throughout an extended construction period.	All ecological impacts on habitats and protected species have been assessed in full within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Where updated pre-construction surveys are required these have been set out within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Pre-construction updated surveys are required to ensure valid surveys, due to the significant time frame associated with both the planning process and the construction programme. This is a standard requirement of all projects of this scale. Pre-construction surveys will ensure all survey results are up to date in line with survey validity windows for each survey type in turn as outlined by good practice guidelines. The Ecological Clerk of Works (ECoW) would ensure compliance and successful delivery of the ecological mitigation as set out within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The ECoW would be suitably qualified based off industry good practice; protected species specialists would be used where required as identified within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Ecology and biodiversity	5.54 Some potential impacts on protected species are not yet fully measured. For some species, the practicality of applying seasonal avoidance mitigation measures (e.g. breeding birds – general and Schedule 1) is proposed to be decided on a case-by-case basis post DCO consent.	The required pre-construction surveys, including Schedule 1 bird surveys, are included in the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** to ensure that any changes to the location of any nesting Schedule 1 birds are captured ahead of construction works starting. Detailed surveys across the route have already been undertaken; the pre-construction surveys are intended to provide up to date information due to the significant length of time involved in both the planning consent and construction programmes.
Ecology and biodiversity	5.55 For other species including badgers and water vole, surveys have been completed but further surveys would be needed pre-construction to account for potential changes between the original survey dates and the eventual start of works.	The required pre-construction surveys, including badgers and water vole, are included in the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** to ensure that any changes to the location of badgers and water voles are captured ahead of construction works starting. Detailed surveys across the route have already been undertaken; the pre-construction surveys are intended to provide up to date information due to the significant length of time involved in both the planning consent and construction programmes.
Ecology and biodiversity	5.56 On bats, aerial inspections and/or emergence surveys of trees rated for roosting bat potential as planned to be undertaken post DCO consent. Further assessment is required on roosting bats in trees along the project length, and this is a matter unagreed for the purposes of the Statement of Common Ground.	The bat roost survey scope was agreed with Natural England in advance of surveys being undertaken. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** includes a reasonable worst-case assessment of impacts on these potential roost features. Barbastelle bats are the rarer bats in the area that could be affected by the Project and so targeted surveys have been undertaken to confirm whether these bats are roosting in trees affected by the Project, including aerial surveys, emergence, back-tracking and radio tracking. Where roosts have been confirmed for barbastelle bats, the route has been amended to avoid the loss of these roosts. 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

Topic	Comments	National Grid's response
		agreed with Natural England, would be employed under licence to ensure no impact on the favourable conservation of bats.
Ecology and biodiversity	5.57 CCC's position is that impacts on protected species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination to support a lawful decision. The absence of effective post-mitigation licence monitoring makes it highly uncertain to reasonably anticipate when a mitigation proposal is likely to succeed.	Draft licence applications for badger, water vole and dormouse have been submitted to Natural England. The Applicant is working closely with Natural England towards Letters Of No Impediment for these protected species and expecting receipt during the examination phase as is typical of the Development Consent Order process. These draft licence applications include any requirement for monitoring of licensable species and associated mitigation. The above protected species licensing requirements are detailed within the **5.5 Consents and Licences Required Under Other Legislation [APP-084]** document.
Ecology and biodiversity	5.58 Should the ExA decide to grant the DCO prior to the completion of the required assessments, they would need to satisfy themselves that they have complied with all relevant legislation including the Conservation of Species and Habitats Regulations 2017 as amended.	The Applicant is confident that **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and other associated documents comply with the Conservation of Species and Habitats Regulations 2017.
Ecology and biodiversity	5.59 NGET have proposed a Biodiversity Net Gain scheme. It is understood this would inform the area habitats, hedgerow, and watercourse compensation requirements. Additionally, the BNG scheme would deliver new habitat creation/enhancement that would provide a 10% increase in respective habitat units over the baseline habitat unit calculations as calculated via BNG Metric. Details remain unresolved regarding where off-site habitat creation would be sited and whom would be responsible for management and monitoring.	Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) would be considered across the length of the Project. However, as detailed within the **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on the Applicant's BNG site selection criteria which will consider a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.
Biodiversity net gain	5.60 Whilst appreciating that legal BNG obligations have not yet been introduced for NSIPs, CCC wishes to emphasise the importance of BNG being delivered on-site wherever possible. Where this is not possible, off-site but local BNG should be delivered, with biodiversity credits only purchased when on-site and off-site delivery options have been exhausted to the satisfaction of the Council. BNG has a narrow focus on habitats, and designing BNG habitat unit creation that also provides improvements for targeted species groups would require focused planning.	While every effort has been made to deliver the required biodiversity units on-site through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and nature of the Project, this 10% net gain is not fully achievable on-site. Off-site biodiversity units are therefore proposed to make up this deficit. Biodiversity is not bound by Local Authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within the **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.
Landscape and visual	5.61 The proposal would lead to construction impacts that would involve the considerable removal of trees, hedgerows and planting. Whilst in theory, replacement mitigation replanting could limit this impact, in practice, it would take many years to mature to a level where the pre-existing conditions would be reinstated. The effect would not be experienced by residents within the area as a temporary loss of planting.	The landscape and visual assessment set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** is based on the vegetation clearance assumptions set out in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and presented on the **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 – APP-055]**. Habitat removed during the construction would be reinstated (with the exception of planting restrictions associated with operational requirements as identified within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. The tree planting strategy will prioritise replanting within the Order Limits, although off-site provision may be required. **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** describes the approach taken in the assessment. Effects are considered during construction, at year 1 of operation and at year 15, with likely maturity of planting being a consideration when judging the effect. The magnitude of effect judgement takes into account whether the effects are short or long term in duration, as set out in the Guidelines for Landscape and Visual Impact Assessment[50]. The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** states (paragraph 9.2.2) '*Reinstatement planting will occur at the earliest opportunity and no later than the first available planting season*

[50] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

Topic	Comments	National Grid's response
		after that part of the authorised development is first brought into operational use'. Early opportunities for replacement planting will therefore be considered and discussed with relevant stakeholders at the appropriate stage as part of ongoing discussions.
Mitigation Measures	5.62 Concerns are raised that replacement and reinstatement plantings may not be suitably managed or replaced until reliably established, given that the 5-year post completion time limit for habitat reinstatement is considered too short. Where the proposals replacement planting would be outside of NGET's land control, only 5-years post completion time monitoring would be achievable. A mutually agreed replacement planting failure percentage would need to be factored into the compensation requirement.	The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** outlines clear roles and responsibilities to ensure compliance with the Development Consent Order documents submitted. 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 the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** which includes like for like replacement or consideration of alternative species based on site by site conditions and the reasons for failure. The comment in relation to the replacement planting failure percentage for compensation planting is noted and will be considered.
Ecology and biodiversity	5.63 Commitment to ensuring a high-quality Ecological Clerk of Works (ECoW) oversight of the project is considered one of the best means of avoiding significant mitigation failures. 5.64 Separately CCC is engaging with NGET to explore whether replacement and tree compensation can be undertaken within Chelmsford, details of which are provided within the comments relating to arboriculture.	5.63 – The Ecological Clerk of Works would be suitably qualified based off industry good practice; protected species specialists would also be used where required as identified within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. 5.64 – The Applicant welcomes the ongoing engagement with Chelmsford City Council on this matter.
Ecology and biodiversity	5.65 Chelmsford has been combined with different Councils (section F and G within A13.6.2), meaning it is difficult to establish the specific arboricultural loss to Chelmsford. 5.66 It appears that there would be a significant and unacceptable impact upon arboriculture. It is difficult to establish where the trees are demarked and whether individual trees are marked to be removed, managed, potentially affected and unaffected.	5.65 – The **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** reports assessments by Project section as shown in Figure A13.6.1: Arboricultural Impacts Plans within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**. This was outlined in the **6.19 Scoping Report [APP-288 to APP-296]** and **6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135]**. 5.66 – The Arboricultural Impacts Plan of Annex D of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** shows the impacts in the categories of Removed, Affected Managed, Potentially Affected and Unaffected, these are colour coded Red, Blue, Amber, Green respectively.
Ecology and biodiversity	5.67 The Arboricultural Impact Assessment is not in accordance with BS:5837:2012. There are omissions within the report and contradictory or limited references between the report and the accompanying plans, such that a full assessment of the impacts of the proposal cannot be carried out.	The **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** has been produced in line with the **6.19 Scoping Report [APP-288 to APP-296]** and uses the tree categories provided as guidance within BS5837:2012[51].
Ecology and biodiversity	5.68 CCC is concerned that the Ancient Woodland and Veteran Tree Strategy identifies a number of high-ranking trees and features within category A that would be removed, together with a large loss of high priority habitats. It is understood that two veteran trees next to Langleys in Great Waltham may be removed. The reason for the removal of these trees is unclear, and the loss of irreplaceable habitat and the mitigation has not been adequately justified.	Worst-case vegetation removal/management is detailed within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and referenced within the limitations section in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236].** 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].** The overhead line alignment as shown on **6.4.F1 Figure 4.1 - Proposed Project Design [APP-133]** avoids impacts to T908, however T909 would be potentially affected. The design also minimises encroachment of pylon TB139 into the root protection area of veteran tree T909. At detailed design the Main Works Contractor(s) will seek to deliver the overhead line whilst minimising impacts on the veteran tree (T909) by applying relevant protective measures as per commitment LV05 in **7.2 Outline Code of Construction Practice [APP-300]**.Paragraph 8.2.3 of the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** 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 mitigation measure GG14 within the **7.2 Outline Code of Construction Practice [APP-300]**.

[51] British Standards Institution (2012) *British Standard 5837:2012 Trees in relation to design, demolition and construction*

Topic	Comments	National Grid's response
		The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** includes the Applicant's approach for veteran trees and the approach to trees being retained during detailed design. The **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** provides further detail on the mitigation/compensation proposed associated with irreplaceable habitats.
Ecology and biodiversity	5.69 The proposed loss to trees and woodland has not been appropriately justified or mitigated. A draft Arboricultural Method Statement should be produced to demonstrate what mitigation is required to appropriately protect retained trees. 5.70 Appropriate arboricultural justification for any losses and/or impacts would need to be compensated for. Direct and indirect impacts that would lead to damage or loss of ancient woodland habitat or veteran trees must be avoided. There is no appropriate mitigation for the loss of irreplaceable habitats.	5.69 – Tree and woodland loss has been reduced as far as practicable; however, some loss would be needed to facilitate construction of the Project. The reported preliminary loss of trees and woodland has been calculated based on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** and the general assumptions around removal within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. Following detailed design and commitments within the **7.2 Outline Code of Construction Practice [APP-300]** it is likely that removal would be reduced. Paragraph 13.4.14 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** confirms that following detailed design and prior to construction an Arboricultural Method Statement (with Tree Protection Plan) will be provided and agreed with the Local Planning Authorities. The commitment is also reflected within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Commitment reference LV05 of the **7.2 Outline Code of Construction Practice [APP-300]** also confirms that relevant tree protective principles would be detailed within an Arboricultural Method Statement. 5.70 – The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** includes the Applicant's approach for veteran trees. The **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** provides further detail on the management of irreplaceable habitats.
Ecology and biodiversity	5.71 CCC is not convinced that NGET would be able to adhere to the standing advice from Natural England and Forestry Commission which proposes 15m buffer zones on distance between development and ancient woodlands.	The Applicant is committed to avoiding impacts on ancient woodland, including the 15 m root protection zone, wherever practicable in line with National Planning Policy. A general commitment to avoiding the 15 m buffer from ancient woodlands has been made within the **7.2 Outline Code of Construction Practice [APP-300]**; this commitment has been applied throughout the pre-consent design phase and also would be applied during the detailed design works. In addition a detailed breakdown of each ancient woodland, the associated works and the required mitigation per woodland has been provided within 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]**) which provides specifics on the measures to be adopted.
Ecology	5.72 Mitigation planting would take many years to mature to a level where the pre-existing conditions would be reinstated and would not be experienced by residents within the area as a temporary loss of planting	**6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** describes the approach taken in the assessment. Effects are considered during construction, at year 1 of operation and at year 15, with likely maturity of planting being a consideration when judging the effect. The magnitude of effect judgement takes into account whether the effects are short or long term in duration, as set out in the Guidelines for Landscape and Visual Impact Assessment[52]. The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** states (paragraph 9.2.2) '*Reinstatement planting will occur at the earliest opportunity and no later than the first available planting season after that part of the authorised development is first brought into operational use*'. Early opportunities for replacement planting will therefore be considered and discussed with relevant stakeholders at the appropriate stage as part of ongoing discussions.
Ecology	5.73 It is acknowledged that NGET is committed to replacement planting on a 3:1 ratio using stock of native species (taking into consideration any associated risk of pest and disease). An adequate programme of maintenance and aftercare to ensure successful establishment is also expected to comply with British Standard BS:8545.	Noted.

[52] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

Topic	Comments	National Grid's response
Ecology	5.74 CCC has an existing tree planting scheme which is operated as part of implementing our ambition in the Council's Climate and Ecological Emergency Action Plan - Tree planting payments, Tree planting planning advice note. The scheme seeks to secure three new trees planted for every new home in the Local Plan.	Noted.
Ecology	5.75 CCC is working with NGET to explore the provision of offsite planting within the Chelmsford administrative area and will report back to the ExA once further information becomes available.	As CCC will be aware, the Applicant has prepared Heads of Terms in relation to: • A unilateral undertaking to be given pursuant to s.106 of the Town and Country Planning Act 1990 ("a s.106 agreement") to secure the provision of Biodiversity Net Gain, as set out in the BNG Report; and • A s.106 agreement to secure the off-site compensation planting of replacement trees
Health and Wellbeing	5.76 Proposals of this scale have the responsibility and means to ensure they achieve the best possible outcome with regard to the impact upon health and wellbeing. It is essential that NGET genuinely engages with the local communities, parish and town councils and vulnerable persons.	Engagement with local communities has formed an important part of Project development to date. The **5.1 Consultation Report [APP-066]** sets out the Applicant's approach to engagement not only with stakeholders, but also the approach to engaging with residents and communities, including more vulnerable people. Appendix E of the Consultation Report (**5.1 Consultation Report - Appendix E Statement of Community Consultation (SoCC) [APP-071]**) describes community consultation undertaken prior to submission of the application for development consent. The **5.1 Consultation Report [APP-066]** also describes the approach taken to engaging with seldom heard groups, defined as those being inaccessible to most traditional and conventional methods of consultation for any reason, and including people who may be described as vulnerable (e.g. older people and people with disabilities). The Applicant undertook research to identify local seldom heard organisations and worked with Local Planning Authorities and other bodies as needed to identify additional groups. The approach was defined as part of the development of the Statement of Community Consultation, giving Local Planning Authorities the opportunity to influence this strategy. Public information events were held across the local area and were accessible and inclusive for members of the public. The Applicant will continue to engage with people potentially affected during progress of the Project, through a variety of communication means.
Health and Wellbeing/RVAA/Landscape	5.77 The main considerations for health and wellbeing are the visual impact, in terms of whether or not the pylons and overhead lines would be physically overbearing to residents, the perceived health impacts and any noise nuisance arising from the long-term positioning of the pylons close to residential properties	This is noted. The assessment provided in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** covers potential impacts as they relate to visual impact (arising from local environmental change during the construction and operation phases), perceived health impacts, particularly in relation to perceived impacts relating to electric and magnetic fields during the operational phase, and potential noise impacts during the construction and operation phases. The assessment of impacts on health and wellbeing as they relate to visual amenity draws on findings from **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and specifically findings from the **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]**.
Community impact	5.78 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 and overhead lines and would be noticeable and potentially overbearing.	**6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** considers the impact of the Project on visual amenity during the operational phase, noting that visual amenity is critical in shaping individuals' perceptions of their surroundings, influencing mental wellbeing, stress levels, and overall quality of life. The assessment draws on findings from **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and specifically findings from the **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]** (RVAA). Based on the tests set out in paragraph 13.2.26 of the RVAA, the RVAA concludes that there are no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties as unattractive places to live. It is noted that some properties / property groups do come close to this threshold and that mitigation measures have been recommended to reduce effects. This conclusion is reflected in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**, paragraph 10.7.131 of which highlights that, whilst there are likely to be individuals who experience adverse mental health and wellbeing impacts associated with visual change, this is not considered to be at a significant scale or to disproportionately affect health deprived populations. A small minority of the population are likely to be affected and change in quality of life may be moderate. This is considered to result in a minor adverse (not significant) health effect for both the general population and vulnerable groups.

Topic	Comments	National Grid's response
Health and safety	5.79 The effect and impact of Electro Magnetic Field (EMF') are material to the consideration of the proposal; which should not be granted unless the ExA is satisfied that the proposal is compliant with all relevant legislation.	The **7.8 Electric and Magnetic Field Compliance Report [APP-330]** details the electric and magnetic field (EMF) assessment for the Project, demonstrating compliance with the requirements of National Policy Statement EN-5 (2024) in-line with the requirements of the government's Code of Practice Power Lines: Demonstrating compliance with EMF public exposure guidelines[53]. This demonstrates that when directly under the overhead lines or directly above the underground cables the International Commission on Non-Ionizing Radiation Protection exposure limits[54] are not exceeded. Any offset from the overhead line or cables reduced the EMF levels significantly ensuring compliance at any distance from the assets.
Noise and vibration	5.80 The proposed hours of 07:00 to 19:00 Monday – Fridays and 07:00 am to 17:00 over weekends/holiday raise concern due to the lack of respite from noise for residents. These hours of working are not accepted by CCC and comments relating to noise are raised with regard to noise and vibration below.	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday – Friday: 0700 to 1900 • Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700 Details relating to the proposed construction working hours and any associated restrictions are contained within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130].** The working hours are secured through Requirement 7 of Schedule 3 of **3.1 Draft Development Consent Order [APP-056]**. The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The 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 [APP-300]**. 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 (CNP) project. The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the Project. **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 [APP-300],** significant effects from noise and vibration during the construction phase are not anticipated. These measures 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.
Health and safety	5.81 Given the scale and duration of construction and the socio economic characteristics of affected communities (see below), CCC recommends consideration of establishing of a Health and	No significant health and wellbeing impacts have been identified as outlined in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** and as such there is no requirement for monitoring measures. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent

[53] Department of Energy and Climate Change (2012) *Code of Practice Power Lines: Demonstrating compliance with EMF public exposure guidelines*

[54] International Commission on Non-Ionizing Radiation Protection (ICNIRP) (1998) *ICNIRP Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic and Electromagnetic Fields.* Health Physics, 74 (4), p.494

Topic	Comments	National Grid's response
	Wellbeing Monitoring Framework to promote best practice. This Framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities.	engagement with residents and stakeholders. If the Project receives development consent, the Project team would continue to engage with potentially affected residents, communities and stakeholders through regular communication including letters, phone calls and meetings, where necessary. 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.
Historic environment	5.85 The proposal would lead to permanent and significant adverse impacts at the following locations (as identified by NGET): • 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).	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment. The impacts of the Project on the historic environment are assessed in **6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]**. The assessment considers the potential impact on archaeology, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212]**. Archaeological trial trench evaluation has also been undertaken and is reported in **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213]**. In addition to the proposals in the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** sets out appropriate mitigation for the historic environment. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development.
Historic environment	5.86 The proposal underestimates the impacts on many designated heritage assets, with additional impacts (to be set out in detail in the Local Impact Report) identified by CCC. These include minor effects to three Grade II listed buildings of moderate value, moderate and significant effects on eight Grade II listed buildings of medium value, one major/moderate and significant effects on a Grade II listed building of medium value and one moderate and significant effect on a Grade I listed building of high value.	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 [APP-208]** and in accordance with professional heritage sector guidance, in particular The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[55]. Although the Council does not list specific assets in this representation the assessment of designated heritage assets in Chelmsford has been reviewed and the Applicant is confident in its assessment, as set out in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. The approach to scoping heritage assets in or out of the assessment was developed in line with relevant national policy and guidance, including the National Planning Policy Framework (2025) and Historic England's guidance on setting. This methodology was presented, discussed, and agreed with key stakeholders – including Historic England and relevant Local Planning Authorities – during the formal scoping stage and through subsequent Thematic Group meetings. It takes into account not only the designation and proximity of assets to the Order Limits, but also a professional judgement on whether their setting may meaningfully contribute to their significance and be affected by the proposed development. On this basis, the methodology used to determine which heritage assets were taken forward for detailed assessment and which were reasonably scoped out is considered robust and proportionate.
Historic environment	5.87 Non-designated heritage assets are not adequately considered in the assessment work. Given Chelmsford's rich historic environment, there are many non-designated heritage assets of low-moderate value, which should be identified and the impacts on their settings fully considered. The approach to discount low value heritage assets is not supported, given the potential for significant impacts.	The Applicant disagrees; all non-designated heritage assets were assessed to determine their value in accordance with the **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 [APP-208]**. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. Any heritage assets of medium or greater value had a settings assessment completed, in line with the methodology. As those low or negligible value assets located outside the Order Limits 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 National Policy Statement (NPS) EN-1 (2024) regarding the Applicant's assessment include paragraph 5.9.9 '*The applicant should undertake an assessment of*

[55] Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition).

Topic	Comments	National Grid's response
	5.88 Protected lanes are identified, but their settings are not considered. This is particularly important at Larks Lane, Paulk Hall and Goodmans Lane. 5.89 Some locally listed buildings are included, but designated landscapes and other buildings and features of sufficient interest to be considered as non-designated heritage assets are not comprehensively identified and should fully inform the assessment baseline. These include the following: • Coptfold Hall locally designated landscape • WWII GHQ defence line (pillboxes)	*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*'; and in several places there is reference to detail being proportionate to the importance/significance of the heritage asset. The Project 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. The Applicant has undertaken a detailed assessment of the historic environment which considers the potential for impact on designated and non-designated heritage assets, including locally listed buildings, protected lanes, designed and historic landscapes, and other features of heritage interest. This is presented in **6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208]**. The assessment and mitigation measures have been developed in consultation with relevant stakeholders during the scoping process and at subsequent thematic working group meetings, including engagement with Historic England and the relevant Local Planning Authorities, including Chelmsford City Council. The methodology applied follows relevant heritage legislation, including the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979, as well as national and local planning policy and established technical guidance, such as the National Planning Policy Framework (2025). We are confident that the methodology applied is robust, proportionate, and has given appropriate weight to the potential impacts of the Project on designated and non-designated heritage assets, including effects from physical change and change to setting. **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]**, **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 [APP-210]** include an up-to-date assessment of both designated and non-designated assets. The Applicant has sought to reduce, as far as practicable, impacts on protected lanes through routeing 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 [APP-208]** and **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The current Coptfold Hall was built between 2005 and 2008 and is not a heritage asset. The designed landscape is neither mapped nor recognised by the Essex and Chelmsford Historic Environment Records. Neither is it recognised by any of the sources agreed upon with stakeholders during scoping. It is acknowledged that the setting assessment of the GHQ defence line was omitted from the Historic Environment Baseline Report in error in the Preliminary Environmental Information Report. A setting assessment has been added for the Development Consent Order submission referencing the pillboxes arranged along its route.
Ecology and biodiversity	5.90 The proposal would lead to construction impacts that would involve the considerable removal of trees, hedgerows and planting. Their removal would have a noticeable impact upon setting. Whilst in theory, replacement mitigation replanting could limit this impact, in practice, it would take many years to mature to a level where the pre-existing conditions would be reinstated. The effect would not be experienced by residents within the area as a temporary loss of planting. The use of the bridge over the River Wid (1207790) should be specifically excluded from the construction access to avoid overloading or potential for impact damage.	The historic environment assessment is concerned with the potential impact of the Project on heritage assets rather than residents. The time taken for planting to be reinstated is a temporary impact, which in the context of the period over which the heritage assets in Chelmsford have been in existence is not in itself significant. Any permanent removal of trees and hedgerows is considered as part of the operation (and maintenance) effects (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]).** There is no proposal to use the grade II listed bridge 'Ingatestone over the River Wid (that part in Brentwood District)' (1207790) for any construction access as it is not on a Primary Access Route or within the Order Limits.
Historic environment	5.91 CCC is disappointed at the lack of proposed mitigation. Where significant harm been identified further mitigation measures should be employed to reduced or limit or offset the level of harm. In most cases this will involve the positioning the Order Limits, associated access roads and pylons further away	Review of the assessment identified seven listed buildings and Langleys Registered Park and Garden in Chelmsford where a mid less than substantial harm conclusion has been reached for the construction phase impacts (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215**]). As these impacts would be temporary and the construction-related elements of the Project would be reinstated following completion of construction it is not considered necessary to microsite all temporary elements of the works. The assessment identified three listed buildings and Langleys Registered Park and

Topic	Comments	National Grid's response
	from heritage assets to limit the impact on the rural surroundings and how assets are experienced.	Garden where a mid less than substantial harm conclusion has been reached for the operation (and maintenance) phase (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). 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 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.
Historic environment	5.92 Landscape screening has been discounted as a means of mitigation. In certain circumstances, screening is beneficial in reducing the harm caused by the intrusion of the pylons and associated works. This may include tree planting, hedge planting or infilling, reinstatement of historic field boundaries or woodland planting. Where mitigation involves replacement of vegetation, hedgerows, walls and earthworks this should be consultation with the LPA on the detail for these works.	Screening planting was considered for the historic environment and the conclusion reached that with the intentional and designed planting associated with Langleys Registered Park and Garden further screening planting would alter the designed landscape, potentially introducing harmful change. Given the embedded mitigation regarding low height pylons in this area this was considered to be a more effective approach than screening planting. 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 already proposed no further mitigation was considered appropriate. The reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) would be undertaken 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 Pan [APP-321].** As part of this 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.
Historic environment	5.93 Where mitigation is not feasible a range of compensatory measures should be considered to offset the harmful impact of the development.	Embedded, standard and additional mitigation is proposed for the historic environment, as set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [APP-208]** and proposals in **7.2 Outline Code of Construction Practice [APP-300], 7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].** Neither National Policy Statement EN-1 nor the National Planning Policy Framework make reference to a requirement for compensation for any harm to heritage assets.
Historic environment	5.94 CCC consider there would be a considerable impact on the historic environment which is a matter of great weight and importance. The mitigation proposed is wholly inadequate for the proposal and the lack of mitigation and appropriate compensation is unacceptable.	**6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of **5.6 Planning Statement [APP-85]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. 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.

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		Para 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.
Historic environment	5.95 The proposal has potential to impact on a number of known and, as yet, unknown archaeological, geoarchaeological and palaeoenvironmental deposits	The assessment presented in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]** has taken a precautionary approach and assessed non-designated heritage assets where there is potential for archaeology, even if this had not been confirmed by field evaluation. This situation is common for all types of development. There are measures in place through **Requirement 5 of 3.1 Draft Development Consent Order [APP-056]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** to secure agreement of any further evaluation and/or mitigation prior to the start of works and which provides protection for currently unknown archaeology.
Historic environment	5.96 A programme of geophysical survey and archaeological trial trenching was proposed for areas identified as High Priority due to either design constraints and/or the presence of archaeological remains of potential high significance. This stage of fieldwork has not been completed and there is concern that the appropriate level of evaluation is not going to be completed within the determination period. The level of fieldwork that has been completed to date is not sufficient to fully understand the nature, extent and significance of archaeological and geoarchaeological deposits that may be present within the scheme.	The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information **[AS-068 to AS-083],** of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,440 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.
Historic environment	5.98 An Outline Archaeological Mitigation Strategy (OAMS) and Outline Written Scheme of Investigation (OWSI) has been submitted (**APP-328** Document:7.5). The document needs to clarify the scope and extent of further evaluation required prior to any agreed mitigation. This would include further geophysical survey, archaeological trial trenching and geoarchaeological investigation. This will allow all parties to be clear about the scope and level of evaluation that may be required should the DCO be granted.	The Project proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination period in consultation with the Local Planning Authority Archaeological Advisors. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed, and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328**] already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ should highly significant remains be identified.
Historic environment	5.99 Archaeological mitigation measures are secured through proposed requirement 5 in the Draft DCO. Should the proposal 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.	**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.
Historic environment	5.100 There is potential for archaeological and geoarchaeological deposits of local to national significance to be present within the proposed scheme that may be negatively impacted by the groundworks required for elements of the scheme, including foundation bases for proposed new towers and substations; construction of new accesses, haul routes and compounds. Geoarchaeological and palaeoenvironmental deposits could be impacted in directional drilling locations.	The assessment presented in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]** has taken a precautionary approach and assessed non-designated heritage assets where there is potential for archaeology, even if this had not been confirmed by field evaluation. This situation is common for all types of development. There are measures in place through **Requirement 5 of 3.1 Draft Development Consent Order [APP-056]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** to secure agreement of any further evaluation and/or mitigation prior to the start of works and which provides protection for currently unknown archaeology.

Topic	Comments	National Grid's response
Historic environment	5.101 Archaeological evaluation has taken place in some of the High Priority Areas and is currently continuing, but the results of these will be difficult to integrate into the documentation already submitted as part of the application and the full impact of the scheme on the historic environment will not be fully defined or assessed pre-determination. 5.102 Within the geoarchaeological report, no scientific dating or further assessment of the deposits has been carried out to inform of the significance of the deposits. There is potential that the assessment conclusions will be based on insufficient evidence.	All completed interim reports for trial trenching were submitted with the application for development consent in **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213]** along with the reports of geoarchaeological monitoring of GI works (**6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**). Further interim reports and assessment reports for priority trial trenching areas and the final report for the Phase 1 priority areas geophysical survey was submitted to the Planning Inspectorate as Supplementary Environmental Information in January 2026, prior to the start of examination. The assessment reports for the Phase 2 geophysical survey and trial trenching will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed and agreed at monthly meetings and set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**.
Historic environment	5.103 The following additional information is required prior to determination of the DCO. • Submission of all archaeological fieldwork data in a report format prior to the determination of the application; • Plan of all completed fieldwork and areas of future evaluation identified and included within the OWSI/AMS; and • Further details for geoarchaeological /palaeoenvironmental investigation that could be completed prior to the determination of the application to establish significance.	Additional interim reports and assessment reports for priority trial trenching areas and the final report for the Phase 1 priority areas geophysical survey was submitted to the Planning Inspectorate as Supplementary Environmental Information **[AS-068 to AS-083],** in January 2026, prior to the start of examination. The assessment reports for the Phase 2 geophysical survey and trial trenching will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed and agreed at monthly meetings and set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. The Supplementary Environmental Information includes a Project-wide figure indicating the progress of the priority evaluation areas (**6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas (Rev B) [AS-082]**). The Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination period in consultation with the Local Planning Authority Archaeological Advisors, which will include figures detailing the completed and planned evaluation. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** already includes provision for further geoarchaeological/ palaeoenvironmental work, and the Applicant proposes to update this document in consultation with the Local Planning Authority Archaeological Advisors.
Landscape and visual	5.105 In respect of the approach to the Landscape and Visual Impact Assessment (LVIA), CCC has concerns regarding several aspects of the methodology, particularly in the approach to landscape value and value of the view, as well as a downplaying of the significance of impacts.	The Landscape and Visual Impact Assessment presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** sets out a robust and consistent methodology within **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**. The approach and methodology was developed during the scoping stage and agreement sought with statutory consultees through consultation. The approach includes clear, transparent criteria for judgements of landscape value and value of the view, in line with the Guidelines for Landscape and Visual Impact Assessment, Third edition[56]. Other referenced technical guidance includes Technical Information Note 8/15: Landscape Character Assessment[57] and Technical Guidance Note 02/21 Assessing landscape value outside national designations[58]. Judgements, including the significance of effects, were also informed by detailed desk and field studies, and the findings supported by detailed explanations. These are presented 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 – APP-232]**. Illustrative supporting materials include Environmental Statement Figures 13.1 to 13.19 **(6.13.F1 - 6.13.F9 [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 proposals, and their findings and judgements are set out in an objective and consistent manner. Significant landscape and visual effects have been reported along the length of the alignment, and it is considered that the judgements made remain fair and reasonable and that no changes need to be made.

[56] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

[57] Landscape Institute (2018) *Technical Information Note 8/15: Landscape Character Assessment*

[58] Landscape Institute (2021) *Technical Guidance Note 02/21 Assessing landscape value outside national designations*

Topic	Comments	National Grid's response
Landscape and visual	5.106 The route planned through Chelmsford traverses rural landscapes. The Holford Rules, which advise the hierarchy for the placement of routes, state 'where possible choose routes which minimise effects on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value'. CCC policy adheres to national policy on local landscape protection and base their policy on local landscape character assessments not designated are effectively penalised via this advice. The Holford Rules appear to have been last updated in the 1990s and would seem to be at odds with current general national landscape policy and guidance.	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. Please refer to the Applicant's response to paragraphs 3.1 and 3.2 of the RR in relation to its compliance with national policy on the use of overhead lines. 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]**. There are no current local landscape designations such as Special Landscape Areas within the Study Area. The value of the landscape has been considered and the approach to making judgements on the value of landscape receptors is set out on pages 12-18 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 '*the relative value or importance attached to different landscapes by society on account of their landscape qualities*' (Landscape Institute's Technical Guidance Note (TGN) 02/21 page 3).
Landscape and visual	5.107 The treatment of undesignated landscape as blank space is compounded by adherence to Rule 5 of the Holford Rules which states that in routeing of high voltage overhead transmission lines, these should '… be kept as far as possible from smaller lines, converging routes and other poles, masts, wires, and vales to avoid a concentration or 'wirescape'. This has the effect of distributing adverse impacts over a wider area of unspoilt countryside rather than containing them in a narrower corridor.	The Applicant notes the reference is linked to Rule 6 rather than Rule 5 and is also caveated. The interpretation of the Holford Rules text, by virtue of the caveats, is not implemented as rigidly as implied. This has been considered by the Applicant throughout the iterative process of assessment and design as part of the Environmental Impact Assessment. The Applicant has considered whether there is merit in parallel arrangements, in the separation of infrastructure or in undertaking modifications to the other vertical infrastructure over the course of the Project development most recently in **5.15 Design Development Report [APP-122]** from paragraph 2.5.24. The approach to the consideration of the value of landscapes is as described against the comment above.
Landscape and visual	5.108 The proposal would run through two National Character Areas NCA 86 South Suffolk and North Essex Clayland and NCA111 Northern Thames Basin. It does not appear as though the effects of the proposal on national or regional landscape character have been assessed.	As set out in **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 Landscape Character Types and Landscape Character Areas (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 this appendix. The Guidelines for Landscape and Visual Impact Assessment[59] (pg.79) state '*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*'.
Landscape and visual	5.109 The Essex Landscape Character Assessment (2003) – Braintree District, Chelmsford District, Brentwood District identifies four Landscape Character Typographies CTs along the proposal in Chelmsford. These are often landscapes without existing significant detractors:	Noted.
Landscape and visual	5.110 Locally, the following areas would be affected: • B1 Central Essex farmlands • C5 Chelmer Valley	Noted.

[59] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

Topic	Comments	National Grid's response
	• D2 Brentwood Hills	
Landscape and visual	5.111 The proposal would lead to a harmful change in the identified character and appearance of the landscape, which would lead to a change in the character and quality of the landscape. It would lead to harmful visual intrusion, through the siting of high large-scale industrialised features that cannot be fully mitigated against. The proposal would lead to the harmful loss of the character and beauty of the countryside.	The Local Planning Authority's position is noted, but the Applicant would point out that National Policy Statement (NPS) EN-5 (2024) specifically guides to overhead line being the strong starting presumption for new connections and that none of the proposed 400 kV overhead line route within the district meets the criteria set out in NPS EN-5 (2024) to justify a change from this technology. Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. NPS EN-5 (2024) also recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Landscape and visual	5.112 The ES acknowledges that the proposals would have a significant negative landscape impact at both construction and operational stages over the length of the proposal. Where negative effects are judged not to be significant further away from the Project 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.	The approach to the Landscape and Visual Impact Assessment follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** and was shared, discussed and agreed with stakeholders. Criteria for assessing landscape value is set out in Table A13.1.4 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** and considers the following factors: natural heritage, cultural heritage, landscape condition, associations, distinctiveness, recreational, perceptual (scenic), perceptual (tranquillity) and functional value.
Landscape and visual	5.113 The Landscape and Visual Impact Assessment suggests that at construction, significant effects would occur generally within 1.5Km of the proposal. Towards the end of the construction period, it is considered that adverse effects, especially visual, could extend beyond this distance, especially in open landscapes as multiple pylons and overhead line runs become visible.	A proportionate and worst-case approach has been taken with assessments and so effects at this stage of construction have been taken into account within **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]**. Adverse effects have been assessed as extending beyond a 1.5 km distance on many visual receptor areas, with effects judged to be either Minor adverse or Negligible adverse and not significant.
Landscape and visual	5.114 At the operational stage it is identified that significant landscape effects are predicted within 1.5Kms of the project line. Many of the judgements suggest these impacts are moderate significant rather than major significant beyond 0.5Kms, which is questioned. 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. CCC's 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 Landscape and Visual Impact Assessment follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** and was shared, discussed and agreed 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 – APP-232]** and illustrative materials on Figures 13.1 to 13.19 of the ES **(6.13.F1 - 6.13.F9 [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.
Landscape and visual	5.115 There is concern that the landscape value criteria evaluation is flawed. The baseline evaluation and judgements appear to be made solely at a district and not a site/setting level, they do not necessarily address the value of the key characteristics of the landscapes in the study area that are directly affected.	The Landscape and Visual Impact Assessment (LVIA), included in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, has been undertaken as part of the Environmental Impact Assessment. The approach to the LVIA follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**, which includes Guidelines for Landscape and Visual Impact Assessment[60]. The approach to making judgements on the value of landscape receptors is set out on pages 12–18 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**. Judgements on landscape value are reported in the annex to **6.13.A2 Environmental Statement**

[60] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

Topic	Comments	National Grid's response
		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[61]. This defines landscape value as '*the relative value or importance attached to different landscapes by society on account of their landscape qualities*' (page 3).
Landscape and visual	5.116 The significant adverse visual effects caused by pylons and overhead lines are not mitigatable and do not reduce after 15 years of time.	Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. National Policy Statement EN-5 (2024) also recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Landscape and visual	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, it is considered the cumulative effect is likely to result in an overall significant adverse effect generally within the study area at both construction and operation. 5.118 The proposal would affect views within the following areas: • F1 Great Leighs: • F2 Peverel's Farm • F3 Great Waltham • F4 Little Waltham • F5 Chignal Smealy • F6 Chelmsford North-West • F7 Roxwell • F8 Writtle and Chelmsford West • F9 Edney Common • F10 Hylands Park • F11 Margaretting and Stock	Noted.
Landscape and visual	5.119 In relation to the Visual Receptor Areas, the Zone of Theoretical Visibility (ZTV) mapping indicates relatively widespread theoretical visibility of the overhead line within the 3 km study area including from villages, the PRoW network, National Cycle Network routes in this area, from the rural lanes and road network	Noted.
Landscape and visual	5.120 The visualisations in the Landscape and Visual Assessment demonstrate the landscapes affected by the proposal are often undeveloped, rural landscapes where intervisibility can be quite high due to large scale flat or gently undulating landscapes or where the scale of the pylons and overhead wires means the effect is a perceived industrialisation of the countryside up to 2km away that can be significant in places.	Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].**

[61] Landscape institute (2021) *Technical Guidance Note 02/21 Assessing landscape value outside national designations*

Topic	Comments	National Grid's response
Landscape and visual	5.121 There are considerable gaps in the Landscape and Visual Assessment Photographic Baseline images and Wireline visualisations. VRA F9 Edney Common (Longer distance) VRA F6 Chelmsford North-West (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.	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed and agreed with relevant Local Planning Authorities, as set out in the Statements of Common Ground (**5.9.1 - 5.9.12 [APP-089 – APP-100]**). The Landscape and Visual Impact Assessment (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 [APP-243]**. 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. 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.
Landscape and visual	5.122 It is not agreed that the value of the view should be judged substantially on identified viewpoints and promoted views in tourist-focussed documents. In lieu of local landscape designation and district-wide Valued Landscape Assessments, the value of the view should be judged by how it relates to the Landscape Character Assessment. 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 characters and not others. It is considered the sensitivity of receptors and significance of the effects has been downplayed as a result.	5.122 – The approach to the Landscape and Visual Impact Assessment (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 **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 – APP-232]** and Figures 13.1 to 13.19 of the Environmental Statement **(6.13.F1 - 6.13.F9 [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 and visual receptors 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 on the value of views and subsequently the sensitivity of receptors remain fair and reasonable and that no changes need to be made.
Landscape and visual	5.123 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.	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, discussed and agreed with stakeholders. This methodology sets out the justification for the 3 km Study Area used for the assessment. This has been 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.
Design Change	5.124 The effects upon F10 Hylands Park are particularly concerning. The ES considers that significant major adverse effects would be experienced. We are concerned that the proposal would effectively sandwich Hylands Park on three sides with linear infrastructure: Greenbury Way to the north, London Road and the railway to the east and the proposed 50m pylons to the west. Further south the A12 effectively creates a barrier. The landscape to the west is currently the only undeveloped rural landscape that forms part of the setting. It is considered this stretch of overhead line should be reconsidered in either alignment or design.	Alternative routes have been considered but not taken forward. Those to the east of Chelmsford are not technically possible (paragraph 2.5.24 onwards of the **5.15 Design Development Report [APP-122]**) and alternatives further west present more and unacceptable effects on ancient woodland (paragraph 9.3.4 onwards of the **5.15 Design Development Report [APP-122]**). As stated in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment [APP-229]**, although significant effects have been identified on VRA F10, effects are assessed as negligible and not significant within Hylands Park itself. This is due to the level of enclosure within the park and screening properties of intervening vegetation between 0.5 km and 1.5 km. The Project would be visible from the north-east of the park, on rising landform; however, at a distance of further than 1.5 km this is not considered significant.
Landscape and visual	5.125 There does not appear to be any compensation offered in relation to the significant residual adverse landscape and visual effects created by the pylons and overhead line along its length. 5.126 The proposals as they stand do not meet (EN-1) 4.3.4 which state '… the applicant must … show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy." The policy has not been followed as there is no compensation offered for the	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]**. Whilst compensation is part of the mitigation hierarchy, EN-1 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. 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.

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	significant adverse landscape and visual effects of the overhead line and pylons. 5.127 It is considered that the DCO should not be granted without a substantial funded landscape and visual compensation scheme. This to recognise the long-term significant residual negative and un-mitigatable operational effects on both landscape and visual receptors. The scheme should be alongside but distinct from any proposed community benefits. 5.128 It is not considered that this proposed replacement / reinstatement planting and provision of BNG compensates for the proposed harm to the landscape.	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'.* 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. 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 CNP 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. The above aligns with the Bramford to Twinstead (BTNO) 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.
Noise and vibration	5.129 There are several matters of concern in respect to construction noise and vibration that require further consideration by the Applicant.	Noted.
Noise and vibration	5.130 The "Holford Rules" are used as the guiding principles for routeing new overhead lines. These were originally formulated by Lord Holford, formerly an adviser to the Central Electricity Generation Board (CEGB) in 1959, and later reviewed and supplemented by National Grid in the 1990s. These deal with a number of areas including route planning considerations for areas of high amenity value, scientific interest and urban areas.	Noted.
Noise and vibration	5.131 The Holford Rules are not specific about residential amenity and simply state "Avoid routing close to residential areas as far as possible on grounds of general amenity.	Noted.
Landscape and visual	5.132 The main considerations for residential amenity are the visual impact, in terms of whether or not the pylons would be overbearing to the residents, the perceived health impacts and any noise nuisance arising from the long-term positioning of the pylons close to residential properties	Noted.
Noise and vibration	5.133 With regard to noise nuisance, the proposed core working hours would be 07:00 to 19:00 Mondays to Fridays; and 07:00 to 17:00 on Saturdays, Sundays and Bank Holidays. This excludes start up and close down activities, which could take place for up to one hour either side of the core working hours.' The hours also exclude other operations that may take place outside of the core working hours including operations commencing during the core working hours which cannot safely be stopped; surveys or monitoring; and operations requested by a third party, for example highway works to avoid disruption to the local road network at peak times. 5.134 The proposed working hours raise concern due to their extended nature, in particular at weekends and bank holidays. In Chelmsford normal working hours are 08:00 to 13:00 on Saturdays, with no working on Sundays or bank holidays. The	Please see response to paragraph 5.80.

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	proposed hours of 07:00 to 17:00 over all days the weekend/holiday is a significant increase and raises concern due to the lack of respite from noise for residents. These hours of working are not accepted by CCC.	
Noise and vibration	5.135 There are a number of residential properties and other sensitive receptors sited within 200 metres of the proposed pylons. CCC's view is that there is a need for noise levels to be lower where the proposal is sited close to residential properties and urban receptors. At weekends, where overall noise levels are generally lower, there could be a perception that weekend working noise levels could appear higher.	Works during any period would be subject to assessment against the applicable construction noise threshold for that period, as per BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise[62], and as detailed in Section 4 of **6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]**. The measures and processes put in place that would ensure that significant adverse effects would not occur are as follows: • The Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the **7.2 Outline Code of Construction Practice [APP-300]** • Based on the outcome of these assessments, specific mitigation measures would be identified and implemented. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]**). Should, with the inclusion of all practicable mitigation measures, the resultant construction noise levels exceed the noise level threshold for potential significant effects during any proposed working period (be it 'normal' daytime periods or otherwise), temporal restrictions would be required to either: • Avoid works during that period at that location if feasible, or • If works during this period cannot be avoided, limit the duration of the works such that the effect is not significant. Such situations may be managed through applications for prior consent under section 61 of the Control of Pollution Act 1974, though consultation between the Main Works Contractor(s) and the Local Planning Authority.
Noise and vibration	5.136 NGET suggests that longer working hours will result in the project's construction being completed sooner but given the duration of associated disturbance to the local communities there is a balance to be struck, respite should be extended to all those affected by the proposal.	The Applicant agrees that there is a balance to be struck, but is confident that this balance is born out of the measures and process in place to control construction noise and vibration. The measures and processes in place ensure that significant adverse effects can be avoided, including during 'non-weekday daytime' working. However, the nature of the Project means that there are many works locations which are not located close to noise and vibration sensitive locations. Restrictions on working hours would limit the ability to undertake works during weekend periods at these locations, despite not leading to significant adverse effects.
Noise and vibration and Air Quality	5.137 It is unclear where generators will be located. Chapter 4 of the ES sets out a list of proposed temporary construction compounds. However, Chapter 7 Figure 7.7 identifies temporary construction areas, some of the temporary construction compounds set out in Chapter 4 and other construction areas with 100m buffers. Figure 7.7 needs to be updated to clearly identify where generators are to be housed. There is no information relating to the potential size of generators. With the current lack of information, it is not possible to review the effect any further and additional information is requested to enable the amenity effects arising from noise and vibration from generators to be assessed.	It has been assumed that generators would be located within temporary construction compounds. **6.7.F7 Environmental Statement Figure 7.7 - Air Quality Generators [APP-157]** shows 100 m buffers around each temporary construction compound that have the potential to host generators. Section 7.3 of **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** also provides site management practices for temporary construction compounds to minimise the risk of impacts on receptors within 100 m of the work boundary. Given the nature and scale of the Project, it is not possible at this stage of the design development to specify the exact size, types and locations of temporary generators that would be used during construction. This will be developed by the Main Works Contractor(s) through detailed design. Indicative size and type of generators and typical usage patterns during the construction phase are provided in **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]**. The use of construction Non- Road Mobile Machinery is unlikely to result in significant effects on local air quality according to the guidance from Local Air Quality Management – Technical Guidance (TG22), paragraph 7.30[63].

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

[63] Department for Environment, Food and Rural Affairs (2025) *Local Air Quality Management – Technical Guidance (TG22)*

Topic	Comments	National Grid's response
		Additionally, the **7.2 Outline Code of Construction Practice [APP-300]** provides steps to ensure the locating of generators within each compound would take into consideration nearby receptors and minimise the likely effect on those receptors. The 100 m buffer areas shown on **6.7.F7 Environmental Statement Figure 7.7 - Air Quality Generators [APP-157]** would be used to identify potential receptors that are within 100 m of the boundary of temporary construction compounds that may be used for hosting generators. With regards to noise, similarly, it is assumed that generators are included within temporary construction compounds. The assessment in **6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]** does not identify any potential significant effects from the operation of temporary construction compounds, including the use of generators. Generators, along with other noise sources within construction compounds, would be subject to additional detailed noise and vibration assessments by the Main Works Contractor(s). Following these assessments, specific mitigation measures would be identified and incorporated where required. This may include, but is not limited to: plant selection, siting and orientation of equipment relative to nearby sensitive receptors, and screening. These further assessments are committed to in commitment NV05 within the **7.2 Outline Code of Construction Practice [APP-300]**. Mitigation measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]**). It is considered this commitment in the **7.2 Outline Code of Construction Practice [APP-300]** would ensure that no likely significant effects would occur from these construction activities.
Noise and vibration	5.138 Post construction, it is understood that the overhead lines can generate a crackling sound accompanied by a low frequency hum known as "corona discharge". Whilst the overhead lines are constructed to minimise this it is understood that weather conditions, particularly damp weather can result in higher noise levels. NGET's own document "Design Guidelines for development near pylons and high voltage overhead power lines" states that it is possible for the developer to mitigate significantly the effects of noise from an existing overhead line by attention to site layout and design of new developments, for example by including landscaping or by placing the noise sensitive elements away from the lines. 5.139 Notwithstanding any mitigation, the post noise impacts will be long standing and permanent and may not be perceived by those living close to the pylons as acceptable	Operational noise from the overhead line was scoped out of the Environmental Statement on the basis that a low noise conductor is being proposed. Based on the proposed conductor system, adverse effects are not expected, even directly underneath the line. Although scoped out, further information on noise from the proposed overhead line is provided in **6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines (Informative) [APP-261]**.
Noise and vibration	5.140 The Limits of Deviation enable the movement of pylons along the Overhead Line. Noise receptors should be reassessed for any movement along the Overhead Line to ensure that they do not lead to harm to residents amenities.	With regards to construction noise from pylon construction, the Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies and the specific pylon locations within the Limits of Deviation, as per commitment NV05 within the **7.2 Outline Code of Construction Practice [APP-300]**. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented such that significant adverse effects are avoided and adverse effects are reduced. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the application for development consent – **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]**). Operational noise from the overhead line was scoped out of the Environmental Statement on the basis that a low noise conductor is being proposed. Based on the proposed conductor system, adverse effects are not expected, even directly underneath the line. Although scoped out, further information on noise from the proposed overhead line is provided in **6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines (Informative) [APP-261]**.
Socio-economics	5.142 CCC is concerned the proposal would have detrimental socio-economic, recreation and tourism impacts.	The assessment of potential effects on agricultural land holdings is detailed in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** within paragraphs 6.7.8. to 6.7.10, and paragraph 6.7.16.

Topic	Comments	National Grid's response
	5.143 The proposal would affect existing businesses sited along the proposed pylon route and associated construction route. Much of the area proposed to site the pylons within is in agricultural use. The proposal would lead to some severance of agricultural fields and access to and from businesses including agricultural land holdings, especially in busy traffic conditions during the construction of the development, should the DCO be granted.	
Socio-economics	5.144 During the construction of the development, community liaison would be critical to mitigate and address local concerns; with appropriate compensation paid to those whose concerns cannot be mitigated. The construction effects would be particularly noticeable around Margaretting and Writtle, whose communities experience a high number of events including national events hosted at Hylands House. Detrimental effects on access to events and local businesses, however temporary, would be unacceptable.	The **7.2 Outline Code of Construction Practice [APP-300]** includes a commitment that members of the public will be kept informed regularly of construction works through active community liaison. Compensation or financial matters fall outside the scope of the Environmental Impact Assessment and will be addressed separately through direct engagement with affected landowners and the implementation of appropriate compensation arrangements. The assessment of potential effects on Hylands House Country Estate is detailed in the **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]**.
Socio-economics	5.145 The proposal would create temporary benefits on local employment generation and the local economy during the construction of the development. Yet a local skills and employment plan is absent from the proposals. This should be secured to help maximise the benefits to the local economy and create localised training opportunities and jobs. Appropriate training should be provided to enable the local workforce to continue to fulfil future projects and provide operational support to the pylons and overhead lines should the DCO be granted. 5.146 The Skills and Employment Plan should include: • Clear delivery plans for apprenticeships, work placements, school engagement and training programmes, • Commitments to local job creation and use of local contractors where feasible, • Evidence-based interventions informed by community engagement and local labour market data, • A sustainability and legacy framework to ensure initiatives continue from construction through to operation.	Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalents (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. This is considered to not be a significant number of construction employment when compared with other sectors. Given these considerations, a DCO requirement for a Skills and Employment Strategy would not be proportionate or necessary for the Project. However, the Applicant will work with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. Post-construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance[64].
Socio-economics	5.147 A Skills Fund, proportionate to the scale and impact of the development, should be prepared and used to: • Invest in local further education facilities and provision • Support employment and skills programmes • Enhance careers education and school engagement • Fund Officer resource for consultation and monitoring of the employment and skills strategy	The Applicant recognises the importance of skills development and employment support, particularly in relation to the green economy, and values ongoing dialogue with Local Authorities on these matters. However, taking into account the modest employment arising from the project as outlined above, the Applicant does not consider that the establishment of a DCO secured Employment and Skills Fund is appropriate, necessary, or proportionate in the context of this Project. Furthermore, **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** concludes that the Project would not give rise to significant adverse socio-economic effects in relation to employment or skills. As such, there is no planning harm that would justify the imposition of a financial contribution or fund as mitigation through the Development Consent Order. It is also important to note that the creation of an Employment and Skills Fund would constitute a community benefit measure, rather than mitigation for a specific environmental impact. In accordance with established

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

Topic	Comments	National Grid's response
		principles, community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through statutory planning requirements. This position is reinforced by the Community Funds for Transmission Infrastructure: Guidance[65], which makes clear that contributions of this nature should be progressed outside the development consent process. Notwithstanding this, the Applicant remains committed to supporting employment, skills and workforce development at a local and regional level through its wider corporate programmes and community benefit initiatives, as set out above. Therefore, while the Council's recommendation is noted and understood, the Applicant considers the establishment of a DCO secured Employment and Skills Fund is not justified by the scale or nature of the Project. Engagement on skills and employment opportunities will instead continue through non-statutory channels, consistent with national guidance and established practice.
Socio-economics	5.148 There are several Public Rights of Way (PRoW) within and abutting the Order Limits and CCC defers to Essex County Council PRoW team regarding the impact of the proposal upon these. The PRoW are an important feature in providing access and recreational opportunities within the countryside and contribute to the recreational and tourism value of the proposal. The PRoW would need to remain open during the construction of the development to maintain recreational access to the countryside.	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.
Socio-economics	5.149 Regard would need to be had to the impact of the proposal upon recreation and tourism, through ensuing [sic] that Chelmsford's valued rural landscape remains open and accessible. The landscapes affected by the proposal are often undeveloped, rural landscapes where intervisibility can be quite high due to being either large scale flat or gently undulating landscapes or where the scale of the pylons and overhead wires means the effect is an industrialisation of the countryside. The proposal would harmfully impact upon the recreational value and character and tranquillity of the countryside. The associated harm to local business and recreational and tourism value, would need to be balanced by the ExA.	The assessment of potential significant visual effects is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** (paragraphs 13.7.5 and 13.7.24). The assessment of potential effects on businesses, recreation and tourism assets and tourism economy is set out in Section 15.7 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. There are potential significant effects on some recreational and tourism assets which are located in Chelmsford. Separate discussions are ongoing with landowners regarding potential compensation, and these matters fall outside the scope of the Environmental Impact Assessment.
Socio-economics	5.150 CCC is concerned about the inclusion of Sunday and bank holidays to the core working hours in relation to socio- economic industry and enjoyment of the countryside. The proposed working hours raise concern due to their extended nature, in particular at weekends and bank holidays where residents and users of the countryside would ordinarily expect respite from operations during the weekend.	Please see response to paragraph 5.80.
Socio-economics	5.151 Cumulatively there is concern that should the DCO be granted, it would coincide with the construction of the Lower Thames Crossing. Although the anticipation is that there would be only 10% of local labour, there would be high demand across the area. Subject to season, those staying in local accommodation, could use vital bed space to which CCC is extremely short of.	An assessment of Cumulative Effects undertaken in accordance with the **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 includes an assessment with the Lower Thames Crossing project. No inter-project cumulative effects have been anticipated in relation to tourism assets during construction or operation. It is relevant to note the scale of employment associated with the Project, with a relatively small number of workers compared to other major construction projects. This factor, combined with the fact that construction activity moves along a linear route and the availability and distribution of accommodation across the Wider Study Area, explains why the effect on visitor accommodation bedspace during the construction period is considered to be negligible.

[65] Department for Energy Security and Net Zero (2025) Community funds for transmission infrastructure.

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		The scale of employment is also important to note. **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]** (paragraph 15.7.13) states that the '*level of local employment, based on the assumption of approximately 4,800 construction jobs throughout the four-year construction period, could result in a total job demand of approximately 480 jobs locally*'. These 480 jobs would be required within the four-year construction period, across the 180 km Project and 10 Local Planning Authority areas.
Traffic and transport	5.152 It is understood the proposal would harmfully impact upon the local highway network and Public Rights of Way (PRoW). The effects would be particularly noticeable during the construction of the development and from the on-going maintenance and operation of the pylons, overhead lines and associated equipment.	**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the likely impact along those roads forming the Primary Access Routes, where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. The Applicant has developed a **7.3 Outline Construction Traffic Management Plan [APP-309]**, the purpose of which is to monitor, mitigate and manage the impacts around construction traffic. Junction modelling was undertaken to assess the likely impact the increase in traffic as a result of the Project would have in combination with committed developments at key junctions on or connecting to the Primary Access Routes. Where required, suitable mitigation measures have been proposed or are under discussion with Essex County Council and National Highways to reduce the impact on journey times through junctions as presented within the **7.11 Transport Assessment [APP-333]**. Furthermore, within the Outline Construction Worker Travel Plan (**7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311]**) workers will be encouraged to car share or undertake flexible working practices. This aims to provide an opportunity to further reduce the number of construction vehicles through each junction. In relation to 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 to maintain access along 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. The PRoW network impacted by the Project was assessed within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and no significant impact on users of PRoWs was identified within Chelmsford. The Applicant would require infrequent access to ensure the operational Project is appropriately surveyed, assessed, and maintained. Infrequent Heavy Goods Vehicles would be needed; however, access would typically be made by foot, 4x4 or tractor and trailer. Further details on operation (and maintenance) can be found within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** (Section 4.10).
Traffic and transport	5.154 It is noted that the A1060 Roxwell Road is the subject of a potential new road safety scheme involving average speed cameras. The scheme is being worked up as part of Essex County Council's Vision Zero approach to road safety with the aspiration of eliminating all road deaths and serious injuries in Essex by 2040. There are concerns that with the extra number of construction vehicles and large vehicle types using the link as part of the designated construction route that there will be an additional impact on safety. Further discussions are needed on areas of the network where accidents have been identified along the construction routes.	**7.3 Outline Construction Traffic Management Plan [APP-309]** details the monitoring and management principles for construction traffic. Within the monitoring principles is the development and provision of the driver information pack. The driver information pack will highlight areas of the network where pedestrians and cyclists may be using the network and other known potential hazard locations, e.g. where there are collision clusters along the highway network. Within the **7.11 Transport Assessment [APP-333]** it was found that the A1060 Rainsford Road / A1060 Roxwell Road Primary Access Route (Link PAR 51) recorded 10 collisions in the period between 2021–2023, which is comparable to the national average for Personal Injury Collisions p.a. per billion vehicle km. **7.3 Outline Construction Traffic Management Plan [APP-309]** highlights the existing absence of a footway or footpath on the A1060 Roxwell Road (Link PAR 51) to access the bus stop. The Project's embedded mitigation includes the driver information pack that will identify this location and other locations where pedestrians may be walking in the verge. Within **7.11 Transport Assessment [APP-333]** it is proposed to monitor the operation of the A1060 Roxwell Road / Lordship Road junction (site 69). Additional mitigation identified through **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** has been highlighted for the A1060 Rainsford Road / A1060 Roxwell Road Primary Access Route (Link PAR 51), including the maintenance of adjacent vegetation to allow suitable visibility. Note also that National Grid is having further discussions with ECC on road safety matters.

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Traffic and transport	5.155 The construction of the development would give rise to a wide range of public health impacts, resulting in harm to the local communities that the proposal would sit. Matters including construction routes, hours of operation, the formation of vehicular accesses, traffic management and associated safety operations would need to be fully considered and mitigated as part of the proposals, with appropriate mitigation provided.	**6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** details the assessment of the potential effects of the Project on Health and Wellbeing. The Applicant has undertaken extensive assessments to ensure the matters of construction routes, working hours, formation of vehicular accesses, traffic management and access for blue light vehicles are suitably considered. The **7.3 Outline Construction Traffic Management Plan [APP-309]** includes details of the proposed mitigations for these.
Traffic and transport	5.156 Cumulatively, the impacts of the proposal on all other existing NSIPS and strategic sites need to be considered with further consideration given to the following: • Essex residents and businesses; • Mitigation of traffic impacts at sensitive junction locations on the wider network; • Mitigation of construction routes on sensitive receptors; • Measures to reduce localised impacts associated with construction workers and construction traffic; • The design and monitoring of the traffic management in the relatively long-term situations.	The Applicant has developed the **7.3 Outline Construction Traffic Management Plan [APP-309]** which was submitted with the application for development consent. The **7.3 Outline Construction Traffic Management Plan [APP-309]** details the process the Applicant is committing to for engagement with other projects in the region. As part of the **7.11 Transport Assessment [APP-333]** junction modelling was undertaken to assess the likely impact the increase in traffic as a result of the Project would have in combination with committed developments at key junctions on or connecting to the Primary Access Routes. Where required, suitable mitigation measures have been proposed or are under discussion with Essex County Council and National Highways. **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the likely impact along those roads forming the Primary Access Routes, where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. The Applicant has developed the **7.3 Outline Construction Traffic Management Plan – Appendix B – Outline Construction Worker Travel Plan [APP-311]** which includes potential measures which can be used to reduce the impact of the construction workforce from the Project on the highway network. The **7.3 Outline Construction Traffic Management Plan [APP-309]** includes mitigation and monitoring measures for construction traffic.
Design	5.157 The Planning Act 2008 requires the Secretary of State to have regard in determining applications for development consent to the desirability of good design. Advice in NPS EN1 Section 4.7 seeks applicants to consider the criteria for good design at an early stage when developing projects. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. CCC draws upon paragraph 4.7.4 of the NPS EN1 which considers how good design can mitigate the adverse impacts of a project and continues to encourage the Applicant to consider all opportunities to reduce the impact of the project on the communities and environment of the administrative area of Chelmsford	Good design has been considered as part of the development of this Project, as detailed within the **7.15 Design and Access Statement [APP-353]**. Details of reasonable alternatives considered through development of the Project are recorded within the **5.15 Design Development Report [APP-122]** and **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. The Applicant refers to its response to paragraph 3.3 of the RR above which details how residual effects following application of the mitigation hierarchy are taken into account within the planning balance.
Landscape and visual	5.158 CCC recognises within Part 2.4, 'Consideration of good design for energy infrastructure' of NPS EN5 the "functional design constraints of safety and security" may "limit an applicant's ability to influence the aesthetic appearance of that infrastructure". Given the scale of the project, CCC considers that design should feature as a key matter in the Examination	Noted. The Applicant notes that the Examining Authority have identified in their **Rule 6 Letter [PD-009]** that Good Design is an issue to be considered in the Examination. As Chelmsford City Council has noted, 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 Statement (NPS) EN-1 (2024) and NPS EN-5 (2024) and the embedded environmental design mitigation as part of the Environmental Impact Assessment 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. NPS EN-1 (2024) and NPS EN-5 (2024) set out the requirement to deliver good design, and the Applicant has responded to the criteria by which it will be assessed, following the Holford Rules and the Horlock Rules, in developing the Project. The Project team has sought to respond to the guidance to ensure that the Project is able to demonstrate that it adheres to good design through both process and outcomes. The **7.15 Design and**

Topic	Comments	National Grid's response
		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[66]. It is important to note that the design approach is also set within technical limitations to meet safety, security, cost effectiveness and operational requirements. These limit the scope for aesthetic or architectural customisation. Key elements like pylon size and substation layout are fixed by these functional needs.
Design	5.159 In isolation and cumulatively, the pylons and overhead lines have locally significant effects on the wider visual amenities of the area. An opportunity exists to ensure the appearance of any substantial structures across the proposal are appropriate for the locations through innovative design and approach to external appearance. This is particularly relevant to Great Waltham and Little Waltham where the introduction of T pylons could help to offset some concerns. The approach would be consistent with Para 4.7.6 of NPS EN1 where it states: "Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform, and vegetation."	Please refer to paragraph 5.44 for our response regarding the use of T-Pylons, particularly around Great Waltham and Little Waltham.
Design	5.160 Good design outcomes should have positive effects on the character of a place and delivery of public benefits and NGET should be aiming to ensure that this is achieved across the scheme. CCC considers that there is an opportunity to be innovative in the approach to design while ensuring the infrastructure remains safe and secure. NGET must follow a good design process to ensuring that the infrastructure proposed remains functional while realising the best local design outcomes.	The Applicant has adopted an iterative design process guided by the Holford and Horlock Rules, statutory duties under the Electricity Act 1989, and the Planning Inspectorate's Advice on Good Design[67]. The approach integrates stakeholder feedback, environmental mitigation, and technical constraints to achieve the best local design outcomes within the boundaries of operational and safety requirements. This is detailed in the **7.15 Design and Access Statement [APP-353]** submitted as part of the application for development consent. It should be noted that the design outcomes are set out in the **5.15 Design Development Report [APP-122]** and the **7.16 Design Approach for Site Specific Infrastructure [APP-354]**. A summary of the design outcomes in relation to the design evolution is also summarised in the **5.6 Planning Statement [APP-085]**. The Development Consent Order as drafted will enable the delivery of an innovative design technology such as the Gas Insulated Switchgear technology at Tilbury North. **Examples of key design outcomes** Regulatory Compliance • Design shaped by safety, operational, and environmental regulations • Net zero infrastructure – public benefit. Embedded Mitigation • Undergrounding in sensitive National Landscape areas • Use of Gas Insulated Switchgear substations for a compact footprint and use of low-height pylons to reduce visual impact • Commitment to 10% Biodiversity Net Gain – public benefit. Stakeholder engagement • Feedback integrated into design evolution and optioneering.
Cumulative effects	5.161 There are several developments within the area that may be affected by the proposals. These include, but are not limited to, the Longfield Solar Farm Development Consent Order – new solar array creating 500 MW of energy, the Countryside zest	Cumulative effects of the Project have been assessed and are presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The assessment includes Longfield Solar Farm, Beaulieu Park and Lower Thames Crossing.

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

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

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	(Beaulieu Park) LLP – Garden Community and the Lower Thames Crossing Nationally Significant Infrastructure Proposal (NSIP). The greatest effects would be felt during the construction of the development.	
Cumulative effects	5.162 The proposal has potential to give rise to intra-project cumulative effects, and these will need to be considered for all receptorFs, especially with regard to agriculture and soil, ecology and historic receptors which have not been considered further. Other receptors include highways, landscape and visual and noise for example.	An assessment of Cumulative Effects that includes consideration of intra-project effects undertaken in accordance with the **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]**.
Cumulative effects	5.163 The proposal would lead to a large number of significant landscape and visual effects during both construction and operation. Whilst it may not be practicable to mitigate these due to scale of the works and the height of the pylons, significant compensation in the form of a funding package should be secured under a side agreement in partnership with the relevant authorities and environmental partners should be provided.	The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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. Please refer to our response to paragraph 5.125 of the RR above regarding landscape compensation
Cumulative effects	5.164 CCC is particularly concerned regarding the cumulative noise and construction impacts arising from these developments. Cumulatively taken all together the proposal 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 the existing permitted development schemes. Reasonable hours of work	An assessment of Cumulative Effects undertaken in accordance with the **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]**. No significant cumulative effects have been identified for noise and vibration. Additionally, the Main Works Contractor(s) will undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the **7.2 Outline Code of Construction Practice [APP-300]**. Where applicable and feasible, this would include consideration of cumulative impacts of other nearby projects. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the development consent application – **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]**).
Cumulative effects	5.165 Cumulative impacts upon the PRoW and local economy, tourism and recreation are also of concern and would need to be appropriately considered.	The overall strategy, as set out in the **7.6 Outline Public Rights of Way Management Plan 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. An assessment of Cumulative Effects undertaken in accordance with the **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]**. The assessment included socio-economic, recreation and tourism receptors.
Community benefits	5.166 The proposal would have clear and extensive residual impacts arising that would adversely affect the local economy and environment, as well as the health and wellbeing of communities in Chelmsford, and which cannot be sufficiently mitigated or compensated through the planning regime. CCC contends that while the Norwich to Tilbury Project will deliver significant benefits at a national level, this will not offset the harm at the local level. This is unacceptable to CCC and CCC objects to the lack of appropriate mitigation and compensation.	Significant residual effects on the environment including the local economy are presented in **6.18 Environmental Statement Chapter 18 – Summary [APP-287]**. No significant residual effects are assessed on the health and wellbeing of communities in Chelmsford. The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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. Please refer to our response to paragraph 5.125 of the RR above regarding landscape compensation.
Cumulative	5.167 CCC recognise the timing for the project is driven by the need for capacity in the transmission system by 2030. Yet it is CCC's view that such benefit should not and cannot be secured at	Noted.

Topic	Comments	National Grid's response
	the expense of Chelmsford's local communities, landscapes and environments that would be affected by the proposal.	
Landscape and visual	5.168 As identified in the preceding paragraphs above, the proposal would introduce vast incongruous features of industrial character into a rural landscape, which would have harmfully impact upon the landscape, historic environment and amenities of the communities within which they would sit. The pylons and overhead lines would be visually noticeable and prominent. Many of the effects cannot be mitigated against due to the height and scale of the proposal and would be permanent.	Noted.
Community benefits	5.169 CCC consider that reasonable compensation and benefits to the wider area including a Community Benefit Fund, Skills and Employment funds, environmental and landscape enhancement and funding for heritage. Although separate to planning, affected residents should be appropriately compensated.	The government has published guidance on community funds for transmission infrastructure[68]. In line with this guidance, the Applicant is committed to working with industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure guidance. Regarding employment and skills, please refer to our response to paragraph 5.147 and 5.148 of the RR above.
Cumulative	5.170 CCC will continue to productively and constructively engage with NGET to secure acceptable mitigation and compensation for all impacts, should the application for Development Consent Order be granted.	Noted the NPS policy framework in relation to the mitigation hierarchy does not require that all residual effects are avoided, reduced, mitigated or compensated. Paragraph 3.3.63 of EN-1 (2024) states [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****'.* The Applicant has set out in response to paragraph 3.3 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Draft DCO	5.171 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".	The Applicant shared a pre-submission version of the **3.1 Draft Development Consent Order [APP-056]** with the lead case officers of all host authorities on 3 June 2025 and had regard to all feedback received prior to submission of the application.
Draft DCO	5.172 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.	The Applicant shared a pre-submission version of the **3.1 Draft Development Consent Order [APP-056]** with the lead case officers of all host authorities on 3 June 2025.

[68] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*

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Draft DCO	5.173 NGET offered CCC an opportunity to review some elements of the draft DCO ahead of submission, but it is particularly disappointing that NGET have failed to discuss the timescales and procedures in respect of the requirements at pre-application stage. CCC have local knowledge and practical experience of discharging these on other NSIPs.	The processes and timescales for the discharge of Requirements and other consents were included in the version of the **3.1 Draft Development Consent Order [APP-056]** that was shared with host authorities on 3 June 2025.
Draft DCO	5.174 While CCC acknowledges that the drafting of the DCO follows the structure and content of previously approved DCO's, drawing on from practical experience from their implementation and interaction with standard internal procedures, it is considered both necessary and sensible to recognise the value of local experience and knowledge, and move away from some precedents, where they facilitate the approval and implementation of the project	In preparing the **3.1 Draft Development Consent Order [APP-056]**, recent precedents have been followed and guidance in Advice Note 15[69] and Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects[70] has been taken into account and complied with. The Applicant has considered each article and the provisions of each schedule to the **3.1 Draft Development Consent Order [APP-056]** on a Project-specific basis and by reference to the issues relevant to the relevant article or schedule. The structure and content of the **3.1 Draft Development Consent Order [APP-056]** is referenced extensively throughout the application documents and any material change to the structure of the document in particular would require the updating of a very significant amount of the application documentation and cannot be supported on that basis given the scale of the application that has to be examined in the examination period.
Draft DCO	5.175 There are several parts of the draft DCO which remain of considerable concern and CCC would ask the ExA to carefully consider commentary in respect of the draft DCO and ensure appropriate consideration is given to the draft DCO through the Examination.	The Applicant notes that the authority has concerns and awaits further detailed comments.
Draft DCO	5.176 CCC is particularly keen to ensure that the proposed 'requirements' are both workable, achievable and deliverable. The current requirements propose a timescale of 28 days from first registration to decision. Timeframes set out in the DCO must be sufficient for CCC to consider, engage with stakeholders and respond to such applications submitted to it, as well as affording applicants time to feedback and respond to any further comments made.	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 Net Zero 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) (**3.1 Draft Development Consent Order [APP-056]**) to extend the 28 day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question.
Draft DCO	5.177 Further consideration should be given to how the processes and timescales are set out in various parts of the Development Consent Order and their effect on the ability to fully consider and discharge requirements.	The Applicant has considered each article and the provisions of each schedule to the **3.1 Draft Development Consent Order [APP-056]** on a Project-specific basis and by reference to the issues relevant to the relevant article or schedule. The Applicant's position is that the processes and timescales for decision making 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 Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of the Applicant.
Draft DCO	5.178 For consistency within the dDCO, there are a number of definitions and drafting points to be addressed (such as the use of 'business day,' 'working day' and 'day' interchangeably).	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.

[69] Planning Inspectorate (2025) *Nationally Significant Infrastructure Projects - Advice Note Fifteen: drafting Development Consent Orders*

[70] Ministry of Housing, Communities and Local Government (2024) *Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects*

Topic	Comments	National Grid's response
Draft DCO	5.179 The draft requirements require further discussion both in terms of their scope, and current detail. This includes those relating to construction hours, piling and potential noisy works. CCC is seeking to ensure communities have appropriate periods of respite from noisy and invasive construction activities.	The Applicant notes the authority's comments regarding the Requirements and awaits further detailed comments and will continue to engage with the authority.
Draft DCO	5.180 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.	The **3.1 Draft Development Consent Order [APP-056]** is drafted on the basis that the overhead line can be aligned within the horizontal limits of deviation shown on the **2.3 Works Plans [APP-017 to APP-024]**. The vertical limits of deviation are described in Article 5 of the **3.1 Draft Development Consent Order [APP-056]** and the table of parameters at the back of the Works Plans. The proposals in respect of the Walthams are a direct response to stakeholder consultation and have been assessed within the Environmental Impact Assessment. As such, no further approval or notification for heights or alignments which are within the Limits of Deviation and the specified parameters is justified.
Draft DCO	5.181 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 are clearly described and shown in the application documents and have been assessed within the Environmental Impact Assessment. As such, no further approval or notification for heights or alignments which are within the Limits of Deviation and the specified parameters is justified.
Draft DCO	5.182 Archaeological mitigation measures are secured through proposed requirement 5 in the Draft DCO. Should the proposal 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.	Requirement 5 within the **3.1 Draft Development Consent Order [APP-056]** already includes provision for evaluation. The post-consent process and techniques in the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** includes evaluation and this document is secured through Requirement 5.
Conclusions	6.1 This Relevant Representation presents a summary of the key points that CCC considers to be the main issues and impacts. CCC is preparing a Local Impact Report alongside the submission of this Relevant Representation. 6.2 The Local Impact Report will cover the matters listed in this representation, providing greater detail and commentary on thematic areas as appropriate.	Noted. The Applicant will respond to the Local Impact Report once published, in accordance with the Examination timetable.
Conclusions	6.3 Chelmsford City Council (CCC) declared a Climate and Ecological Emergency (CEE) in 2019. CCC supports the transition towards a low or zero carbon economy to address the impact of climate change and improve sustainability. This includes renewable energy production where this can be appropriately located and suitably mitigated. 6.4 CCC recognises the rapidly growing need for electricity as the climate emergency requires us to help support the replacement of fossil fuels such as oil and gas as soon as possible. This does not mean however, that all proposals which may assist in reducing climate change should be approved at any cost.	Noted. The Applicant has provided a response to this matter in relation to paragraphs 3.3 to 3.9 of the Relevant Representation, within this table.
Conclusions	6.5 CCC objects to the Norwich to Tilbury pylon proposal. Our objection is based on the following grounds: I) The preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons.	The Applicant has provided a response to this matter in relation to paragraphs 3.3 to 3.9 of the Relevant Representation, within this table.

Topic	Comments	National Grid's response
	II) CCC recognises that this option would need to be delivered at pace and without risk to national net zero, renewable energy and decarbonisation targets, and energy security. III) CCC consider that the presence of overhead lines and approximately 30m - 50m high pylons would be visually harmful and would result in unnecessary harm to heritage, landscape, ecology and residential amenity across the Chelmsford City Council administrative area.	
Conclusions	6.6 CCC is supportive of well-developed, well-designed, and coordinated projects that enable the goal of Net Zero and the interim targets, as set out in the revised National Policy Statements (NPS's). CCC consider this this cannot occur at the expense of Chelmsford's natural environment, landscapes and communities that would be affected by the proposal. 6.7 CCC 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. However, the shift towards the delivery of low carbon will only be successfully achieved if developments such as Norwich to Tilbury are permitted having first taken into account the very real impacts they would have upon the natural environment, landscapes and local communities that they would be sited within.	The Applicant has provided a response to this matter in relation to paragraphs 3.3 to 3.9 of the Relevant Representation, within this table.
Conclusions	6.8 The proposal would introduce vast incongruous features of industrial character into a rural landscape, which would harmfully impact upon the landscape and historic environment. The pylons and overhead lines would be visually noticeable and prominent. Many of the effects cannot be mitigated against due to the height and scale of the proposal and would be permanent.	The Applicant has provided a response to this matter in relation to paragraphs 5.7 to 5.10 of the Relevant Representation, within this table.
Conclusions	6.9 The proposal, as inappropriate development, would by definition be harmful to the Green Belt. It would result in encroachment and moderate harm to the openness of the Green Belt in both visual and spatial terms. The very special circumstances put forward by NGET would need to be considered alongside any other identified harm arising from the scheme, acknowledging that the proposal is inappropriate development.	The Applicant has provided a response to this matter in relation to paragraphs 5.11 to 5.14 of the Relevant Representation, within this table.
Conclusions	6.10 The proposal would irreversibly destroy the unique and irreplaceable historic environment within Great Waltham and Little Waltham. Whilst some of the harm identified is at the low level, cumulatively there would be an extensive impact. The proposed mitigation proposed does not adequately limit the harm on the historic environment, the sensitive landscape, ecology and residents that reside within it. CCC object to the proposal due to lack of sufficient mitigation and appropriate compensation.	The Applicant has provided a response to this matter in relation to paragraphs 5.23 and 5.29 and 5.32 to 5.37 of the Relevant Representation, within this table.
Conclusions	6.11 CCC's position is that impacts on protected species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination to support a lawful decision. The absence of effective post-mitigation licence monitoring makes it highly uncertain to reasonably anticipate when a mitigation proposal is likely to succeed. Should	The Applicant has provided a response to this matter in relation to paragraph 5.57 of the Relevant Representation, within this table.

Topic	Comments	National Grid's response
	the ExA decide to grant the DCO prior to the completion of the required assessments, they would need to satisfy themselves that they have complied with all relevant legislation including the Conservation of Species and Habitats Regulations 2017 as amended.	
Conclusions	6.12 The proposed loss to trees and woodland has not been appropriately justified or mitigated. A draft Arboricultural Method Statement should be produced to demonstrate what mitigation is required to appropriately protect retained trees. Appropriate arboricultural justification for any losses and/or impacts would need to be compensated for. Direct and indirect impacts that would lead to damage or loss of ancient woodland habitat or veteran trees must be avoided. There is no appropriate mitigation for the loss of irreplaceable habitats.	The Applicant has provided a response to this matter in relation to paragraphs 5.61 to 5.72 of the Relevant Representation, within this table.
Conclusions	6.13 The proposal would lead to a harmful change in the identified character and appearance of the landscape, which would lead to a change in the character and quality of the landscape. It would lead to harmful visual intrusion, through the siting of high large-scale industrialised features that cannot be fully mitigated against. The proposal would lead to the harmful loss of the character and beauty of the countryside.	The Applicant has provided a response to this matter in relation to paragraphs 5.105 to 5.124 of the Relevant Representation, within this table.
Conclusions	6.14 It is considered that the DCO should not be granted without a substantial funded landscape and visual compensation scheme. This to recognise the long-term significant residual negative and un-mitigatable operational effects on both landscape and visual receptors. The scheme should be alongside but distinct from any proposed community benefits.	The Applicant has provided a response to this matter in relation to paragraph 5.125 of the Relevant Representation, within this table.
Conclusions	6.15 It is essential that NGET genuinely engages with the local communities. It is important to stress that long working hours can have significant adverse effects on people's health and wellbeing. The proposed construction hours are unacceptable.	The Applicant recognises the importance of genuine engagement with local communities. The construction working hours proposed in the **3.1 Draft Development Consent Order [APP-056]** establish a maximum permissible working envelope and do not imply that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place over the full duration of the permitted working day or at all locations simultaneously. Given the linear nature of the Project, construction activity at any individual location would be temporary and time-limited, moving progressively along the route. The limited flexibility to undertake certain activities outside core working hours is included to ensure that works can be completed or made safe where they cannot reasonably be paused, for example due to weather disruption, land access constraints or technical and safety requirements associated with electricity transmission projects. This flexibility supports programme resilience and helps avoid extending the overall construction period. Potential effects on health and wellbeing are not governed by working hours alone, but by the extent and effectiveness of the mitigation measures secured through the **7.2 Outline Code of Construction Practice [APP-300]**. In this regard, the Project is subject to a comprehensive package of controls, including: • Application of best practicable means to manage construction noise and vibration in accordance with commitment NV01, supported by activity-specific mitigation under the **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** (NV05) • Provision for additional controls, including the use of Section 61 consents, where noise-sensitive situations arise (NV03) • Control and minimisation of construction lighting to reduce disturbance to residential and ecological receptors (GG26)

Topic	Comments	National Grid's response
		• Mandatory environmental training for construction staff, including training on working hours and disturbance minimisation (GG05) • Active community liaison, including advance notification of disruptive activities, provision of contact details, and a formal complaints handling process (GG30). All construction activity, including any undertaken at weekends or outside core weekday hours, remains fully subject to these controls, which are secured through Requirement 4 of the **3.1 Draft Development Consent Order [APP-056]** and are enforceable. Further restriction of working hours, such as the removal of weekend or Bank Holiday working, would reduce the Project's ability to respond to weather-related delays, access constraints and system requirements, increasing the risk of delay and potentially lengthening the overall construction period. This would extend the duration over which communities experience disruption, rather than reducing it. The proposed construction hours therefore reflect a balanced and proportionate approach, enabling safe and efficient delivery of nationally important electricity transmission infrastructure while ensuring that impacts on local communities are actively managed, minimised and monitored through the secured **7.2 Outline Code of Construction Practice [APP-300]** commitments.
Conclusions	6.16 There is scope to develop a skills and employment plan and skills fund. Harmful socio-economic and recreational impacts of the proposal must be avoided, including the cumulative impacts of construction	The Applicant has provided a response to this matter in relation to paragraph 5.145 to 5.147 of the Relevant Representation, within this table.
Conclusions	6.17 Impacts upon the local highway network and Public Rights of Way (PRoW), must be appropriately mitigated and compensated for.	The Applicant has provided a response to this matter in relation to paragraphs 5.148 and 5.152 of the Relevant Representation, within this table.
Conclusions	6.18 The application is silent on community benefits and compensation. This position is unacceptable and CCC object to the lack of appropriate mitigation and compensation. There is a need for reasonable compensation and benefits to be provided.	The Applicant has provided a response to this matter in relation to paragraphs 5.144 and 5.163 of the Relevant Representation, within this table.
Conclusions	6.19 Should the Development Consent Order be granted, refinement and amendment of the draft Development Consent Order is needed.	The Applicant has provided a response to specific comments on drafting of the Development Consent Order within this table, primarily in response to paragraphs 5.172 to 5.182 of the Relevant Representation.
Conclusions	6.20 CCC continues to productively and constructively engage (NGET) to secure the best possible outcomes for the local community and environment, including acceptable mitigation and compensation for all impacts; should the application for the Development Consent Order be granted by the Secretary of State.	Noted.

Appendix I. Colchester City Council

nationalgrid

Appendix I
Colchester City Council

Colchester City Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the **Relevant Representation (RR) [RR-0676]** provided by Colchester City Council.

The Applicant has been engaging with host authorities since the Project started and has been progressing a SoCG. An updated SoCG is provided to the Examining Authority at Deadline 1 (**5.9.8 Draft Statement of Common Ground – Colchester City Council [Revision B]**), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table I1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
Agriculture and soils	4.1. The Council notes the temporary loss of best and most versatile agricultural land (agricultural land class grades 1, 2 and 3a) during construction, alongside the permanent loss where design features like the Cable Sealing End Compounds (CSECs) are built. Given the mitigations raised by the applicant to limit these impacts and the creation of environmental areas surrounding the CSECs, assuming these are applied then the Council has no significant concerns to raise.	**7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]** provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources and ensure the land can be restored to its previous condition. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]** is secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]**.
Air quality	5.1. The Senior Scientific Officer advising the Council on air quality impacts of the project has reviewed the air quality documentation and is content that the air quality impacts of the project on human receptors and mitigation and management plans to manage the impacts have been identified and are acceptable.	The Applicant notes this comment.
Air quality	5.2. However, it has been noted that the size, type or location of generators to be used in the temporary construction areas are not detailed within the Air Quality chapter of the Environmental Statement. The applicant needs to outline these details in further plans in order for the impact of the use of generators on air quality to be assessed.	Indicative size of generators and typical usage patterns during the construction phase are provided in Section 7.3 of **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]**. Given the nature and scale of the Project, it is not possible at this stage of the design development to specify the exact size, types and locations of temporary generators that would be used during construction. This would be determined as part of detailed design. It has been assumed that generators would be located within temporary construction compounds which are shown on **6.7.F7 Environmental Statement Figure 7.7 - Air Quality Generators [APP-157]**. Section 7.3 of **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** also provides site management practices for temporary construction compounds to minimise the risk of impacts on receptors within 100 m of the work boundary. The use of construction Non-Road Mobile Machinery is unlikely to result in significant effects on local air quality according to the guidance from Local Air Quality Management – Technical Guidance (TG22)[71] Paragraph 7.30. As stated in **7.2 Outline Code of Construction Practice [APP-300]**, '*This outline management plan will be fully developed based on detailed design information to be provided by the Main Works Contractor(s). The final version will be submitted for approval in accordance with Requirement 4 (construction management plans) of the draft DCO (document reference 3.1) prior to commencement of development. This process ensures that detailed design is developed with clear alignment to the principles and procedures within this document.*' This commitment would ensure that no likely significant effects will occur from these construction activities.

[71] Department for Environment Food and Rural Affairs (Defra) (2025) Local Air Quality Management – Technical Guidance (TG22)

Topic	Comment	National Grid's response
Ecology and biodiversity	6.1. The council is concerned about the project's impacts on ecological assets within Colchester with our concerns set out below: 6.2. Whilst the applicant's ecological survey scope and methodology are broadly acceptable, the council notes that approximately 12.5% of the order limits are still being surveyed, with incomplete data for otter and water voles. This missing data is expected to be provided in November 2025. Further assessment of bat roosting potential in trees is required prior to DCO consent. The council believes that climbing inspections should be undertaken to allow for worst case scenario estimation of impacts and proportionate mitigation. Without this the council believes that the adequacy of mitigation cannot be assured.	Updated ecology survey reports that include the 2025 survey data were submitted to the Planning Inspectorate in November 2025. This included an update to **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** and the following associated appendices: • **6.8.A13 ES Appendix 8.13: Otter and Water Vole Report [AS-039]** • **6.8.A1 ES Appendix 8.1: Habitat Report [AS-028]** • **6.8.7 ES Appendix 8.7: Breeding Bird Report [AS-030]** • **6.8.A9 ES Appendix 8.9: Bat Roost Report [AS-034]** • **6.8.A10 ES Appendix 8.10: Bat Activity Report [AS-036]** • **6.8.A15 ES Appendix 8.15: Badger Report [AS-043]**. The bat roost survey scope was agreed with Natural England in advance of surveys being undertaken. The results of the bat surveys undertaken to date are sufficient to provide a reasonable worst-case assessment of impacts on roosting bats within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, as agreed with Natural England. For the majority of the route, further aerial inspections/ emergence surveys would be undertaken as part of the pre-commencement survey package of works, following detailed design. These pre-commencement surveys will provide confirmatory information, recognising survey validity periods and the transient nature of bat tree roosts, to confirm the location of prior agreed bat mitigation. In areas of highest risk for potential barbastelle bat roosts, surveys of these trees/woodland blocks were undertaken over the 2024/2025 survey season. Where barbastelle roosts were confirmed, the route has been amended to avoid these roosts.
Ecology and biodiversity	6.3. The applicant predicts construction phase impacts to County Wildlife sites (CWS) and Local Wildlife Sites (LWS) within the order limits as minor, temporary and reversible with residual impacts post-mitigation appraised as negligible. For Colchester this includes: • Possible hydrological impacts to Black Brook LWS; and Potential for accidental encroachment into ancient woodland at Harrow Wood LWS 6.4. The council does not dispute these assessments in principle but stresses that they are contingent on effective mitigation and robust monitoring. Impacts to Priority Habitats and important hedgerows are inevitable but rated negligible based on assumptions of successful mitigation and compensation planting. The council expects clarity on how these assumptions will be enforced.	Mitigation measures and commitments would be delivered through the implementation of **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Compliance with the final version of these documents will be a Requirement of the Development Consent Order (DCO) and therefore it would be a criminal offence for the Applicant not to comply. Every effort has been made to reduce the impacts on priority habitats and features of high ecological value including native hedgerows through careful routeing and siting. On completion of works, all areas of temporary construction impacts would be subject to replacement planting, replanting the habitat type that was lost. For the relatively small areas of permanent habitat loss, additional planting is proposed within Environmental Areas surrounding the Applicant's permanent assets. Illustrative landscape designs for these areas are provided within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. All replacement planting would be subject to an adaptive five-year monitoring and management period. New planting within Environmental Areas would be subject to a 30-year management period.
Ecology and biodiversity	6.5. Some potential impacts on protected species are not yet fully measured. For species such as bats, badger and water vole, additional pre-construction surveys will be required to account for seasonal changes and project delays. The council is concerned that the applicant's reliance on post-DCO surveys and mitigation introduces uncertainty and risk.	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 these additional data do 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]**. Where updated pre-construction surveys are required, these have been set out within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Pre-construction surveys are required to ensure valid surveys, due to the timeframe associated with both the planning process and the construction programme. This is a standard requirement of a project of this scale. Pre-construction surveys would ensure all survey results are up to date in line with survey validity windows for each survey type in turn as outlined by good practice guidelines.
Ecology and biodiversity	6.6. The Council welcomes the applicant's commitments to a non-mandatory BNG scheme aiming for 10% habitat unit increase and	Biodiversity is not bound by local authority area and therefore off-site Biodiversity Net Gain (BNG) will be considered across the length of the Project. However as detailed within **7.1 Biodiversity Net Gain Report [APP-**

Topic	Comment	National Grid's response
	acknowledges the importance of delivering BNG on site as a priority is key, followed by considering opportunities for local offsite BNG delivery as close to the areas of biodiversity harm as possible.	**299]**, the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.
Ecology and biodiversity	6.7. The Council is keen that opportunities for BNG delivery in Colchester align with the 'strategic opportunity areas' in the Local Nature Recovery Strategy developed by Essex County Council, as these are the areas where the greatest benefit for nature could be delivered if managed positively. Details remain unclear on who will be responsible for long term management and monitoring.	The Applicant can confirm the local nature recovery strategies for Essex will be considered as part of the Applicant's off-site BNG selection process.
Ecology and biodiversity	6.8. The Council also notes that mitigation measures include phrases such as "where practicable," which introduce ambiguity and risk inconsistent application. The applicant should provide enforceable commitments and clarify these provisos.	The use of the phrase 'where practicable' provides the flexibility required for a project of this scale at this point in the Project. Once detailed design has been developed, the Final Landscape and Ecological Management Plan and Code of Construction Practice would provide more certainty on any exceptions. The drafting of the Development Consent Order (see Requirement 4) in **3.1 Draft Development Consent Order [APP-056]** provides the necessary control measures.
Ecology and biodiversity	6.9. The role of the Ecological Clerk of Works (ECoW) is critical to ensuring compliance. The Council request confirmation of ECoW qualifications, experience and decisions-making authority, given the scale and complexity of the project.	The Ecological Clerk of works (ECoW) would be suitably qualified based on industry good practice; and protected species specialists would be used where required as identified within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Ecology and biodiversity	6.10. Additionally, the five-year post completion monitoring period for replacement planting is considered too short. The Council advises that a mutually agreed failure percentage be factored into compensation requirements to address potential planting failures.	The Applicant considers 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 [AS-046]** 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 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.
Ecology and biodiversity	6.11. To address these concerns, the Council would appreciate that additional information is provided by the applicant including: • Outstanding surveys (including bat roosting inspections) must be completed prior to DCO determination. • Mitigation measures should be enforceable and not subject to vague provisos. • Robust ECoW oversight commitments are essential • Clarity is needed on BNG delivery for Colchester and long-term monitoring arrangements. • Compensation requirements should account for planting failure rates.	Additional survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. The bat roost survey scope was agreed with Natural England in advance of surveys being undertaken. For the majority of the route, aerial inspections/emergence surveys would be undertaken following detailed design when it is clear which trees with potential bat roosting features will be impacted by the Project. The Environmental Statement includes a reasonable worst-case assessment of loss of bat tree roosts as outlined in **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]**. The use of the phrase '*where practicable*' provides the flexibility required for a project of this scale at this point. Once detailed design has been developed, the Final Landscape and Ecological Management Plan and Code of Construction Practice would provide more certainty on any exceptions. The Ecological Clerk of Works (ECoW) would be suitably qualified based on industry good practice, protected species specialists would be used where required as identified within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. 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 the Applicant's BNG site selection criteria which will consider a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.

Topic	Comment	National Grid's response
		The Applicant considers 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 [AS-046]** which includes like for like replacement or consideration of alternative species based on site by site conditions and the reasons for failure. Requirement 9(7) (reinstatement planting plan) 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 serious damaged or diseased.
Contaminated land	7.1. The Council's Contaminated Land Officer has reviewed the Contaminated Land Geology and Hydrogeology chapter of the ES. The Council notes that there is a relatively low level of contamination risk as the project will mainly affect agricultural and undeveloped land since the late 1800s. Therefore, there are no main concerns the Council would like to raise.	Noted. This agreement is reflected in the **Draft SoCG with Colchester City Council [5.9.8, Revision B].**
Health and wellbeing	8.1. The Council is concerned about the project's potential health and wellbeing impacts on communities within Colchester, with our concerns set out below:	The Applicant notes this comment. See also our response below.
Health and wellbeing	8.2. The Overarching National Policy Statement for Energy (EN-1) requires Environmental Statements to identify and mitigate adverse health impacts, including 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.	A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. Paragraphs 17.5.46 to 17.5.48 contain the findings in relation to health and wellbeing of inter-project cumulative effects. For example, it is identified that in a number of instances, adverse effects on mental health and wellbeing may 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. **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** contains an assessment of impacts on vulnerable groups. Vulnerable groups considered in the assessment are identified in Table 10.5 of ES Chapter 10.
Health and wellbeing	8.3. The ES relies heavily on the 2019 Index of Multiple Deprivation (IMD) to define community sensitivity. This approach risks masking inequalities within wards. IMD data was updated in October 2025, and the Council expects the assessment to be revisited to reflect any changes. More granular Lower Super Output Area (LSOA) data should be used to reveal localised deprivation, particularly in Colchester where health inequalities are most acute. Failure to do so risks underestimating differential health effects, contrary to EN-1 requirements.	The assessment undertaken in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** reported the available IMD data at the time it was prepared to understand baseline health and socio-economic characteristics of populations potentially affected by the Project. A review of the updated IMD data published in October 2025 (after the DCO application was submitted) shows that, as a whole, deprivation levels have reduced for the Colchester City Council area, with fewer neighbourhoods now ranking among the most deprived in England. Therefore it is not considered that the updated dataset would result in material changes to the conclusions of the health and wellbeing assessment.
Health and wellbeing	8.4. Table 10.1 of the ES omits reference to local health and wellbeing strategies and Integrated Care System Joint Forward Plans. This weakens alignment with the Essex Joint Health and Wellbeing Strategy, which prioritises tackling inequalities, supporting mental wellbeing, and enabling healthier, more active communities. The Council expects these strategies to be integrated into the assessment.	Colchester City Council sits within Essex County Council, and the health priorities set out within the Essex Joint Health and Wellbeing Strategy are summarised in Table 10.1 on page 5 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. Paragraph 10.2.16 states that local health and wellbeing strategies, Joint Strategic Needs Assessments and the health priorities they contain, have been used to inform the health and wellbeing assessment. As such, it is considered that the omission of the Integrated Care System Joint Forward Plans from Table 10.1 of the Environmental Statement does not affect the conclusions of the assessment.
Health and wellbeing	8.5. The ES baseline acknowledges language vulnerability along the route but does not incorporate this into sensitivity or mitigation planning. Communities with limited English proficiency may face barriers to understanding consultation materials and health information, leading to heightened anxiety and exclusion from mitigation measures. The Council recommends inclusive engagement methods, including translated materials, interpreters, and collaboration with local community and faith organisations.	**5.1 Consultation Report [APP-066]** sets out the Applicant's approach to engaging with seldom heard groups, defined as those being inaccessible to most traditional and conventional methods of consultation for any reason, and including people for whom English may be a second language. The Applicant undertook research to identify local seldom heard organisations and worked with Local Planning Authorities and other bodies as needed to identify additional groups. The approach was defined as part of the development of the Statement of Community Consultation (SoCC), giving Local Planning Authorities the opportunity to influence this strategy. Public information events were held across the local area and were accessible and inclusive for members of the public.

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		The Applicant will continue to engage with people potentially affected during progress of the Project, through a variety of communication means.
Health and wellbeing	8.6. 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 Applicant recognises people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. Paragraph 17.5.47 identifies that, in a number of instances, 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 Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the Project through making timely design decisions and engaging with residents and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. In relation to Mental Wellbeing Impact Assessment (MWIA) workshops, the Applicant understands from statutory and non-statutory consultation already undertaken that the principal concerns of local residents from a mental health and wellbeing perspective centre around stress and anxiety associated with impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on businesses and properties) as well as perceptions of the impacts of electric and magnetic fields on health and wellbeing. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** has identified opportunities for public awareness raising about electric and magnetic fields, which will form part of measures recommended for affected communities along the proposed route.
Health and wellbeing	8.7/8.8. The ES concludes that no additional mitigation or monitoring is required beyond embedded measures. The Council considers this inadequate given the scale and duration of construction and the socioeconomic characteristics of affected communities. A Health and Wellbeing Monitoring Framework should be established, including baseline data on active travel, green space access, amenity satisfaction, and mental wellbeing. Indicators and reporting intervals should be clearly defined and co-developed with local communities.	No significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design and to reduce concern or uncertainty about the proposals through transparent engagement with residents and stakeholders during Project development. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. **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.
Health and wellbeing	8.9. To address these concerns, the Council requests that the applicant provide: • 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.	No updated assessment incorporating October 2025 IMD and LSOA-level data for Colchester is considered necessary as the updated data are not considered to affect the conclusions of the assessment. The Essex Joint Health and Wellbeing Strategy (which incorporates Colchester) has been reviewed and health priorities have helped inform the health and wellbeing assessment; as such, no further review is considered necessary. As previously noted, the Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact. Cumulative impacts on health and wellbeing as a result of other developments have been described in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. As previously noted, the Applicant understands from statutory and non-statutory consultation the principal concerns of local residents from a mental health and wellbeing perspective. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-**

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		192] has identified opportunities for public awareness raising about electric and magnetic fields, which will form part of measures recommended for affected communities along the proposed route. Finally, no significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures.
Health and wellbeing	8.10. Additionally, as raised in the section on noise of this representation, the Council is aware that noise, particularly during construction phases of the project, would likely have negative impacts on people's mental health. Residents require periods of respite and so it is important that the proposed working hours are not lengthy. As proposed, working during Sundays and bank holidays should be avoided.	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday – Friday: 0700 to 1900 • Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700 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]** (draft DCO). The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the project. The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. **7.2 Outline Code of Construction Practice [APP-300]** (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 draft DCO [APP-056]** within the final CoCP. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in **Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300]**, including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30).
Historic environment	9.1. The Council is concerned about the project's impacts on the historic and archaeological assets in Colchester. Our concerns for impacts on the built historic environment and archaeology are separated out below:	The Applicant notes this comment. Responses to this comment are set out below.

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Historic environment	*Built heritage* 9.2. Whilst the applicant's assessment of impacts on listed buildings and conservation areas either result in no harm or less than substantial harm during the operational and construction phases, the Council believes there is still improvements that can be made in regard to the mitigation of impacts on historic assets and environment.	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 [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders, including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. 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. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, the Overarching National Policy Statement for Energy EN-1 (2024) does not require the Applicant to take any further measures.
Historic environment	9.3. Critically, although the applicant identifies that there is less than substantial harm identified to designated heritage assets and that no designated heritage assets are within the order limits, there are instances where land that forms parts of the setting of designated heritage assets fall within them.	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 [APP-208]**. 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 [APP-210]**. 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. In addition, as the Project is classified as critical national priority as set out in section 4.2 of NPS EN-1 (2024) there is a presumption that it 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).
Historic environment	9.4. The Council considers that embedded mitigation measures should be increased regarding the project's impacts on Aldham Hall, a grade II* listed building and Wagon Lodge to North of Aldham Hall, a grade II listed building. This mitigation should take the form of positioning the order limits and pylons further away from these assets in order to preserve the undeveloped agricultural quality of their setting.	See response to 9.2, in particular, **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. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, the Overarching National Policy Statement for Energy EN-1 (2024) does not require the Applicant to take any further measures.
Historic environment	9.5. Additionally, where assets have been classified as at risk at the mid level of less than substantial harm, the Council also expects more clarity about how mitigation measures have been determined and whether or not alternatives were considered to more substantially lower the harm experienced.	Review of the assessment identified 11 listed buildings and one conservation area in Section D/Colchester where a mid less than substantial harm conclusion has been reached (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). **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. **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. **5.15 Design**

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		Development Report [APP-122] sets out the consideration given to changes affecting these designated heritage assets.
Historic environment	9.6. The Council also notes that as part of standard mitigation measures taken during the construction process, the applicant states that in paragraph 11.6.6 of the Environmental Statement Chapter 11 – Historic Environment: *"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 Applicant notes this comment.
Historic environment	9.7. The Council seeks to understand further the definition of 'appropriate' in this context. Additionally, we request that the applicant should commit to contacting the Council where any features need removing 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 Pan [APP-321]**. 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.
Historic environment	9.8. The Council is also concerned about the appeared lack of consideration of the project's impacts on the setting and significance of built Non-Designated Heritage Assets (NDHAs). In the applicant's methodology for assessing impacts on designated and non-designated heritage assets, in paragraph 11.4.25 of the Environmental Statement Chapter 11 – Historic Environment, the applicant states: '…The settings of all negligible and low value non-designated heritage assets have not been assessed…, due to the lack of potential for any impacts to these assets to result in significant effects…'	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 [APP-208]**. 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. Overarching National Policy Statement for Energy EN-1 (2024) paragraph 5.9.9 includes instructions regarding the Applicant's assessment '*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*' and in several places refers to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that the Project has appropriately complied with relevant policy in the National Policy Statement EN-1 (2024) regarding assessment of impacts to non-designated heritage assets.
Historic environment	9.9. The applicant also states that this approach was discussed and agreed with stakeholders in February 2025, but we do not agree that this agreement was reached.	The historic environment thematic group meeting held on 27 February 2025 was principally focused on the updated **6.11.A1 Environmental Statement Appendix 11.1 Historic Environment Baseline Report [APP-209]**. This was shared with all historic environment stakeholders on 13 February 2025, and had been produced in accordance with the approach of not including a written settings assessment for non-designated heritage assets of low and negligible value. This element of the methodology was briefly discussed during the meeting and no objections were raised. The effects of the development on built non-designated heritage assets has been carried out and a written settings assessment is presented for those built non-designated heritage assets that are of medium value or above and had the potential to experience significant effects from the Project.
Historic environment	9.10. This approach of not considering the impacts of the project on the setting and significance of all NDHAs does not appear to	Response as for 9.8 above

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	be in accordance with paragraph 5.9.7 of the Department for Energy Security and Net Zero Overarching National Policy Statement for Energy (EN-1) which states: *'The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan making process by plan-making bodies, including 'local listing', or through the application, examination and decision making process). This is on the basis of clear evidence that such heritage assets have a significance that merits consideration in that process, even though those assets are of lesser significance than designated heritage assets'.*	
Historic environment	*Archaeology* 9.11. The Council notes the fieldwork including the geophysical surveys and trial trenching that has been completed to assess the presence of potential archaeological remains. However, it is clear that some areas identified to be assessed have not been completed. The Council is concerned that the level of fieldwork required to understand the nature, extent and significance of archaeological and geoarchaeological deposits that may be present within the environment affected by the project may not be completed within the determination period. 9.12. By not fully evaluating and assessing the potential of archaeological and geoarchaeological deposits present, the scheme risks causing avoidable harm to the historic environment. Whilst, the Outline Archaeological Mitigation Strategy (OAMS) and Outline Written Scheme of Investigation (OWSI) has been submitted, the document still needs to clarify the scope and extent of further evaluation required prior to any agreed mitigation. This will include further geophysical survey, archaeological trial trenching and geoarchaeological investigation. This will allow all parties to be clear about the scope and level of evaluation that may be required should consent be given.	The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information **[AS-068 to AS-083]** which the council are aware of. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. The Phase 2 stage of the geophysical survey and trial trenching will continue throughout 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. The vast majority of the priority geophysical survey and trial trenching are complete and inform the forthcoming Supplementary Environmental Information. The Project proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination period in consultation with the Local Planning Authority Archaeological Advisors. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed, and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ should highly significant remains be identified.
Historic environment	9.13. Additionally, there is concern that the results of archaeological evaluation (e.g. ageing) that is currently taking place will not be able to be integrated into the documents already produced. Therefore, there is potential that the significance of geoarchaeological deposits identified will not be fully understood leading to decisions and opportunities for mitigation being based on insufficient evidence. 9.14. To address these concerns, the Council would appreciate that additional information is provided by the applicant including: Submission of all archaeological fieldwork data in a report format prior to the determination of the application; Plan of all completed fieldwork and areas of future evaluation identified and included within the OWSI/AMS; and Further details for geoarchaeological/palaeoenvironmental investigation that could be completed prior to the determination of the application to establish significance.	All completed interim reports for trial trenching in Colchester were submitted with the application for development consent in **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213]** along with the reports of geoarchaeological monitoring of GI works (**6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**). Further interim reports and assessment reports for priority trial trenching areas and the final report for the Phase 1 priority areas geophysical survey was submitted to the Planning Inspectorate as Supplementary Environmental Information in January 2026 **[AS-068 to AS-083]**, prior to the start of examination. The assessment reports for the Phase 2 geophysical survey and trial trenching will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed and agreed at monthly meetings and set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. The Supplementary Environmental Information includes a Project-wide figure indicating the progress of the priority evaluation areas (**6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [APP-219]**). The Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination period in consultation with the Local Planning Authority Archaeological Advisors, which will include figures detailing the completed and planned evaluation. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** already includes provision for further geoarchaeological/ palaeoenvironmental work.

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Flood risk	10.1. The Council has no significant concerns to raise but encourage the Examining Authority to review any issues raised by Essex County Council as the Lead Local Flood Authority for Essex.	Noted. This agreement is reflected in the **Draft SoCG with Colchester City Council [5.9.8, Revision B].**
Landscape and visual impact	11.1. The Council is seriously concerned with the scale of impact the project poses to the landscape and views, and how this in turn affects people's health and livelihoods.	The Landscape and Visual Impact Assessment (LVIA), included in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, has been undertaken as part of the EIA. The approach to the LVIA follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3). The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). 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 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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-145]** and **5.6 Planning Statement [APP-085]**. EN-1 paragraph 4.1.7 provides *'… 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'.* 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 Colchester 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.
Arboriculture	*Arboriculture*: 11.3. The Council's Arboricultural Officer has reviewed the Arboricultural Impact Assessment (AIA, APP-236), the Ancient Woodland and Veteran Tree Strategy (APP-323), and the Trees and Hedgerows to be Removed or Managed Plans (APP-050 / 051) covering Sections C and D of the project where the route passes through Colchester. 11.4. It should be noted that it was difficult to navigate and cross check between the documents due to poor labelling of tree locations and the lack of tree numbers on the managed plans. Extra information had to be requested to support the review of the documents, which did help but it was still a significantly difficult task to complete.	Annex D of **6.13.A6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]** includes labelled figures of the surveyed high and moderate value trees which are colour coded to illustrate the likely impacts.
Arboriculture	11.5. From the assessment, it is difficult to fully understand the level of tree loss as within Section C of the AIA (covering Babergh, Colchester and Tendring) tree loss cannot be disaggregated to those trees located in Colchester. However, it is estimated that at least 47 individual trees will be removed	Section 8.2.3 of **7.4 Outline Landscape and Environmental Management Plan [AS-046]** confirms that following detailed design and prior to construction, relevant surveys will be undertaken to reduce removal of trees/ hedgerows as far as practicable. This is recorded as mitigation measure GG14 within **7.2 Outline Code of Construction Practice [APP-300]**.

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	alongside substantial portions of 20 groups (~ 32 800 m² of canopy, potentially exceeding 40,000 m2 with Section C estimated losses). To help understand, and mitigate, the tree loss the Council requests that the applicant should produce a Colchester Specific Canopy Cover Assessment and Recovery Plan clearly quantifying baseline canopy area within Colchester, level of canopy loss and disturbance and projected canopy recovery over 5, 10 and 15 years.	Reporting of potential impacts corresponds to the Project sections. Information covering Colchester can be found on sheets 166-182 of Annex D within **6.13.A6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]**. Tree canopy loss has been reported as per the sections of the scheme with no specifics for Colchester Council. Section 8.2.3 of **7.4 Outline Landscape and Environmental Management Plan [AS-046]** confirms that following detailed design and prior to construction relevant surveys would be undertaken to reduce removal of trees/hedgerows.
Arboriculture	11.6. Additionally, the Ancient Woodland and Veteran Tree Strategy submitted details that one veteran tree is to be removed. However, the reasoning behind the need for removal is unclear which is of significant concern considering its removal would constitute the loss of irreplaceable habitat. Full justification for its removal needs to be provided.	The tree for removal within Colchester's sphere (T566) is shown as removed due to Limits of Deviation and cable construction swathe. The tree will be a consideration at detailed design and retained if possible. This veteran tree is reported as impacted due to its proximity to existing infrastructure and working area. Section 8.2.3 of **7.4 Outline Landscape and Environmental Management Plan [AS-046]** 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 is recorded as mitigation measure GG14 within **7.2 Outline Code of Construction Practice [APP-300]**.
Arboriculture	11.7. The applicant does propose compensation through the Ancient Woodland and Veteran Tree Strategy, including creation of replacement veteran features, retention of felled timber for in-situ habitat, and targeted veteranisation of younger oaks. While these measures align with good practice, the Council considers the impact major adverse and requires a Veteran Tree Compensation and Management Plan securing local delivery and a minimum 30-year management term.	**7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** would be developed further and form part of the final Landscape and Ecological Management Plan and would be discharged with the relevant Local Planning Authority under Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**. The final compensation and management plan will require landowner agreement and be implementable.
Arboriculture	11.8. The Council notes the 3:1 replacement planting ratio proposed by the applicant. The Council wishes to emphasise that tree planting should occur on-site as priority, and where this is not possible then off-site compensatory planting undertaken. The replacement planting should reinstate boundary oak and hedgerow patterns using native, climate-resilient species, prioritise canopy continuity and ecological connectivity, include a 10-year aftercare programme and 30-year monitoring for veteran compensation planting, and be tied to DCO Requirements mandating outcome-based canopy recovery	**7.4 Outline Landscape and Ecological Management Plan [AS-046]** states that where practicable, trees will be replanted in the same, or in close proximity to, the location from which they were removed. If constraints preclude this, tree replanting will be undertaken as close as possible to the original location. If it is not possible to replant the trees within the Order Limits, then off-site provision will be provided. Where practicable, removed woodland and trees will be replaced on site with the same species or another locally appropriate species with consideration given to ecological enhancement of areas, with a more diverse mix of native species planting. Indicative hedgerow species are provided within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The five-year aftercare period for tree and hedgerow replacement planting is considered sufficient to ensure successful establishments. The aftercare measures will be adaptive, as stated within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The Environmental Areas are located on land to be acquired by the Applicant and any habitats included within the BNG onsite provision will be monitored and managed by the Applicant for 30 years in line with commitments made within **7.1 Biodiversity Net Gain Report [APP-299]**. 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])** confirms that the monitoring programme for veteran trees will cover a minimum 30-year period.
Arboriculture	11.9. Additionally, the Council requests that a Tree Monitoring Plan is included within the Construction Environment Management Plan (CEMP) by the applicant and that it confirms that the Landscape Ecological Management Plan (LEMP) will detail that reinstatement planting will restore rural field-boundary character.	Onsite tree monitoring will take place in line with **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, Section 9.4 of which also outlines the commitment to reinstate hedgerow field boundaries. The restoration of hedgerows would restore rural field-boundary character.
Landscape and visual impact	*Landscape* 11.10. The project will have a significant impact on the landscape character within many parts of rural Colchester, particularly	The Applicant notes this comment and refers to its response to paragraph 11.1 of the RR above, regarding the overall planning balance.

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	around the villages and parishes of Langham, Great Horkesley, Fordham and Fordstreet, Aldham and Great Tey.	
Landscape and visual impact	11.11. The Council notes that within the Environmental Statement, the landscape character areas within the Colchester Borough Landscape Assessment, published in 2005 appear to have been used for considering the impacts of the project on landscape. However, an updated Colchester Landscape Character Assessment was produced in November 2024. The Council considers that judgements made on landscape impact should be updated to reflect the revised landscape character areas and their descriptions identified in the Colchester Landscape Character Assessment.	The landscape assessments within **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**, assessed the Landscape Character Areas (LCAs) identified within the 2005 Landscape Character Assessment report[72]. It is acknowledged that the November 2024 Colchester Landscape Character Assessment[73] represents the most current LCAs for Colchester. The 2024 report is listed under the evidence base for the 2013-2033 Local Plan. However, the 'Landscape' webpage of the Colchester City Council website still links to the 2005 landscape character assessment. The 2024 report has been reviewed. The 2024 LCA boundaries remain the same as in the 2005 report. An exception to this is LCA A7 which is no longer divided into subcategories of A7a, A7b and A7c. The 2024 report updates key characteristics and provides a high level rating on inherent value for each LCA. This value judgement has been reviewed against the landscape value judgements assessed in Annex A Landscape Value Assessment presented in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. The value judgements are broadly similar across the 2024 Colchester LCA and judgements set out in Appendix 13.2. Exceptions to this are within the Roman River Valley and the Colne River Valley where the value has been judged as higher in the 2024 LCA compared to Appendix 13.2. There would be no change to the effects reported on these LCAs.
Landscape and visual impact	11.12. Additionally, within paragraph 13.2.9 of Document 6.13.A2 Environmental Statement Appendix 13.2 Landscape Baseline and Assessment states, 'There are no locally designated landscapes within the 3 km Study Area', without reference to the fact that the Council, alongside other districts through which the Project line passes no longer designate landscapes locally, in keeping with National policy from the late 1990s and 2000s. It is concerning that judgements may be being made regarding landscape value and sensitivity based on an assumption that because there are no designations, the landscape lacks value. A caveat to the statement in the documentation needs to be made that recognises that fact.	A landscape value assessment has been undertaken as part of the landscape assessments presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Each LCA or Landscape Character Type (LCT) has been systematically assessed against the value factors presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and has informed the sensitivity judgement in the landscape assessments. Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations[74] has been used to inform this assessment. It is therefore considered that local landscape value has been sufficiently represented within the assessments despite the absence of local designations.
Landscape and visual impact	11.13. Lack of local landscape designation does not imply lack of landscape qualities or value. The current Holford Rules advise 'Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape Value and other similar designations of County, District or Local value'. Yet, by adhering to national policy from the late 1990s and 2000s and basing our policy on local landscape assessments not designation, the Council is effectively penalised by this advice. The Holford Rules were last updated in the 1990s. Additionally, Rule 5 of the Holford Rules which states that routes of overhead transmission lines, should '… be kept as far as possible from smaller lines, converging routes and other poles, masts, wires, and vales to avoid a concentration or 'wirescape'. This has the perverse effect of distributing adverse impacts over a wider area of unspoilt countryside rather than containing them in a narrower	A landscape value assessment has been undertaken as part of the landscape assessments, presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Each LCA or LCT has been systematically assessed against the value factors presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and has informed the sensitivity judgement in the landscape assessments. Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations[75] has been used to inform this assessment. It is therefore considered that local landscape value has been sufficiently represented within the assessments despite the absence of local designations. Whilst noting the Councils opinion, the Holford Rules, and Horlock Rules for substations, are identified in NPS EN5 paragraph 2.9.16 and 2.9.18 as relevant guidance to be embodied in applicant's proposals. The Applicant has used them in this way as guidance but also made a balanced decision informed by additional considerations including feedback, environmental and technical studies and assessment results, The specific example cited relates to the balance between close paralleling existing infrastructure or adopting a route that is separated. This was considered as part of the routeing with close parallel not being favoured in this instance.

[72] Colchester Borough Council (2005) Colchester Borough Landscape Character Assessment.

[73] Colchester City Council (2024) Colchester Landscape Character Assessment.

[74] Landscape Institute (2021) Technical Guidance Note 02/21 Assessing landscape value outside national designations. https://landscapeinstitute.org/publication/tgn-02-21-assessing-landscape-value-outside-national-designations/

[75] Landscape Institute (2021) Technical Guidance Note 02/21

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	corridor. We consider the Holford Rules need updating in light of these concerns.	
Landscape and visual impact	11.14. As an overall point, the Council believes the project does not meet criteria outlined in paragraph 4.3.4 of the National Policy Statement EN-1 which states '… the applicant must … show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy… (our emphasis added). As no compensation has been offered for the significant adverse landscape and visual effects of the overhead line and pylons, we judge that the policy has not been met. Therefore, our position is that a significant strategic landscape compensation package should be put in place as part of the submission or a significant strategic financial compensation package put in place as a side agreement to offset the landscape and visual harm across the route of the overhead line. This should be alongside but distinct from a similar package for community benefits.	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]**. Whilst compensation is part of the mitigation hierarchy, EN-1 or EN-5 do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. 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'.* 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. 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 CNP 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. The above aligns with the Bramford to Twinstead (BTNO) 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.
Landscape and visual impact	11.15. On the landscape impacts, the Council judges that in many instances the impacts are of higher significance than what is outlined by the applicant given the scale of industrialisation of the predominantly undeveloped and flat countryside that the project will lead to. Additionally, the distances to which landscapes will be significantly impacted will in many locations exceed the 1km or 1.5km distance from the project suggested by the applicant. In many cases, the Council judges that landscapes up to 2km from the alignment could be significantly impacted given the relatively high levels of intervisibility across the landscapes.	The Landscape and Visual Impact Assessment (LVIA) set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and accompanying **6.13.A1 Environmental Statement Appendix 13.1: Landscape and Visual Methodology [APP-227]** set out a robust and consistent methodology, with clear, transparent criteria and assessment grades, in line with GLVIA3[76] and the Clarification Notes[77]. The approach and methodology that was taken was presented to and discussed with statutory consultees through consultation as recorded in relevant Statements of Common Ground (**5.9.1 - 5.9.12 [APP-089 - APP-100]**). The judgements were informed by detailed desk and field studies, and the findings are supported by detailed explanations within **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 - APP-232]**; and **7.12 Visualisations [APP-343 - APP-349]**. In the area referred to by the Council, the landscape is relatively undeveloped and flat, as the Council suggests. This means there is typically an absence of elevated views from longer distances. It also means that the existing framework of hedgerows and trees, as well as blocks of woodland and areas of settlement where present, reduce invisibility across the landscapes in places and will help to screen or filter views of the new infrastructure, accepting that filtering will be reduced when deciduous vegetation is leafless. 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, in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. These findings have been re-checked in light of the comments made above and it is considered that the judgements made remain fair and reasonable and that no changes need to be made.

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

[77] Landscape Institute (2024) Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3) LITGN-2024-01. https://landscapeinstitute.org/technical-resource/notes-and-clarifications-on-aspects-of-the-3rd-edition-guidelines-on-landscape-and-visual-impact-assessment-glvia3-litgn-2024-01/

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Landscape and visual impact	11.16. The Council has particular concern of the landscape impact posed by the overhead lines and pylons affecting the area between, and the surroundings of, West Bergholt, Fordham and Aldham (Landscape Character areas of Colne Valley Slopes and Colne River Valley Floor). 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 is used extensively by walkers. The opportunity should be explored further for either realignment north and west of the Open Access Land or undergrounding the overhead line.	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 respondent 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. 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]**. There are no current local landscape designations such as Special Landscape Areas within the Study Area. The value of the landscape has been considered and the approach to making judgements on the value of landscape receptors is set out on pages 12-18 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 '*the relative value or importance attached to different landscapes by society on account of their landscape qualities*' (Landscape Institute's Technical Guidance Note (TGN) 02/21 page 3). In the context of all the landscapes considered in the LVIA, the relative value of the Colne Valley River Slopes (LCA A5) and Colne River Valley Floor (LCA A4) is judged to be medium-high. The basis for these judgements is contained within Tables A29 and A30 in Annex A Landscape Value Assessment of **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. .
Landscape and visual impact	*Visual Impact* 11.17. The Council does welcome the increase in viewpoints provided in Colchester following recommendations made during the Statutory Consultation. 11.18. However, we note there are still gaps in provision of viewpoints, particularly from distances beyond 0.5km-1.5km of the project where impacts in many places are likely to be significant, particularly with effects on the public rights of way network. Additional viewpoints need to be provided from these distances in order to determine if the effects can be clearly identified as significant or not. These include additional viewpoints surrounding the settlements of Dedham, Langham, Boxted, Great Horkesley, Little Horkesley, West Bergholt, Wormingford, the North Colchester area, Fordham, Fordstreet, Aldham, Great Tey and Marks Tey.	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed and agreed with relevant Local Planning Authorities (LPAs), as set out in the Statements of Common Ground (**5.9.1 - 5.9.12 [APP-089 - APP-100]**). A number of viewpoints suggested by LPAs were 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 Landscape and Visual Impact Assessment (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. Baseline photography was captured from all assessment viewpoints and is shown alongside visualisations of the Project in **7.2 Visualisations [APP-343 - APP-349]**. The locations of all viewpoints are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]**. This includes a number of viewpoints located between 1-1.5 km and some beyond 1.5 km. The visualisations from each of the viewpoints have been produced to assist stakeholders and the Examining Authority with understanding the likely effects of the Project on landscape character and views / visual amenity. 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. These are also presented in **7.2 Visualisations [APP-343 - APP-349]**. It is important to note that the landscape and visual impact assessment is based on first-hand observations during site visits and not on viewpoints and visualisations alone. 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 up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km.

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Landscape and visual impact	11.19. From the cable sealing end compounds in Great Horkesley, the Council thinks viewpoints need to be considered from beyond 3km, particularly in the areas that could affect the national landscape, to demonstrate the effects are not significant. On this point, the Council believes that the cable sealing end compounds do need to be thoroughly screened to minimise visual impacts and views from all Listed Buildings and that the tallest sections are perceived against woodland background in order to break up the visual impact in any directions where it is impossible to plant trees.	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed and agreed with relevant Local Planning Authorities (LPAs), as set out in the Statements of Common Ground (**5.9.1 - 5.9.12 [APP-089 - APP-100]**). A number of viewpoints suggested by LPAs were 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 Landscape and Visual Impact Assessment (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. Baseline photography was captured from all assessment viewpoints and is shown alongside visualisations of the Project in **7.12 Visualisations [APP-343 - APP-349]**. The locations of all viewpoints are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]**. The visualisations from each of the viewpoints have been produced to assist stakeholders and the Examining Authority with understanding the likely effects of the Project on landscape character and views / visual amenity. It is important to note that the landscape and visual impact assessment is based on first-hand observations during site visits and not on viewpoints and visualisations alone. **6.13.F13 Environmental Statement Figure 13.13 - ZTV of Great Horkesley EACN side CSE Compound [APP-249]** and **6.13.F14 Environmental Statement Figure 13.14 - ZTV of Great Horkesley Tilbury side CSE Compound [APP-250]** illustrate the theoretical visibility of the Cable Sealing End (CSE) compounds at Great Horkesley. 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. Viewpoints beyond 3 km are not considered necessary to demonstrate that visual effects are not significant. Viewpoint (VP) 4.13: B1508 Main Road, Wormingford, is approximately 1.9 km from the nearest above ground structure of the Project. The assessment of effects from VP 4.13 can be found in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]**, pdf page 37. At this distance, effects are judged to be minor and not significant (adverse) during construction, at year 1 and also year 15 of operation. Proposals for planting around the CSE compounds are included within 'Environmental Areas' illustrated in Appendix D of **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]**. **7.16 Design Approach for Site Specific Infrastructure [APP-354]**, discusses design principles for landscape and visual mitigation of the CSE compounds together with any scope for variation at detailed design stage. The final details of landscape and visual mitigation within the 'Environmental Areas' will be provided in the final Landscape and Ecological Management Plan secured by Requirement 4 within **3.1 Draft Development Consent Order [APP-056]** and subject to approval by the relevant LPAs.
Landscape and visual impact	11.20. The Council also disagrees that that the value of the view should be judged substantially on identified viewpoints and promoted views in tourist-focussed documents and argue that in lieu of local landscape designation and district-wide Valued Landscape Assessments, the value of the view should be judged by how it relates to the Landscape Character Assessment (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.	GLVIA3[78] and the Landscape Institute Clarifications[79] set out in detail how value of views should be considered as part of Landscape and Visual Impact Assessment (LVIA). This approach is reflected in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**, pages 24 and 25. The methodology was discussed and agreed with relevant Local Planning Authorities (LPAs), as set out in the Statements of Common Ground (**5.9.1 - 5.9.12 [APP-089 - APP-100]**). The LVIA has followed the approach recommended by the guidance. It is noted that the value of a view does not necessarily relate directly to the value of the landscape character unit or designated area which it may be located within, and which is assessed separately under the guidance provided on judging landscape value. Judgements on landscape value are reported in the Annex to **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. Views within a landscape character unit or designated area

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

[79] Landscape Institute (2024) Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3) LITGN-2024-01.

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		will not all be 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. The assessment describes the value of views within Visual Receptor Areas (VRAs) with reference to Table A13.1.9 on page 25 of **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. The judgements which are made at representative viewpoints 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.
Landscape and visual impact	11.21. As raised in the landscape section, the Council is particularly concerned about the impacts on views from Fordham, Fordstreet and Aldham. The pylons are very prominent next to the village of Aldham looming over existing housing and creating extremely negative place-making. The alignment is not acceptable and needs undergrounding (ideally) or setting back significantly from these settlements. There would also be close views from parts of the Essex Way and open access land within the Colne Valley.	Alternative routes and consideration of the use of underground cables is set out in **Application Document 5.15 Design Development Report [APP-122]** from paragraph 7.3.1. A more western route is acknowledged to have different effects, however the Applicant does not consider the Project to be inconsistent with Policy. The Landscape and Visual Impact Assessment (LVIA) set out in **6.13 Environmental Statement Chapter 13: Landscape and Visual [APP-226]** which identifies significant adverse residual effects 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 assessment of effects on views from Fordham, Fordstreet and Aldham are described in relation to Visual Receptor Areas (VRAs) as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The assessment of effects on VRA D5 Fordham is found on page 173 onwards and VRA D7 Fordstreet and Aldham on page 181 onwards. The following viewpoints (VPs) are located within these VRAs: • VP 4.08, Fordham – visualisation found within **7.12 Visualisations - Part 4 of 9 [APP-346]**, pdf page 68; and **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-231]**, pdf page 21 • VP 4.11, PRoW south of Aldham (Aldham 15) - found within **7.12 Visualisations - Part 4 of 9 [APP-346]**, pdf page 85; and VP assessment within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-231]**, pdf page 30 • VP 4.14, Fordham Road, north-east of Fordham - found within **7.12 Visualisations - Part 5 of 9 [APP-347]**, pdf page 5; and VP assessment within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-231]**, pdf page 39 • VP 4.24, Essex Way near Fordstreet - found within 7**.12 Visualisations - Part 5 of 9 [APP-347]**, pdf page 47; and VP assessment within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-231]**, pdf page 67 • VP 4.30, Mill Road, south of Fordham - found within **7.12 Visualisations - Part 5 of 9 [APP-347]**, pdf page 82; and VP assessment within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-231]**, pdf page 89 • VP 4.31, Rectory Road near Hoe Farm, east of Great Tey - found within **7.12 Visualisations - Part 5 of 9 [APP-347]**, pdf page 87; and VP assessment within 6**.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-231]**, pdf page 92 • VP 4.35, PRoW, Hemps Green (Fordham 5) - found within **7.12 Visualisations - Part 5 of 9 [APP-347]**, pdf page 109; and VP assessment within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-231]**, pdf page 106 • VP 4.37, Hines Close, Aldham - found within the Visualisations (**7.12 Visualisations - Part 5 of 9 [APP-347]**, pdf page 119; and VP assessment within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-231]**, pdf page 112. Heritage viewpoint HE26 is also located within VRA D7 Fordstreet and Aldham and the visualisation can be found within **7.12 Visualisations - Part 9 of 9 [APP-351]**, pdf page 27.

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		The locations of the VRAs and VPs are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual receptors and Viewpoints [APP-243]**.
Landscape and visual impact	11.22. Additionally, there are 3 pylons being built on open access land around Fordham. Within National Policy Statement (NPS) EN-1, paragraph 5.11.9 states '*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 proposa*l'. The Council is not aware of any direct consultation that has taken place with the community about siting three pylons on Open Access Land. The Council wishes to make the Examining Authority aware of this as paragraph 5.11.24 of NPS EN-1 states '*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' and '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*'. This should go alongside considerations set out within paragraph 5.11.25 of NPS EN-1 '*The Secretary of State should also consider whether any adverse effect on green infrastructure and other forms of open space is adequately mitigated or compensated by means of any planning obligations, for example exchange land and provide for appropriate management and maintenance agreements*.	National Grid notes this comment and anticipates that Colchester City Council is referring to the Fordham Hall Estate which is a Woodland Trust site. The site includes a network of 19 km of unsurfaced paths, some of which are noted to be Public Rights of Way (PRoWs) including bridleways. The Essex Way, a long-distance PRoW, broadly follows the River Colne along the southern extent of the site. It is understood that much of the site is subject to third-party grazing licences. Whilst public access is permissible, visitors are only allowed to deviate from the PRoW where the land is occupied by the Woodland Trust. Therefore, there is a recreational open space use along the PRoWs throughout the site. As assessment of the Project's interaction with this site is presented in Appendix B (Open Space Assessment) of **5.6 Planning Statement [APP-085]**. Whilst public access is permissible on this land, visitors are only allowed to deviate from paths where the land is occupied by the Woodland Trust. Pylons TB48 and TB49 are located within the site, however, these are located on areas of the site where third-party grazing licences exist and these are located away from pathways on the site, with the nearest located approximately 40 metres to the south of pylon TB49. Therefore, there would not be an impact on the use or function of the open space at Fordham Hall Estate. TB46 is within an area of the estate which is not farmed and within land leased by the Woodland Trust. Therefore, as a precautionary approach it has been assumed that the area around TB46 is publicly accessible. Given the siting of several pylons on the Estate, including the precautionary approach being taken in respect of TB46, an assessment of provision has been carried out using a relevant Local Authority Assessment. In doing this, the Colchester Borough Council Open Space Report[80] (April 2023) identifies a surplus of open space both within the locality of Fordham Hall Estate and within the wider Colchester area.
Noise and vibration	12.1. The Council's Environmental Protection team notes that during construction the noise levels are unlikely to be significant, given the relatively short duration (typically less than a day) of activities that may produce elevated noise levels such as compaction activity involved in highway works, haul road construction, and the construction of temporary construction compounds.	Noted. The agreement on this matter is reflected in **5.9.8 Draft SoCG with Colchester City Council [Revision B]**.
Noise and vibration	12.2. However, we are concerned with the core working hours for construction outlined by National Grid (07:00am-19:00pm on Mondays to Fridays and 07:00am-17:00pm on Saturdays, Sundays, Bank Holidays and other public holidays). These are far beyond what would ordinarily be accepted as reasonable working hours. The Council suggests working hours should be 08:00am-18:00pm on Mondays to Fridays, 08:00am-13:00pm on Saturdays and non-construction work on Sundays, Bank Holidays and other public holidays in order to provide neighbours with respite during the construction phase.	Please refer to the Applicant's response to paragraph 8.10 of the RR, regarding proposed working hours. In relation to noise and vibration specifically, the assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the Project. **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 [APP-300]**, significant effects from noise and vibration during the construction phase are not anticipated. These measures 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.
Socio-economics	13.1. The Council perceives that this project has the potential to have significant negative socio-economic impacts on Colchester's economy, particularly impacts on local businesses, residents and	Socio-economic impacts on the local economy, including impacts on local businesses, residents and the tourism sector are assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and**

[80] Colchester Borough Council (2023) Colchester Borough Council Open Space Report.

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	the tourism sector. It is essential that the applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy.	**Tourism [APP-265]**. The chapter concludes that there would be no significant impacts on the local economy as a result of the Project. In addition to the ES, the Applicant is committed to providing a coordinated local and regional approach to community benefits. The Government has published its guidance on community funds for transmission infrastructure (DESNZ, 2025). The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. This would be delivered outside the development consent process, since it is not a material consideration in the decision on the Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025)[81]. Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the EIA.
Socio-economics	13.2. The Council outlined issues at the 2024 statutory consultation stage, specifically to do with project's impact on visitor attractions, employment, local supply chains and the links between these. These are still key outstanding issues that will need further consideration and mitigation identified to ensure the visitor economy continues to function well.	The Applicant acknowledges comments raised on visitor attractions, employment, local supply chain and the links between these received during statutory consultation. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** has been undertaken in accordance with **6.19 Scoping Report - including appendices B to K [APP-296]** and **6.20 Scoping Opinion [APP-297]**. Potential effects on visitor attractions have been assessed within **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** (see Table 15.22: Potential residual construction effects on built and other assets and Table 15.28: Residual operation (and maintenance) effects on built and other assets). The potential effects on local employment have been assessed within the chapter (see Paragraphs 15.7.13 to 15.7.14). With regard to impacts on the supply chain of local businesses, the Applicant acknowledges that there may be indirect economic implications for individual businesses. Potential perceived impacts arising from this are also noted within **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** (Table 15.22: Potential residual construction effect on built and other assets; and Table 15.28: Residual operation (and maintenance) effect on built and other assets). However, these financial matters fall outside the scope of the Environmental Impact Assessment (EIA) and will be addressed separately through direct engagement with landowners and the implementation of appropriate compensation arrangements.
Socio-economics	13.3. Whilst the Environmental Statement outlines that there is sufficient availability of bedspace to accommodate the Project workforce without compromising the availability of accommodation for tourists visiting the area, it does not identify that some hotels (e.g. 4* or 5* hotels) may not necessarily be appropriate for construction teams, reducing available bedspace. The cumulative impact of other projects in the area on available visitor accommodation should be considered, particularly on budget accommodation.	**6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** considers the impacts of the Project in relation to visitor accommodation (e.g. impacts on bedspace availability as a result of the construction workforce). Paragraphs 15.7.26 to 15.7.30 conclude that the residual effect on visitor accommodation bedspace would be negligible adverse and not significant. The assessment anticipates an estimated peak non-local construction workforce of 1,528. This figure represents the total workforce distributed along the entire linear route of 180 km of the Project, rather than concentrated in a single geographic area. As construction activity progresses along the route, use of short-term accommodation by the Project workforce is expected to be spread across the district and county, reducing pressure on any one locality. Paragraph 15.7.27 and 15.7.28 of **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]** set out the assumptions for the breakdown of accommodation for staff employed during construction of the Project based on previous project experience. It is noted that pressure on bedspaces is further reduced by the fact that workers are unlikely to take up single occupancy accommodation and are more likely to share accommodation. Given these factors, the Project is not expected to compromise the availability of visitor accommodation, including budget options. The cumulative impact of other projects has been considered within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**.
Socio-economics	13.4. The Council is concerned about the impact of the project on visitor numbers to local attractions. Whilst it is noted that the	**6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** assessed potential impacts on tourism economy during the construction phase of the Project. That assessment concluded

[81] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*

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	direct impacts during the construction phase, for example from increased traffic would be temporary, visitor numbers may struggle to recover as a result of the disruption caused during construction. Additionally, the impact of including Sundays and bank holidays in the core working hours is of concern as this could impact on the local tourism industry.	that, with the implementation of mitigation set out in **7.2 Outline Code of Construction Practice [APP300]**, significant adverse effects on the tourism economy during construction are not anticipated. Mitigation measures are secured through Requirement 4(a) (Construction Management Plans) of **3.1 Draft Development Consent Order [APP-056]** and would be implemented through the final Code of Construction Practice. The recovery in tourism numbers has not yet been raised by CCC as a concern during the thematic group meetings. In this context, the Applicant will engage with CCC via the ongoing discussion and will be incorporated into the SoCG. Please see paragraph 8.10 for our response to comments on the proposed working hours.
Socio-economics	13.5. The potential impact of the project on business, specifically business staff could be significant. Businesses are already under pressure on a number of fronts such as rising labour and material costs, cyber attacks, supply chain issues and more. The impact of this project, along with other NSIPs would provide an added pressure. Consideration should be given to NSIPs contributing to a compensation fund to provide business support, potentially through a co-ordinator role who can communicate with businesses so they are prepared as possible for any disruption caused by the project.	Impacts on local businesses, including where effects are considered to be significant, are set out in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. Potential effects on communities, including residents and local businesses, have been reduced through routeing and design. The Applicant has sought to reduce concern or uncertainty about the proposals through transparent engagement with residents and stakeholders, which has formed an important part of Project development to date. **5.1 Consultation Report [APP-066]** sets out the Applicant's approach to engagement to date. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This will enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.
Socio-economics	13.6. These impacts overall, and in combination with other NSIPs, CCC believe have the potential to cause cumulative impacts that will negatively affect visitor experience and visitor economy within Colchester.	Cumulative effect on tourism economy is detailed in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**, paragraph 17.5.64 which concludes that effects would be negligible and not significant.
Socio-economics	13.7. Despite, the Council's concerns with the economic impacts of the project, there is the potential for it to contribute positively to supporting the local economy through providing local employment opportunities.	This is noted and further information relating to local employment opportunities is described in the following response.
Socio-economics	13.8. The Council encourages the applicant to work with Essex County Council on providing detailed labour market demand data as early as possible to allow for timely coordination with local education and training providers including those in Colchester, enabling the development of targeted upskilling programmes and reducing the risk of workforce shortages that could delay project delivery. 13.9. The applicant identifies that it expects 10% of construction jobs on the project could be filled by people from the local area, noting that many of its skilled specialists are sourced from an existing pool of contractors/workers. Whilst this is limited, it would be beneficial to see the applicant supporting the development of local construction skills, particularly those supporting the green economy.	The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four-year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors or large-scale regeneration schemes. The Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes: • Working with local suppliers and supporting forums, such as Chambers of Commerce • Contributing to a coordinated regional approach to electricity industry jobs and skills planning • Engaging with Local Authorities to understand local priorities and opportunities around skills and employment. These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.
Socio-economics	13.10. Therefore, the Council strongly recommends that a dedicated Employment and Skills Fund is established to support employment and skills programmes. This fund would be agreed with Essex County Council for distribution to fund sites across Essex.	The Applicant recognises the importance of skills development and employment support, particularly in relation to the green economy, and values ongoing dialogue with Local Authorities on these matters. However, the Applicant does not consider that the establishment of a DCO secured Employment and Skills Fund is appropriate, necessary, or proportionate in the context of this Project.

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		As stated above, the scale of construction employment arising from the Project is modest, with a maximum peak local construction workforce of approximately 172 Full Time Equivalent roles and an overall local job demand of approximately 480 roles over the four year construction period. The Environmental Statement concludes that the Project would not give rise to significant adverse socioeconomic effects in relation to employment or skills. As such, there is no planning harm that would justify the imposition of a financial contribution or fund as mitigation through the Development Consent Order. It is also important to note that the creation of an Employment and Skills Fund would constitute a community benefit measure, rather than mitigation for a specific environmental impact. In accordance with established principles, community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through statutory planning requirements. This position is reinforced by the Community Funds for Transmission Infrastructure: Guidance[82], which makes clear that contributions of this nature should be progressed outside the development consent process. Notwithstanding this, the Applicant remains committed to supporting employment, skills and workforce development at a local and regional level through its wider corporate programmes and community benefit initiatives. These initiatives take a coordinated, long-term approach to electricity industry skills and the green economy and are delivered independently of individual DCO applications, recognising that meaningful skills development requires sustained investment beyond the lifespan of a single project. Therefore, while the Council's recommendation is noted and understood, the Applicant considers the establishment of a DCO secured Employment and Skills Fund is not justified by the scale or nature of the Project. Engagement on skills and employment opportunities will instead continue through non-statutory channels, consistent with national guidance and established practice.
Socio-economics	13.11. There are real opportunities for tangible benefits to be delivered and to address skills gaps in industry. For example, the Council is aware of organisations such as Colchester Institute, a further education provider, who have the ambition to expand their site, creating a new Sustainable Skills Centre at the planned Tendring Colchester Borders Garden Community, to build on their established Net Zero Centre. Funding to support this, and public transport (shuttle buses) or other options to increase the accessibility for young people to travel to the skills centre would be beneficial. This would contribute to addressing existing sectoral skills gaps, increasing the future workforce that can support the UK's wider transition to net zero.	The Applicant welcomes the Council's identification of opportunities to support the growth of skills in the construction and low carbon sectors and recognises the important role that further education providers, such as Colchester Institute, play in developing the future workforce required to support the UK's transition to net zero. The Applicant acknowledges the ambition to expand provision through the creation of a Sustainable Skills Centre at the Tendring Colchester Borders Garden Community and notes the potential benefits that such a facility could deliver in addressing sector-specific skills gaps over the longer term. However, the Applicant does not consider that the provision of funding for a specific education facility, or associated measures such as shuttle buses or public transport enhancements, could be justified or secured as part of the Development Consent Order for this Project. Such measures would constitute community benefit initiatives, rather than mitigation for a project-specific environmental or socio-economic impact. As previously noted, the Environmental Statement concludes that the Project would not give rise to significant adverse effects in relation to employment or skills. In line with established principles, community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through DCO Requirements. This approach is consistent with the Community Funds for Transmission Infrastructure: Guidance[83], which makes clear that funding or financial contributions aimed at broader social or economic benefits should be delivered outside the planning and development consent process. Notwithstanding this, the Applicant remains committed to supporting skills development and the green economy through wider corporate and regional initiatives, including engagement with education and training providers, industry-led skills programmes, and supply chain development linked to electricity transmission and low carbon infrastructure. These activities are designed to take a coordinated and long-term approach, recognising that skills provision for the net zero transition extends beyond the scope and lifespan of any single project. The Applicant therefore considers that, while the aspirations outlined by the Council are recognised and supported in principle, they are not appropriately addressed through the Development Consent Order for this

82 Department for Energy Security and Net Zero (2025) Community funds for transmission infrastructure.

83 Department for Energy Security and Net Zero (2025) Community funds for transmission infrastructure. https://www.gov.uk/government/publications/electricity-transmission-network-infrastructure-community-funds/community-funds-for-transmission-infrastructure-accessible-webpage

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		Project. Engagement on skills development opportunities will continue through non-statutory channels and community benefit mechanisms, rather than through DCO secured obligations.
Traffic and transport	14.1. The Council's understanding of the impact of the scheme on traffic and transport has been informed by input from Essex County Council.	This is noted by the Applicant.
Traffic and transport	14.2. Given the scale of the project, it is expected that there will be a significant increase in traffic using the highway network in Colchester. There is particular concern about how the project will impact on key junctions, particularly around the A12, that already experience high levels of congestion at certain times of day and how this will be managed. Specifically, we note that within Document 6.16.A3 Environmental Statement Appendix 16.3 – Future Baseline and Document 7.3 Outline Construction Traffic Management Plan, that the A12 widening scheme (between junctions 19-25) is referenced, in the former document it is outlined as a committed development. In July 2025, the scheme was cancelled, and therefore the impact of the project on future congestion and highway safety may not have been appropriately assessed.	The A12 widening scheme was detailed within the list of highway schemes that were planned but had not yet been completed. **7.3 Outline Construction Traffic Management Plan [APP-309]** and the associated mitigations were completed based on the current road network, and the modelling of the junctions in Colchester that is presented in **7.11 Transport Assessment [APP-333]** does not include the A12 widening scheme. Whilst the scheme is referenced as a committed development, it is shown as excluded as it was withdrawn just prior to the submission of the DCO application. The selection of the sensitive junctions considered for the traffic assessment within Colchester was based on a sifting process based on existing congestion or potential capacity issues due to the increase in traffic as presented within **7.11 Transport Assessment [APP-333]**. The approach to this methodology and the list of sensitive junctions was shared with Essex County Council (ECC) and National Highways (NH), whose feedback was taken into account and additional junctions were included in the final list. Junction modelling was undertaken and where found to be required, suitable mitigation measures have been proposed or are being refined under discussion with ECC and NH as presented in **7.11 Transport Assessment [APP-333]**. Where mitigation is being refined impacts at these junctions would be no worse than reported within **7.11 Transport Assessment [APP_333].** Furthermore, within **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, workers would also be encouraged to car share or undertake flexible working practices where practicable. Therefore, this would provide an opportunity to reduce the impact at junctions during peak construction. There would be no change to the findings in **6.16 Environmental Statement, Chapter 16 – Traffic and Transport [APP-271].**
Traffic and transport	14.3. The Council notes that the transport reports do not specify the start and end times of the traffic surveys so it is unclear if the worst-case hour has been reviewed, and there is no data to compare the model output with observed traffic conditions to validate the models. It is considered extra mitigation is required in order to reduce impacts on an already congested highway network, ideally through the applicant reducing the amount of traffic associated with the scheme using key junctions such as by restricting work activities and movements during the peak hours.	The traffic survey data used within **7.11 Transport Assessment [APP-333]** and for the junction modelling exercise were derived from traffic surveys that were conducted over a 12-hour period from 07:00-19:00 and analysed to establish the AM and PM peak hours. The AM and PM peak hours for each junction were identified from the 12 hours of traffic surveys conducted at each location. The Applicant notes the comment related to the restriction of work activities and movements during the peak hour. A response to Essex County Councils Relevant Representation is provided within this document. It should be noted that for junctions within Colchester the likely impact associated with the Project will be short term and suitable mitigation measures have been proposed or are under discussion with ECC and NH as presented within **7.11 Transport Assessment [APP-333]**. Where mitigation is still to be agreed, the likely impact at these junctions would be no worse than reported within **7.11 Transport Assessment [APP_333].** Furthermore, within **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, workers will be encouraged to car share or undertake flexible working practices where practicable. Therefore, this provides an opportunity to reduce the impact at junctions during peak construction. There would be no significant impact to the findings within **6.16 Environmental Statement, Chapter 16 – Traffic and Transport [APP-271].**
Traffic and transport	14.4. Additionally, the transport assessments assume that construction workers will travel to/from the site outside of the highway network peak hours. Our concern is whether this will be adhered to during the autumn/winter seasons with the prevailing weather and reduced daylight hours, and how this would be monitored and managed. To contribute to limiting impacts, consideration should be given to the provision of a mini-bus on a flexible timetable between various locations or shuttle bus running on a fixed service between specific locations, such as from train stations, bus stops and shared accommodation.	**7.3 Appendix B Outline Construction Worker Travel Plan [APP-311]** includes monitoring and management of staff arrival and departure times. The quarterly report includes any changes in staff arrivals and departures related to seasonal variations. The construction programme and assessment of worker travel patterns assumes that there will be no change to working hours within the autumn and winter months. This assessment is based on discussions between the Applicant and the Main Works Contractor(s). **7.3 Appendix B Outline Construction Worker Travel Plan [APP-311]** also details that mini-buses and shuttle services from public transport hubs could be a measure coordinated by the respective Travel Plan Coordinators of each project.

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Traffic and transport	14.5. Also of concern, is that there appears to be a lack of commitment to reviewing the number of vehicles against the proposed numbers used in the ES assessment. This is an important point to enable the local highway authority to hold the developer to account if there are more vehicles arriving/departing than assessed and in particular where there is potential for localised issues on the rural road network along with cumulative impacts.	**7.3 Outline Construction Traffic Management Plan [APP-309]** details that the Main Works Contractor will be expected to monitor the number of construction vehicles using the Primary Access Routes between the site access points and the SRN/MRN. **7.3 Appendix B Outline Construction Worker Travel Plan [APP-311]** includes quarterly monitoring which includes the level of staff arriving by car and non-car modes, and any car share uptake. These two monitoring principles will be used to review the number of vehicles travelling to site, compared to those assessed in the Environmental Statement. **7.3 Outline Construction Traffic Management Plan** [APP-309] includes details of the junctions where no specific monitoring of trips has been proposed as a result of the Project, but where the suggested mitigation measure is to monitor the operation of the junctions. This measure, alongside the robust trip generation and assessment completed as part of the application for development consent, is deemed suitable in terms of commitments to monitoring vehicle movements. Additionally, there are mechanisms within **7.3 Outline Construction Traffic Management Plan** [APP-309] which define how non-compliance with its content will be identified, reported and enforced via corrective actions (Sections 6.3 and 6.4 respectively).
Traffic and transport	14.6. There are specific local concerns in relation to the large volume of construction traffic movements that the project will cause. Firstly, many vehicles, including HGVs will be directed through the village of Great Horkesley along the main linear A134 road. The road has a pedestrian footway on alternating sides of the road requiring people to cross the road at intervals. Considering that in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section D, National Grid propose the removal of street furniture and traffic islands to support the increased traffic movements, this poses a significant safety risk to residents in the village.	**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** considered the Abnormal Indivisible Load (AIL) routes through Great Horkesley and took into account the highway mitigation measures for AILs set out in **7.3 Outline Construction Traffic Management Plan [APP-309]**, in which paragraph 5.9.4 indicates under 'Yellow' mitigation measures that temporary traffic management would be put in place where appropriate to temporarily replace removed street furniture and maintain safety for road users. Section 5.8 in **7.3 Outline Construction Traffic Management Plan [APP-309]** details the indicative duration of traffic management measures. Where traffic management is to be left in place for periods without construction work being undertaken, the Main Works Contractor(s) will, in coordination with the LHA, assess whether it is reasonably practicable and safe to remove the traffic management during this period.
Traffic and transport	14.7. Secondly, there is concern about proposals raised by the applicant in the Abnormal Indivisible Loads (AIL) Strategy that identify a potential viable route through Colchester City Centre for directing AIL traffic to avoid restrictions on the A12 in the Colchester area imposed by National Highways. This would cause significant disruption to traffic movements through the city centre and surrounding highway network and we would want this route to be reviewed. Regardless of the route chosen, the AIL Strategy should also include incorporate a communication strategy to notify both those local to and those using the network affected by the AIL routes so they can plan their journeys appropriately. Electronic roadside message signs (known as variable message signs or VMS') at local congestion hotspots and other key locations would be an obvious way of getting this information across alongside the other stated means of communication (website, press releases and notifications to residents/businesses that may be impacted).	**7.3 Abnormal Indivisible Load (AIL) Access Strategy [APP-310]** does not identify or propose an AIL route through Colchester Town Centre or St. Boltoph's Street. Discussions with National Highways and structural assessments at the locations with weight restrictions on the A12 are ongoing. All AIL movements will be coordinated through the ESDAL system[84] and in coordination with the Local Highway Authorities, to reduce disruption where possible. A communication strategy such as the use of Variable Messaging System boards to inform people is something the Applicant would welcome further discussion on with the relevant LHAs.
Cumulative effects	15.1. The Council is concerned about the cumulative impacts that will be generated by the project, both between the several different effects resulting from the project in isolation (intra project impacts) and those produced between other projects and schemes happening (inter project impacts).	An assessment of Cumulative Effects undertaken in accordance with **6.19 Scoping Report [APP-288 - 296]** and **6.20 Scoping Opinion [APP-297]** is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The inter and intra-project cumulative assessment predict a number of significant cumulative effects largely on landscape and agricultural land receptors. Mitigation is detailed in **7.2 Outline Code of Construction Practice [APP-300].**

[84] National Highways (n.d.) Abnormal loads and the ESDAL system

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Cumulative effects	15.2. In relation to inter-project impacts, the Council is currently undertaking a review of its Local Plan. While this is currently at Regulation 18 consultation stage, we are aware that the project could impact on land availability/viability for housing and employment sites.	The inter-project cumulative assessment presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** included a 'cut-off date' of 1 April 2025 to confirm the long list of cumulative developments to be assessed. However, since 1 April the Applicant has been undertaking monthly reviews of planning registers and Local Planning Authority websites and will continue to do so during the Examination period, to check whether there are any new relevant developments / allocations. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). In addition, Colchester City Council will also be required to undertake its own assessments to determine the viability of any new allocations.
Cumulative effects	15.3. Additionally, alongside this nationally significant infrastructure project, there are others taking place in the East of England which together will exacerbate 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	The cumulative assessment within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** has been undertaken in accordance with the agreed methodology in **6.19 Scoping Report [APP-288 - 296]** and **6.20 Scoping Opinion [APP-297]** which assesses other Nationally Significant Infrastructure Projects in the East of England within defined Study Areas (that are based on how far impacts could reach as a result of the Project on environmental receptors). The assessment includes landscape and visual impacts, economic impacts and traffic congestion. **7.3 Outline Construction Traffic Management Plan [APP-309]** includes the Applicant's commitment to ensuring liaison takes place between the Main Works Contractor(s) and other developments, to provide a coordinated approach to traffic management.
Cumulative effects	15.4. 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.	The intra-cumulative assessment within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** assessed the impacts on common receptors within the Environmental Statement **(Volume 6 of the DCO application)** in accordance with the agreed methodology in **6.19 Scoping Report [APP-288 - 296]** and **6.20 Scoping Opinion [APP-297]**. The assessment did not conclude that there would be any intra-cumulative effects common on agriculture and soil, ecology or historic receptors. The assessment did, however, assess a number of common landscape and visual receptors.
	This relevant representation presents a summary of points which the Council considers to be the main issues and impacts of the project. The main concerns, worth repeating are the: Lack of clear, enforceable mitigation measures identified to reduce impacts on priority habitats	The embedded and standard mitigation measures include specific commitments to avoid and reduce impacts on habitats, including those identified as priority habitats. These commitments are set out within **7.2 Outline Code of Construction Practice [APP-300]**.
	Impacts of the project on the setting of non-designated and designated heritage assets that do not appear to have been considered	The Applicant acknowledges that the settings of some designated assets fall partially within the Order Limits. This is assessed within **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]**. 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 [APP-210]**. 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.
	Incomplete and unanalysable information on tree loss	Annex D of **6.13.A6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]** contains labelled figures of the surveyed high and moderate value trees which are colour coded to illustrate the likely impacts. Reporting of potential impacts corresponds to the Project Sections. Information covering Colchester can be found on sheets 166-182 of Annex D within **6.13.A6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]**.
	Lack of justification for removal of veteran tree	**6.13.A6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]** is based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead and underground cable design as detailed within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. Following detailed design (post-consent) it is anticipated that the amount of vegetation loss would be reduced. **7.4 Outline**

Topic	Comment	National Grid's response
		Landscape and Ecological Management Plan [AS-046]) and **7.2 Outline Code of Construction Practice [APP-300]** include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts where practicable.
	Lack of recognition that local authorities no longer designate local landscapes and how this impacts significance of impacts on landscape	A landscape value assessment has been undertaken as part of the landscape assessments, presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Each LCA or LCT has been systematically assessed against the value factors presented in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** and has informed the sensitivity judgement in the landscape assessments. Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations[85] has been used to inform this assessment. It is therefore considered that local landscape value has been sufficiently represented within the assessments despite the absence of local designations.
	Lack of consideration of impacts on landscape beyond 1km of the scheme.	The Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** sets out a robust and consistent methodology, with clear, transparent criteria and assessment grades, in line with GLVIA3[86] and the Clarification Notes[87]. The approach and methodology that was taken, was presented to and discussed with consultees through consultation as recorded in Statements of Common Ground (**5.9.1 - 5.9.12 [APP-089 - APP-100]**). The judgements were informed by detailed desk and field studies, and the findings are supported by detailed explanations within **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 - APP-232]** and **7.12 Visualisations [APP-343 - APP-349]**. 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, in **6.13.A2 Environmental Statement Appendix 13.2: Landscape Baseline and Assessment [APP-228]**. These findings have been re-checked in light of the comments made above and it is considered that the judgements made remain fair and reasonable and that no changes need to be made.
	Lack of provision of a Strategic landscape compensation package to offset landscape and visual harm across route of the overhead line	Please refer to our response to paragraphs 11.1 and 11.14 which respectively set out the Applicant's position regarding the overall planning balance, taking into account residual effects, and the Applicant's position on landscape compensation.
Conclusion	Lack of viewpoints, particularly from distances beyond 0.5km-1.5km of the scheme where visual impacts may still be significant	The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed and agreed with relevant Local Planning Authorities (LPAs), as set out in the Statements of Common Ground (**5.9.1 - 5.9.12 [APP-089 - APP-100]**). A number of viewpoints suggested by LPAs were 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 Landscape and Visual Impact Assessment (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. Baseline photography was captured from all assessment viewpoints and is shown alongside visualisations of the Project in **7.12 Visualisations [APP-343 - APP-349]**. The locations of all viewpoints are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual receptors and Viewpoints [APP-243]**. This includes a number of viewpoints located between 1-1.5 km and some beyond 1.5 km. The visualisations from each of the viewpoints have been produced to assist stakeholders and the Examining Authority with understanding the likely effects of the Project on landscape character and views / visual amenity. 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. These are presented in **7.12 Visualisations [APP-343 - APP-349]**. It is important to note that the landscape and visual

[85] Landscape Institute (2021) Technical Guidance Note 02/21 Assessing landscape value outside national designations.

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

[87] Landscape Institute (2024) Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3) LITGN-2024-01.

Topic	Comment	National Grid's response
		impact assessment is based on first-hand observations during site visits and not on viewpoints and visualisations alone. The LVIA set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km.
Conclusion	16.1 Working hours need to include some respite for residents with shorter working hours on Saturdays and no working on Sundays, Bank Holidays and other public holidays	Please see the response to paragraph 8.10.
Conclusion	16.2 Lack of proposed monitoring of vehicle numbers and movements	**7.3 Outline Construction Traffic Management Plan [APP-309]** details that the Main Works Contractor will be expected to monitor the number of construction vehicles using the Primary Access Routes between the site access points and the SRN/MRN. **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** includes quarterly monitoring which includes the level of staff arriving by car and non-car modes, and any car share uptake. These two monitoring principles will be used to review the number of vehicles travelling to site, compared to those assessed in the Environmental Statement. **7.3 Outline Construction Traffic Management Plan [APP-309]** additionally includes details of the junctions where no specific monitoring has been proposed as a result of the Project, where the suggested mitigation measure is to monitor the operation of the junctions. These measures, alongside the robust trip generation and assessment completed as part of the application for development consent, are deemed suitable in terms of commitments to monitoring vehicle movements.
Conclusion	16.3 Additional mitigation is required to reduce impacts from construction traffic on an already congested highway network	**7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** include additional mitigation to the embedded and standard mitigation proposed as part of the Project. Additional mitigation measures at junctions and along primary access routes are described within **7.11 Transport Assessment [APP-333]** and **6.16 Environmental Statement Chapter 16: Traffic and Transport [APP-271]**.

Appendix J. Combined IDBs - Water Management Alliance

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Appendix J
Combined IDBs - Water Management Alliance

Table J1.1 outlines the Applicant's comments on the RR provided by the **Water Management Alliance** [**RR-3792**]. The Applicant has held a number of meetings with the Environment Agency during the development of the Project and has been progressing a SoCG. An updated SoCG (**5.9.16 - Draft Statement of Common Ground - Combined IDBs - Water Management Alliance [Revision B])** is provided to the Examining Authority at Deadline 1, which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table J1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
Watercourse crossings	The proposed overhead cable corridor and the proposed haul road will cross a number of watercourses within the IDBs of the three named Boards. Such works could require approval from the Boards under the Protective Provisions that replace the disapplied Byelaws of the Boards or Section 23 of the Land Drainage Act 1991, depending on the crossing methodology. The Boards wish to further understand the likely watercourse crossing locations and methods. The applicant will be required to provide detailed designs for watercourse crossings when applying to the Boards for approval, as set out in the Protective Provisions for Drainage Authorities.	The Applicant provided a watercourse crossing schedule **6.4.A2 Environmental Statement Appendix 4.2 - Watercourse Crossing Details [APP-132]**, including a GIS mapping file of crossing locations, in September 2025. The detailed designs of the crossings will be shared as they are developed by the Main Works Contractor(s), who would engage with the Water Management Alliance to secure the necessary approvals in accordance with the agreed Protective Provisions for Drainage Authorities.
Surface water discharge	The Boards wish to ascertain whether the applicant intends to discharge surface water into watercourses within any of the named IDBs. Where this occurs, this will require approval from the relevant Board under the Protective Provisions that replace the disapplied Byelaws of the Board. The Boards consider it to be imperative that any such discharge is attenuated to the greenfield runoff rate. The Boards wish to be involved in the development of drainage strategies where these are relevant to their IDBs.	The Applicant is currently preparing a surface water drainage strategy, which will be shared with relevant stakeholders, including the Internal Drainage Boards, and submitted to the DCO Examination in due course.
Draft DCO	The Boards are supportive of the proposed use of Protective Provisions for drainage authorities, subject to the Boards' continued involvement in the drafting process. Furthermore, the Boards believe that an appropriate Protective Provision may act to avoid conflict between the planning (DCO) process and the Board's regulatory regime and consenting process (as per the Land Drainage Act 1991 and the Board's Byelaws), while assuring the Board that their interests and ability to undertake their statutory functions are safeguarded and subject to due consideration. With regards to the wording of Protective Provisions for Drainage Authorities (Schedule 16, Part 3 of the draft Development Consent Order), at present the Boards consider that the wording is unsatisfactory. The Boards will continue to engage with the applicant and the other affected drainage authorities to agree appropriate wording.	This is noted and welcomed by the Applicant. The Applicant will continue to engage with the Boards and the other affected drainage authorities to agree appropriate wording.

Appendix K.
Dedham Vale National Landscape and Stour Valley Partnership

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Appendix K
Dedham Vale National Landscape and Stour Valley Partnership

Table K1.1 outlines the Applicant's comments on the Relevant Representation (RR) **[RR-0893]** provided by Dedham Vale National Landscape and Stour Valley Partnership. The Applicant has held a number of meetings with the Dedham Vale National Landscape Partnership during the development of the Project and has been progressing a SoCG. An updated SoCG is provided to the Examining Authority at Deadline 1, which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table K1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
Planning policy	Issues that need addressing: How section 85 of the Countryside and Rights of Way Act (2000) as amended by section 245 of the Levelling Up and Regeneration Act (2023) has been met in developing the proposals.	The Applicant's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, which is to 'conserve and enhance natural beauty' in accordance with section 85 of the Countryside and Rights of Way Act 2000, is set out in **5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**.
Planning policy	Issues that need addressing: How the statutory Dedham Vale National Landscape management plan 2021-26 has been considered during the development of these proposals.	The Applicant is required to consider National Landscapes under planning policy and guidance when routeing, designing and assessing new electricity transmission infrastructure. Further details of the approach taken in relation to National Landscapes can be found in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]**, **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**, **5.7 Policy Compliance Document [APP-086]**, **5.15 Design Development Report [APP-122]** and **7.15 Design and Access Statement [APP-353]**. The statutory Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Project Area Management Plan 2021 – 2026[88] has been considered in the assessment of landscape and visual effects of the Project on Dedham Vale National Landscape. The Management Plan summarises the special qualities of the National Landscape. **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** presents the assessment of effects of the Project on the special qualities of Dedham Vale National Landscape. The aims and objectives of the Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Project Area Management Plan 2021 – 2026 have been reviewed and considered as part of The Applicant's approach to fulfilling the seek to further duty as 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]**.
Cumulative effects	Issues that need addressing: How the scheme proposer has coordinated with other energy projects impacting the Dedham Vale National Landscape (proposed, consented, under construction and operational) to reduce impacts on the designated landscape.	The multiple developments that are proposed to connect to the Project, including other energy projects that impact the Dedham Vale National Landscape, are assessed within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** including the North Falls and Five Estuaries projects. The assessment was undertaken in accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**. A full list of Other Developments considered is detailed within the long list of Other Developments (**6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283**]). The cumulative effects assessment also follows the Planning Inspectorate's advice page on Cumulative Effects Assessment[89]. **8.4.3 Report on Interrelationship with Other Infrastructure Projects [Revision A]** 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.
Landscape and visual	Issues that need addressing: How the scheme proposer has assessed the impacts on the defined Natural Beauty indicators (Landscape Quality, Scenic Quality, Relative Wildness, Relative	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

[88] Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Project Area Partnership (2021) *Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Project Area Management Plan 2021-2026*.

[89] Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment*.

Topic	Comment	National Grid's response
	Tranquillity, Natural Heritage Features, Cultural Heritage) and Special Qualities on the National Landscape. How development in the setting of the National Landscape is impacting the Natural Beauty indicators (Landscape Quality, Scenic Quality, Relative Wildness, Relative Tranquillity, Natural Heritage Features, Cultural Heritage) and Special Qualities of the National Landscape.	Landscape. The assessment was undertaken with reference to NatureScot's Special Landscape Qualities - Guidance on assessing effects[90], the principles of which can be applied to developments outside of Scotland. Reference was made to the Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Project Area Management Plan 2021 – 2026[91] and the Dedham Vale AONB Natural Beauty and Special Qualities and Perceived and Anticipated Risks[92], which summarises the special qualities of the National Landscape. **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** presents the assessment of effects of the Project on Dedham Vale National Landscape. The assessment was undertaken taking into consideration the special qualities (natural beauty) of Dedham Vale National Landscape. These are reflective of natural beauty indicators comprising landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features, and cultural heritage. The Project 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. Annex A of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** includes the Dedham Vale National Landscape Setting Study. The purpose of the annex is to identify areas of the landscape that form part of the setting of the National Landscape, to inform the assessment of effects of the Project on the defined special qualities (natural beauty) of the National Landscape. The identified setting is illustrated on Figures A13.5.4 and A13.5.5 in Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. Table A13.1.3 in Annex A sets out the assessment of effects on the special qualities (natural beauty) of the National Landscape with reference to parts of the Project within the setting where relevant.

[90] NatureScot (2025) *Special Landscape Qualities - Guidance on assessing effects*.

[91] Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Project Area Partnership (2021) *Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Project Area Management Plan 2021-2026*.

[92] Alison Farmer Associates (2016) *Dedham Vale AONB Natural Beauty and Special Qualities and Perceived and Anticipated Risks*.

Appendix L.
Defence Infrastructure Organisation (DIO)

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Appendix L
Defence Infrastructure Organisation (DIO)

Table L1.1 outlines the Applicant's comments on the Relevant Representation (RR) provided by the Defence Infrastructure Organisation (DIO) [RR-0895]. A Statement of Common Ground (SoCG) with the DIO is anticipated to be submitted at an appropriate future deadline. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table L1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
Airfields	The application site occupies the statutory safeguarding zones surrounding Wattisham Station and East 2 WAM (Wide Area Multilateration) Network. In particular, the aerodrome height and birdstrike safeguarding zones surrounding the aerodrome for Wattisham Station and the zone for technical asset East 2 WAM Network related to Air Traffic Services – and it is approximately 1.78km from the aerodrome boundary at Wattisham Station. Based on the information available the MOD must object to this application on the grounds that insufficient information has been made available to enable necessary assessments to be completed to understand the potential impact of the development on the operation and capability of a technical asset used to facilitate air traffic management (the East 2 WAM Network), and on the potential for the development to impact on aviation safety within the statutory safeguarding zone drawn around the Wattisham Station aerodrome.	Appendix 15 of the Environmental Statement (ES) **(ES Appendix 15.2 - Review of Aviation Impact [APP-267])** acknowledges that the proposed alignment of the Project infringes the statutory safeguarding zones surrounding Wattisham Flying Station (WFS, paragraph 15.3.18) and the East 2 WAM Network (paragraph 15.3.19). The Applicant has consulted with and made available sufficient information in various data formats to the Defence Infrastructure Organisation (DIO) as the representative of the Ministry of Defence (MOD), as well as other relevant parties, to enable the completion of the necessary assessments regarding potential impacts of the Project on WFS and the East 2 WAM Network in accordance with the requirements of the Overarching National Policy Statement for Energy EN-1 (2024) (paragraph 5.5.39). Further information is available within the Policy Compliance document **(5.7 Policy Compliance Document [APP-086])**. In relation to WFS, the Applicant initially engaged directly with representatives of the Flying Station, meeting on 17 April 2023 and subsequently shared design information (including coordinates and heights of the pylons as designed at the time) to inform impact assessment appraisals relating to its assets. Following receipt on 16 May 2024 of the DIO representation responding to the Project's statutory consultation, confirming safeguarding infringements relating to both WFS and the East 2 WAM Network, on 2 August 2024 the Applicant shared the information as provided to WFS with the DIO. On 13 August 2024, the DIO advised more detailed information should be provided at such a time as pylon locations and other details had been finalised. On 4 April 2025, following development of the Project's proposed alignment, the Applicant contacted the DIO proposing a meeting to share further details relating to the design and to discuss the resolution of outstanding matters in readiness for submission of the application for development consent. On 8 April 2025 the DIO requested grid references for, and heights in metres of, each pylon within the alignment, as well as grid references pertaining to the extent of substations, to enable the completion of a revised assessment. The Applicant provided the requested information to the DIO on 28 April 2025. On 12 May, 5 June and 6 July 2025, the Applicant sought updates regarding the DIO's review of the information and requested meetings to discuss the assessment of potential impacts as well as the progression of a draft Statement of Common Ground (SoCG). Following submission of the application for development consent in August 2025, the Applicant contacted the DIO on 3 October 2025 to advise of the Planning Inspectorate's acceptance of the application. Within this correspondence, the Applicant sought confirmation of the DIO's position regarding safeguarding concerns for WFS, and an update on concerns in principle regarding the East 2 WAM Network as well as the planned assessment relating to this matter. No responses have been received to the aforementioned correspondence. On 6 November 2025, the Applicant received a request from the DIO for information as described, although it specifically requested grid references for the pylons within the plans list. This information was provided to the DIO on 27 November 2025. The Applicant's response repeated information previously shared on 28 April 2025, with additional explanatory text. On 18 December 2025 the Applicant received a response from the DIO to confirm that the requested information had been received and was being reviewed by the relevant Subject Matter Experts for the completion of relevant assessments. The DIO has advised that a response will be made available to both the Planning Inspectorate and the Applicant to give the updated MOD position with regards to the proposed development.
Airfields	*Statutory Safeguarding – Technical Assets*	The Applicant recognises assessments of aviation impacts should take account of factors including potential adverse impacts of electric and magnetic fields from electricity network infrastructure in accordance with the

Topic	Comment	National Grid's response
	The technical safeguarding zones define areas within which the height of development, the materials used in construction, and the potential introduction of sources of electro-magnetic fields are of particular concern as they can impact the operation and capability of radars, radio transmitter/ receiver sites and other types of technical installations supporting operational defence or national security requirements. The MOD have previously been consulted at both the Scoping (response sent dated 30 November 2022) and the Applicants Environmental Impact Assessment (response sent 16 May 2024) stages for this development. In the responses sent to each of these consultations the MOD advised that details of the specific route and heights of the proposed electricity towers would be required to enable the MOD to complete the necessary assessments to identify the potential impact of the development. Whilst the heights of the electricity towers have been made available, the locations/grid references have not been provided. Following the most recent consultation the MOD, through an e:mail dated 6 November 2025, requested the grid references for specific electricity towers where there is the need for an assessment to be completed. At the time of writing the MOD has not received the requested electricity tower location information. As such it has not been possible to complete assessments of the potential impacts of the proposed development on the operation and capability of the East 2 WAM Network or quantify any impact on the operations/activities that asset supports/enables. Given the proximity of the development corridor to elements of the East 2 WAM Network and insufficient information to allow the MOD to complete the necessary assessments on the potential for the development to result in the degradation of aviation safety the MOD must, at this time, object to the proposal. The information required by the MOD to enable assessments to be completed is set out below: Document 2.3 Work Plans Section A Sheet 1 – RG1, RG2 & RG3 Document 2.3 Work Plans Section B Sheet 8 – RG134, RG135 & RG136 Sheet 11 – RG153, RG154 & RG155 Sheet 12 – RG166 Sheet 16 – RG182 Sheet 17 – RG188, RG191 & RG 192 Document 2.3 Work Plans Section C Sheet 6 – JC31, JC32 & JC 33 Please also confirm what construction activity will be undertaken within the Order Limits boundary shown on Sheet 16 near "The Old Blacksmiths" Document 2.3 Work Plans Section F Sheet 1 – TB124 & TB125 Document 2.3 Work Plans Section H Sheet 7 – YYJ116 & ZB22	National Policy Statement for Electricity Networks Infrastructure EN-5 (2024), paragraph 2.11.14) as well as Overarching National Policy Statement for Energy EN-1 (2024) (section 5.5), and this is reflected within Appendix 15 of the ES **(ES Appendix 15-2 Review of Aviation Impacts [APP-267])**, (paragraph 15.2.11). Furthermore, the Applicant recognises the need for MOD assessment of potential impacts on military assets, appropriately informed through the provision of detailed project design information (paragraph 15.3.19). As described in the previous response, the Applicant has shared Project information with WFS and latterly the DIO since mid-2023 to enable completion of impact assessments. Most recently, on 28 April 2025, this included DIO-requested grid references for, and heights in metres of, each pylon within the alignment, as well as grid references pertaining to the extent of substations. No response was received from the DIO. Following the DIO request for information of 6 November 2025, the Applicant's response of 27 November 2025 repeated information previously shared on 28 April 2025, providing the information requested regarding the specific pylons as listed, with additional explanatory text. The Applicant has since sought to clarify the DIO's precise area of interest near 'The Old Blacksmiths' but has advised that the order limits within the vicinity relate to proposed highway widening and construction of a non-motorised user route.
Airfields	*Statutory Safeguarding – Aerodrome Safeguarding – Development heights* Within statutory aerodrome safeguarding zones, the principal concern of the MOD is that structures/development, whether permanent or temporary, may project into the three-dimensional air space above and surrounding an aerodrome within which air	The Applicant recognises National Policy Statement EN-1 (2024) policy requirements and aviation regulations relevant to military aerodromes which address definition and infringement of Obstacle Limitation Surfaces (OLS) within the Appendix 15 of the ES **(ES Appendix 15.2 – Review of Aviation Impacts [APP-267])** (paragraphs 15.2.4, 15.2.7 and 15.2.14). The ES Appendix also refers to the Applicant's consideration of OLS infringements as a key parameter within its own aviation impact assessments for all civil aerodromes in scope, recognising this to be best practice for obstacle assessment and treatment (paragraph 15.3.27).

Topic	Comment	National Grid's response
	systems are likely to be at critical stages of flight. The lower edge of the various parcels of airspace above and surrounding an aerodrome are known as Obstacle Limitation Surfaces (OLS). The introduction of physical obstacles that penetrate these OLS has the potential to degrade aviation safety. In this case the development corridor passes through the statutory aerodrome safeguarding zones associated with Wattisham Station, an aerodrome which accommodates the Army Air Corps. The development proposed passes through an area where development with a height of, or exceeding, 45.7m above ground level may be of particular concern. Having reviewed the proposed route detailed on Document 2.3 Work Plan B the MOD have identified that electricity towers RG166 to RG192 (inclusive) fall within and trigger the safeguarding height criteria for this aerodrome height safeguarding zone. The specific grid references for these electricity towers are required to allow the MOD to complete the necessary assessments to identify what potential impact the development has on aviation safety.	The Applicant provided grid references and height information for pylons RG166 to RG192 within its response to the DIO of 28 April 2025 which is sufficient to enable the MOD to complete the necessary assessments regarding WFS. Whilst this information was not specifically requested within the DIO correspondence of 6 November 2025, on 9 January 2026 the Applicant re-issued the Project information as provided on 28 April 2025.
Airfields	Given the proposed route of the development through the statutory 45.7m aerodrome height safeguarding zone at Wattisham Station and insufficient information to allow the MOD to complete the necessary assessments on the potential for the development to result in the degradation of aviation safety the MOD must, at this time, object to the proposal. It should be noted that this objection may be addressed through the submission of additional data which sets out the grid references for electricity towers RG166 to RG192 inclusive.	The Applicant has provided sufficient information to enable the MOD to complete the necessary assessments and awaits the DIO response providing the updated MOD position with regard to the Project and impacts on aviation safety.
Airfields	*Physical Obstruction* In this case the development falls within Low Flying Areas 5 and 10 (LFA 5 and LFA 10), areas within which military aircraft may conduct low level flight training. The addition of a development featuring tall or narrow profile structures such as electricity towers in this locality has the potential to introduce a physical obstruction to low flying aircraft operating in the area. In the event that the applicant is able to overcome the objections detailed above regarding the East 2 WAM Network and the aerodrome height safeguarding zone at Wattisham Station, the MOD would require that conditions are added to any consent issued requiring the submission of sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.	The Applicant has recognised the proposed Project alignment falls within Low Flying Areas 5 and 10 (LFA 5 and LFA 10) as well as the associated MOD requirement for a condition to any consent issued for sufficient data to be submitted to ensure Project structures can be accurately charted to enable deconfliction with military aviation (Para. 15.3.19 of **ES Appendix 15.2 – Review of Aviation Impacts [APP-267]**, and item SO6 within Table 6.1 of **7.2 Outline Code of Construction Practice [APP-300]**).
Ecology and Biodiversity	*Birdstrike* Within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of those large and/or flocking bird species hazardous to aviation safety close to an aerodrome. Having reviewed the proposals, the MOD have identified no safeguarding objection with regard to birdstrike.	The Applicant recognises assessments of aviation impacts should take account of factors including bird strike risk in accordance with NPS EN-1 (2024) (paragraph 5.5.42), and this is reflected within Appendix 15.2 of the ES **(ES Appendix 15.2 - Review of Aviation Impacts [APP-267])** (paragraphs 15.3.45 – 15.3.46) and the Policy Compliance document **(5.7 Policy Compliance Document [APP-086]).**

Appendix M. Eastern Power Networks

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Appendix M
Eastern Power Networks

Table M1.1 outlines the Applicant's comments on the Relevant Representation (RR) provided by Eastern Power Networks **[RR-0974]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application. The Applicant does not have a Statement of Common Ground with Eastern Power Networks.

Table M1.1 Summary of comments and National Grid's response

Topic	Comments	National Grid's response
Draft DCO	Eastern Power Networks plc objects to the making and confirmation of the Order unless at the cost of the acquiring authority there are first provided to it on no less favourable tenure suitable alternative sites and suitable alternative rights in, on, over or under land in substitution to those to be acquired and/or temporarily used under the above Order and in, on over or under which there are first installed and commissioned Electric Lines and Electrical Plant in substitution for those in the land to be acquired and/or temporarily used under the above Order, before that land is acquired and/or temporarily used so that my client can carry out its statutory functions and contractual obligations no less efficiently than previously.	The Applicant has made provision for the necessary consent and land rights for the diversions agreed with Eastern Power Networks to be delivered by Eastern Power Networks, to which see Article 3, subject to Article 6 (Transfer of Benefit) and Articles 24 and 28 along with the wider Draft Development Consent Order (**3.1 Draft Development Consent Order [APP-056]**), which provide the necessary consent and land rights to deliver the diversions. The Draft DCO powers will work in conjunction with a legal agreement to be put in place between the parties to address the use of the Draft DCO powers and the payment of the diversion costs by the Applicant, the combined impact of which will be that there will be no material detriment on the apparatus or undertaking of Eastern Power Networks.
Draft DCO	Conversations are ongoing currently with the Acquiring Authority but please treat this letter as an objection by Eastern Power Networks plc to the relocation and extinguishment of rights and apparatus mentioned above because their relocation will be detrimental to the carrying on of its undertaking. No alternative land, rights and apparatus for those proposed to be acquired under the above Order are in currently fully in place.	The Applicant understands that the relocation of Eastern Power Networks apparatus is agreed in accordance with the diversions proposed in the Draft DCO (**3.1 Draft Development Consent Order [APP-056]**) and that the Draft DCO secures all necessary consents and land rights to deliver the agreed diversions, if consented. The Applicant is in discussion with UK Power Networks and Eastern Power Networks over the terms of a legal agreement to conclude commercial matters between the parties including the Applicant covering the costs of diversions.
Draft DCO	The above objection(s) will be deemed to be withdrawn upon signature of an appropriate deed of Undertaking by an authorised signatory of the Acquiring Authority.	As explained above, the parties are working together to conclude a legal agreement to secure the arrangements set out above, in order to secure the withdrawal of Eastern Power Networks' Objection to the Draft DCO (**3.1 Draft Development Consent Order [APP-056]**) and further updates on the progress of concluding this agreement will be provided in due course.

Appendix N.
Environment Agency

nationalgrid

Appendix N
Environment Agency

Table N1.1 outlines the Applicant's comments on the RR provided by the **Environment Agency [RR-1073]**. The Applicant has held a number of meetings with the Environment Agency during the development of the Project and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (**5.9.15 Draft Statement of Common Ground - Environment Agency [Revision B]**), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table N1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
Flood risk	2.1 The Project is largely located within Flood Zone 1, at low risk of fluvial flooding. Localised areas of the Order Limits are located within Flood Zones 2 and 3. The submitted Flood Risk Assessment (FRA) and plans confirm:	The Applicant notes this comment.
Flood risk	2.2 All of the proposed new substations and extensions to existing substations are located in Flood Zone 1. Some components, namely pylons, are located in flood zone 3.	The Applicant notes this comment.
Flood risk	2.3 We have previously advised the applicant that if any development is to remain in Flood Zone 3 then level for level compensatory flood storage should be provided for the volume of storage taken up by each tower, to the height of the 1% AEP with climate change. This is to ensure the towers do not increase flood risk elsewhere, as required by the Exception Test in paragraph 5.7.16 of EN1. Flood storage should be provided by lowering higher land down to the level at which the flood storage was removed by the construction of the towers. This is particularly important in Flood Zone 3b where paragraph 5.7.24 of EN1 requires the development to 'not result in a net loss of floodplain storage'. The towers should also be designed to remain operational in a flood.	This advice has been adhered to, with compensation storage provision secured by commitments W11 and W17 in the Outline Code of Construction Practice (Outline CoCP) **(7.2 Outline Code of Construction Practice [APP-300])**.
Flood risk	2.4 Initial compensatory storage details are described in the Flood Risk Assessment (FRA) (document reference 7.9). Full details will be provided by the Main Works Contractor(s) in support of future Flood Risk Activity Permit applications for creation of the storage areas. The Project design has been revised following initial consultation with the Environment Agency during pre-application and no land within the Order Limits encroaches into the Tilbury Flood Storage Area, nor the defended floodplain of the River Thames. We are broadly satisfied with the initial compensatory storage details provided for the Project. They seem to be precautionary, hydraulically linked and designed to drain following a flood event. Provision of compensatory storage is secured by commitment W17 within the Outline CoCP (document reference 7.2).	The Applicant notes this comment.

Topic	Comment	National Grid's response
Flood risk	2.5 A sequential approach has been taken to siting infrastructure for the Project, particularly those elements that are vulnerable to inundation. The proposed temporary construction compounds and Cable Sealing End (CSE) compounds are located in Flood Zone 1, with one exception concerning a CSE compound site at Wenham Grove that is partially situated in Flood Zone 3 in the updated flood mapping dataset. However, this CSE compound would be situated within the defined Limits of Deviation (LoD) to avoid Flood Zone 3, as secured by commitment W19 within the Outline Code of Construction Practice (CoCP) (document reference 7.2).	The Applicant notes this comment.
Flood risk	2.6 Where construction activities take place in Flood Zone 3, temporary construction compounds, laydown areas and other work sites will be laid out in accordance with the Sequential Test and incorporate flood resilience measures where necessary. There should be no land raising and storage of construction equipment and materials will be done in such a way as to avoid forming barriers to floodplain flows. Material storage areas will be located outside of the fluvial floodplain where practicable.	The Applicant notes this comment.
Flood risk	2.7 Where temporary construction haul roads pass within or cross watercourses and/or their floodplains and key overland flow routes, the haul road design will include flood mitigation/drainage to allow for the flow of water within the floodplain during flood events up to and including the 1% Annual Exceedance Probability event. The design of the haul roads themselves will include some resilience to flooding for example, incorporating suitable geo-textiles to stabilise the road surfacing, as well as allowing water to flow within the floodplain.	These aspects of the haul road design are secured by commitment W10 within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300]).**
Flood risk	2.9 Mitigation measures state where a main river is crossed by a trenchless crossing, the cables will be laid at least 1 m below the hard bed level of the river and will remain at or below this level for not less than 3 m from the bank of the river. Marker posts shall also be positioned on each bank of the river to indicate the location of the under crossing and the nature of the works.	These design parameters are secured by commitment W06 within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300]).**
Flood risk	2.10 We have previously advised the applicant that soffits for permanent road bridges must be 600mm above the 1:100 plus climate change flood level, open span and not encroach into the channel/reduce channel capacity (otherwise hydraulic modelling maybe required). Level for level flood compensation may be required for any land raising in the 1:100 plus climate change flood outline.	Commitment W12 within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** secures this request for access roads and haul road crossings of watercourses, soffit heights at clear span crossings would be set on a site-specific basis, following more detailed survey and design work by the appointed Main Works Contractor(s). The Main Works Contractor(s) would engage with the Environment Agency on this matter through the Flood Risk Activity Permit consenting process, which is a noted requirement within **5.5 Consents and Licences Required Under Other Legislation [APP-084]**.

Topic	Comment	National Grid's response
Flood risk	2.11 The applicant is not proposing to disapply the need for an Environmental permit for flood risk activities. An Environmental permit for flood risk activities will be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. The FRA has confirmed that Flood risk activity permits will be applied for where required. It is likely that this project will require a significant number of permits. We advise the applicant submits their permit application or engage in permit pre-application discussions as soon as possible.	The Applicant's appointed Main Works Contractor(s) will engage with the Environment Agency on this matter and will seek pre-application advice, as confirmed within **5.5 Consents and Licences Required Under Other Legislation [APP-084]**.
Flood risk	2.12 A Flood warning/evacuation plan (FWEP) has been submitted confirming the applicant will: Register the construction work sites with the Environment Agency flood warnings service. Ensure construction site personnel are aware of the FWEP and are trained sufficiently to implement the procedures. Identify an appropriate, designated evacuation point on higher ground that is outside the flood extent. It is not within the remit of the Environment Agency to assess the evacuation plan.	The Applicant notes this comment.
Flood risk	2.13 The points at which the proposed overground pylon route crosses the River Waveney, Frenze Beck, Black Brook and Colne (main river designated watercourses), are not sections of river channel or banks maintained by the Environment Agency for flood risk management purposes. Therefore, no access is required to these sections either before, during or after the pylon installation.	The Applicant notes this comment.
Flood risk	2.14 The Crossing of the Gipping, Somersham Watercourse, Open channel at TM 10935 43311 and Spring Brook also have no assets within their vicinity. Natural high ground is present.	The Applicant notes this comment.
Flood risk	2.15 The points at which the proposed underground cable route crosses the River Stour (main river designated watercourses) are not in a section of river channel or banks maintained by the Environment Agency for flood risk management purposes	The Applicant notes this comment.
Flood risk	2.16 Pylon RG85 is located close to one of our structures, but the pylon is still 325m away from it to the North-East. The proposed construction site around RG85 also does not appear to interfere with the access route to the structure.	The Applicant notes this comment.
Flood risk	2.17	The Applicant notes the requirement for access. The temporary closure of The Doit is required to enable construction, and later removal, of the haul road crossing located within the Order Limits further north, beyond the River Waveney. While the closure will restrict through-traffic movements past the crossover point during its

Topic	Comment	National Grid's response
	Plan/Drawing/Section numbered 'APP-033', and titled 'EN020027-000265-2.5 Access Rights of Way and Public Rights of Navigation Plans - Section A' indicates that there will be a Temporary Closure (SM-A-052) and/or a Temporary Diversion (SMD-A 076) on the public highway called 'The Doit' during the construction phase. This highway forms part of the vehicular access route to the currently Environment Agency maintained water level control structure at National Grid Reference TM0875180083. Access to this route will need to be maintained to ensure necessary Public Safety inspections and maintenance works (e.g. repairs to fencing and signage) can be completed within the required timescales. The planned highway closure/diversion on vehicle access route to an Environment Agency maintained water level control structure could potentially prevent access to the water level control structure for necessary Public Safety inspections and maintenance works. The solution is to ensure Environment Agency personnel and vehicles have authorised access through the highway closure and diversion when required. Access is required infrequently.	construction and removal, access to land and property both north and south of the construction area will be maintained. As such, access to the water level control structure will remain possible via the diversion route SMD-A-072, SMD-A-074 and SMD-A-075 as shown on Section A, Plan E of **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section A [APP-033]**. Additionally, it should also be noted that, once the crossover has been constructed, The Doit is proposed to remain open throughout the main construction works for the pylons and overhead line.
Flood risk	2.18 In relation to EN020027-000407-6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk, the Environment Agency requests to review the design drawings for the temporary works and watercourse crossings when available.	The Applicant's appointed Main Works Contractor(s) will share design drawings for watercourse crossings and relevant temporary works with the Environment Agency through the Flood Risk Activity Permit consenting process, which is a noted requirement within **5.5 Consents and Licences Required Under Other Legislation [APP-084]**.
Flood risk	2.19 Document EN020027-000407-6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk refers to flood defence monitoring. We request further information on this comment and request further information regarding where the applicant proposes to install flood defence monitoring.	The Applicant will share further information on the locations in which the Project has potential to interact with flood defences, and the Main Works Contractor(s) will engage to discuss and agree any monitoring requirements. This is secured by commitment W18 within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**.
Flood risk	2.20 It is important that during construction/demolition activities that the natural riverbanks remain undisturbed and unharmed with vibration minimised as far as reasonably practicable.	There are several commitments within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** that would act to avoid harm to natural river beds, banks and flood defences. Commitment W06 for trenchless crossings of main rivers and W20 regarding pylon placement, secure minimum buffer distances between these activities and river channel beds and banks in order to avoid disturbance. Further, NV01 commits the contractor to use best practicable means to reduce vibration during construction of the Project and NV04 states that where there is potential for works to generate vibration at, or approaching, levels exceeding 12.5 mm Peak Particle Velocity (PPV) at buildings or structures (or lower levels if the building or structure is deemed particularly sensitive to vibration), pre- and post-work condition surveys would be undertaken. Any damage (cosmetic or otherwise) deemed to be caused by the works would be rectified.
Ecology and biodiversity	3.1 Chapter 8 – Ecology and Biodiversity (document reference EN020027-000403) line 8.5.97 states that initially 555 watercourses were identified as having potential to be affected by the proposal, then were subjected to further review which reduced this number to 204. We would like clarification on how these watercourses were reviewed.	The 555 watercourses that were identified for otter and water vole surveys were identified using aerial photographs and Ordnance Survey mapping, before the baseline habitat walkover survey took place. A very precautionary approach was taken whereby all water features such as field drains, hedgerow ditches, larger ditches and features that could hold water were identified as potential watercourses for survey. This was to ensure land access for these surveys could be obtained and surveys could be scheduled for the correct time of year in line with survey guidelines. As the habitat and other targeted surveys progressed, it was possible to confirm that many of these features were not actually present on the ground, did not hold water, did not have suitable banks for water voles or did not support features (dense vegetation/natural features) that could be used by otters as holts. The 204 watercourses identified under Paragraph 8.5.97 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [APP-158]** is the number of watercourses that were identified as either

Topic	Comment	National Grid's response
		being potentially suitable for water vole and otter following initial surveys or included on a precautionary basis for those not accessible prior to the start of water vole and otter surveys.
Ecology and biodiversity	3.2 We further note in Table 8.4 in the same document that only 65% of the watercourse survey results have been submitted so far, with 35% surveyed post March 2025 unavailable at time of review. As a result, we are unable to assess our position on the conclusions made in the Environmental Statement Chapter 18 Summary at this stage.	Table 8.4 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [APP-158]** identifies that 35% of the watercourses were to be surveyed for otter and water vole in 2025. Some of the watercourses had been surveyed previously (one visit) but had not received the two survey visits required to rule out the presence of water voles in line with guidance. All but two of these watercourses were successfully surveyed in 2025. The results of these 2025 surveys are presented in the revised **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** and the supporting otter and water vole technical appendix **6.8.A13 ES Appendix 8.13: Otter and Water Vole Report [AS-039]**, which were submitted to the Planning Inspectorate in November 2025.
Ecology and biodiversity	3.3 We require the following to be submitted to us before works commence: The remaining 35% of the watercourse surveys to ensure the protection of water voles, otters and their habitat within the development site and avoiding damaging the site's nature conservation value as per Table 8.4 of Chapter 8 Ecology and Biodiversity. A method statement that will manage invasive non-native species (INNS) via personnel, vehicles, plant, or machinery as per Commitment Reference B04 on page 45 of the Construction Code of Practice. A method statement detailing management of the safe passage of fish, otters, water vole within culverts as per Standard Mitigation 8.6.8 B11 on page 65 of Chapter 8 Ecology and Biodiversity.	The additional otter and water vole survey results are presented in Revision B of **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** and the supporting technical appendix **6.8.A13 ES Appendix 8.13: Otter and Water Vole Report [AS-039]**, which were submitted to the Planning Inspectorate in November 2025. The need for pre-construction surveys and method statements for invasive species is already identified in the Outline CoCP (**7.2 Outline Code of Construction Practice [APP-300])** with more detail provided in the Outline Landscape and Ecological Management Plan (LEMP) **(7.4 Outline Landscape and Ecological Management Plan [AS-046])**. Further detail will be provided within the final versions of both the CoCP and the LEMP, specific to the phase of works, post-consent and following detailed design. The commitment for the culverts to provide safe passage for fish, otter and water vole is secured through commitment B11 in the Outline CoCP (**7.2 Outline Code of Construction Practice [APP-300])** and will form part of the detailed design.
Ecology and biodiversity	3.4 In relation to White Clawed Crayfish - Chapter 8 of the Environmental statement in section 8.5.35 states that the native white clawed crayfish (WCC) have been scoped out of the study area, however there are records of WCC on the River Tas (which is within the study area). WCC may be present where there aren't recent records on the River Tas system and its tributaries. Where works are likely to impact this watercourse, it will be critical that appropriate biosecurity measures are in place to prevent the transfer of crayfish plague on clothing, equipment and machinery.	As discussed with the Environment Agency, the invasive species method statement within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** and Outline LEMP **(7.4 Outline Landscape and Ecological Management Plan [AS-046])** are to be updated to include reference to crayfish plague and include the 'Check, Clean, Dry' method for any works within the River Tas and its tributaries. This would ensure no transfer of crayfish plague on clothing, equipment and machinery.
Ecology and biodiversity	3.5 We have reviewed the Outline Landscape and Ecological Management Plan (document EN020027). Section 9.7.1 - Environmental Areas of the Outline Landscape and Ecological Management Plan. This states that Bramford Substation does not currently have an Environment Area plan due to insufficient space due to other planned developments. It should be considered if there is scope to create offsite areas of habitat or the development of management plans of existing ancient and deciduous woodland within the site as part of an Environmental Area to compensate for impacts in line with the applicants BNG commitments.	The Environmental Areas in the Outline LEMP comprise land that would be owned and managed by the Applicant. At Bramford Substation, available land within the Applicant's control is significantly constrained by existing infrastructure and other planned developments, meaning there is no suitable space to establish an Environmental Area without creating future conflicts or risking the loss of newly created habitats. The Applicant has considered opportunities for habitat creation or enhancement within the landholding, including existing woodland, but does not have the powers to secure long term management of habitats outside its ownership. To ensure Biodiversity Net Gain is delivered and maintained, the Project will therefore secure offsite Biodiversity Units in addition to onsite measures.

Topic	Comment	National Grid's response
Ecology and biodiversity	3.6 In relation to Horizontal Directional Drilling (HDD) works section 7.7 (protection of watercourses) of the Outline Landscape and Ecological Management Plan, states in paragraph 7.7.6 "...This will protect the banks and channel of the River Stour removing any direct construction impacts". The main risk associated with HDD works remains in the event of catastrophic fluid loss, or 'frac-out'. A significant frac-out can have severe ecological consequences, particularly within aquatic habitats. Appropriate design, particularly regarding depth of the drill pathway, must be carefully considered to lessen the impact of any potential frac outs, which are not uncommon. High levels of scrutiny are therefore required regarding the design of HDD works and operators associated fluid loss procedures. It is important we are given the opportunity to review HDD designs and operators' fluid loss procedures (this has historically been during either where HDD works have required a FRAP, or where we have been consulted during the Discharge of Protective Provisions where the requirement for a FRAP has been replaced).	The Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** details two relevant commitments, GH11 and GH12, linked to managing the potential for fluid losses at trenchless crossings. Commitment GH11 specifies that the nature and scope of any mitigation or remediation would be agreed with the Environment Agency or other stakeholders, as appropriate, providing the Environment Agency the opportunity to review HDD designs and emergency fluid loss procedures. GH12 secures provision of a drilling fluid breakout method statement, where horizontal directional drilling is proposed at trenchless locations. The method statement will be developed by the Main Works Contractor(s), informed by sufficient appropriate ground investigation. In addition, a specific commitment within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**, 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.
Biodiversity Net Gain (BNG)	3.8 Paragraph 3.3.13 states "Habitat condition for each UKHab type was then determined by taking the mean condition of the same habitat type from the 87.5 % (approximately) of surveyed land. Given the extensive coverage of the local area that has been subject to detailed survey (approximately 87.5 %), this is considered to be a robust and reliable sample size for extrapolation of data". We suggest that a precautionary approach is taken and the assumption that all habitats are taken to be a minimum of 'good' condition. This will potentially incur a greater value multiplier and result in a higher number of units to be compensated for however is commonly adopted as an approach where condition assessments cannot be carried out.	Following the completion of additional habitat surveys over 2025, the completed survey area is now 97% of the Order Limits leaving only a very small area of 3% where this applies. The same approach to categorisation of habitat conditions for the remaining 3% has been taken as per the submitted Biodiversity Net Gain Report **(7.1 Biodiversity Net Gain Report [APP-299])**, with an average habitat condition for that specific habitat type applied based on the data already obtained for the area. This approach is considered a more pragmatic and accurate approach to the application of habitat condition for the remaining 3% than the precautionary approach suggested, given that it is based on a large amount of data local to the area. This approach has been discussed and agreed in principle with Natural England and will be updated in the next iteration of the Statement of Common Ground submitted at Deadline 1.
Biodiversity Net Gain (BNG)	3.9 Paragraph 3.3.18 states that "The RCA is only applicable to Priority River Habitat. Other Rivers and Streams and Canals and Ditches condition assessments were undertaken using the Statutory Biodiversity Technical Appendix 1: Condition Assessment Sheets (Defra, 2024b)". While we understand that BNG is not yet mandatory for NSIPs and for that reason a more flexible approach to the guidance can be taken, the above statement is incorrect.	The Applicant acknowledges that the wording in Paragraph 3.3.18 of **7.1 Biodiversity Net Gain Report [APP-299]** is incorrect, however we can confirm the MoRPH methodology was used for ordinary watercourses, rivers and streams within the Order Limits. Culverts were assigned the default condition in the metric, ditches were assessed using the condition assessment sheets and all other watercourses were treated as priority river habitat and subjected to a River Condition Assessment. This error has been addressed and text amended within **8.1 Errata List [Revision A]**.
Biodiversity Net Gain (BNG)	3.9 The Defra Metric User guide February 2024 (p.38) clearly states 'Watercourse habitat types use different methodologies to assess condition, for: culverts – you do not need a condition assessment ditches – you should use biodiversity metric condition sheets all other watercourses (including canals) – you should conduct a river condition assessment (RCA).' Adhering to this guidance, an	The Applicant acknowledges that the wording in Paragraph 3.3.18 of **7.1 Biodiversity Net Gain Report [APP-299]** is incorrect, however we can confirm the MoRPH methodology was used for ordinary watercourses, rivers and streams within the Order Limits. Culverts were assigned the default condition in the metric, ditches were assessed using the condition assessment sheets and all other watercourses were treated as priority river habitat and subjected to a River Condition Assessment. This error has been addressed and text amended within **8.1 Errata List [Revision A]**.

Topic	Comment	National Grid's response
	RCA survey should be carried out for all watercourses including canals. We would expect the morph methodology to be used for any ordinary watercourses, rivers and streams or canals which are within the redline boundary of the project area.	
Ecology and biodiversity	3.10 The Norwich to Tilbury proposals have the potential to interact with the Waveney and Little Ouse (WaLOR) project. The WaLOR project is an initiative being delivered under the Landscape Recovery Pilot. The project is led by Suffolk Wildlife Trust, in partnership with the Environment Agency. 3.11 We welcome further discussions with the applicant, especially when the method of crossings are finalised.	The Applicant has engaged with parties with interest in the WaLOR project and is pleased to confirm that positive progress is being made and it is intended to finalise the position prior to the closure of the Examination.
Ecology and biodiversity	4.1 We have reviewed Appendix 8.4 – Aquatic Report (reference EN020027 000343). Regarding the River Ter (sections E to F), the presence of brown trout at this location has not been included in the assessment. In the most recent fish surveys undertaken at this site (Site 884) by the Environment Agency on the 16/05/2025 brown trout were recorded at this site. Measures should be included to ensure brown trout spawning periods and spawning habitat is not disturbed during construction of watercourse crossings in sections E to F.	The Applicant acknowledges that in-channel works and permitting would need to take account of seasonal constraints associated with spawning fish wherever practicable. The commitment to avoid fish spawning season where practicable is already included within B11 within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**.
Ecology and biodiversity	4.2 In relation to work timings, there may be timing restrictions applied to proposed works applied to watercourse crossings. This can be dependent on the fish stocks (e.g. coarse fish) surrounding a given work location or the overriding water type. Timing restrictions on a prospective Flood Risk Activity Permit could include: "The activities shall be undertaken outside of the period (from 15 March to 15 June inclusive as this activity is on a cyprinid river) OR (from 1 October to 31 May inclusive as this activity is on a salmonid river) OR (from1 October to 15 June inclusive to protect spawning fish and their spawn)". The applicant should note that timing restrictions may be applied and structure their workplan accordingly.	The Applicant acknowledges that in-channel works and permitting would need to take account of seasonal constraints associated with spawning fish wherever practicable. The commitment to avoid fish spawning season where practicable is already included within B11 within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**.
Ecology and biodiversity	4.3 Culverts installed as part of these works must be passable to fish, Water Vole and Otter, throughout construction and account for fluctuating water levels.	The measures set out in the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** under commitments W03 and B11 ensure that the culverts would be designed and implemented so that they are suitable for passage of fish, otter and water vole.
Geomorphology	5.1 The primary geomorphological issues that would be associated with this project would be the crossings. The applicant has clearly stated their mitigations for each type: Pylons will be situated a minimum of 8m from the top of the bank. Main rivers and WFD waterbodies will use temporary clear span bridges.	The Applicant notes this comment.

Topic	Comment	National Grid's response
	Ordinary water courses will use temporary culverts that will preserve the natural bed or be box culverts set 300mm below the hard bed so the natural substrate can pass through. The Stour is the only river which requires trenchless crossings where the applicant will use ground investigation data to reduce the risks of breakouts of drilling mud.	
Waste management	6.2 In relation to section 1.3.4, the Statutory Guidance Waste Duty of Care: Code of Practice (26 November 2018) is not listed as a guidance document when drafting the Outline SWMP. This is key guidance to prevent unauthorised or harmful deposit, treatment or disposal of waste. We recommend this is considered and the SWMP updated in line with this guidance.	The management of waste will adhere to the latest guidance. Appendix B of the Outline CoCP **(7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302]** has been updated to include the Statutory Guidance Waste Duty of Care: Code of Practice[93] as a key guidance document. The updated Outline SWMP (**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [Revision B]**) will be submitted into the Examination at Deadline 2.
Waste management	6.3 In section 1.3.5 Relevant Legislation, Policy and Guidance - superseded legislation remains quoted such as the Waste Management Licensing (England and Wales) Regulations 1994 and the Pollution Prevention and Control (England and Wales) Regulations 2000. Originally these were replaced by the Environmental Permitting (England and Wales) Regulations 2007. These 2007 Regulations have also been replaced by the Environmental Permitting (England and Wales) Regulations 2016 (as amended). The management of waste produced by the Project with not be compliant with current law if the 2016 Regulations are not adhered to. The Hazardous Waste (England and Wales) Regulations 2005 should read Hazardous Waste (England and Wales) Regulations 2005 (as amended) as these have been amended multiple times.	The management of waste will adhere to the latest guidance. Appendix B of the Outline CoCP **(7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302])** has been updated to reflect the relevant latest legislation. The updated Outline SWMP (**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [Revision B]**) will be submitted into the Examination at Deadline 2.
Waste management	6.4 Section 3.2 - Project Responsibilities - with superseded legislation mentioned in the SWMP and with the SWMP drafted without considering the November 2018 Waste Duty of Care Code of Practice this does not give us confidence that the Project will manage waste within the scope of current legislation and practices. If the SWMP is not updated to include and consider these there is a risk the Applicant's Contractors may not be compliant with the current law.	The management of waste will adhere to the latest guidance. Section 3.2 of Appendix B of the Outline CoCP **(7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302])** has been updated to reference a Site Waste Manager as a Project role. Table 3.1 in the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** has also been updated to include the Site Waste Manager as a Project role. Both updated documents will be submitted into the Examination at Deadline 2.
Waste management	6.5 Section 3.3 - Duty of Care - A key stage of the waste duty of care is missing from this section as there is no mention of the waste producers/holders responsibility to provide an accurate description of the waste before it is transferred to an authorised person. This is necessary to prevent unauthorised or harmful deposit, treatment or disposal of waste. If the Contractor decides to use a Waste Broker to arrange transportation or management of waste, they must check the brokers used have a current brokers licence registered with the Environment Agency. This	Section 3.3 of **7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302]** has been updated to reference the Waste Duty of Care: Code of Practice to ensure the Main Works Contractor(s) abide by this statutory guidance. The updated Outline SWMP (**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [Revision B]**) will be submitted into the Examination at Deadline 2.

[93] Department for Environment, Food and Rural Affairs (2018) *Waste Duty of Care Code of Practice*.

Topic	Comment	National Grid's response
	section must be updated in accordance with the Statutory Guidance for Waste Duty of Care: Code of Practice (26 November 2018).	
Waste management	6.6 Section 5.6 - Waste Management Records and Handling - In relation to paragraph 5.6.2, in 2016 an amendment to the Hazardous Waste (England and Wales) Regulations changed the law for hazardous waste premise registrations and, as such, they are no longer required to be registered with the Environment Agency. We take the opportunity to remind the applicant that Waste Acceptance Criteria (WAC) testing results cannot be used for a hazardous property assessment. A hazardous property assessment for waste is to be carried out using procedures described in the WM3 guidance or to an equivalent standard.	Paragraph 5.6.2 of **7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [APP-302]** has been updated in line with this comment. The updated Outline SWMP (**7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [Revision B]**) will be submitted into the Examination at Deadline 2.
Hydrogeology	7.1 The applicant has committed to producing a foundation or piling works risk assessment (commitment GH02 in the code of construction practice) to support any subsurface works at pylons, cable sealing end compounds and substations. The applicant refers to piling and penetrative ground improvement methods on land affected by contamination but we would also like to see water resources-related impacts considered in these risk assessments. This would include scoping and investigating any potential impacts of piling or foundation works to groundwater flow, level changes to protected rights water supplies and other sensitive groundwater receptors. We suggest any risk assessments scoping radius be agreed with the Environment Agency in the event a foundation works risk assessment is required.	The purpose of the Foundation Works Risk Assessment, as set out in commitment GH02 within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** is to review potential impacts on groundwater quality in accordance with the CL:AIRE guidance 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination'[94]. It is not considered that a piled foundation solution is likely to impact groundwater flows and levels unless dewatering is required. As described in Section 9.4 of **6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]**, large scale dewatering (where groundwater is actively lowered) is not anticipated to be required within sections of new overhead line, Cable Sealing End compounds or substations and changes to groundwater levels and flows are not anticipated. Commitment GH07, included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**, secures the requirement for appropriate assessment to be undertaken in accordance with Environment Agency guidance where temporary dewatering is required, and Commitment GH11 included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** secures the requirement for Hydrogeological Risk Assessment at trenchless crossings. **6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]** identifies where additional Hydrogeological Risk Assessment is required, for example, if dewatering is found to be required following detailed design, and this is also secured by commitment GH11. The assessment would include the potential for changes to groundwater levels and flow as appropriate.
Hydrogeology	7.2 Document 6.9.A3 Qualitative Groundwater Risk Assessment (reference EN020027) includes information on dewatering. We agree that any dewatering may require Hydrogeological Risk Assessment as stated under commitment GH11 (although GH11 appears to be focused specifically on HRAs for trenchless crossings rather than HRAs in general) which includes potential dewatering of subsurface works at Cable Sealing Ends and Substations. Dewatering commitments are covered in GH07 and GH14. The applicant might want to refer to The Water Abstraction and Impounding (Exemptions) Regulations 2017 Regulation 5: Small scale dewatering while building or engineering works to ascertain whether an abstraction licence is required for any dewatering operation.	Commitment GH07 included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** describes that any dewatering activities required during construction would be undertaken in accordance with Environment Agency guidance, including appropriate risk assessment. It goes on to describe that, if required, an abstraction licence would be obtained. Therefore, in accordance with the Environment Agency guidance and commitment GH07, appropriate risk assessments would be undertaken anywhere that dewatering would be required. Commitment GH11 also states that, at trenchless crossings and other specific areas indicated within **6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]**, Hydrogeological Risk Assessments would be undertaken. The Applicant notes the Environment Agency's advice regarding The Water Abstraction and Impounding (Exemptions) Regulations 2017.

[94] CL:AIRE (2025) *Piling and penetrative ground improvement methods on land affected by contamination: Guidance on pollution prevention.*

Topic	Comment	National Grid's response
Hydrogeology	7.3 We recommend that the applicant refers to the Environment Agency's Groundwater protection position statements - GOV.UK, particularly B2- Designation of Source Protection Zones (SPZs) around groundwater abstractions which states our default SPZ1 applied to any groundwater abstraction intended for human consumption or food production. This is applied to (but not limited to) protected rights and lawful users of groundwater.	The groundwater risk assessment provided in **6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]** provides an assessment of the potential for impacts related to the construction of the Project, on the groundwater and groundwater receptors identified within the Study Area.
Hydrogeology	7.4 The headings in Tables A9.3.6 and A9.3.7 in the Qualitative Groundwater Risk Assessment also appear to be in reverse order.	This correction has been reflected in **8.1 Errata List [Revision A]**. The correction does not affect the assessment.
Underground cables	7.5 It is recognised that the applicant has not settled on the final trenchless crossing technique or techniques. Of the three proposed, at least Horizontal Directional Drilling requires the use of bentonite slurry as both a lubricant and a sealant during and post construction. Bentonite slurry often includes additives which may have to be assessed for their potential as groundwater pollutants. Discharges of these substances to ground would be considered groundwater activities and potentially require a permit. Any additives used in bentonite can be assessed against the published JAGDAG list to see if any are hazardous substances or non-hazardous pollutants. The developer may need to seek to apply for a permit for the use of these additives or an exclusion from these.	Should the contractor choose to use additives identified on the Joint Agencies Groundwater Directive Advisory Group's list of hazardous substances, then the appropriate permit or exclusion request shall be submitted. Commitment GH12 included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** requires the provision of a drilling fluid breakout method statement which would include assessment of the additives used to support the drilling fluid and a permit will be sought, if necessary.
Underground cables	7.6 Higham Road, River Stour (north and south) - The applicant suggests there is a significant thickness of undifferentiated Lambeth Group and Thanet Sands is anticipated to lie between the bottom of the proposed crossing and the Chalk. This is used as justification that there is a low permeability barrier between the chalk and the trenchless cabling. This may not be a safe assumption as the Thanet Sands Formation of the Lambeth Group forms a higher conductivity aquifer, often horizontally discontinuous and usually in direct contact with the underlying chalk. We suggest a close study of available borehole logs, in particular those listed in Appendix 6.9.A4 Hydrogeological Risk Assessment. Borehole MM_JC_BH_102a, which is the closest to the Higham Road trenchless crossing, the Lambeth Group rocks are here dominated by sands and gravels of the Upnor Formation overlying the Thanet Formation, overlying weak, weathered siltstone. These deposits overlie the Chalk and are unlikely to provide an effective barrier between the Chalk and the base of the proposed drilling.	The Applicant notes the Environment Agency's interpretation of the hydrogeological conditions. An assessment of the borehole data including MM_JC_BH_102a has been undertaken as part of the Project development, please refer to **6.9.A4 Environmental Statement Appendix 9.4 - Hydrogeological Risk Assessment [APP-185]**. Based upon the details within this assessment of the borehole logs, the superficial deposits directly overlie the White Chalk Subgroup beneath the River Stour in the western cable crossing. Therefore, it is evaluated that a natural pathway between groundwater in the superficial deposits and White Chalk Subgroup already exists. At the eastern crossing, it is considered that the trenchless crossings will be solely through the Thanet Formation and Lambeth Group and not penetrate the Chalk. Therefore, the trenchless crossings will not introduce a new artificial preferential pathway at either of the cable corridors. With respect to risks from trenchless crossing drilling fluids, these are assessed within **6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]** to be moderate/low to the groundwater in the White Chalk Subgroup. The probability of affecting this receptor at the eastern cable corridor is lower than at the western cable corridor due to the presence of the Thanet Formation and Lambeth Group. The Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** provides the following commitments with regards to groundwater protection from trenchless works. GH01 commits to additional investigation and monitoring, including intrusive ground investigations to aid the further characterisation of hydrogeological conditions. GH11 commits to undertaking a Hydrogeological Risk Assessment at trenchless crossings with the nature and scope of any mitigation or remediation to be agreed with the Environment Agency or other stakeholders, as appropriate.

Topic	Comment	National Grid's response
Environmental permitting	7.7 We advise the applicant that the Environmental Permitting (England & Wales) Regulations 2016 make it an offence to cause or knowingly permit a groundwater activity unless authorised by an environmental permit which we may issue. The applicant should be aware that there is no guarantee that a permit will be granted. A groundwater activity includes any discharge that will result in the input of pollutants to groundwater.	The Applicant notes this comment.
Environmental permitting	7.8 Requirement for an environmental permit - The use of bentonite containing additives associated with this development will require an environmental permit under the Environmental Permitting (England & Wales) Regulations 2016, from the Environment Agency, unless an exemption applies. The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be raised. It should be noted that there is no guarantee that a permit will be granted. Additional 'Environmental Permitting Guidance' can be found at: Check if you need an environmental permit - GOV.UK.	The Applicant notes this comment.
Hydrogeology	7.9 Dewatering – derogation on local water supplies. Dewatering is the removal/abstraction of water (predominantly, but not confined to, groundwater) in order to locally lower water levels near an excavation. This can enable operations to take place, such as mining, quarrying, building or engineering works, whether underground or on the surface. The dewatering activities on-site could have an impact upon local wells, water supplies and/or nearby watercourses and features of environmental interest. Most cases of new planned dewatering operations above 20 cubic metres a day will require a water abstraction licence from us prior to the commencement of dewatering activities at the site. More information is available on gov.uk: Apply for a water abstraction or impounding licence - GOV.UK. We are satisfied that the applicant has taken on board comments raised during pre application around dewatering and discharging it as close to the source as possible. We also recommend that any dewatered water is discharged within 24 hours to minimise any negative impacts on the environment and the water levels.	The Applicant notes this comment.
Contaminated land	8.2 As a general comment, where landfills are referred to, their contaminants of concern are not broad enough (particularly for commercial, household, non-hazardous wastes) - and should include a broader suite, for example including PFAS.	The list of contaminants of concern included within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** are preliminary in nature and provided for information only. The potential contaminants of concern do not impact or influence the risk assessment provided.
Hydrogeology	8.3 We note paragraph 9.3.17 has a linked reference error. We advise the applicant reviews and corrects.	The Applicant notes this comment. The correction has been reflected in **8.1 Errata List [Revision A]**.

Topic	Comment	National Grid's response
Contaminated land	8.4 Table A9.1.7 explores potential sources of contamination in section A: South Norfolk. We have the following comments on its contents: A2 - backfilled ponds should be investigated to determine their backfill, these should be medium risk and individually assessed. A3 – the coordinates here are incorrect and require updating.	A2 – As a proportionate approach to the risk assessment, and in accordance with the methodology presented throughout the environmental assessment process, each site that represents a potential source of contamination is initially classified for its potential to generate contamination. The various small historical ponds (that have not been classified as either landfills or potentially contaminated land) have been classified as having a low potential for generating contamination and, in accordance with the methodology agreed at scoping stage, have not been taken forward for further assessment on the basis that a significant source of contamination is unlikely and therefore significant effects are not anticipated. In addition, commitment GH01, included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**, secures the requirement for additional ground investigation and geoenvironmental sampling and testing as appropriate, and commitment GH08 provides a protocol for dealing with any unexpected contamination. Therefore, it is considered that significant effects in relation to small historical ponds are unlikely. A3 – The Applicant notes this comment. The correction has been reflected in **8.1 Errata List [Revision A]**.
Contaminated land	8.5 Table A9.1.8 explores potential sources of contamination in section B: Mid Suffolk. We have the following comments on its contents: B7 – We would like further information as to why this is not medium risk. B14 – There is a northing coordinate error in this section of the report (2514478N should be 251478N)	B7 – This potential source of contamination relates to the former Swattesfield Brick Works which has been classified as having low potential for generating contamination in accordance with the methodology agreed at scoping stage. This is based on the site not being identified as a historical landfill, and insufficient evidence has been presented to suggest a higher potential. However, if the contamination potential had been moderate, this would not change the outcome of the assessment due to the site being located outside of the Order Limits. In addition, commitment GH01, included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**, secures the requirement for additional ground investigation and geoenvironmental sampling and testing as appropriate, and commitment GH08 provides a protocol for dealing with any unexpected contamination. Therefore, it is considered that significant effects are unlikely. B14 – The Applicant notes this comment. The correction has been reflected in within **8.1 Errata List [Revision A]**.
Contaminated land	8.6 Table A9.1.9 explores potential sources of contamination in section C: Babergh District Council, Colchester City Council and Tendring District Council. We have the following comments on its contents: C4 and C5 – If there is a backfilled gravel pit which needs assessment, this should be listed as medium risk. C6 – We advise the applicant that the large tank referred to here appears to be a salt store. C11 - Based on the description provided by the applicant in the table, this appears to be medium risk. However, it is noted that this is to be used just as an access road rather than any development on this site. We request the applicant confirms. C19 – We advise the applicant that there is the Tendring District Council EIA Scoping Opinion application at 25/00711/EIASCO which the scheme runs through.	C4 and C5 – These potential sources of contamination relate to former gravel pits and have been classified as having low potential for generating contamination in accordance with the methodology agreed at scoping stage. This is based on the sites not being identified as either historical landfills or potentially contaminated land, and insufficient evidence has been presented to suggest a higher potential. In addition, commitment GH01, included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**, secures the requirement for additional ground investigation and geoenvironmental sampling and testing as appropriate, and commitment GH08 provides a protocol for dealing with any unexpected contamination. Therefore, it is considered that significant effects are unlikely. C6 – The Applicant notes this comment, however this would not change the outcome of the risk assessment for this highways depot and therefore no changes to the risk assessment is proposed. C11 – This potential source of contamination relates to a carriage company and a marine and auto electrics company. The site is located outside of the Order Limits with the nearest works comprising the use of existing access. The site has been classified as low potential for generating contamination, in accordance with the agreed methodology presented at previous stages of the environmental assessment process. C19 – The Applicant notes this comment, although this does not impact the assessment of site C19 itself.
Contaminated land	8.7 Table A9.1.14 explores potential sources of contamination in section H: Thurrock Council. We have the following comments on its contents: H5 and H6 - We suggest the planning history for this site is reviewed as there may be publicly available information already present.	H5 and H6 – Information from the Thurrock Planning Portal that was found to be relevant to inform the risk assessment was included within the further assessment for H5 and H6 included within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**. H15 – The planning history for the site has been used to inform the assessment, as well as information received from Thurrock Council which supports the classification of the site used in the assessment. The site is located outside of the Order Limits, and therefore interaction with the Project is not anticipated and significant effects are considered unlikely.

Topic	Comment	National Grid's response
	H15 - There is planning history for this site in relation to land contamination that the applicant should review to determine the risk levels posed.	
Contaminated land	8.8 PSC A7 explores potential sources of contamination at the historical Landfill site near Shelfanger Road which is within the Order Limits. The applicant should expand potential contaminants beyond what is listed in the table. Our records state "Category A, B and C waste". As little is known, we suggest a broader range of contaminants are considered than the list provided due to the uncertainty in waste types. With respect to the conceptual site model risk classification of low, this would largely depend on whether the site is disturbed or not. If the site is disturbed, further investigation would be required. If it can guaranteed that the site is not disturbed, we are inclined to agree with the assessment.	The list of contaminants of concern included within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** is preliminary in nature and provided for information only. The potential contaminants of concern do not impact or influence the risk assessment provided. Based on the current understanding of the Project, PSC A7 is unlikely to be disturbed by the construction activities of the Project. However, the wording of commitment GH10 included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** will be updated and submitted at Deadline 2 to include the wording contained within Paragraph 9.7.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]**. This requires the preliminary risk assessment to be reviewed following detailed design of the Project to ensure that the assumptions made within the risk assessment are still valid. If they are not still valid for specific sites, or additional sites are identified as having a moderate or above risk, those sites will be required to be investigated in accordance with commitment GH10, included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**.
Contaminated land	8.9 In relation to site PSC B1, the applicant must again expand the list of potential contaminants. This site is a former landfill which accepted commercial waste. As the waste types are unknown the list of potential contaminants of concern should be broad enough to cover all foreseeable contaminants	Contaminants of concern are provided for information only. The potential contaminants of concern do not impact or influence the risk assessment provided. Due to the information indicating that commercial waste was accepted at this site, the site has been classified as having high potential for generating contamination within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**. This was taken into the further assessment which concluded a moderate risk. Commitment GH10 included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** provides for additional investigation and assessment of sites presenting a moderate (or above) risk such as PSC B1, and requires engagement and agreement with the Environment Agency and relevant Local Planning Authorities.
Contaminated land	8.10 PSC B6 explores potential sources of contamination at the historical Landfill site at Rookery Farm which is directly adjacent to the Order Limits. Our records state "Dry, inert material and shall include no waste other than topsoil, subsoil, brick, concrete, stone, clay, plaster, sand (excluding foundry sand), silica, coal, coke, ash and clinker residues of coal and coke mixtures of these specified materials." This must be considered in the contaminants of concern.	The list of contaminants of concern included within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** is preliminary in nature and provided for information only. The potential contaminants of concern do not impact or influence the risk assessment provided. Due to the information indicating that inert waste was accepted at this site, the site was classified as having moderate potential for generating contamination. This was taken into the further assessment which concluded a low risk as the site is outside of the Order Limits.
Contaminated land	8.11 PSC C6 explores potential sources of contamination at the highways depot within the Order Limits. Contaminants of concern should include salt.	The list of contaminants of concern included within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** is preliminary in nature and provided for information only. The potential contaminants of concern do not impact or influence the risk assessment provided. Due to the land use at the site, the site was classified as having a moderate potential for generating contamination. This was taken into the further assessment which concluded a low risk due to the proposed activities (removal of existing overhead line) meaning that significant ground disturbance is not anticipated. However, the wording of commitment GH10 included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** will be updated and submitted at Deadline 2 to include the wording contained within Paragraph 9.7.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]**. This requires the preliminary risk assessment to be reviewed following detailed design of the Project to ensure that the assumptions made within the risk assessment are still valid. If they are not still valid for specific sites, or additional sites are identified as having a moderate or above risk, those sites would be required to be investigated in accordance with commitment GH10, included within the Outline CoCP **(7.2 Code of Construction Practice [APP-300])**.

Topic	Comment	National Grid's response
Contaminated land	8.12 PSC C10 explores potential sources of contamination at the Thornbush Hall historical landfill site which is located directly south of the order Limits. We note that the coordinates listed here are incorrect and have been incorrectly copied from B6. Our records state: "Spoil from supermarket development" in relation to this landfill. The applicant must update this.	The correct coordinates for site PSC C10 should be 611500E, 245300N in the further assessment table. The correction has been reflected in **8.1 Errata List [Revision A]**. The Applicant notes the additional information, however this information would not change the risk assessment of the site already presented within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**.
Contaminated land	8.13 PSC C12 explores potential sources of contamination at Valley Farm Landfill which is located adjacent to the Order Limits. The applicant must expand potential contaminants listed in this section. As little is known about the waste types, we suggest a broader range of contaminants are considered than the list provided due to the uncertainty in waste types. With respect to the conceptual site model risk classification of low, this would largely depend on whether the site is disturbed or not (the document states "Therefore, intrusive works within this area are not required and ground disturbance is not anticipated within the landfill"). If the site is disturbed, further investigation would be required. If it can guarantee that the site is not disturbed, we are inclined to agree with the assessment.	The list of contaminants of concern included within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** is preliminary in nature and provided for information only. The potential contaminants of concern do not impact or influence the risk assessment provided. Based on the current understanding of the Project, PSC C12 is unlikely to be disturbed by the construction activities of the Project. However, the wording of commitment GH10 included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** will be updated and submitted at Deadline 2 to include the wording contained within Paragraph 9.7.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]**. This requires the preliminary risk assessment to be reviewed following detailed design of the Project to ensure that the assumptions made within the risk assessment are still valid. If they are not still valid for specific sites, or additional sites are identified as having a moderate or above risk, those sites would be required to be investigated in accordance with commitment GH10, included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**.
Contaminated land	8.14 PSC F1, F3 and H6 explore the potential sources of contamination at Brittons Hall Farm (landfill within the order limits), Boyton Cross (historical landfill within the order limits) and Tarmac Orsett Quarry (within the order limits) respectively. For all of these sites, the applicant must expand potential contaminants listed due to landfill source. The key reasoning for low risk to groundwater and surface water receptors is that the pylons are currently proposed to be located outside of the landfill boundary. Currently is a key word here - if pylons are later proposed within the landfill, significant investigation would be required which we would require consultation on. We recommend this scenario is avoided.	For the avoidance of doubt, the Applicant has carefully positioned pylons outside any areas of landfill and, noting both geotechnical and contaminative risks, does not intend to utilise the Limits of Deviation to build pylons on any such areas of former landfill. The list of contaminants of concern included within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** is preliminary in nature and provided for information only. The potential contaminants of concern do not impact or influence the risk assessment provided. Due to the information reviewed for the sites, they were classified as having either a moderate or high potential for generating contamination. This was taken into the further assessment which concluded a low risk as ground disturbance associated with the Project is not anticipated. The wording of commitment GH10 included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** has been updated to include the wording contained within Paragraph 9.7.7 of **6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]**. This requires the preliminary risk assessment to be reviewed following detailed design of the Project to ensure that the assumptions made within the risk assessment are still valid. If they are not still valid for specific sites, or additional sites are identified as having a moderate or above risk, those sites will be required to be investigated in accordance with commitment GH10, included within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**.
Contaminated land	8.15 PSC F2 and F7 explore the potential sources of contamination at Roxwell Quarry (historical landfill site within the order limits) and Boyton Hall (landfill directly adjacent to the order limits). The applicant must expand the list of potential contaminants of concern due to the landfill source.	The list of contaminants of concern included within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]** is preliminary in nature and provided for information only. The potential contaminants of concern do not impact or influence the risk assessment provided.
Contaminated land	8.16 PSC H7 explores the potential sources of contamination at Collingwood Farm which is a historical landfill site within the order limits. We advise the applicant that our records note the following waste types: "controlled waste, solid, inert, non-hazardous	The Applicant notes this comment, however the information provided does not change the outcome of the risk assessment.

Topic	Comment	National Grid's response
	builders rubble, soil and excavated materials in their natural state".	
Contaminated land	8.17 PSC H10 explores the potential sources of contamination at Linford Quarry which a current and historical landfill site within the order limits. We advise the applicant that our records note the following waste types "Inert waste from factory only" and "Principally broken aerated blocks".	The Applicant notes this comment, however the information provided does not change the outcome of the risk assessment.
Flood risk	8.18 In relation to document 7.9 (Flood Risk Assessment), we mote that table A.1 notes our SuDS requirements. We are pleased that these are included and we wish to highlight again at this stage, that these comments need to be adhered to in the Surface Water Drainage Strategy when this is produced.	The Applicant notes this comment and has provided further information into the Examination at Deadline 1 in the form of **8.2 Drainage Strategy [Revision A]**. The Strategy has been developed in compliance with the National Sustainable Drainage Systems (SuDS) Standards, as well as relevant local SuDS guidance from the Lead Local Flood Authorities.
Contaminated land	8.19 Paragraph 9.5.5 from document: 6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology may may need to be amended following review of our comments above on Appendix 9.1.	The Applicant notes this comment, but does not consider that the paragraph needs amending based on the responses presented above.
Hydrogeology	9.1 Paragraph 9.4.52 of Document 6.9.A3 Qualitative Groundwater Risk Assessment (reference EN020027) includes reference to dewatering at the River Stour trenchless crossing. We highlight the presence of a water intake downstream of this river crossing. This needs to be considered in plans/procedures to avoid any impacts.	The Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])** ensures that the Environment Agency would have the opportunity to review horizontal directional drilling designs and method statements, which would ensure that the water intake structure is safeguarded. This is secured by commitments GH11 and GH12.
Hydrogeology	9.2 In relation to Paragraph 9.4.58 of the above document, an unplanned loss of drilling fluids to surface water at the River Stour trenchless crossing could potentially impact the downstream intake. This needs to be considered in plans/procedures to avoid any impacts.	A drilling fluid breakout method statement, informed by sufficient ground investigation data, would be prepared by the Main Works Contractor(s) who would engage with the Environment Agency to agree suitable procedures and safeguards for water environment receptors. This is secured by commitment GH12 within the Outline CoCP **(7.2 Outline Code of Construction Practice [APP-300])**.
Hydrogeology	9.3 In relation to document 7.10 Water Framework Directive Assessment (document reference (EN020027), in general the document appears to cover the main points we would want to see addressed. These are identified in the standard mitigation measures from page 95 of the pdf: W02 - Use of spill kits, precautionary booming, sediment management W16- Waste water from welfare facilities will be discharged to the public sewer, taken off site by tanker to a licensed disposal facility. GG21- Fuel storage, secondary containment and use of spill kits GG22- A Surface Water Management Plan will also cover pollution prevention GG23- Wash water from vehicle cleaning and permitting requirements. GG32 General pollution prevention	The Applicant notes this comment.

Topic	Comment	National Grid's response
	GH05 Storage of oils and chemicals in accordance with guidance and Regulations GH07- Temporary dewatering and requirement for abstraction licences or water discharge environmental permits. GH09 Identification of and restrictions on certain works in SPZ's GH12 Drilling fluid breakout method statement and emergency procedures.	
River navigation	10.2 We acknowledge that closures may be necessary in respect of safety for the public right of navigation. We require that once the route is confirmed (north or south) that National Grid advise our navigation team directly on anglianwaterways@environment-agency.gov.uk to enable us to issue our statutory notice to river users for river closure. Further we would need to make our main river user groups aware of the works and likely closure.	The Outline Public Rights of Way Management Plan (Outline PRoWMP) **(7.6 Outline Public Rights of Way Management Plan [APP-329]**) contains information in relation to impacts on navigable watercourses, noting that impacts would be confined to a small number of areas on the River Stour close to the riverbanks, with only minor encroachment into the waterway such that no restrictions to navigation are anticipated. Notwithstanding this, appropriate signage will be installed at access points and along the banks of the waterway to inform waterway users of the ongoing works and to ensure safety.
River navigation	10.3 We would not support a closure in September of any year due to an annual event that uses the whole navigable river from Sudbury to the Sea. If this were to come to pass, we would expect the project to provide support to adequately bypass the temporarily closed sections.	The current programme anticipates the works affecting the River Stour would be carried out in the second quarter of 2030, between late March and early May. Notwithstanding this, the Outline PRoWMP **(7.6 Outline Public Rights of Way Management Plan [APP-329**]) notes that impacts would be confined to areas close to the riverbanks, with only minor encroachment into the waterway such that no restrictions to navigation are anticipated.
River navigation	10.4 We require additional information from the applicant regarding the length of time that the temporary closure may be required. There is currently no information in the documentation that references any impact at this stage.	The Outline PRoWMP **(7.6 Outline Public Rights of Way Management Plan [APP-329])** contains information in relation to impacts on navigable watercourses. These impacts would be restricted to the River Stour and are associated with the installation and subsequent decommissioning of temporary drainage outfalls. These works will be confined to areas close to the riverbanks, with only minor encroachment into the waterway, such that no restrictions to navigation are anticipated.
River navigation	10.5 The applicant should ensure monies set aside for any subsequent tree failure affecting the ability to navigate as a consequence of the works. (i.e. undermined trees in area that then fall into the Stour causing a restriction on navigation and a cost to the Agency).	The Applicant would ensure that appropriate funds are allocated for this purpose provided it can be proven that the tree failure is attributable to the Project rather than, for example, natural weathering or erosion.
Draft DCO	11.1 Our review of the draft DCO is ongoing with our legal team and we will provide a further update in our written representation.	The Applicant notes this comment.
Flood risk	11.2 National Grid are not seeking to disapply Flood Risk Activity Permits (FRAPs). The applicant will be seeking to apply for numerous FRAPs separately. Given no disapplication is currently sought, there is no need for protective provisions (as things currently stand). We remind National Grid of our 'advice' in the SOCG that they should begin to apply for these FRAPS imminently as they will take significant time to process	The Main Works Contractor(s) will engage with the Environment Agency on this matter and will seek pre-application advice, as detailed in **5.5 Consents and Licences Required Under Other Legislation [APP-064].**
Draft DCO	11.3 We are content with Section 20, Part 4, 'Discharge of water'. It makes it clear that nothing in that article overrides the need for an environmental permit or permits water discharge activities.	The Applicant notes this comment.

Appendix O.
Essex County Council

nationalgrid

Appendix O
Essex County Council

Essex County Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the Relevant Representation (RR) provided by **Essex County Council [RR-1083]**.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1, which reflects the latest position (**5.9.3 Draft Statement of Common Ground - Essex County Council (ECC) (incl LLFA and Highways) [Revision B]**). The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table O1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Consultation	2.2. ECC confirms its view, given in its recent response to the Adequacy of Consultation (AoC-009), that the Applicant carried out pre-application consultation in line with the statutory requirements of sections 42, 47 and 48 of the Planning Act 2008. Without wishing to repeat the additional commentary given in AoC-009, ECC reiterates the need for feedback from the Applicant that engages with the points raised, so that ECC can know how its points have been taken on board or, if they have not, why that is the case. ECC is confident that the Applicant will implement an effective and open engagement process through this Pre-Examination and Examination stage to ensure all those participating in the process feel adequately informed. 2.3. ECC notes that a number of the issues raised in this Relevant Representation were raised with National Grid at pre-application stages, but the lack of feedback from the Applicant means that a considerable number of principal and technical matters remain unresolved. ECC's view is that the Applicant could have used the pre-application stages much more effectively to front load matters and resolve matters ahead of the Examination. As that did not happen, the Applicant will need to engage in the application and examination process in a positive manner to resolve the considerable number of as-yet unresolved issues raised by relevant authorities and stakeholders. 2.4. To that end, ECC remains committed to engaging and working with the Applicant, including through ongoing discussions around the Statement of Common Ground, as well as through the Local Impact Report which ECC will prepare and submit and any representation ECC makes throughout the Examination as necessary.	All feedback received has been carefully reviewed and considered. In some cases, the Project has been modified in response. A response to all the points raised (regardless of the outcome as accepted or not taken forwards) has been published as part of either subsequent consultations or as part of the submission documentation. The full listing is within the **5.1 Consultation Report [APP-066]** and appendices along with the **5.15 Design Development Report [APP-122]** setting out the reasons for some of the more overarching alternatives and more substantive changes. It is not practical, nor required by the legislation, to provide individual feedback to respondents; that said, the Applicant has provided opportunities for the Host Planning Authorities to have access, if required, to the Project Design team to clarify matters for their area. The Applicant is also committed to continuing a constructive dialogue with Essex County Council.
	3.1 In the response to the statutory consultation held in 2024, ECC raised a number of in principle objections. Due to significant impacts arising from the use of overhead line technology, ECC maintains that its preferred strategic option is that of securing an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines (OHL's) and pylons along its entire length. ECC considers that option could deliver the best outcome in the interests of	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. In response to the relevant EN-5 (2024) paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer

Topic	Summary of matters raised	National Grid's response
	safeguarding the amenities of communities and the environment. It is noted that the independent review of the project, the outcome of which was published in the Hiorns Smart Energy Network Report (November 2023) ("the Hiorns Report"), described the Offshore Solution as a credible alternative to that proposed by the Applicant. ECC accepts that this would be a more expensive solution than the Onshore Solution with OHLs, although it would be less expensive than an Onshore Solution with High Voltage Alternate Current ("HVAC") cables. Also, as set out in more detail below, were the timescale for delivery of the Norwich to Tilbury Project to be extended because of less need for transmission capacity in the future, this would provide a greater window within which to consider the viability of alternate solutions to deliver the necessary capacity.	underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. In accordance with NPS EN-1 (2024) and NPS EN-5 (2024), 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 (2024) 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 (2024) policies on undergrounding. Please refer to the Applicant's response regarding the Hiorns Report at paragraph 3.2 of the RR below.
Needs Case	3.2. ECC recognises the great emphasis on renewable energy in the National Government's Clean Power 2030 Action Plan (December 2024) and the considerable evidence that has been submitted with this DCO application relating to the need for the project. However, ECC maintains that there are significant uncertainties and sensitivities remaining around the timing and need for the Norwich to Tilbury project that would have been evident to National Grid and the Electricity System Operator ("ESO") during the appraisal of strategic options and choice of strategic proposal in 2022, and that these still remain. This is a position that is further supported by the Hiorns Report and the ESO's East Anglia Study Report (March 2024). 3.3. ECC acknowledges National Grid's license obligations and understands it has contracts with energy generators including offshore wind developers at North Falls and Five Estuaries, that require connection at the proposed new EACN substation in Tendring by 2030. Both these schemes are to come forward as DCO proposals, both have progressed through the Hearing stage, with a decision on Five Estuaries due in December 2025 and North Falls in January 2026. ECC question's whether the Applicant has provided sufficient relevant evidence in the present application to refute the conclusion of the Hiorns report that all of the contracted connections will not be required until 2035, as opposed to 2030 as referenced by the Applicant.	At each key stage of the consultation and submission process the Needs Case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Transmission Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 in as set out in the **7.17 Strategic Options Backcheck and Review [APP-355]**. The timing and urgency for electricity infrastructure is referred to within The Overarching National Policy Statement for Energy 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*. The National Policy Statement for Electricity Networks infrastructure (EN-5) 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.* The 2023 Strategic Options Backcheck and Review **(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 The National Policy Statement for Electricity Networks infrastructure EN-5 (2024). *Condition D2: "Obligation to provide transmission services", which includes "responding to requests for the construction of additional transmission system capacity".* *Condition D3 "Transmission system security standard and quality of service" which includes "Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')"* *Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS are in place.*

Topic	Summary of matters raised	National Grid's response
		The factors above show the 2025 updated Needs Case continues to indicate the urgent need for reinforcement for both Contracted and ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. The Applicant's response to the findings of the Hiorns Report was published in April 2024 and is available on the Project website. In summary, the Applicant does not accept the report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under its Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register. Furthermore, a delay to the Project would result in additional cost to the consumer. 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.
Alternatives	3.4. As set out in detail in section 6.3 below, the Applicant has not adequately addressed the likely significant impact of the Project on the Dunton Hills Garden Village ("DHGV"). DHGV is a strategic allocation in the adopted Brentwood Local Plan for around 4,000 homes and associated infrastructure, supported by a Supplementary Planning Document ("SPD") and an outline permission in principle for 3,700 homes, but with viability already finely balanced and subject to detailed S106 negotiations and a recent landownership change. The proposed Norwich to Tilbury overhead line route runs along and through DHGV and adjacent growth areas in Brentwood and Basildon. The Applicant has not properly taken this into account in route selection, contrary to Holford Rule 7. ECC provided the Applicant with evidence of the Garden Community Principle and of analysis by Savills that the pylons and overhead lines are likely to have a materially adverse effect on residential values and residual land value (circa £17.5m reduction to a policy compliant scheme), with consequential risks to the delivery of affordable housing and essential infrastructure at DHGV and other emerging sites. ECC considers that alternative solutions, including undergrounding or different pylon design, should have been assessed in line with the mitigation hierarchy and principles of good design in NPS EN-1 and EN-5. In ECC's view, the current preferred alignment fails to mitigate locally significant effects on DHGV and surrounding allocations and thereby undermines the planned delivery of housing and infrastructure in Brentwood, Basildon and Thurrock.	The Applicant has considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. The Applicant considers it possible for the overhead line to co-exist with the housing proposals and has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high-pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village (DHGV) housing proposals. No alternative connection route is appropriate to either east or west due to the extent of urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. The Applicant also shared its guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. The Applicant continues to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the Applicant's position is that the Project will not impede or inhibit the community development potential of DHGV or growth potential in the vicinity of the proposed alignment. Specifically, with regard to delivery of DHGV, paragraph 3.4 of the 29 July 2025 Committee Report considered by Brentwood Borough Council confirmed '*… critically that it was not anticipated that N2T would have any material impact on the delivery of DHGV.*' Furthermore, the Representations submitted on behalf of LIH Dunton Hills Limited, the new owners of the DHGV site, confirm that '*the proposed alignment for the new 400kV line lies within a corridor of land which is already contained by the 'inner zone' of the high pressure gas main - LIH welcomes and supports this*' (paragraph 25(b)), that '*… NGET has endeavoured to minimise the impact of its proposed works on the Garden Village*' (paragraph 37), and that '*Discussions between the parties are continuing and it may be that LIH is able to withdraw its objection once further details are resolved through a Statement of Common Ground (SoCG) and / or a legal agreement*' (paragraph 45). The Applicant is considering the information presented in the Savills report and will submit a response to that to the Examining Authority in due course.
Socio-economics Recreation and Tourism	3.5 ECC strongly wishes to see the Norwich to Tilbury project deliver significant beneficial socio-economic effects to the host communities but is concerned that this issue and especially the associated social value opportunities around skills, training, and future employment have not been fully assessed by the Applicant and needs to be as a matter of priority. ECC continues to encourage the Applicant to respond positively to the issue of social value and community benefits, particularly having regard to the Government's recently published guidance - Community Funds for Transmission Infrastructure.	Socio-economic impacts on the local economy, including impacts on local businesses, residents and the tourism sector are assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265**]. The chapter concludes that there would be no significant impacts on the local economy as a result of the Project. The scale of construction employment arising from the Project is modest, with a maximum peak local construction workforce of approximately 172 Full Time Equivalent roles and an overall local job demand of approximately 480 roles over the four year construction period. **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265**] concludes that the Project would not give rise to significant adverse socio-economic effects in relation to employment or workforce requirements.

Topic	Summary of matters raised	National Grid's response
		However, the Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes: • Working with local suppliers and supporting forums, such as Chambers of Commerce • Contributing to a coordinated regional approach to electricity industry jobs and skills planning • Engaging with Local Authorities to understand local priorities and opportunities around skills and employment. These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. This would be delivered outside the development consent process, since it is not a material consideration in the decision on the Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure Guidance[95]. Therefore, any community benefit or investment would be captured under the National Grid Community Grant Scheme and dealt with separately to the EIA.
Needs Case	4.2. As set out in the submitted draft Statement of Common Ground (APP-091 pg 22) ECC is concerned about project timing, given the uncertainties surrounding the time frames for planned future connections. This at the very least requires sensitivity testing. ECC has repeatedly requested that a further review of the contracted electricity generation is undertaken to assess whether the contracted position and the readiness of projects to connect as planned, is robust. This would either reaffirm the need and timescale for the Norwich to Tilbury project or provide a greater window within which to consider the viability of alternate solutions to deliver the necessary capacity. 4.4. In relation to the general need case for the project, the Hiorns Report concluded that the case for the Norwich to Tilbury project focused solely on the contracted energy generation position to identify the maximum requirement for additional transmission capacity in East Anglia. The report also identified that it is extremely unlikely that all of the contracted energy generation projects would come forward and/or connect at the volumes stated or dates contracted. As a result, the report concluded that there was scope for further analysis of potential options, including a potential offshore HVDC link, and it could not be concluded that the National Grid proposal was the best option. 4.5. NGET provided a short response to the Hiorns Report in April 2024, suggesting that it could not delay its reinforcement of the transmission network beyond 2030 without being in breach of its contractual and licence obligations. 4.6. ECC accepts the relevance of those contractual and licence obligations and when responding to the targeted consultation in 2025, ECC acknowledged the licence obligations placed on National Grid. However, the ECC response concluded that it considered a further review of the contracted electricity generation was still needed as part of the DCO submission. This is needed to confirm the need and timescale for the planned Norwich to Tilbury Project; and until this confirmation is evidenced, ECC maintains its position that credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding,	Please refer to the Applicant's response regarding the Hiorns Report at paragraph 3.2 of the Relevant Representation above. In summary, we do not accept the report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register.

[95] Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*

Topic	Summary of matters raised	National Grid's response
	delivered at pace, to minimise onshore infrastructure in Essex should continue to be fully explored. 4.7. ECC does not believe that NGET has provided any new evidence or sensitivity testing to refute the conclusion of the Hiorns report that the Norwich to Tilbury project is not needed by 2030. While ECC has had regard to the TEC Register, ECC considers it essential that in determining what future expansion is needed, more transparency is required about the assumptions on the status of the contracted connections and what future generation connections are actually likely to be ready to connect to the transmission network by 2030. The Applicant must not restrict the justification on future network expansion solely based on the ESO contracted position.	
Alternatives	4.8. The current application proposes predominantly 50m high lattice pylons, with targeted AC undergrounding in the Dedham Vale National Landscape within Essex. As such, the scheme as put forward would have very significant impacts including landscape and visual impacts. If indeed the timing for the network reinforcement is less acute as suggested in the Hiorns Report, alternative schemes to the current lattice pylons scheme should be explored in more detail (such as off-shore and High Voltage Direct Current undergrounding). This is to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme, and if so, put them forward at pace to achieve the required network reinforcement instead of the submitted scheme. 4.9. In order to be satisfied that the Applicant has properly considered alternatives, the Examining Authority will need to consider evidence about the timing of delivery of the project, and whether the Applicant's position is robust.	Please refer to the Applicant's response regarding the Hiorns Report at paragraph 3.2 of the RR above. Please refer to paragraph 3.1 regarding the Applicant's position on the use of overhead lines in the Project. 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 application for development consent. This includes the **5.1 Consultation Report [APP-066]** and supporting appendices, **5.15 Design Development Report [APP-122]**, **7.17 Strategic Options Backcheck and Review [APP-355]**, **7.18 2022 - Corridor and Preliminary Routeing 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]** and **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**. Alternatives in the context of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 have been described in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**. The Applicant considers this to have provided for a robust and appropriate approach, consistent with relevant planning policy, Further delay to investigate alternatives that cannot meet the Need Case is unnecessary and counterproductive.
Key Legislation and Planning Policy Context	5.1. A detailed review and commentary on local and national policy and guidance will be provided as part of the Local Impact Report. ECC will approach the examination in line with its Nationally Significant Infrastructure Projects (NSIPs) Policy (15 December 2022), described in paragraph 1.4 above, under which ECC is committed to supporting NSIPs that create resilience in Essex and not those that exacerbate existing or create new vulnerabilities.	Section 104(2) of the Planning Act 2008 (PA 2008) sets out that the primary policy considerations for NSIPs include any relevant National Policy Statements (NPSs). The NPSs are produced by the government, pursuant to specific legislative requirements under the PA 2008 to set out policy for nationally significant development in a particular sector and provide the framework for decisions on applications for NSIPs in that sector. In this case, the Energy NPSs are of relevance to the Project, therefore section 104 of the PA 2008 applies. The **5.6 Planning Statement [APP-085]** and **5.7 Policy Compliance Document [APP-086]** include an assessment of the Project against the NPSs and relevant material considerations including the National Planning Policy Framework (2025), Local Planning Policy and relevant Neighbourhood Plans. With regard to resilience, it is important to note that the Project will help deliver on the UK's Clean Power 2030 mission to achieve energy security, boost the economy, and tackle climate change by ensuring clean sources produce enough electricity to meet demand by 2030. The **Strategic Options Backcheck and Review [APP-355]** and the **Planning Statement [APP-085]** explain that the Project is one of the essential network reinforcements needed to deliver the UK's net zero target. The reinforcement will also support security and reliability of supply, in accordance with Paragraph 2.3.3. Without reinforcement, the capacity of the existing network in East Anglia is insufficient to accommodate the connection of proposed new power sources connecting in the area. The Project would provide this reinforcement, helping to deliver 50 GW of offshore wind by 2030, and ultimately contributing towards achieving net zero.

Topic	Summary of matters raised	National Grid's response
Draft DCO	6.1. Development Consent Order 6.1.2. The Applicant offered ECC an opportunity to review some elements of the DCO ahead of the submission. ECC provided detailed, considered comments. However, the Applicant failed to give any feedback and it appears from the **draft Development Consent Order ("dDCO")** as submitted **[APP-056]** that many of ECC's comments have not been picked up. The Applicant has not offered any explanation.	The Applicant is grateful for the Authority's comments on the **3.1 Draft Development Consent Order [APP-056]** ahead of submission and had regard to these when preparing the **3.1 Draft Development Consent Order [APP-056]** for submission. The Applicant will continue to engage with the authority during the Examination process.
Draft DCO	6.1.3. ECC acknowledges the drafting of the DCO follows the structure and content of previously approved DCOs, however, it must recognise local circumstances and experiences within Essex. Drawing on practical experience from their implementation and interaction with standard internal procedures, it is considered both necessary and sensible to recognise local requirements and move away from some precedents, where this better facilitates the approval and implementation of the DCO.	In preparing the **3.1 Draft Development Consent Order [APP-056]**, recent precedents have been followed and guidance in Advice Note 15[96] and Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects[97] has been taken into account and complied with. The Applicant has considered each article and the provisions of each schedule to the **3.1 Draft Development Consent Order [APP-056]** on a Project-specific basis and by reference to the issues relevant to the relevant article or schedule. The structure and content of the **3.1 Draft Development Consent Order [APP-056]** is referenced extensively through the application documents and any material change to the structure of the document in particular would require the updating of a very significant amount of the application documentation and cannot be supported on that basis given the scale of the application that has to be examined in the Examination period.
Draft DCO	6.1.4. In summary, the ECC's key areas of concern about the drafting are as follows: i) The process and timeframes across the DCO must be sufficient for the relevant local authority to consider, undertake the necessary checks, engage with relevant stakeholders and respond to such applications submitted to it. ii) In respect of Article 3, clarity is needed that the development consent is provided for the authorised development "to be carried out within the Order limits" (as defined in the dDCO), so that the scope and limits of the development consent can be clearly set out, in order to reflect the development subject to the examination. iii) Further clarity is needed around the limits of deviation and authorised development so that the scope of the development consent can be clearly set out, in order to reflect the development subject to the examination. iv) The dDCO seeks to disapply the Hedgerows Regulation 1997 under Article 50, more specifically the obligation for the undertaker to secure consent to remove hedgerows under the regulations. The impact on the protected hedgerows requires proper assessment before this can be agreed. ECC is reviewing the **Hedgerows Regulations Report [APP-161]** and will expand within the ECC Local Impact Report. v) As highway authority, ECC welcomes draft Protective Provisions but these need to be the subject of further discussion between ECC and the Applicant to ensure appropriate mitigations.	I) 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 circumstances outside the control of the Applicant. In each instance, the **3.1 Draft Development Consent Order [APP-056]** allows for the relevant decision-making authority and the undertaker to agree 'such other period' as may be appropriate in the circumstances. Likewise, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) of the **3.1 Draft Development Consent Order [APP-056]** to extend the 28-day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question. In any case, National Grid will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure Essex County Council, and other relevant host authorities, are able to respond on programme. II) Article 3(7) makes clear that the authorised development must be constructed and installed in the lines and situations shown on the **2.3 Works Plans [APP-017 – APP-024]**, subject to article 5 (limits of deviation) and to the Requirements. The Applicant does not consider any further clarification is required. III) The Applicant is unclear as to the concern raised. The authorised development and associated development are described in Schedule 1 to the **3.1 Draft Development Consent Order [APP-056]**. The authorised development is further shown on the **2.3 Works Plans [APP-017 – APP-024]**. In addition, the Applicant submitted a **5.14 Details of Associated Development, with references to documents [APP-121]** report with its application, which delineates the authorised development and the associated development. The Limits of Deviation are set out in Article 5 (limits of deviation) to the **3.1 Draft Development Consent Order [APP-056]** and are shown on the **2.3 Works Plans [APP-017 – APP-024]** and in the table of parameters at the back of the Works Plans for each section. IV) The Applicant notes the Authority's holding comment on the disapplication of the Hedgerows Regulations 1997 and awaits further comments in the Local Impact Report.

[96] Planning Inspectorate (2025) *Nationally Significant Infrastructure Projects – Advice Note Fifteen: drafting Development Consent Orders*

[97] Ministry of Housing, Communities and Local Government (2024) *Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects*

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	vi) The draft Requirements require further discussion both in terms of their scope, and current detail. This includes in relation to construction hours, piling and potential noisy works. ECC will be seeking to ensure communities have appropriate periods of respite from noisy and invasive construction activities. vii) The Lead Local Flood Authority ("LLFA") is concerned that the dDCO, Draft Schedule of Requirements and Explanatory Memorandum do not highlight the existing flood risk, the need for managing said risk and/or the presence of overland flows. This issue is relevant for both pre and post construction. 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 affect ordinary watercourses/drainage channels, surface water drainage, and the control of pollutants. viii) Given the scale and complexity of the project across multiple areas, ECC would encourage that the DCO requires the Applicant to maintain a 'Register of Requirements' such as that seen in the Lower Thames Crossing Development Consent Order to ensure ongoing fairness, public confidence and transparency. Additionally, to ensure the timeliness and efficiency of the discharge of requirements process this should include all relevant certified plans and documents that will be required to undertake the assessment of the submitted requirement material. ix) The content and quality of any submission for the discharge of requirements must be to an agreed standard to support efficient processing. x) 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'). 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.	V) The Applicant has been, and continues to be, committed to engagement with stakeholders on the Protective Provisions. VI) The Applicant notes the Authority's comments regarding the Requirements and awaits further detailed comments. VII) The **7.2 Outline Code of Construction Practice [APP-300]** secures a number of measures that would robustly control the construction and operation of the Project in terms of works to watercourses, land drainage, surface water drainage and pollution risks. It is therefore not considered necessary that the **7.9 Flood Risk Assessment [APP-331]** becomes a certified document. VIII) 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 DCO Requirement discharge applications, as it would planning condition discharge applications and, therefore, the Applicant does not consider it necessary or proportionate for it to maintain a composite public Register of Requirements. IX) Those Requirements that require the submission of substantive documents specify the required content of these documents. In particular, the Applicant notes that any submissions under Requirement 4 must be in substantial accordance with the relevant outline management plan, which ensures that the relevant authorities are aware of the nature of the submission they will receive and which will support effective and efficient processing. X) 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]**.
Cumulative Effects	6.2. Dunton Hills Garden Village 6.2.1. Dunton Hills Garden Village ("DHGV") is an allocated strategic housing site (Policy R01) in the Brentwood Local Plan adopted on 23rd March 2022 to deliver circa 4000 new homes together with associated infrastructure. This allocation was identified to meet the majority of Brentwood's housing need, within the Plan period and beyond. In support of this policy objective, Brentwood Borough Council approved the Dunton Hills Supplementary Planning Document in January 2023 ("SPD"). Brentwood is currently in the process of reviewing its adopted Local Plan. 6.2.2. The adjacent boroughs of Basildon and Thurrock are also in the process of preparing new Local Plans to guide the future development of their respective areas. This could include further	Please refer to the Applicant's response to paragraph 3.4 of the Relevant Representations.

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	growth between Basildon, DHGV and West Horndon, as demonstrated by the joint Expression of Interest to the New Towns Task Force earlier this year. Further detail regarding the policy background will be provided within the Local Impact Report. 6.2.3. The proposed route of the overhead power line runs along the eastern boundary (in Basildon Borough) and through the south eastern corner of the DHGV site (in Brentwood Borough), as illustrated below. 6.2.5. It also runs close to and/or through other proposed development sites in Brentwood and Basildon BCs, for example including the areas around Lower Langdon to the east and West Horndon to the west.	
Cumulative Effects	6.2.6. The allocated site was considered to be viable at the Local Plan stage. However, a viability assessment was submitted alongside the outline planning application (reference 21/01525/Out) to develop up to 3700 homes on the majority of the site. This resulted in extensive negotiations between ECC, Brentwood Borough Council and the applicant to agree an approach to deliver a viable scheme which would still deliver key on- and off-site infrastructure and meet Town and County Planning Association ("TCPA") Garden City principles. The application was approved in principle by Brentwood Borough Council's Planning Committee in November 2023. This resolution was subject to the completion of a legal agreement pertaining to the delivery of affordable housing, necessary infrastructure and other associated contributions needed to ensure the creation of a sustainable garden village community. 6.2.7. The completion of the legal agreement has been subject to detailed negotiations over a period of two years in order to preserve the viability of the development and ensure the delivery of the necessary homes, affordable housing, and infrastructure. This process culminated with Brentwood Borough Council's Planning Committee approving the detailed heads of terms on 29th July 2025. Following the Committee's decision, the landowner changed from CEG to Land Improvement Holdings (LIH), which has necessitated further negotiations to finalise the S106 agreement. It is clear the viability of the scheme remains at risk and sensitive to factors that will impact on costs and funding stream including property sales.	Please refer to the Applicant's response to paragraph 3.4 of the Relevant Representations.
Key Legislation and Planning Policy Context	6.2.8. Applications for NSIP's are primarily to be determined in accordance with relevant National Policy Statements, in this case, the National Policy Statement for Energy (EN1) and National Policy Statement for Electricity Networks (EN5). It is acknowledged these will take precedence where there is conflict with any local policy. ECC considers that its concerns regarding the impact on the delivery of DHGV are consistent with the national policy statements and will expand upon this point within its Local Impact Report. 6.2.9. In ECC's statutory consultation and targeted consultation response, together with Brentwood Borough Council and Basildon	With regard to the Dunton Hills Garden Village allocation, the Applicant has carefully considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward, taking into account the sites allocation within the Brentwood Local Plan. The Applicant consider it possible for the overhead line to co-exist with the housing proposals and have sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high-pressure gas pipeline to the eastern edge of the housing proposals. The decision to following the safety zone, in an area where housing development would not be permitted, is considered to be in accordance with Holford Rule 7. No alternative connection route is appropriate to either east or west due to the extent of urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. The Applicant also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. The Applicant continues to engage with the new developer

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	Borough Council, ECC highlighted the locally significant effects arising from the proximity of the proposed pylons and overhead power lines to the proposed residential development. 6.2.10. Formulation of the adopted Brentwood Local Plan, including the allocation of DHGV, pre date the pre application process for the Norwich to Tilbury proposals and the Applicant was made aware of DHGV by the County Council and local authority partners at initial meetings and during the first round of non-statutory consultation in 2022. 6.2.11. This important strategic site allocation should therefore have been fully taken into account to inform the evolution of the transmission project. In so doing, the Applicant should have given significant weight to the effect of the pylon route on the overall deliverability of these new homes at Dunton Hills Garden Village as well as the impact on the viability of the development which needs to both deliver affordable housing and supporting infrastructure, consistent with the TCPA Garden City principles and Policies RO1 & RO2 of the Brentwood Local Plan. 6.2.12. Furthermore, Holford Rule 7 states that a new high-voltage route alignment should only be chosen after consideration has been given to the effects on the amenity of '…existing development and proposals for new development'. The same rule goes on to state that when a new line needs to pass through a 'development area' it should be routed to minimise as far as possible, effects on development. 6.2.13. After reviewing the submitted information which makes limited reference to this material consideration, the concern about the approach and weight given to the effect of the proposed development on DHGV remains.	following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position.
Landscape and Visual	6.2.14. It is of course recognised that overhead lines are considered to be the starting presumption for electricity network developments in Government policy (NPS-EN5). Nevertheless, Para 2.9.7 of EN5 acknowledges new overhead lines can give rise to adverse landscape and visual impacts with national policy supporting the use of alternative technological solutions in certain situations. While this is primarily aimed at protecting nationally designated landscapes, it does not preclude alternative solutions being promoted in other scenarios where adverse landscape and/or visual impacts may exist (Para 2.9.23). 6.2.15. This is considered relevant in the context of DHGV. Dunton Hills is one of a small number (14) of Garden Communities that is included in Homes England's national Garden Communities Programme to be both allocated and consented. The proposed Norwich to Tilbury route which runs along the eastern edge of the allocated site and cuts through this new settlement, clearly does not adhere to Holford rule 7. Furthermore, and exacerbated by the elevated nature of the site relative to the route, the proposed overhead powerlines and	The Applicant does not agree that the principles of a Garden Village are degraded by the Project. As noted by Essex County Council the relevant policy for the development is set out in NPS EN-1 (2024) and NPS EN-5 (2024). Please refer to paragraph 3.1 regarding the Applicant's position on the use of overhead lines in the Project; as a non-designated landscape, the presumption is a design based on overhead line. The Holford Rules set out guidelines on the routeing of overhead lines. The guidance in Rule 7 is as follows: '*Approach urban area through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, go carefully into the comparative costs of the undergrounding, for lines other than those of the highest voltage.*' The Project is a 400 kV connection and therefore considered high voltage; however, the Applicant has committed to rationalising nearby infrastructure (an existing 132 kV overhead line) in the area close to Dunton Hills Garden Village (DHGV). It is noted that the relative cost of overhead lines as set out in the independent April 2025 Institution of Engineering and Technology report[98] is a quarter to a fifth of that of underground cable line (noting this ratio will be higher over very short distances due to the costs of the Cable Sealing End compounds) and in this case would directly reduce the area of built development (by two to three hectares – **5.15 Design Development Report [APP-122]** paragraph 10.4.5) for the trenchless crossing under the dual carriageway to the north of the site. NPS EN-5 (2024), paragraphs 2.9.23–2.9.25 set out the potential for a recommendation to be made for undergrounding in the event that there is a '*high potential for widespread and significant adverse landscape and/or visual impacts*' even where the development does not cross a designated landscape. Significant adverse visual effects identified in the Landscape and Visual Impact Assessment are set out in detail in **6.13.A3**

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

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	pylons offer no potential to enhance the quality of the landscape or the amenity of DHGV. ECC therefore maintains the proposed installation of overhead powerline along this section of the route will degrade the design principles of a Garden Village and considers it is highly likely to lead to a reduction in current and future land value and property prices, which will be to the detriment of the viability and deliverability of housing and infrastructure delivery.	**Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Parts 1 to 4 [APP-229 to APP-232]** and visual receptors are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]**. Significant adverse visual effects are reported within the Visual Receptor Areas (VRAs) within which DHGV lies, though these effects are not considered to be widespread. Existing 132 kV overhead lines are already present within this view, and a section would be removed in views to the south-east. The Project is not visible in views looking towards the north, west and south-west due to the route of the alignment and intervening rising land to the north. Once built, views east and south-east towards the visible sections of the Project, and from other areas within DHGV, will be curtailed in places by intervening buildings and therefore the Project will be less apparent in views. For these reasons, widespread significant views are not anticipated. On this basis, the test in NPS EN-5 (2024) paragraph 2.9.23 is not engaged; the Applicant is progressing the Project as overhead line. Even if the paragraph 2.9.23 of NPS EN-5 (2024) had been engaged the decision making would have needed to reflect on the substantial additional costs and loss of development land.
Landscape and Visual	6.2.16. With regard to the issue of viability, ECC commissioned Savills to investigate the impact of the pylons and overhead power lines on the planned viability and deliverability of the garden village development at Dunton Hills and specifically, the impacts of the N2T proposals on property prices and the Residential Gross Development Value (RGDV) of the proposed Dunton Hills Garden Village (DHGV) scheme. This report will be appended to ECC's Local Impact Report. 6.2.17. The report concludes that the introduction of overhead pylons is likely to have a material impact on residual land value with a reduction in the order of £17.5m to a policy compliant scheme. 6.2.18. It is likely the DHGV scheme will face increased viability and deliverability challenges due to inflation and increased costs, accentuated by the delivery of the Norwich to Tilbury proposals as currently planned. Any negative changes in viability could impact the provision of affordable housing and necessary infrastructure. 6.2.19. The recommendation of Savills, which is supported by ECC, is for ECC to continue to seek measures which mitigate the impact of the overhead powerlines and to secure an underground solution to minimise the viability and deliverability of both, DHGV and emerging development proposals in Basildon Borough directly to the east. 6.2.20. Savills also advised that Authorities should be aware of the potential effect of the N2T scheme on the development of land beyond DHGV. In particular, reference is made to draft policies E5 and H11 in the emerging local plan for Basildon Borough (a Regulation 18 consultation is expected to commence on 28 November 2025) 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. 6.2.21. Further detail on this report will be provided within the Local Impact Report accordingly.	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. This includes **5.1 Consultation Report [APP-066]**, **5.15 Design Development Report [APP-122]**, **7.17 Strategic Options Backcheck and Review [APP-355]**, **7.18 2022 - Corridor and Preliminary Routeing 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]** and **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**. The Applicant has adequately considered any potential impact of the Project on DHGV, in line with National Policy Statements EN-1 (2024) and NPS EN-5 (2024) and the Holford Rules, and it does not consider that it will result in any significant impact with regard to the viability of the development. This position is supported by the Relevant Representation submitted by the new landowner, LIH Dunton Hills Limited (EN020027-000610). 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. National Grid is aware of the emerging Basildon Local Plan and has made representations on the emerging plan on Regulation 18 Consultations (November 2024 and November 2025). Whilst responding primarily on matters pertaining to emerging allocations H11 and E5, National Grid sought to confirm that there should be no reason why the allocations referred to cannot be successfully developed alongside the Project. The Applicant is considering the information presented in the Savills report and will submit a response to that to the Examining Authority in due course.
Cumulative Effects	6.2.22. As highlighted in ECC's statutory response, the strategic importance of DHGV for housing in Brentwood, Basildon, and the	The Applicant has been cognisant of the need to consider the potential for development and make a balanced decision. The specific consideration of sites is as set out in the **5.15 Design Development Report [APP-122]**

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	South Essex Housing Market Area, including the delivery of affordable housing and supporting infrastructure, must be acknowledged. 6.2.23. The need for Councils to plan for housing growth to meet housing targets responds to the Government's mission to kick start the economy by building 1.5 million new homes. While it is acknowledged the Government's missions also seek to make Britain a clean energy superpower by delivering clean power by 2030, it is considered the latter does not override the former and the 'missions' should be mutually inclusive. ECC would therefore have expected all preferred draft alignments to have been informed by the relevant local development plans and specifically in relation to Basildon, the absence of an up-to-date local plan and five-year housing land supply. 6.2.24. The evidence submitted by the Applicant does not adequately demonstrate how the effect on housing delivery arising from the project has been taken into account to inform the project design across all stages. 6.2.25. Further, National Grid are not exempt from the need to balance route selection with good design and impact mitigation. 6.2.26. ECC was therefore disappointed to see that the opportunity to address this effect was not taken when undertaking targeted consultation in March 2025. Therefore, ECC remains of the opinion that the current proposals do not respond at all to the concerns raised in it's response to the 2024 statutory consultation regarding the impact on DHGV by including revisions which would mitigate the impact. 6.2.27. Placing the route underground for the length that it runs through / alongside the Garden Village would accord with the principles of good design and minimise the impact, safeguarding the viability and deliverability of DHGV. If this is not feasible, it is considered that alternate pylon design should also have been considered alongside any identified mitigation to minimise the impact of the Norwich to Tilbury project.	based on their status in planning (including in development plans). The Applicant considered alternative routes that would avoid the Dunton Hills Garden Village (DHGV) area at various stages of study and backcheck. Alternative corridors are primarily constrained by the extent of urban areas with the only possible alternative corridor (following an existing overhead line from Rayleigh to Tilbury Substations) constrained by both practical restrictions on available space and crossing areas designated as Special Protection Areas. These constraints were set out in the **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** and remain unchanged. Local alternative alignments have also been considered but are less preferred as set out from paragraph 10.4.2 of the **5.15 Design Development Report [APP-122]**. The Applicant has also established that the presence of a high-pressure gas pipeline provided an approximately 160 m wide corridor with the potential to accommodate the route. Whilst understanding the concerns about risk to housing delivery, and subject to micro-siting, no reduction in housing delivery is expected. The Applicant considers this has been communicated on a range of occasions in a number of formats and does not agree with the suggestion that it has not considered impact mitigation. The Project as submitted accords with the principles of good design given the form of the development and the policy and legislative context within which the Applicant has to operate. In respect of DHGV, paragraphs 10.4.4 and 10.4.5 of the **5.15 Design Development Report [APP-122]** conclude that the use of underground cable leads to greater impact on development land availability and that the level of effects and absence of national landscape designations supports the use of overhead line technology. As explained at paragraphs 2.5.7 to 2.5.9 of the **5.15 Design Development Report [APP-122]**, the effects of standard lattice pylons and level of change achieved by alternative pylon types were not at a level to justify the substantially greater costs of other pylon types at DHGV.
EIA Approach and Method	6.2.28. ECC is concerned over the absence of any baseline assessment undertaken by National Grid in relation to the impacts of overhead line and pylon technology at DHGV and the lack of application of the mitigation hierarchy, including compensation, to the likely locally significant effects arising from those impacts, to the principles of the Garden Village and viability of this strategic housing allocation, including its supporting infrastructure. 6.2.29. As a result, ECC considers that the proposed alignment is contrary to the principles of good design and impact mitigation for energy infrastructure as required by NPS EN-1 and NPS EN-5. Furthermore, it also considers the proposals are contrary to garden community principles of Policy R01: Dunton Hills Strategic Allocation of the adopted Brentwood Local Plan 2016 – 2033 and that the 2024 preferred draft alignment materially undermines the local plan-making process in Basildon, Brentwood, and Thurrock to the detriment of housing and infrastructure delivery.	The Applicant has considered the identified feedback and engaged with the relevant authorities and developers in respect of the housing proposals coming forward. We consider it possible for the overhead line to co-exist with the housing proposals and the Applicant has sought to reduce the interaction by routeing within the 80 m wide safety zone associated with the high pressure gas pipeline to the eastern edge of the Dunton Hills Garden Village (DHGV) housing proposals. No alternative connection route is appropriate to either east or west due to the extent of urban areas, and the use of underground cable leads to a direct loss of development area in contrast with the proposed overhead line design. The Applicant also shared our guide for developers which identifies opportunities to closely position housing in the immediate vicinity of the alignment. The Applicant continues to engage with the new developer following a change in ownership and are making progress to an agreed Statement of Common Ground / Heads of Terms position. On this basis the Applicant's position is that the Project will not risk the delivery of affordable housing and essential infrastructure at DHGV and other emerging sites. Appendix 17 of the ES **(6.17.A3 Environmental Statement Appendix 17.3 – Inter-Project Cumulative Effects [APP-284])**, following the application of the mitigation hierarchy, concludes there would be residual significant adverse effects on landscape and visual, agriculture and soils and the historic environment on the Dunton Hills Garden Village allocation. The Project has complied with policy requirements and therefore there is no requirement to consider further mitigation.

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		The **Planning Statement [APP-085]** explains that the Project is Critical National Priority Infrastructure as defined in National Policy Statement EN-1 (2024). Without reinforcement, the capacity of the existing network in East Anglia and the Southeast is insufficient to accommodate the connection of proposed new power sources connecting in the area. 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. In line with Paragraph 4.1.7 where a project qualifies as CNP infrastructure the need case for the project will likely outweigh residual effects. The NPS EN-1 (2024) (paragraph 4.2.16) sets out that, where a project is CNP infrastructure, the Secretary of State will take as a starting point for decision making that that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
Cumulative Effects	6.3.1. Cumulative impacts are clearly one of the key principle issues in the Examination. ECC is aware of a significant number of developments which are proposed, or under construction across Essex (in particular, within the Tendring Peninsula and other NSIP schemes dependant on Norwich to Tilbury). Three NSIPs will already interact in concentrated ways in specific places in Essex, which could be exacerbated by a fourth NSIP. As set out across this response, the Norwich to Tilbury project is a catalyst and has the potential to give rise to intra-project cumulative effects in addition to the effects arising from other strategic development projects. The cumulative effect of these will need to be considered, especially with regard to highways, landscape and visual, noise, for example. The fourth NSIP, Tarchon Interconnector for which an application for Development Consent is expected to be submitted to the Planning Inspectorate in September 2027.	Multiple developments that are proposed to connect to the Project within Essex, are assessed within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**, in accordance with the agreed methodology in the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**, including North Falls and Five Estuaries. The assessment concluded that significant effects would be experienced on landscape (construction), agriculture and soils (construction and operation) receptors as a result of the Project. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as a cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025; however, since the 1 April 2025, 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). In addition, the Tarchon Interconnector project will be required to undertake its own cumulative assessment with other developments as part of their respective development consent application.
Traffic and Transport	6.3.2. A particular concern is in relation to the effect of construction traffic on the County's highway network. Minimal information is available concerning the development programme and timing for this project and how this relates to various other projects. It will be important for there to be coordination between ECC and all developers / key stakeholders for the effect on local communities to be minimised. This is addressed in more detail below within the 'Local Highway Impact' section.	The Applicant is committed to the principle of reducing traffic impacts on the County's highway network, identified within Section 7 of the **7.11 Transport Assessment [APP-333]** and Section 16.7 **of the 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]**. 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 developed the **7.3 Outline Construction Traffic Management Plan [APP-309]** which includes a section on communicating and liaising with other developments within the area of the Project. Section 2.4.2 of **7.3 Outline Construction Traffic Management Plan [APP-309]** states that National Grid is proposing to use the Permit Scheme in place and operated by Essex CC to best coordinate the street works required for the Project. The Applicant has ongoing discussions with both the Wind Farm projects (noted as Five Estuaries and North Falls) in ensuring the cumulative assessment of Bentley Road, Ardleigh Road and associated junctions are reflective of the submitted construction programmes and proposals for both the Wind Farm projects. The cumulative impacts of committed developments on the local highway network have been assessed within the **7.11 Transport Assessment [APP-333]** where Project programmes overlap during peak activity and suitable mitigation proposed where deemed required.
Noise and Vibration	6.3.3. ECC is also concerned with the cumulative noise and environmental impacts arising from these developments. Taken together, especially in the Tendring area, but all along the route,	**6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** includes an assessment of construction traffic noise. This assessment is based on traffic data which includes committed developments,

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	the proposals have the potential to lead to significant adverse effects on communities and the environment. It is crucial that respite is offered to the communities affected by the development through reasonable working hours and construction traffic management. ECC is therefore seeking substantially better controls within the Development Consent Order and the Management Plans to ensure this respite is secured.	including the North Falls and Five Estuaries projects. Only one significant effect on Jasmine Cottage is anticipated during the construction phase. An assessment of cumulative effects, which includes noise and vibration (excluding construction traffic noise which is intrinsic in the noise and vibration assessment in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**), and other environmental topics, was undertaken in accordance with the **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. No further significant cumulative effects have been identified for noise and vibration. Additionally, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies, as per commitment NV05 within the **7.2 Outline Code of Construction Practice [APP-300]**. Based on the outcome of these assessments, specific mitigation measures would be identified and implemented. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from the Outline NVMP submitted as part of the development consent application – **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306])**. The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday – Friday: 0700 to 1900 • Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700 Details relating to the proposed construction working hours and any associated restrictions are contained within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The working hours are secured through Requirement 7 of Schedule 3 of **3.1 draft Development Consent Order [APP-056]**. The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. The Applicant has developed **7.3 Outline Construction Traffic Management Plan [APP-309]** (Outline CTMP) which includes details the proposed management and mitigations to be used to manage construction vehicles' adherence to working hours throughout the construction programme. Construction vehicles travelling outside of the agreed working hours (unless otherwise stated and agreed with the Local Highway Authority) are categorised as non-compliance and will follow the non-compliance procedure per section 6.3 of 7.3 of the Outline CTMP. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of **7.2 Outline Code of Construction Practice [APP-300],** including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of

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		Pollution Act 1974 (NV03) and advance community notification (GG30), and the mitigation measures detailed in the Outline CTMP.
Landscape and Visual	6.3.4. In respect of landscape, the proposal will lead to a significant landscape change across the Essex environment, both during construction and operation. Whilst it may not be practicable to mitigate all visual impacts due to the scale of works and height of pylons, ECC would expect to see all aspects of design more carefully considered by the Applicant to minimise the impacts, alongside financial compensation packages.	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 Landscape and Visual Impact Assessment set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Mitigation measures of relevance to landscape and visual effects are summarised in **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 of infrastructure and pylons. Whilst compensation is part of the mitigation hierarchy, 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 (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. 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'.* It is particularly noteworthy that none of the policies on landscape and visual effects in NPS EN-1 (2024) or NPS EN-5 (2024) 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. 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 NPS EN-1 (2024) and NPS EN-5 (2024) policy framework, including the further CNP presumption in section 4.2 of NPS EN-1 (2024). The NPS position in relation to compensation (as set out above) is also consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. There is no requirement under the said Regulations for all residual effects to be compensated. The above aligns with the Bramford to Twinstead (BTNO) 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.
Traffic and Transport	6.3.5. As Local Highway Authority, additional consideration is provided below relating to the cumulative impacts on the local highway network. Firstly on cumulative impact, the concerns include overlapping of works (in the case of the Bentley Road area where three NSIPs interact) which will have a localised impact for residents and users of this part of the network; the number of construction vehicles and workers overlapping on parts of the local network (again in the case of Bentley Road); and the challenge of accommodating all the competing demands on the network through the Permit Scheme. On this latter point there could potentially be multiple roadworks occurring at the same time around Essex which would impact on overall journey times around the county for road users. In addition, the NSIPs generate abnormal indivisible loads ("AILs") which will slow traffic all along the designated routes and create queuing at key interchanges of the strategic road network and	The Applicant has undertaken extensive collaboration with both of the Wind Farm projects proposing to use Bentley Road to connect to the new East Anglia Connection Node (EACN) Substation (Five Estuaries and North Falls). The Applicant's assessments within **6.16 Environmental Statement - Chapter 16 Traffic and Transport [APP-271]** therefore include a comprehensive review of the proposed traffic number impacts on the routes. At the time of the **3.1 Draft Development Consent Order [APP-056]** submission, the Applicant had a draft construction programme for both the Wind Farms projects, to ensure that the peak number of vehicles which was assessed was robust, with the current programme understandings. The resulting mitigation proposed and incorporated within the Applicant's application for development consent incorporates the anticipated impacts of the Wind Farms and cumulative developments. The **7.3 Outline Construction Traffic Management Plan [APP-309]** includes details of the Applicant's proposal to ensure liaison takes place between the committed developments at Bentley Road, to ensure the traffic management approach is coordinated, and impacts are reduced where possible. The construction vehicles have been assessed within the Applicant's application for development consent based on the provided construction programme from the Wind Farm projects. The Applicant notes Essex County Council's comment regarding the challenge of accommodating all the competing demands on the network through the Permit Scheme and has commenced discussions on this matter

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	major roads of the local highway network as well at junctions along the primary access routes on the minor and rural lanes. This is likely to cause disruption to road users and will occur over a prolonged period of time due to the cumulative nature of the works depending on the various programmes for the NSIPs. It is anticipated that the level of AILs in any one day will be limited by police escort resource and the capacity of the ports. To prevent the cumulative impact of multiple AILs taking place on any one day, ECC require confirmation that AILs, in consultation with the relevant police authorities and the local highway authority, will be limited to minimise the impact on the highway network.	with Essex County Council. The Applicant proposes to submit early notifications of street works where possible to assist the coordination of competing demands on the network. Regarding Abnormal Indivisible Loads (AILs), the **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 (LHAs) 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 are scheduled outside of peak traffic times. The Applicant is also in ongoing discussions with the relevant police forces, assisting with information exchanges in terms of indicative volumes of AIL movements, and indicative programme dates, to help the Police forces plan resources required to escort certain types of AILs. Opportunities to minimise/optimise AILs on the highway network will be explored as part of development of the construction programme by the Main Works Contractors (MWCs). Following confirmation of the construction programme by the MWCs, the schedule of AIL movements is anticipated to be shared with the relevant police authorities and LHAs when appropriate.
Traffic and Transport	6.3.6. There is limited scope for the Local Highway Authority to control when construction works within the site are implemented by the Applicant. However, there is the ability to manage when physical works to the highway network are undertaken by the Applicant through the Essex Permit Scheme system which the applicant has stated they will use. It is noted that the Applicant has confirmed they will liaise with other developments (notably North Falls, Five Estuaries and Lower Thames Crossing) likely to be taking place at the same time as Norwich to Tilbury to reduce cumulative impacts. Though, ECC would require the commitment to go further in joining and positively engaging with a Developer's Forum to be set up by ECC with key members of the other NSIP Teams as well as other Strategic Site Teams, alongside Local Highway Authority and Planning Authority participation. In addition, further information on the detailed build programme will be required for the various stages of the construction through the Construction Management Plan which will be fed into from the Developer's Forum. It is anticipated that all three approaches will assist in reducing the cumulative impact but there will still remain a legacy impact.	The Applicant commits to joining and engaging with the Developers Forum to continue and formalise their stated engagement within the **7.3 Outline Construction Traffic Management Plan [APP-309]** to coordinate the approach to traffic management. The Applicant envisages that when the build programmes are available from the Main Works Contractor(s) these will be bought to the Developer's Forum and discussed with the applicability of the Final Construction Traffic Management Plan.
Traffic and transport	6.3.7. Turning to the likely disruption caused by the AILs, ECC believes a wider communication strategy is needed that includes all residents and businesses in Essex that use the AIL routes. It is important that not only those local to the site or likely to be impacted are given advance warning of forthcoming AILs but also those using the wider network so they can plan their journeys appropriately. Variable Messaging System ("VMS") boards at local congestion hotspots and other key locations would be an obvious way of getting this information across alongside the other stated means of communication (website, press releases and notifications to residents/businesses that may be impacted). The VMS boards could also be used to provide live information and advertise how road users could register for ongoing updates. In addition, the communication strategy needs to include clear information for the general public on what AILs are, why they are needed, and how they impact the local network so that there is a full understanding of the implications to people.	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. The **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** details the AIL transport requirements and the assessment of suitable routes. All AIL movements will be coordinated through the Electronic Service Delivery for Abnormal Loads (ESDAL) system and in coordination with the Local Highway Authorities (LHAs), to reduce disruption where possible. A communication strategy such as the use of VMS boards to inform people is something the Applicant would welcome further discussion on with the relevant LHAs.

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Traffic and transport	6.3.8. Another point of concern around the cumulative impact is the pressure on existing facilities for HGV drivers due to the number of NSIPs and Strategic Sites in Essex. This should be examined in more detail by the Applicant to determine where there are issues and how improvements can be implemented.	Construction traffic to be generated by the Project and its routeing 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 CTMP will be developed and approved by Essex 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 Essex. 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 Essex 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.
Key Legislation and Planning Policy Context	6.4.1. The Planning Act 2008 requires the Secretary of State to have regard in determining applications for development consent to the desirability of good design. Advice in NPS EN1 Section 4.7 seeks applicants to consider the criteria for good design at an early stage when developing projects. Achieving good design requires a holistic approach to deliver high quality, sustainable infrastructure that responds to place and takes account of often complex environments. ECC draws upon paragraph 4.7.4 of the NPS EN1 which considers how good design can mitigate the adverse impacts of a project and continues to encourage the Applicant to consider all opportunities to reduce the impact of the project on the communities and environment of Essex. 6.4.2. ECC also recognises within Part 2.4, 'Consideration of good design for energy infrastructure' of NPS EN5 and that the "functional design constraints of safety and security" may "limit an applicant's ability to influence the aesthetic appearance of that infrastructure". However, ECC would still wish, given the scale of the project, that design features as a key matter in the Examination.	Fundamentally, the routeing of the transmission corridor and the siting of the site-specific infrastructure has been optimised to balance function and aesthetics, minimising environmental impacts, including landscape and visual. Regard has been had to the Horlock and Holford Rules in respect to the siting of new transmission infrastructure and substations and as described in detail in Chapter 5 of **5.6 Planning Statement [APP-085]**. Both sets of rules have been deployed by the Applicant and have formed an important part of developing the preferred route and design of the Project. For example, the route seeks to avoid siting infrastructure in areas with significant amenity value; the most direct route is preferred to avoid the need for additional angle pylons; siting infrastructure in areas benefiting from existing advantageous vegetation screening is preferred; and densely populated urban/residential areas are avoided, where possible. Essentially the Project's route alignment has been selected because it performed more strongly overall than any other options, having regard to these factors (amongst others) and national planning policy. The design review of the Project has been an iterative process, influenced by an extensive process of stakeholder engagement and Environmental Impact Assessment. The **5.1 Consultation Report [APP-066]** sets out the Project engagement with stakeholders. The **7.15 Design and Access Statement [APP-353]** (DAS) and the **7.20 2023 Design Development Report [APP-358]**, **7.21 2024 Design Development Report [APP-359]** and **7.22 2025 Design Development Report Addendum [APP-360])** (DDR) are the primary documents referred to for information on the Project's approach to good design and set out the changes that have been accepted as a result of the consultation. The DAS describes the factors that influence design in relation to the permanent linear elements of the Project. It sets out the background to the Project, the design principles applied by the Applicant and summarises the approach to and development of good design. The DDR presents the main changes that have been made to the Project since the completion of statutory consultation in 2024 and also of various targeted consultations in 2025. The Project design has been informed by feedback received during these consultations, along with that received during the 2022 and 2023 non-statutory consultations.
Landscape and Visual	6.4.3. The proposals for Norwich to Tilbury involve significant ground-based infrastructure which includes substations. There will be considerable visual impact across the entire county, especially in the vicinity of Ardleigh. In isolation and cumulatively, there is the potential for the structures to have locally significant effects on the wider visual amenities of the area. It is therefore considered an opportunity exists to ensure the appearance of any substantial structures across the proposal, including at Ardleigh, are appropriate for the locations through innovative design and approach to external appearance. This would be consistent with Para 4.7.6 of NPS EN1 where it states:	The **7.15 Design and Access Statement [APP-353]** (DAS) and the **7.20 2023 Design Development Report [APP-358]**, **7.21 2024 Design Development Report [APP-359]** and **7.22 2025 Design Development Report Addendum [APP-360])** (DDR) are the primary documents referred to for information on the Project's approach to good design. The Cable Sealing End (CSE) compounds and substations have been carefully sited and mitigated. Landscape and visual mitigation is proposed within 'Environmental Areas' at Norwich Main Substation, the proposed new East Anglia Connection Node (EACN) Substation and the proposed new Tilbury North Substation and the seven CSE compounds. An indicative landscape design has been developed for the Environmental Areas as detailed within **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]**. The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** provides the site context for each of the permanent features and identifies the individual landscape mitigation proposals for the Environmental Areas.

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	"Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform, and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area."	The **7.16 Design Approach for Site Specific Infrastructure [APP-354]** discusses design principles for landscape and visual mitigation of the CSE compounds together with any scope for variation at detailed design stage, including at Ardleigh.
Landscape and Visual	6.4.4. Good design outcomes should have positive effects on the character of a place and delivery of public benefits and National Grid should be aiming to ensure that this is achieved across the scheme. ECC considers that there is an opportunity to be innovative in the approach to design while ensuring the infrastructure remains safe and secure. National Grid must follow a good design process to ensuring that the infrastructure proposed remains functional while realising the best local design outcomes. 6.4.5. ECC expects to see the Applicant working alongside the promoters of North Falls (EN010119), Five Estuaries (EN010115) and Tarchon Interconnector, to ensure a joined up approach in the design of the infrastructure located in Ardleigh, and would expect engagement in any design review processes. 6.4.6. The design of the development is therefore considered to be an issue which requires consideration through the Examination.	Good design of electricity transmission infrastructure is primarily governed by application of the Holford and Horlock Rules, alongside an iterative design approach informed by stakeholder engagement, relevant sections of national policy (National Policy Statements EN-1 (2024) and EN-5 (2024)) and the embedded environmental design mitigation as part of the Environmental Impact Assessment 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. The design review of the Project has been an iterative process, influenced by an extensive process of stakeholder engagement and Environmental Impact Assessment. The **5.1 Consultation Report [APP-066]** sets out the Project engagement with stakeholders. The **7.15 Design and Access Statement [APP-353]** (DAS) and the **7.20 2023 Design Development Report [APP-358]**, **7.21 2024 Design Development Report [APP-359]** and **7.22 2025 Design Development Report Addendum [APP-360])** (DDR) are the primary documents referred to for information on the Project's approach to good design and set out the changes that have been accepted as a result of the consultation. The DAS describes the factors that influence design in relation to the permanent linear elements of the Project. It sets out the background to the Project, the design principles applied by the Applicant and summarises the approach to and development of good design. The DDR presents the main changes that have been made to the Project since the completion of statutory consultation in 2024 and also of various targeted consultations in 2025. The Project design has been informed by feedback received during these consultations, along with that received during the 2022 and 2023 non-statutory consultations. Appendix B of the **7.15 Design and Access Statement [APP-353]** provides an internal design review note that has been prepared in support of the application for development consent. It explains the design review process, which in summary considered regulatory obligation, process and outcomes and design principles, most relevant being the Holford and Horlock Rules. Appendices B and C of the **7.15 Design and Access Statement [APP-353]** set out that the Project is meeting and addressing good design and therefore a full design review panel is not considered necessary for the Project. The Applicant has and will continue to engage with the promoters of North Falls and Five Estuaries Wind Farms and the Tarchon Interconnector on design matters pertaining to the integration of design around the East Anglia Connection Node (EACN).
Traffic and Transport	6.5.1. Generally, ECC are content with the methodology that has been used in the highways and transportation assessments undertaken (subject to clarifications on the junction modelling and review of committed development (discussed later). However, ECC has concerns around the impact on the county highway network and highlights the recent decision to cancel the A12 widening scheme (TR010060) which would have provided improvements to driver delay and safety in Essex. ECC requires further discussion on the control and mitigation of impacts proposed in terms of highways design, road safety elements, traffic management, road diversions and AIL route proposals. 6.5.2. Particular issues related to control and mitigation of the impacts to be discussed further include the cumulative impact of NSIPs and Strategic Sites; impacts of AILs on wider Essex	The **7.3 Outline Construction Traffic Management Plan [APP-309]** contains information on the current proposals to provide the control measures on the mitigation measures associated with the construction traffic. The **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** details the access strategy for Abnormal Indivisible Load movements. There will only be temporary impacts on the Essex Highways Depot in Ardleigh. Subject to the Main Works Contractor(s) detailed design and installation methodology, access to the eastern edge of the site may be required for installation of temporary scaffolding to facilitate the netted crossing protection of the railway during 400 kV stringing activities. Additionally, temporary access and work areas are required for UK Power Networks to remove and dismantle the 33 kV overhead line that currently traverses the site. Ardleigh Road is also 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. The **7.3 Outline Construction Traffic Management Plan [APP-309]** provides information on traffic management. Given that access to the depot would be required 24/7, the Main Works Contractor(s) will have a duty to provide 'access only' arrangements for Essex County Council

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	residents and businesses; mitigation of traffic impacts at sensitive junction locations on the wider network; mitigation of construction routes on sensitive receptors ; measures to reduce localised impacts associated with construction workers and construction traffic; and the design and monitoring of the traffic management in the relatively long term situations. Further clarification is also sought on the potential impact on the operations at the Essex Highways Depot in Ardleigh (junction of A137 Ardleigh Road, and Little Bromley Road).	access and egress to the site. The specifics of this would be confirmed through engagement between Essex County Council and the Main Works Contractor(s). The Applicant will continue to liaise with Essex County Council throughout the Examination to discuss these matters.
Traffic and Transport	*Junction Mitigation* **6.5.3. The Transport Assessment ("TA") [APP-333]** / **Environmental Statement ("ES") [APP-271]** highlight that mitigation for sensitive junctions are yet to be agreed with ECC. ECC understands that the Applicant's consultants have commissioned some additional traffic surveys to review against those used in the modelling and so commentary is awaited on the conclusions reached. At this point, it is noted that the transport reports do not specify the start and end times of the traffic surveys so it is unclear if the worst case hour has been reviewed, and there is no data to compare the model output with observed traffic conditions to validate the models. Putting aside these technical points on the modelling it is well understood that the sensitive junctions are congested during the peak hours and that any additional traffic would have a further impact on them. The level of impact remains to be seen following the receipt of the additional surveys and confirmation on the peak hour, but based on an already congested network there needs to be some form of mitigation. Although the impacts will be temporary, a suitable level of mitigation is needed that is reasonable and proportional in planning terms. ECC's preferred approach, where physical interventions are unrealistic due to constraints, is for the Applicant to reduce the amount of traffic associated with the scheme using the junction. This could involve constraining multiple work activities and/or restricting movements associated with construction (including visitors/office based staff) during the peak hours through the junctions as has been discussed to date. Other options could include reducing background flows through the junctions by enhancing sustainable infrastructure in the area.	Traffic data and modelling files have been provided to ECC for review and all proposed mitigation has been discussed at Thematic Group Meetings or at specific meetings to review modelling results. Mitigation for junctions can be found within Where modelling assessments have been updated, the findings will be provided to ECC for review and further engagement will be held to discuss and agree mitigation. the Applicant will A technical note is to be provided to ECC outlining the findings of the updated modelling for those junctions where concerns where baseline scenario models presented in the **7.11 Transport Assessment [APP-333]** did not appear to accurately reflect baseline operation (as expected by ECC) or where the future baseline highway layout will be changed as a result of improvements provided by other committed developments. The modelling and traffic flows for these will be provided to ECC for review and a meeting is to be arranged to discuss all findings. The traffic survey data used within the **7.11 Transport Assessment [APP-333]** and for the junction modelling exercise was derived from traffic surveys that were conducted over a 12-hour period from 0700–1900 and analysed to establish the AM and PM peak hours. The AM and PM peak hours for each junction were identified from the 12 hours of traffic surveys conducted at each location.
Traffic and Transport	Mitigation on Primary Access Routes ("PARs") 6.5.4. As a consequence of the NSIP proposals there are a number of roads on the local highway network that will impact the maintenance regime required due to the different usage and higher 'wear and tear' associated with large vehicles – notably the rural lanes that have minimal existing levels of heavy goods vehicles. Where defects or damage are identified, a comprehensive scheme of repair will be needed that fully addresses the impact to the highway and highway structures. Whilst there is a commitment to undertake before and after road condition surveys which will highlight any defects to be corrected, there is a concern that the maintenance liability for Essex will be	The **7.3 Outline Construction Traffic Management Plan [APP-309]** details the scopes of the surveys in Section 5.2. The Applicant and the Main Works Contractor(s) (where necessary) will continue to liaise with Essex County Council on how these will be managed on the proposed Primary Access Routes.

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	increased. ECC would welcome further dialogue with the Applicant as to how this can be managed.	
Traffic and Transport	6.5.5. Further concerns include managing impacts on the PARs where there is school related activity on the local highway network. It is acknowledged that the Applicant has included restrictions on HGV movements using some routes during the school start/finish periods where schools are directly located, but ECC believe further consideration is needed where schools are not directly located but do have a level of activity associated with it. This should include existing and planned schools.	Schools in Essex were considered within **6.16 Environmental Assessment Chapter 16 - Traffic and Transport [APP-271]**. Where schools are directly located adjacent to the construction route, e.g. Margaretting Church of England Primary School, construction vehicles would avoid school drop-off and pick-up times as secured within the **7.3 Outline Construction Traffic Management Plan [APP-309]**. This included a review of all proposed schools identified during the review of committed developments. This mitigation was considered appropriate to avoid potential risk of direct interaction between construction Heavy Goods Vehicles (HGVs) and congregations of pupils and parents outside the school entrance. There may also be localised congestion on the construction route due to parents' vehicles parked/waiting outside the school. A review of other existing schools where Essex County Council has raised concerns has been carried out. From our review, these did not have the same level of risk due to the presence of local infrastructure (e.g. controlled crossing, wide or separated footways, and available drop-off areas within school grounds). Also, the expected Project construction traffic during the predicted peak weeks of the construction programme is considered low as detailed below: 1) Quilters Infant & Junior School, The Billericay School (secondary school) – A129/A179: seven HGVs (seven movements one-way) an hour during seven weeks, is an average of one HGV approximately every eight minutes (one-way system operating anti-clockwise at Billericay) and a net increase of 1% of total traffic 2) Cressing Primary School – B1018: eight HGVs (16 two-way movements) an hour during four weeks, which is an average of one HGV approximately every four minutes and a net increase of 1% of total traffic 3) Maltings Academy (secondary school) and Powers Hall Academy (primary school) – Spinks Lane/Spa Road: nine HGVs (18 two-way movements) an hour during two weeks, which is an average of one HGV every three and a half minutes and a net increase of 2% of total traffic 4) Mountnessing Church of England Primary School – No Project construction traffic is expected on the B1002 Roman Road at Mountnessing.
Traffic and Transport	6.5.6. Other issues include the effective width of the footways in unlit rural locations along the PARs; lack of crossing facilities associated with key desire lines along the PARs; consideration of the existing traffic calming features on Spa Road, Witham in relation to accommodating HGVs along this PAR; and inclusion of mitigation for all Public Rights of Way ("PRoWs") routes that cross or enter the highway network along the PARs where there are no footways to wait or walk on.	Chapter 16 of the ES **(6.16 Environmental Statement - Chapter 16 Traffic and Transport [APP-271])** assessed the likely impact along those roads forming the Primary Access Routes (PARs), where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. 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 PARs across the Project, including on Spa Road. With specific regard to temporary alterations to Public Right of Way (PRoW) connections to the highway network resulting from PRoW diversions, the Applicant has engaged with Essex County Council and through this engagement the following eight locations have been highlighted for further consideration and will be subject to Road Safety Audits at the relevant stages of the design and construction process: • Langham 16 (Western Section) • Langham 16 (Western Section) • Great Tey 36 • Great Tey 50 • Great Tey 38 • Great Waltham 74 • Stock 37 • West Horndon 69.

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Traffic and Transport / Construction	*Controls on Vehicle Numbers* 6.5.7. ECC notes that there are some gaps in the information provided in terms of mitigation and controls on local communities. One aspect relates to further measures and commitments in the **Construction Workers Travel Plan ("CWTP") [APP-311]** to assist with controlling the number of vehicles associated with the scheme, and the other to monitoring and review of construction vehicles against assumed traffic generation included in the TA/ES assessments. It is noted that there is no commitment in the **Construction Traffic Management Plan ("CTMP") [APP-309]** for the Contractor to consider ways of reducing freight by road – potential options to reduce impacts on the local highway network could include using consolidation centres and working with other developers on shared delivery logistics planning alongside the wider considerations of the Multi-Modal Strategy using rail and port facilities to replace long distance road freight. On the two Multi-Modal Strategies set out in the assessment, ECC has reservations on the front loaded delivery option on the basis that there is more disruption compared to the other scenario, although over a shorter time period. However, ECC is open to discuss further when a more detailed programme is available which will provide more information on the expected duration of impacts and specific locations.	Section 8.2 of the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** details the proposed monitoring and review of construction workers, with the monitoring completed monthly. The quarterly report will include the levels of car share uptake, changes in staff arrivals and car parking capacity against demand. Committed to monitoring and managing the Project's impact on the road network, the **7.3 Outline Construction Traffic Management Plan [APP-309]** states '*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 Network/Major Road Network]' (paragraph 6.2.6). It is expected that the monitoring of the construction vehicles will form part of the reporting to the Local Highway Authority. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is detailed in the **7.3 Outline Construction Traffic Management Plan [APP-309]**. The multi-modal assessment is discussed in Section 2.19 of the **7.11 Transport Assessment [APP-333]**, with further details given in the **7.11 Transport Assessment - Appendix G - Multi-Modal Strategy [APP-340]**. The Applicant and their Main Works Contractor(s) are further investigating the opportunity to reduce the freight movements by road. The Multi-Modal Scenarios were based on assessing a worst-case impact; if the ports/sidings were to be selected, this ensures any mitigation proposed is robust. The Applicant will continue to liaise with Essex County Council to discuss the programme and impacts associated with the strategy.
Traffic and Transport	6.5.8. The transport assessments assume that construction workers will travel to/from the site outside of the highway network peak hours. ECC's concerns about this are far reaching and include whether this will be adhered to during the autumn/winter seasons with the prevailing weather and reduced daylight hours, and how this would be monitored and managed. Further detail is needed in the CTMP to show how the construction work would operate (shift patterns etc) within these defined hours and more surety on how this would be enforced. 6.5.9. Whilst the arrival/departure times of workers are assumed to be outside of the peak hours there will still be a local impact on users of the local highway network surrounding the site until the traffic from the site disperses onto various routes. This will also be pronounced where routes are shared with other sites. One commitment that appears to be a reasonable way of limiting impacts is the provision of a mini-bus on a flexible timetable between various locations or shuttle bus running on a fixed service between specific locations. This would connect workers with key locations such as train stations, bus stops, towns and shared accommodation. Further consideration is also needed in the CWTP on measures that will be adopted to encourage and facilitate car sharing, monitoring of car occupancy rates alongside the mode share so as to review the assumptions used in the assessment, and interventions in the event that targets are not achieved. 6.5.10. On the construction vehicle monitoring there appears to be a lack of commitment to reviewing the number of vehicles	The **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** includes monitoring and management of staff arrival and departure times. The quarterly report includes any changes in staff arrivals and departures related to seasonal variations. The construction programme and assessment of worker travel patterns assumes that there will be no change to working hours within the autumn and winter months. As set out in Section 6.4 of the **7.3 Outline Construction Traffic Management Plan [APP-309]**, construction traffic operating outside the agreed hours has been identified as a non-compliance matter. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is detailed in the **7.3 Outline Construction Traffic Management Plan [APP-309]**. As noted in the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, should the construction periods of other nearby projects overlap with the construction phase of the Project, discussions would be undertaken to identify opportunities to minimise the impact of the overlapping construction workforce vehicle movements on the highway network. This could include coordinated measures such as a minibus or shuttle service from local public transport hubs. Further detail will be included in the final Construction Worker Travel Plan. As also stated in the **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**, the Travel Plan Coordinator (TPC) will act as mediator for anyone interested in car sharing. At site inductions, interested parties will be asked to approach the TPC, who will request their residential postcode and identify any clusters. Site workers will also be notified of any car club locations close to the site. Further detail will be included in the final Construction Worker Travel Plan. 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 daily assessment, to be transparent in the expected trips along each construction route. The Applicant has stated within the **7.3 Outline Construction Traffic Management Plan [APP-309]** '*Given … the comprehensive trip generation and distribution approach and the proposed mitigation measures, a cap on vehicle numbers is not considered necessary*' (paragraph 5.4.17). The **7.3 Outline Construction Traffic**

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	against the proposed numbers used in the ES assessment. This is an important point to enable the local highway authority to hold the Applicant to account if there are more vehicles arriving/departing than assessed and in particular where there is potential for localised issues on the rural road network along with cumulative impacts.	**Management Plan [APP-309]** additionally states '*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 Network/Major Road Network]' (paragraph 6.2.6). It is expected that the monitoring of the construction vehicles will form part of the reporting to the Local Highway Authority. Instances of non-compliance will be investigated to identify corrective actions where necessary. The non-compliance and enforcement procedure is detailed in the **7.3 Outline Construction Traffic Management Plan [APP-309]**.
Traffic and Transport	*Site Access, Crossover Points and Local Highway Mitigation Design* 6.5.11. There has been some progress on the detail provided in respect of site access, crossover points and local highway mitigation designs. However, there are a number of details that remain of concern which have been requested and need to be evaluated prior to any in principle agreement. A specific issue has been raised on the highway mitigation works at Wick Lane in relation to the operation of the temporary traffic lights which requires further consideration by the Applicant. Concerns have been consistently raised around anti-social behaviour due to speeding as a result of the permanent widening on the Ardleigh Road/Bentley Road which requires some thought on how additional measures could be implemented. In addition, the haul road/permanent access road between Ardleigh Road and Bentley Road crosses two Public Rights of Way ("PRoWs") – the proposals include permanently stopping up and diversions of the PRoWs however there is no detail at this stage. ECC has concerns around the impact on the PRoW network and require more surety on the design and protection of rights. Further discussions are ongoing to hopefully reach agreement on the designs prior to examination. The TROs are not agreed at present and ECC have requested further information to assist in reviewing them.	The **7.3 Outline Construction Traffic Management Plan [APP-309]** Section 5.9 details the illustrative mitigation measures to reduce the impact on traffic, including at Wick Lane, comprising temporary speed limits, temporary traffic signals and/or temporary road closure. The Applicant is continuing discussions on these matters with the Local Highway Authority (LHA). The permanent Public Right of Way (PRoW) diversions associated with the permanent access road are proposed where the existing PRoWs cross the permanent access road at an angle. In accordance with the approach set out in the **7.6 Outline Public Rights of Way Management Plan [APP-329]**, these PRoWs would be subject to very minor permanent diversions to create new, safer perpendicular crossing facilities. The proposed sections of PRoWs to be permanently stopped up, 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-035]**. As detailed design progresses, the precise alignment, length and specification of the permanent diversions and crossing will be developed in consultation with the LHA PRoW Officer. With regards to the Traffic Regulation Orders, this is noted and discussions with the LHA are ongoing.
Traffic and Transport	*Road Safety* 6.5.12. There are concerns over the longevity of some of the traffic management associated with the works and whether a more semi-permanent design may be more appropriate to consider alongside daily checks to ensure it remains in place. The issue is around keeping the traffic management in position over a prolonged period of time and up to standard to ensure the level of safety required, as well as concerns around the length of time they are implemented and hours of operation.	As set out in Section 6.2 of the **7.3 Outline Construction Traffic Management Plan [APP-309]**, regular site checks are required to be carried out across the Project. Table 6.1 lists weekly frequency for monitoring of the road network with Transport Coordinators checking signage is in place. The visibility splays and Traffic Regulation Orders presented in the **3.1 Draft Development Consent Order [APP-056]** have been developed to allow for some flexibility should a more semi-permanent arrangement be appropriate. Further development of traffic management associated with the works will be undertaken by the Main Works Contractor, in consultation with Essex County Council.
Traffic and Transport	6.5.13. It is noted that one of the PARs is along the A1060 Roxwell Road which is the subject of a potential new road safety scheme involving average speed cameras. The scheme is being worked up as part of Essex County Council's Vision Zero approach to road safety with the aspiration of eliminating all road deaths and serious injuries in Essex by 2040. ECC has concerns that with the extra number of construction vehicles and large vehicle types using the link as part of the designated construction route that there will be an additional impact on safety. Further discussions are needed on areas of the network where accidents	The **7.3 Outline Construction Traffic Management Plan [APP-309]** details the monitoring and management principles for construction traffic. Within the monitoring principles is the development and provision of the driver information pack. The driver information pack will highlight areas of the network where pedestrians and cyclists may be using the network and other known potential hazard locations, e.g. where there are collision clusters along the highway network. Within the **7.11 Transport Assessment [APP-333]** it was found that the A1060 Rainsford Road / A1060 Roxwell Road Primary Access Route (Link PAR 51) recorded 10 collisions in the period between 2021–2023, which is comparable to the national average for Personal Injury Collisions p.a. per billion vehicle km. The **7.3 Outline Construction Traffic Management Plan [APP-309]** highlights the existing absence of a footway or footpath on the A1060 Roxwell Road (Link PAR 51) to access the bus stop. The Project's embedded

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	have been identified along the construction routes or where pinchpoints have been identified.	mitigation includes the driver information pack that will identify this location and other locations where pedestrians may be walking in the verge. Within the **7.11 Transport Assessment [APP-333]** it is proposed to monitor the operation of the A1060 Roxwell Road / Lordship Road junction (site 69). Additional mitigation identified through the **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** has been highlighted for the A1060 Rainsford Road / A1060 Roxwell Road Primary Access Route (Link PAR 51), including the maintenance of adjacent vegetation to allow suitable visibility. The Applicant is committed to ongoing engagement on this matter.
Traffic and Transport	*Abnormal Indivisible Loads ("AILs")* 6.5.14. ECC is continuing to work with the Applicant's consultants to review structural capacity for assets affected by the proposals. 6.5.15. The AIL Strategy highlights that National Highways have restrictions on the A12 in the Colchester area and as a result have considered a potential viable route through Colchester Town Centre. ECC object to this route being used due to the level of disruption through the town and surrounding highway network. Further work is needed to discuss the restrictions with National Highways to find a suitable way forward using the strategic highway network to avoid the use of Colchester Town Centre. It should be noted that there is one structure on the route through Colchester Town Centre that is part of a planned inspection regime due next year. It is strongly suggested that the applicant undertakes their own review at this time so as not to be dependent on ECC timescales if they are relying on this town centre route as an option. In addition, major road works are currently planned for next year in Colchester which co-incides with the AIL route option at St. Boltoph's Street.	The **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** notes potential weight limits near the A12 and through Colchester, but does not consider a route through Colchester Town Centre or St. Botolph's Street as a result. (It is assumed the reference is to St Botolph's Street.) The Applicant is engaging with National Highways to confirm suitability of Abnormal Indivisible Load (AIL) access. All AIL movements will be coordinated through the Electronic Service Delivery for Abnormal Loads (ESDAL) system and in-coordination with the Local Highway Authorities.
Traffic and Transport	6.5.16. There are instances of other structures on the AIL routes proposed where there is no information available on the structures and more discussions are needed on agreeing a way forward. It is anticipated that this will involve the need for further review of these specific structures by the Applicant such as investigative works, structural calculations and risk assessments. The outcome of these reviews could be that the structure is capable of accepting the AIL, but there is also a possibility that it won't in which case works may be required or an alternative route considered. Therefore, these reviews should be undertaken to understand if the routes are acceptable. ECC would expect this to be undertaken prior to the end of Examination and ECC will continue to work positively to engage in this matter.	The Applicant acknowledges that there are structures along the proposed Abnormal Indivisible Load (AIL) routes where sufficient information is not yet available to determine if the structures are suitable to carry the proposed AILs. It is also agreed that record information may not be available, and further investigations will therefore be required. The Applicant is progressing the assessments of the structures where information is available and will continue to work with the relevant asset owners on this matter. All AIL movements will be coordinated through the Electronic Service Delivery for Abnormal Loads (ESDAL) system and in coordination with the Local Highway Authorities
Traffic and Transport	6.5.17. A specific point should be noted on the AIL Strategy Document in relation to frequency of inspections. ECC undertake General Inspections ("GIs") every two years (not annually as stated by the Applicant) and Principal Inspections ("PIs") are carried out based on a risk based assessment where intervals vary between 4 – 12 years (not every 6 years as stated by the applicant). The Applicant should satisfy themselves of this risk in relation to the AIL routes using these structures.	The Applicant notes Essex County Council's specific frequency of General and Principal Inspections stated. The timing of the previous and planned condition inspection specific to each structure will be considered during the structural review and assessment process, in addition to any mitigation required prior to Abnormal Indivisible Load vehicles crossing the structure.
Minerals and Waste	6.5.19. In summary, ECC as the Minerals and Waste Planning Authority ("MWPA") welcomes the pro-active engagement with	The Applicant welcomes that Essex County Council has noted the pro-active engagement regarding minerals and waste planning.

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	the Applicant with regards to minerals and waste planning issues as they relate to the Norwich to Tilbury project. The recent engagement with the Applicant in relation to potential impacts of the NSIP scheme on existing operating minerals and waste sites and those Candidate Sites currently being assessed through the ongoing review of the Essex Minerals Local Plan ("MLP") is particularly noted. The MWPA further notes that whilst the scheme will sterilise quantities of mineral, and potentially conflict with the working of existing and potential future mineral extraction sites, appropriate steps have been taken to mitigate these impacts as clearly documented within **the Qualitative Minerals Resource and Infrastructure Assessment [APP-183]** and within **Chapter 4 - Project Description of the Environmental Statement [APP-130]**. On that basis, the MWPA have no objection to the scheme as submitted.	The Applicant welcomes that Essex County Council has no objections to the Project regarding minerals.
Minerals and Waste	6.5.20. That said, from the evidence supporting the application, it is the case that the Applicant is relying on future conversations with existing and potential future mineral site operators to fully address operational matters. Of particular note with respect to Candidate Sites for potential future mineral extraction, Candidate Sites A85 and A86 are currently being assessed for future allocation as part of the ongoing Review into the Essex MLP. These sites are being promoted as an extension to an existing silica sand and sand and gravel mineral site. Silica sand is a rare and more valuable resource than 'standard' sand and it is from the part of the county represented by the proposed site extensions A85 and A86 where the only deposits of this mineral have been found. Whilst the recognition of impact on this nationally important (from the Mineral Products Associates (Industrial Sand) "It is recognised by government as an essential raw material of national importance and as such there is a requirement to provide an adequate and steady supply, through maintaining stocks of permitted reserves and safeguarding silica sand resources") resource is welcomed, it is not explicitly stated whether the Candidate Sites are now effectively sterilised and therefore additional work will be required with the site promoters to understand whether the sites are still capable of being delivered as part of the emerging MLP (or otherwise) should the MWPA, following assessment, be minded to allocate either site as a Preferred Site.	Section 6.5 of the **5.15 Design Development Report [APP-122]** discusses routeing in this general area and confirms a change to the Project to reduce the potential sterilisation of part of sites A85 and A86. This is achieved by the change to route cables to the north of Little Bromley Road (to the extent that space allows) with the pylons being positioned to the south of the road. Whilst the Applicant acknowledges there would be some restriction on resource recovery it is at a level that would still be capable of being substantially delivered as part of the emerging Minerals Local Plan. Discussions to finalise a Statement of Common Ground with the future minerals site operator are ongoing.
Minerals and Waste	6.5.21. With regards to impacts on existing quarry operations, these have been potentially identified at the active quarry at Crown Quarry, Ardleigh although this has yet to be fully ascertained. It is noted that whilst in principle the MWPA would defend the primacy of its planning permissions where appropriate, where sites already have planning permission, matters may be privately resolved by the Applicant and the site operator. The MWPA currently has no comment on this matter, but this may change depending on the outcome of conversations between the two parties as well as, potentially, the MWPA.	The Applicant notes that Essex County Council has no comment on this matter.

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Minerals and Waste	6.5.22. Paragraph 9.6.3 of the **A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure Assessment (Final Issue A) [APP-183]** states that 'National Grid has and will continue to engage with the minerals operators and mineral proposers to discuss potential mitigations if appropriate'. Until such conversations and assessments are progressed, including by the MWPA in light of its own planning responsibilities, the MWPA has no reason to doubt that the highlighted impacts have been appropriately recognised and minimised, particularly where they relate to Candidate Sites proposals. As planning matters are progressed in relation to the NSIP and the emerging MLP, the MWPA respects that the appropriate course of action will depend on the planning context as exists at the time when such issues are determined, to be considered within the planning balance, with weight applied to each issue accordingly. 6.5.23. ECC as MWPA will provide detailed commentary in respect of **Volume 6: Environmental Statement: Document – 6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure Assessment [APP-183]** within it's Local Impact Report.	The Applicant is committed to continue engagement with Allocated and Candidate mineral sites to ensure impacts are minimised as far as is practicable. We note ECC's intention to comment further in the LIR and will consider them when received.
Hydrology Land Drainage and Flood Risk	6.6.1. ECC as Lead Local Flood Authority ("LLFA") is responsible for managing risk of flooding from surface water, ground water and from ordinary watercourses. As such, the LLFA has engaged collaboratively with the Applicant's commissioned drainage consultants to scope the detail required to assess the proposed Surface Water Drainage Strategy and other supporting documents including **Flood Risk Assessment [APP-331]**, **Ground Investigation Report [APP-214]**, Water Quality Assessment, and flood management during the construction phase of the scheme.	The Applicant notes this comment.
Hydrology Land Drainage and Flood Risk	6.6.2. The development as proposed has been assessed in relation to, national planning policies, local standards and guidance documents and industry best practice standards (NPPF 2021, NPS-EN1, Suds Design Guide 2020, Ciria SuDS Manual C753, Flood and Water Management Act 2010). 6.6.3. The proposed Norwich to Tilbury project comprises a mix of permanent and temporary works on largely greenfield land. The LLFA requests further clarity on the location of permanent and temporary construction works, but 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. 6.6.4. 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.	6.6.2 - The Applicant notes this comment. 6.6.3 - Further clarity on the locations of the permanent and temporary construction works proposed will be provided by the Applicant within the Drainage Strategy Report which has been submitted into the Examination at Deadline 1 **(8.2 Drainage Strategy [Revision A])**. Flood mitigation and surface water runoff management measures are secured by inclusion in the **7.2 Outline Code of Construction Practice [APP-300]**. 6.6.4 - Building on the information provided in Appendix C of the **7.9 Flood Risk Assessment [APP-331]**, further details regarding proposals for surface water management (including calculated attenuation volumes, specified discharge rates/limits) will be shared with Essex County Council and submitted to the Examination in the form of a Drainage Strategy Report **(8.2 Drainage Strategy [Revision A])**. This has been submitted into the Examination at Deadline 1. The Strategy has been formed in accordance with both the National Standards for Sustainable Drainage Systems (SuDS) and Lead Local Flood Authority (LLFA) local guidance, which will be evidenced.

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Hydrology Land Drainage and Flood Risk	*Adaptation to Climate Change* 6.6.5. The LLFA notes that the allowance for climate change as proposed in the FRA, is 40% for drainage serving permanent assets. With reference to standard policy and guidance however, the normal expectation for climate change allowances for peak rainfall is 45%. This latter figure should form the basis for assessment in the FRA.	In paragraph 2.3.2 of the **7.9 Flood Risk Assessment [APP-331]** the Applicant confirms that the allowance applied within the surface water drainage designs is for a 45% uplift in peak rainfall for climate change. This is in line with Essex County Council requirements.
Hydrology Land Drainage and Flood Risk	*Surface Water Runoff* 6.6.6. In general, the FRA details how good practice will be employed during the construction phase to mitigate surface water run and how pollution will be managed. However, while the LLFA is generally satisfied with the approach of the FRA, there is concern that information previously requested in respect of the control and management of surface water discharge has not been provided. 6.6.7. For surface runoff disposal during construction and from built areas (offices, storage compounds), this will need to be designed in accordance with 'The Sustainable Drainage Systems Design Guide for Essex 2020' and should capture / control all surface water discharge. Unrestricted runoff from the site into any open water body or sewer is not considered acceptable. 6.6.8. 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. In particular, there is concern that details for flow rates and dimensions for a culvert proposed under a construction laydown area associated with the proposed Tilbury North Substation have not been provided. It is therefore impossible to assess whether the capacity of the proposed culvert is sufficient to manage the predicted peak flow. In the absence of this detail, the LLFA is concerned that the situation could lead to unacceptable surface water run-off and flooding. 6.6.9. In accordance with the aforementioned policy and guidance, surface water runoff from permanent and temporary built-up areas should be managed on site using infiltration or runoff and should be restricted to 1-year greenfield rates. Additionally, 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.	As noted, building on the information provided in Appendix C of the **7.9 Flood Risk Assessment [APP-331]**, further details regarding proposals for surface water management (including calculated attenuation volumes, specified discharge rates/limits) will be shared with Essex County Council and submitted to the Examination in the form of a Drainage Strategy Report (**8.2 Drainage Strategy [Revision A]**). The Strategy has been drafted in accordance with both the National Standards for Sustainable Drainage Systems (SuDS) and Lead Local Flood Authority (LLFA) local guidance, which will be evidenced. With regard to the culvert at the proposed new Tilbury North Substation, commitment W08 within the **7.2 Outline Code of Construction Practice [APP-300]**, secures that the detail of the designs to maintain existing overland flow routes, would be developed by the Main Works Contractor(s) in liaison with the LLFAs, and further that such measures would be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.
Hydrology Land Drainage and Flood Risk	*Temporary works* 6.6.10. 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 the proposed Project design, including all temporary and permanent elements. **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]** presents the permanent features of the Project.
Hydrology Land Drainage and Flood Risk	6.6.11. All of the above comments have been raised in previous consultation responses by the LLFA and ECC. Furthermore, concerns were raised when responding to the targeted consultation about the revised placement of pylons which would be located in Flood Zone 3. At this time however, the LLFA has	Whilst the Project has avoided the placement of pylons in Flood Zone 3 along the vast majority of the route, where, in a small number of locations, this has not been practicable, mitigation (in the form of compensation storage provision) has been agreed with the Environment Agency and secured through commitment W17 within the **7.2 Outline Code of Construction Practice [APP-300]**. With regard to the comments linked to surface water

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	not received any information to address the aforementioned concerns.	drainage, the Applicant has provided further information into the Examination at Deadline 1 in the form of **8.2 Drainage Strategy [Revision A]**.
Socio-economics Recreation and Tourism	*Employment and Skills* 6.7.1. 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. It is essential that the Applicant proactively explores mitigation strategies to minimise these impacts and works closely with local partners to identify opportunities to support and strengthen the local economy. This includes ensuring that Essex-based businesses are able to benefit from the project through meaningful engagement with the supply chain, procurement opportunities, and targeted support to help them meet project requirements. A coordinated approach to infrastructure planning and delivery, including co-location and alignment with other schemes, will be vital to reducing adverse effects and maximising socio-economic benefits for the region. 6.7.2. The potential socio-economic impact of the Norwich to Tilbury proposal is substantial. This development forms part of a wider cluster of NSIPs in and around Essex, which are critical to achieving national net zero targets and supporting post-pandemic economic recovery. Given the acute national and local skills shortages, the employment and skills benefits—both during construction and operation—are significant and must be fully recognised and planned for.	Socio-economic impacts on the local economy, including impacts on local businesses, residents and the tourism sector are assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. The chapter concludes that there would be no significant impacts on the local economy as a result of the Project. The ES assessment does however anticipate significant effects on certain local businesses as set out **in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**, Table 15.22 Potential residual construction effect on built and other assets and Table 15.28 Residual operation (and maintenance) effect on built and other assets. Engagement between the Applicant and the affected business owners is ongoing. The ES assessment does not anticipate significant effects on the tourism economy, as detailed in Chapter 15, Paragraphs 15.7.15 to 15.7.19 of the ES. The ES assessment does not anticipate significant cumulative effects on Socio-economics, Recreation and Tourism. Details are set out in Chapter 17 of the ES **(6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281])**. The scale of construction employment arising from the Project is modest, with a maximum peak local construction workforce of approximately 172 Full -Time Equivalent roles and an overall local job demand of approximately 480 roles over the four -year construction period. **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** concludes that the Project would not give rise to significant adverse socioeconomic effects in relation to employment or workforce requirements. Notwithstanding this, the Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes: • Working with local suppliers and supporting forums, such as Chambers of Commerce • Contributing to a coordinated regional approach to electricity industry jobs and skills planning • Engaging with Local Authorities to understand local priorities and opportunities around skills and employment. These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.
Socio-economics Recreation and Tourism	6.7.3. ECC welcomes the opportunity to work collaboratively with the Applicant to maximise the education, skills and employment benefits of the project for Essex residents. According to MACE's Construction Growth in Essex 2020–2040 report (April 2020), major projects across the county could generate demand for up to 15,000 additional workers at peak, with shortages expected to intensify by 2031. The Essex Local Skills Improvement Plan ("LSIP") further highlights the cumulative impact of NSIPs on the construction skills landscape.	The Applicant welcomes ECC's commitment to collaborative working. Outside of the DCO process, the Applicant is committed to working with local suppliers, facilitated by supporting forums (such as the local Chambers of Commerce), on electricity industry skills and workforce planning. The Applicant is also committed to providing a coordinated regional approach to jobs and skills opportunities. The Applicant acknowledge the findings presented in MACE's Construction Growth in Essex 2020–2040 report. However, as outlined in the response above, 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 and spread across the 180 km route.
Socio-economics Recreation and Tourism	6.7.4. To enable effective planning and ensure Essex residents are equipped to take advantage of employment opportunities arising from this project, ECC strongly urges the Applicant to provide detailed labour market demand data as early as possible. This will allow for timely coordination with local education and training providers, enabling the development of targeted upskilling programmes and reducing the risk of workforce shortages that could delay project delivery. 6.7.5. The Applicant should actively engage with relevant partners to mitigate risks associated with skills shortages and consider	The Applicant recognises the importance of skills development and employment support, particularly in relation to the green economy, and values ongoing dialogue with Local Authorities on these matters. However, the Applicant does not consider that the establishment of a Development Consent Order secured Employment and Skills Fund or a DCO requirement for a Skills and Employment Strategy is appropriate, necessary, or proportionate in the context of this Project. As set out above, the construction employment arising from the Project is modest. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** concludes that the Project would not give rise to significant adverse socio-economic effects in relation to employment or skills. As such, there is no planning harm that would justify the imposition of a financial contribution or fund as mitigation through the Development Consent Order.

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	opportunities for shared apprenticeships, traineeships, and collaborative training programmes across concurrent projects. A strategic approach that considers the wider infrastructure pipeline will help maximise social value and ensure long-term benefits for the local workforce. 6.7.6. Securing employment and skills benefits must be a central focus of this development and appropriate consideration should be given to this matter within the Examination. There is a real opportunity not only to mitigate potential negative impacts but to leave a lasting legacy by upskilling Essex residents and addressing existing sectoral skills gaps. ECC expects the Applicant to work with local partners to ensure that jobs created by the project are accessible to local people and that appropriate training pathways are in place. 6.7.7. To support this, ECC strongly recommends the establishment of a dedicated Employment and Skills Fund. This fund should be proportionate to the scale and impact of the development and used to: • Invest in local further education facilities and provision • Support employment and skills programmes • Enhance careers education and school engagement • Fund ECC officer resource for consultation and monitoring of the employment and skills strategy 6.7.8. ECC also considers that the Applicant should adhere to ECC's guidance, including the Skills and Employment Principles for Major Projects and Developments and section 5.4 of the Essex Developer's Guide to Infrastructure Contributions. The Applicant should produce a comprehensive Employment and Skills Strategy that includes: • Clear delivery plans for apprenticeships, work placements, school engagement, and training programmes Commitments to local job creation and use of local contractors where feasible • Evidence-based interventions informed by community engagement and local labour market data • A sustainability and legacy framework to ensure initiatives continue from construction through to operation 6.7.9. ECC encourages the formation of a local stakeholder working group to co-design and inform the strategy and associated programmes. ECC is keen to collaborate with the Applicant to establish a skills initiative tailored to Essex, drawing on successful models implemented elsewhere. ECC asks that this matter be given appropriate consideration through the Examination as a principal issue given the potential for a positive legacy to be offered through this project. ECC will seek to expand upon the matters raised through its Local Impact Report.	It is also important to note that the creation of an Employment and Skills Fund would constitute a community benefit measure, rather than mitigation for a specific environmental impact. In accordance with established principles, community benefits are not a material consideration in the determination of a Development Consent Order and should not be secured through statutory planning requirements. This position is reinforced by the Community Funds for Transmission Infrastructure guidance, which makes clear that contributions of this nature should be progressed outside the development consent process. Notwithstanding this, the Applicant remains committed to supporting employment, skills and workforce development at a local and regional level through its wider corporate programmes and community benefit initiatives. These initiatives take a coordinated, long-term approach to electricity industry skills and the green economy and are delivered independently of individual DCO applications, recognising that meaningful skills development requires sustained investment beyond the lifespan of a single project. Therefore, while the Authority's recommendation is noted and understood, the Applicant considers the establishment of a DCO secured Employment and Skills Fund or a DCO requirement for a Skills and Employment Strategy is not justified by the scale or nature of the Project. Engagement on skills and employment opportunities will instead continue through non-statutory channels, consistent with national guidance and established practice.
Health and Wellbeing	*Health and Wellbeing*	6.8.1 - **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** presents a comprehensive assessment of the potential impacts of the Project on local communities.

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	6.8.1. ECC has a statutory duty under the Health and Social Care Act 2012 to improve and protect Public Health. ECC recognises the strategic importance of the Norwich to Tilbury project in strengthening the UK's energy infrastructure and supporting the transition to net zero. It is important to ensure that the **Environmental Statement ("ES") Health and Wellbeing Chapter [APP-192]** fully addresses the potential health, and wellbeing impacts on Essex communities along the linear route. 6.8.2. Matters raised by ECC in its response to the Preliminary Environmental Information Report ("PEIR") remain unresolved. It is unclear how stakeholder input from the November 2024 technical meetings has informed the final assessment due to the omission in the ES chapter of input provided from ECC Public Health (Table 10.2) **[APP-192]**. Assurance is therefore required to demonstrate compliance with the requirements of the Overarching National Policy Statement for Energy (EN-1) regarding health and wellbeing. 6.8.3. Overall, the points below set out the key matters which must be given due consideration as part of the Examination: • Integrate updated Index of Multiple Deprivation ("IMD") October 2025 • Apply the identified language vulnerability within sensitivity and mitigation planning • Address unresolved SoCG matters and demonstrate how stakeholder feedback informed the ES • Consider cumulative and mental health effects in accordance with EN-1 paragraph 4.4.5 • Should significant health impacts be identified, application should seek to introduce proportionate health and wellbeing monitoring, and adaptive mitigation measures consistent with EN-1 paragraphs 4.4.4–4.4.6.	6.8.2 - **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** has been informed by stakeholder input throughout the development of the Project. Technical meetings were held with Public Health officers to discuss the approach to assessment, input from which informed the approach. For example, discussions centred around the importance of a focus on wider determinants of health, which was subsequently incorporated into the assessment; baseline data sources were also discussed and an appropriate range of data has been used to inform the assessment. 6.8.3 - The key matters are noted and the Applicant's response to each of these matters is provided in the subsequent responses below to which they relate.
Health and Wellbeing	*Adequacy of assessment* 6.8.4. The overarching National Policy Statement for Energy (EN-1) requires that Environmental Statements identify and mitigate adverse health impacts arising from energy infrastructure, including cumulative effects and impacts on vulnerable groups. It also expects applicants to consider indirect health impacts such as access to open space, active travel and community wellbeing. ECC considers that the ES does not yet meet these expectations. The Health and Wellbeing chapter **[APP-192]** does not provide any view on cumulative health effects as required under EN-1.	In line with the Overarching National Policy Statement for Energy EN-1 (2024), a cumulative assessment has been prepared and is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. Paragraphs 17.5.46 to 17.5.48 contain the findings in relation to health and wellbeing of inter-project cumulative effects. For example, it is identified that, in a number of instances, adverse effects on mental health and wellbeing may 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. **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** also includes an assessment of impacts on vulnerable groups, which are identified in Table 10.5 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**.
Health and Wellbeing	*Baseline data and use of deprivation measures* 6.8.5. The ES relies heavily on the 2019 Index of Multiple Deprivation (IMD) to define community sensitivity. This single overall measure risks masking inequalities within wards. It should	Paragraphs 10.5.25 to 10.5.26 and Table 10.10 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** describe the approach that has been taken to assessing the sensitivity of communities along the route of the Project. A number of sources of baseline data have been used to inform this assessment, of which the 2019 IMD[99] is one. Other sources of data used to inform the assessment include Census 2021[100]

[99] Ministry of Housing, Communities and Local Government (2019) *English Indices of Deprivation*

[100] Office for National Statistics (2021) *2021 Census*

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	be noted that IMD was updated in October 2025. ECC recommends that the assessment be revisited to address any changes particularly in the identification of vulnerable and sensitive receptors and any implications this may have on findings. Inclusion of more granular Lower Super Output Area ("LSOA") information to reveal localised deprivation—particularly in Tendring, Basildon and Colchester, where health inequalities are most acute. Failure to do so risks under-estimating differential health effects, contrary to the EN-1 requirement to identify how developments may impact populations differently.	information (e.g. self-reported health status), life expectancy data and proportions of vulnerable groups (notably older people, children and people with a disability under the Equality Act 2010). This combination of data sources is considered to provide a robust approach to defining sensitivity of communities at ward level along the Project route. The use of 2019 IMD data was the most up to date available at the time the health and wellbeing assessment was prepared and submitted and there is no requirement to update the Environmental Statement with subsequent information accordingly. However, the Applicant is aware that 2025 data is now available; an initial review of this data suggests that it would not fundamentally change the findings of the health and wellbeing assessment. It is understood that there are variations in the socio-economic characteristics of populations even at ward level. More granular baseline data has been used to inform the health and wellbeing assessment as appropriate. For example paragraph 10.5.18 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** includes information relating to a review of IMD 2019 data at LSOA level, noting that LSOAs ranked as the most deprived according to the health deprivation and disability domain of the IMD are primarily focused in urban areas, with the highest number of LSOAs in the top 10% in Tendring (Section C of the Project) and that variations by ward within the Local Study Area are also evident
Health and Wellbeing	6.8.6. Table 10.1 [**APP-192]** of the ES omits reference to local health and wellbeing strategies and Integrated Care System Joint Forward Plans. This weakens alignment with local policy objectives and the Essex Joint Health and Wellbeing Strategy, which focus on tackling inequalities, supporting mental wellbeing and enabling healthier, more active communities.	The health priorities set out within the Essex Joint Health and Wellbeing Strategy[101] are summarised in Table 10.1 on page 5 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. Paragraph 10.2.16 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** states that local health and wellbeing strategies, Joint Strategic Needs Assessments and the health priorities they contain, have been used to inform the health and wellbeing assessment. The review of health and wellbeing strategies contained in Table 10.1 reveals that common themes include health inequalities, mental health and wellbeing and the importance of healthy lifestyles / physical activity.
Health and Wellbeing	*Vulnerable populations* 6.8.7. EN-1 emphasises the need to assess potential impacts on vulnerable groups within society. The ES baseline data acknowledges that sections of the population along the project corridor do not speak English as their main first language, yet this vulnerability has not been considered within the sensitivity assessment or mitigation planning. Communities with limited English proficiency may face barriers to understanding consultation materials, receiving construction updates, or engaging with health information - leading to heightened anxiety and exclusion from mitigation measures.	A range of baseline data sources have been used to inform the sensitivity profile of wards along the Project route and these are set out in Table 10.10 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. Additional data has been used to inform the assessment of potential impacts on health and wellbeing; this is described in Section 10.5 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** and includes the percentage of residents in the Study Area with English as their main language, as the potential vulnerability of residents for whom English is not their main language is understood, particularly in relation to communication of information. The **7.14 Equality Impact Assessment [APP-352]** notes that the Applicant has undertaken inclusive and accessible consultation throughout the development of the Project. This has included targeted engagement with seldom heard groups, provision of materials in alternative formats, and the use of accessible venues and digital platforms. The **5.1 Consultation Report [APP-066]** also sets out the Applicant's approach to engaging with seldom heard groups, defined as those being inaccessible to most traditional and conventional methods of consultation for any reason, and including people for whom English may be a second language. The Applicant undertook research to identify local 'seldom heard' organisations and worked with Local Planning Authorities and other bodies as needed to identify additional groups. The approach was defined as part of the development of the Statement of Community Consultation **(5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) [APP-071])** and supporting evidence, giving Local Planning Authorities the opportunity to influence this strategy. Public information events were held across the local area and were accessible and inclusive for members of the public. The Applicant will continue to engage with people potentially affected during progress of the Project, through a variety of communication means in order to overcome barriers to understanding Project information.
Health and Wellbeing	6.8.8. ECC recommends that the Applicant adopt inclusive engagement methods, including translated materials, interpreters, and collaboration with local community and faith organisations.	As noted in the previous response, the Applicant has used inclusive engagement methods to communicate Project information to local communities and stakeholders and will continue to engage with people potentially affected during progress of the Project through a variety of communication means. **7.2 Outline Code of**

[101] Essex County Council (2023) *Essex Joint Health and Wellbeing Strategy (2022 – 2026)*

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	These measures would align with EN-1's requirement to take opportunities to promote local improvements to encourage health and wellbeing, especially for groups who may be differentially affected by the development.	**Construction Practice Appendix E - Community Engagement and Public Information [APP-305]** sets out the communications channels and approach to community engagement during the construction phase of the Project.
Health and Wellbeing	*Cumulative impacts and mental health* 6.8.9. EN-1 (paragraph 4.4.5) requires consideration of cumulative impacts where multiple developments may affect people simultaneously. Many Essex communities, particularly in Tendring, will experience overlapping NSIPs and growth schemes. The ES does not sufficiently consider the compounded psychological stress of multiple construction projects and landscape change.	As noted in an earlier response, a cumulative assessment has been prepared and is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. Paragraphs 17.5.46 to 17.5.48 include the findings in relation to health and wellbeing of inter-project cumulative effects. For example, it is identified that, in a number of instances, adverse effects on mental health and wellbeing may 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 cumulative assessment was undertaken in accordance with the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**.
Health and Wellbeing	6.8.10. ECC notes that Mental Wellbeing Impact Assessment ("MWIA") workshops, recommended by Suffolk County during the PEIR stage, were not undertaken. The absence of such qualitative engagement means the assessment lacks depth in understanding how residents experience disruption and change. ECC recommends that the Applicant revisit this through targeted community engagement to ensure that cumulative mental health and wellbeing impacts are adequately evaluated and addressed.	The Applicant understands from statutory and non-statutory consultation already undertaken that the principal concerns of local residents from a mental health and wellbeing perspective centre around stress and anxiety associated with impacts on quality of life / wellbeing once the Project has been constructed (for example visual impacts on businesses and properties) as well as perceptions of the impacts of electric and magnetic fields (EMFs) on health and wellbeing. As such, further engagement to understand how residents feel they might be impacted is not considered necessary at this point. Mental health and wellbeing has been included in the health and wellbeing assessment undertaken for the Project. **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** presents the findings from the mental health and wellbeing assessment for the construction phase, noting that enhancing control is a protective factor; accordingly, appropriate processes would be in place to provide the local community with mechanisms by which some measure of control may be experienced during construction, such as ongoing engagement. **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 that would be applied during the construction phase. In relation to perceptions about health risk from EMFs, **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** has identified opportunities for public awareness raising about EMFs, which will form part of measures recommended for affected communities along the proposed route.
Health and Wellbeing	*Mitigation and monitoring* 6.8.11. The ES concludes that no additional mitigation is required beyond embedded measures and proposes no health and wellbeing monitoring. However, given the scale and duration of construction and the socioeconomic characteristics of affected communities, ECC recommends that this matter is given due consideration during the Examination including the exploration of establishing of a Health and Wellbeing Monitoring Framework. This framework should include baseline data on active travel, access to green space, amenity satisfaction and mental wellbeing; define clear indicators and reporting intervals; and be co-developed with local communities.	No significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design and to reduce concern or uncertainty about the proposals through transparent engagement with residents and stakeholders during Project development. 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. 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. **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.
Landscape and Visual	6.9.1. Documents forming part of the ES **[APP-226 – APP-255]** have been reviewed, in particular the Landscape and Visual Impact Assessment ("LVIA"). It is recognised that the project will impact on the National Landscape (Dedham Vale National Landscape) as well as the landscape character and visual amenity of the wider County. The LIR will expand further on the detail of the impact of the Norwich to Tilbury project but this	The approach to the Landscape and Visual Impact Assessment follows professional guidance (including the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3)[102]), as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**, and was shared, discussed and agreed 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 **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Parts 1 to 4 [APP-229 to APP-232]** and illustrative materials in **6.13.F1**

[102] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

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	response will highlight key considerations in respect of landscape matters. 6.9.2. In respect of the approach to the LVIA, ECC has concerns regarding several aspects of the methodology, particularly in the approach to landscape value and value of the view, as well as a downplaying of the significance of impacts between 0.5Km and 1Km.	**Environmental Statement Figure 13.1 to 6.13.F19 Environmental Statement Figure 13.19 [APP-237 to APP-255]**. **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Landscape value judgements were informed by the Landscape Institute's Technical Guidance Note (TGN) 02/21 Assessing landscape value outside national designations[103]. This defines landscape value as '*the relative value or importance attached to different landscapes by society on account of their landscape qualities*' (page 3). 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]**. GLVIA3 requires evaluation of the value attached to the view or visual amenity and relates this to planning designations and cultural associations (GLVIA3, para. 6.37, page 114). The approach is set out clearly on page 24 of the **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** and in Table A13.1.9: Value of views and visual amenity.
Key Legislation and Planning Policy Context	6.9.3. ECC considers that in respect of policy, the proposed development as it stands, does not meet (EN-1) Para 4.3.4 of which states "… the applicant must … show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy…". ECC's view is that this policy has not been followed as there is no compensation offered for the significant adverse landscape and visual effects of the overhead line and pylons.	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]**. Whilst compensation is part of the mitigation hierarchy, 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 (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. 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'.* It is particularly noteworthy that none of the policies on landscape and visual effects in NPS EN-1 (2024) or NPS EN-5 (2024) 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. 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 NPS EN-1 (2024) and NPS EN-5 (2024) policy framework, including the further CNP presumption in section 4.2 of NPS EN-1 (2024). The NPS position in relation to compensation (as set out above) is also consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. There is no requirement under the said Regulations for all residual effects to be compensated. The above aligns with the Bramford to Twinstead (BTNO) 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.
Landscape and Visual	6.9.4. With regards to 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 it is accepted 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, ECC considers that the cumulative impact is likely to result in an overall significant adverse effect generally	**6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Most landscape and visual receptors within the Study Area are static, and so would experience effects across the more localised areas explained in the Landscape and Visual Impact Assessment (LVIA). For example, a recreational receptor within a certain park or street would only be affected by the changes they can see and experience within that location, and, unless they move, not by the total effects of the Project as a whole. The total visual effects of the Project as a whole would be experienced by people who are moving along the length of the Project, perhaps on longer distance journeys on roads (sequential effects). The effects on landscape character would 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 Landscape Character Areas or types).

[103] Landscape Institute (2021) *Technical Guidance Note 02/21 Assessing landscape value outside national designations*

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	within the study area during both the construction and operation stages.	Again, they would not typically be experienced as a whole, but the total effect on landscape character 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 would be significant, as would be expected for any project of this size and nature. Cumulative effects with other development have been assessed in accordance with the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** and are set out in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**.
Landscape and Visual	6.9.5. Generally, ECC does not agree that the value of the view should be judged substantially on identified viewpoints and promoted views in tourist-focussed documents. ECC contends that, in lieu of local landscape designation and district-wide Valued Landscape Assessments, the value of the view should be judged by how it relates to the Landscape Character Assessment ("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 characters and not others.	The approach to the Landscape and Visual Impact Assessment 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 (**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 – APP-232]** and **6.13.F1 Environmental Statement Figure 13.1 to 6.13.F19 Environmental Statement Figure 13.19 [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 and visual receptors 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 on the value of views and subsequently the sensitivity of receptors remain fair and reasonable and that no changes need to be made.
Landscape and Visual	6.9.6. With regards to landscape effects, the Colchester Borough Landscape Assessment has been updated since the PEIR was submitted, however, there are still references to it in the ES. ECC considers it necessary that the judgements be updated to reflect the Colchester Landscape Character Assessment (LUC November 2024) if that has not already been done.	The landscape assessment submitted as part of the application for development consent (**6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**), assessed the Landscape Character Areas (LCAs) identified within the 2005 report. It is acknowledged that the November 2024 Colchester Landscape Character Assessment[104] represents the most current LCAs for Colchester. The 2024 report is listed under the evidence base for the 2013–2033 local plan. However, the 'Landscape' webpage of the Colchester City Council website still links to the 2005 landscape character assessment. The 2024 report has been reviewed. The 2024 LCA boundaries remain the same as in the 2005 report. An exception to this is LCA A7 which is no longer divided into subcategories of A7a, A7b and A7c. The 2024 report updates key characteristics and provides a high-level rating on inherent value for each LCA. This value judgement has been reviewed against the landscape value judgements assessed in Annex A Landscape Value Assessment presented in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. The value judgements within the 2024 Colchester LCA are broadly similar to the judgements set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. Exceptions to this are within the Roman River Valley and the Colne River Valley where the value has been judged as higher in the 2024 LCA compared to **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. Having reviewed the information, it is anticipated that there would be no change to the effects reported on these LCAs.
Landscape and Visual	6.9.7. 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 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.	As noted, the Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Most landscape and visual receptors within the Study Area are static and so would experience effects across the more localised areas explained in the LVIA. For example, a recreational receptor within a certain park or street would only be affected by the changes they can see and experience within that location, and, unless they move, not by the total effects of the Project as a whole. The total visual effects of the Project as a whole would be experienced by people who are moving along the length of the Project, perhaps on longer distance journeys on roads (sequential effects). The effects on landscape character would 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 Landscape Character Areas or types). Again, they would not typically be experienced as a whole, but the total effect on landscape character can

[104] Colchester City Council (2024) *Colchester Landscape Character Assessment*

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		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 would be significant, as would be expected for any project of this size and nature. Such residual effects are taken into account as part of the overall planning balance. 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 (2024) and NPS EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. NPS EN-1 (2024) paragraph 4.1.7 provides '… 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'. The residual environmental effects on the landscape 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.
Landscape and Visual	6.9.8. Valued landscape criteria have now been included in the landscape assessment; however, ECC is concerned that some of the evaluation is flawed. In addition, as the baseline evaluation and judgements appear to be made solely at a district and not a site/setting level, they do not necessarily address the value of the key characteristics of the directly affected landscapes in the study area, particularly 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 Landscape and Visual Impact Assessment (LVIA) presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, sets out a robust and consistent methodology within **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**. The approach and methodology was developed during the scoping stage and discussed with statutory consultees through consultation. The approach includes clear, transparent criteria for judgements of landscape value, in line with the Guidelines for Landscape and Visual Impact Assessment, Third edition[105]. Other referenced technical guidance includes Technical Information Note 8/15: Landscape Character Assessment[106] and Technical Guidance Note 02/21 Assessing landscape value outside national designations[107]. The approach to making judgements on the value of landscape receptors is set out on pages 12–18 of **6.13.A1 Environmental Statement - Appendix 13.1 - Landscape and Visual Methodology [APP-227]**. Judgements of landscape value specifically relate to the Study Area and are reported in the Annex to **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 '*the relative value or importance attached to different landscapes by society on account of their landscape qualities*' (page 3). Consideration of river valleys falls under a range of factors (or criteria) including Natural Heritage, Distinctiveness, Perceptual (scenic) and Functional factors. Long-distance walking routes and rural amenity sites (assumed to be areas of open access land or common land) are considered under the Recreational factor. The Applicant's position with respect to undergrounding is set out below in response to paragraph 6.9.9 of the RR.
Landscape and Visual	6.9.9. ECC is profoundly concerned about the likely significant effect of the pylons running through the eastern margin of the DHGV, as set out at the relevant section above. ECC considers this does not fit with the vision for the garden village, and ECC seeks a review of the alignment and/or the choice of an overhead solution.	The Applicant notes this concern. As part of the feedback received from the 2022 non-statutory consultation, the alignment near the Dunton Hills Garden Village (DHGV) development was reviewed and restricted to the eastern edge of the proposed corridor, following along the existing gas pipeline corridor, to reduce interaction with the DHGV and to reduce residual effects. With regards to the choice of an overhead solution, the Applicant has carefully considered the feedback proposing the use of underground cable along the route, the alternatives available, and other relevant considerations. EN-5 requires the Applicant to operate in an efficient, coordinated and economical way[108]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for

[105] Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

[106] Landscape Institute (2016) *Technical Information Note 8/15: Landscape Character Assessment*

[107] Landscape Institute (2021) *Technical Guidance Note 02/21 Assessing landscape value outside national designations*

[108] Electricity Act 1989, Section 9

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		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. In accordance with NPS EN-1 (2024) and NPS EN-5 (2024), 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.
Landscape and Visual	6.9.10. There does not appear to be any compensation offered in relation to the significant residual adverse landscape and visual effects created by the pylons and OH line along its length. ECC's position is that the project should not go ahead, without a substantial funded landscape and visual compensation scheme, alongside but distinct from any proposed community benefits and mitigation. This is in recognition of the long-term significant residual negative and un-mitigatable operational effects on both landscape and visual receptors that this project will generate.	Please refer to the Applicant's response to paragraph 6.3.4 of the RR.
Landscape and Visual	6.9.11. ECC notes that it would have been helpful if the written text of the LVIA had been presented as a track changes document to better understand the changes had been made since the PEIR was submitted. The response has not made reference in detail about issues relating to vegetation removal but it is expected for any landscape removal for it to be fully quantified and identified, including on plan, in the emerging Landscape and Ecological Management Plan ("LEMP") and/or other emerging documents. The Local Impact Report will raise additional issues as the pre-examination process progresses as may be necessary.	The request for a tracked changes document to show the changes made between the Preliminary Environmental Information Report (PEIR) and **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** is not required by guidance or policy. It should also be noted that the PEIR prepared for the Project was not a draft Environmental Statement chapter. The arboricultural impact plan can be found within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]**. Commitment GG14 has been included in the **7.2 Outline Code of Construction Practice [APP-300]** which states, '*Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable.*'
Ecology and Biodiversity	*Position on the Application* 6.10.2. The Norwich to Tilbury application proposes habitat planting, screening, and ecological enhancements across cable sealing end compounds and substations. However, the documentation does not clearly distinguish between standard mitigation, enhancement, and genuine GI contributions (such as connective linear and habitat corridors).	The proposed Environmental Areas, as set out within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, provide both a landscape and ecological function. Landscape and visual mitigation is proposed within 'Environmental Areas' at Norwich Main Substation, the proposed new East Anglia Connection Node (EACN) Substation and the proposed new Tilbury North Substation and up to seven Cable Sealing End (CSE) compounds. An indicative landscape design has been developed for the Environmental Areas as detailed within **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]**. The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** provides the site context for each of the permanent features and identifies the individual landscape mitigation proposals for the Environmental Areas. The **7.16 Design Approach for Site Specific Infrastructure [APP-354]** discusses design principles for landscape and visual mitigation of the CSE compounds together with any scope for variation at detailed design stage. Ecologically, the Environmental Areas provide habitat mitigation for the permanent impact of the associated substations and 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.
Ecology and Biodiversity	6.10.3. The principle of infrastructure development that is aligned with climate resilience and biodiversity enhancement is supported. However, there are concerns regarding the adequacy and clarity of the proposed mitigation and compensation measures, particularly in relation to:	The **7.1 Biodiversity Net Gain Report [APP-299]** clearly sets out the Applicant's overall approach to Biodiversity Net Gain (BNG), the assessment methodology used and the mitigation and enhancement proposed in the absence of BNG guidelines for Nationally Significant Infrastructure Projects. This approach was broadly agreed in principle with Natural England. The Applicant will consider Local Nature Recovery Strategy areas as part of the off-site BNG selection process, where sites are available, and appropriate to project circumstances.

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	• The alignment with the Essex Local Nature Recovery Strategy ("LNRS") • The integrity of green infrastructure delivery • he potential for double-counting mitigation as compensation in relation to Biodiversity Net Gain.	The Applicant will explore a range of options to deliver BNG for projects which provide the best choices and outcomes for nature and wider environmental and societal benefits and provide value for money for consumers. The BNG principle around 'additionality' has been applied to the Project to ensure no double counting of mitigation.
Ecology and Biodiversity	*Key Issues and Potential Effects* 6.10.4. Green Infrastructure Delivery: The project intersects with priority areas identified in the Essex LNRS. There is insufficient evidence that the scheme will contribute meaningfully to the LNRS targets, particularly in terms of habitat connectivity and enhancement in Essex.	The location of on-site ecological mitigation measures is specific to the locations of impacts both in terms of temporary and permanent impacts. However, The Applicant will consider Local Nature Recovery Strategy areas as part of the off-site BNG selection process where sites are available and appropriate to project circumstances. This off-site selection process would take into consideration the potential for wider habitat connectivity and enhancement across Essex, as well as specific areas of particular importance for biodiversity. Full details of the off-site solution would be provided to the Local Planning Authorities post-consent.
Ecology and Biodiversity	6.10.5. Landscape and Ecological Compensation: Changes in the Landscape and Ecological Management Plan ("LEMP") (APP-321) suggest a shift in terminology from "enhanced mitigation" to "landscape compensation." It is unclear whether this represents a substantive change or a rebranding of existing measures. This raises concerns about potential double-counting of Biodiversity Net Gain ("BNG") and compensation. There are concerns that some mitigation described as "landscape compensation" may represent repurposed or enhanced mitigation, not additional BNG, risking double-counting.	The Biodiversity Net Gain principle around 'additionality' has been applied to the Project to ensure no double counting of mitigation.
Substations	6.10.6. Sealing End Compounds and East Anglia Connection Node ("EACN") Areas: These areas are referenced as locations for compensation, but it is not evident whether these are new interventions or enhancements of existing mitigation. Clarification is needed to ensure transparency and avoid misleading accounting.	Paragraph 13.6.4 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** sets out that the landscape planting around CSE compounds and the proposed new EACN Substation is embedded mitigation, not compensation. The Project allows for landscape planting including proposed woodland, hedgerows, spoil bunds, scrub and grassland. These are shown as 'Environmental Areas' 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]**. Further details including landscape plans and planting schedules are provided in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Ecology and Biodiversity	6.10.7. To ensure consistency and maximise ecological outcomes across the EACN area, ECC recommends that the landscape and BNG plans for the Norwich to Tilbury project be aligned with those of other regional projects, specifically North Falls and Five Estuaries offshore wind farms. Both projects have committed to aligning landscape and BNG commitments. Co-ordinating approaches across these NSIPs would support coherent habitat creation, reduce fragmentation, and strengthen the delivery of GI, BNG and nature recovery. It would also provide a more consistent framework for landowner engagement, long-term stewardship, and monitoring, helping to secure meaningful and measurable nature recovery across the wider EACN landscape.	An indicative landscape design has been developed for the Environmental Area around the proposed new East Anglia Connection Node (EACN) Substation as detailed within **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]**. The landscape proposals were informed by the landscape proposals for the neighbouring Five Estuaries and North Falls substation sites. The Applicant will continue engagement with the North Falls and Five Estuaries teams as their schemes progress. This will include coordination on Biodiversity Net Gain, to ensure a cohesive scheme with measurable net gain of biodiversity across the wider EACN landscape is successfully achieved.
Ecology and Biodiversity	*Agreements and Disagreements with the Applicant* 6.10.8. The Applicant has acknowledged the need to engage with local environmental strategies, such as Essex GI Strategy and Essex GI Standards and recognised the emerging LNRS now published.	The Applicant will consider Local Nature Recovery Strategy areas as part of the off-site BNG selection process where sites are available and appropriate to project circumstances. This off-site selection process would take into consideration the potential for wider habitat connectivity and enhancement across Essex, as well as specific areas of particular importance for biodiversity. Full details of the off-site solution would be provided to the Local Planning Authorities post-consent.

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	6.10.9. Where possible, the delivery of GI as part of the project development should be directed towards locations where it will have the greatest ecological and community impact. The Essex LNRS provides a vital evidence-based framework to guide developers in identifying optimal locations for such delivery. The LNRS includes Areas of particular importance for biodiversity (designated sites) and both strategic habitat creation opportunity areas and other potential opportunities areas important for biodiversity, ensuring that even in locations without designated strategic priorities, there is still a clear steer on where nature recovery and GI can be most effective.	
Ecology and Biodiversity	6.10.10. ECC would recommend that the Applicant demonstrates how the proposed green infrastructure and biodiversity measures: • Align with LNRS spatial priorities and action themes. • Contribute to long-term nature recovery goals in Essex. • Are additional to mitigation and BNG obligations.	The Applicant's off-site Biodiversity Net Gain (BNG) selection process would take into consideration the spatial priorities and action themes (including habitat restoration/ creation, nature-based solutions and connecting existing habitats), as set out within the Essex Local Nature Recovery Strategy (LNRS). This will ensure the Project contributes to Essex's long-term nature recovery goals. The Biodiversity Net Gain principle around 'additionality' has been applied to the Project to ensure no double counting of mitigation.
Ecology and Biodiversity	6.10.11. ECC is able to share the LNRS layers should these be required. 6.10.12. In respect of outstanding matters, ECC draws attention to the following: • Lack of detailed mapping showing how the project supports LNRS priorities. • No clear methodology for distinguishing between mitigation, enhancement, and compensation. • Absence of a robust monitoring framework to ensure delivery of green infrastructure benefits over time.	6.10.11 - The Essex LNRS has been used to inform the **7.1 Biodiversity Net Gain Report [APP-299]**. Receipt of the LNRS as a layer file would be useful for future (post-consent) BNG off-site decision making. 6.10.12 -The Applicant's off-site BNG selection process would take into consideration the spatial priorities and action themes (including habitat restoration/ creation, nature-based solutions and connecting existing habitats), as set out within the Essex LNRS. This will ensure the Project contributes to Essex's long-term nature recovery goals. Mitigation, enhancement and compensation is defined in **6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135]**. Measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**.
Ecology and Biodiversity	*Suggested Mitigation and Compensation Measures* 6.10.13. ECC suggests the Applicant should consider the following mitigation measures: • Strengthen GI corridors in line with LNRS spatial priorities. • Use native species and climate-resilient planting in all landscape interventions. • Ensure ecological connectivity across fragmented habitats. • Creation of new accessible, high-quality GI open spaces across Essex.	The approach to new and replacement planting is set out within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. As stated within Section 9 of the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, native species would be used. Indicative species lists are provided within the planting schedules in the **7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324]**. Requirement 4 in the **3.1 Draft Development Consent Order [APP-056]** requires a Final Landscape and Ecological Management Plan be prepared to discharge the requirement which is '*substantially in accordance with the Outline Landscape and Ecological Management Plan'*. The Final Landscape and Ecological Management Plan would be agreed with Local Planning Authorities. The **7.1 Biodiversity Net Gain Report [APP-299]** clearly sets out our overall approach to Biodiversity Net Gain (BNG), the assessment methodology used and the mitigation/enhancement proposed in the absence of BNG guidelines for Nationally Significant Infrastructure Projects. This approach was agreed in principle with Natural England. The Applicant can confirm the Local Nature Recovery Strategy for Essex, will be part of the National Grid off-site BNG selection process, and will be a key consideration in determining the right location for off-site enhancement measures.
Ecology and Biodiversity	6.10.14. Where habitats such as hedgerows and trees are removed as a consequence of the project, they shall be reinstated and replaced with an enhanced hedgerow habitat using locally important and native species. The species mix should be identified in consultation with Wildlife Groups across Essex and will overall improve the degree of connectivity of ecological networks across the project route.	The approach to hedgerow replacement planting is clearly set out within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. As stated within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, species-rich mixes or other locally appropriate species that provide ecological enhancement would be used. Indicative hedgerow species lists are provided within the planting schedules in **7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324]**.

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Ecology and Biodiversity	*Compensation* 6.10.15. ECC suggests that the following compensation should be considered by the Applicant: • Secure off-site compensation within Essex, ideally in LNRS strategic opportunity habitat areas. • Provide transparent accounting to demonstrate that BNG and compensation are not conflated (i.e. percentage gain, distinct from mitigation). • Request binding commitments: Land tenure, management, and funding for GI and BNG areas. Monitoring timelines and corrective actions Establish long-term stewardship agreements with local environmental bodies or NGO's i.e. Essex Wildlife Trust.	The Applicant can confirm the Local Nature Recovery Strategy for Essex, will be considered as part of the National Grid off-site Biodiversity Net Gain (BNG) selection process. The **7.1 Biodiversity Net Gain Report [APP-299]** clearly sets out our overall approach to BNG, the assessment methodology used and the mitigation/enhancement proposed in the absence of BNG guidelines for Nationally Significant Infrastructure Projects. This approach was agreed in principle with Natural England. The BNG principle around 'additionality' has been applied to the Project to ensure no double counting of mitigation. 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 off-site BNG sites.
Biodiversity Net Gain	*Landscape and BNG Monitoring and Management Commitments* 6.10.16. The Applicant's BNG Report (APP-299) and Outline LEMP (APP-321) outlines a commitment to a five-year monitoring and management period for all tree and hedgerow planting within the DCO boundary, as set out in the oLEMP. While this timeframe reflects standard establishment periods, typically 1–2 years for shrubs and up to 5 years for trees, it may not be sufficient to ensure long-term ecological success across all planting types and locations. 6.10.17. ECC acknowledges the Applicant's explanation that extending monitoring beyond five years presents challenges, particularly due to the involvement of multiple landowners along the cable route, to securing long-term access agreements, variability in landowner expectations and conditions and administrative complexity in managing legal and maintenance obligations across several landowners. 6.10.18. However, ECC recommends that the Applicant align with best practice demonstrated by other regional NSIP projects such as Five Estuaries and North Falls Offshore Wind Farms, which have committed to 10-year monitoring periods for similar planting schemes. A 10-year period is increasingly recognised as a reasonable standard in planning applications to ensure the successful establishment and maintenance of ecological features. The proposed 10-year monitoring period could be structured into two phases: an initial 5-year period of high-frequency establishment monitoring, followed by a subsequent 5-year period of lower-frequency development monitoring.	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 Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain Report [APP-299]**.
Biodiversity Net Gain	6.10.19. In addition, a 30-year management and monitoring period should be secured for all BNG and GI measures associated with EACN and other substation landscape proposals, in accordance with statutory BNG requirements. For planning applications subject to mandatory BNG, a Habitat Management and Monitoring Plan must be submitted to and approved in writing by the local planning authority. This plan should ensure that the biodiversity net gain identified in the Biodiversity Gain Plan or	The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for development (subject to certain exemptions); however, this requirement is not yet in force for development consented pursuant to a Development Consent Order. Current indications suggest that it will apply to development consent applications submitted from May 2026; although this is yet to be confirmed. Notwithstanding that the application has been submitted in advance of the mandatory requirement, the Applicant has committed to deliver 10% BNG together with wider environmental and societal benefits for the Project. The 10% BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitments. In the absence of any guidelines for Nationally Significant

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	Assessment is fully delivered and maintained over the 30-year period.	Infrastructure Projects, the BNG assessment methodology was set out and agreed with Natural England and Local Planning Authorities. The details of the BNG methodology are presented in the **7.1 Biodiversity Net Gain Report [APP-299]**. The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas in line with the commitments made within the **7.1 Biodiversity Net Gain Report [APP-299]**. The monitoring and maintenance measures for the Environmental Areas would be included in the final Landscape and Ecological Management Plan, which would be subject to review by the relevant Local Planning Authority ahead of works starting.
Biodiversity Net Gain	*Summary* 6.10.20. ECC considers that the Examining Authority needs further clarification from the Applicant regarding the nature and location of compensation measures and requires evidence that these are additional to mitigation and BNG obligations. ECC recommends that the Applicant justify whether newly described "compensation" is truly additional, and requests evidence such as geo-located planting plans or habitat creation that is outside of what would otherwise be required under BNG or mitigation.	Mitigation, enhancement and compensation is defined in **6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135]**. Measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**.
Ecology and Biodiversity	6.11. Ecology and Biodiversity Net Gain *Survey effort* 6.11.3. Place Services consider that cable/pipeline routes are reasonably straightforward developments from an ecological survey and assessment perspective, but when the scale is very large that can be an overwhelming challenge. 6.11.4. Multiple consultations were undertaken with relevant stakeholders concerning the ecological survey methods. It is noted that Natural England was consulted regarding the survey scope for bats, breeding birds, wintering/passage birds, and hazel dormouse; and the Environment Agency were consulted regarding the scope of aquatic ecology surveys.	The Applicant notes this comment.
Ecology and Biodiversity	6.11.5. Place Services considers that the scope of the survey effort is acceptable across the suite of ecological impact receptors within the Essex LPA areas. It is recognised that circa 12.5% of the Order Limits are still undergoing ecological survey, and there are certain surveys where the results are more incomplete (e.g. for otter and water vole only 65% reported; see also **ES Chapter 8 [APP-158]**, Table 8.4). This missing information in the dataset is anticipated to be provided in November 2025. It is expected that the results of those surveys will not significantly deviate from the precedent set by the rest of the results so far reported.	Survey results from 2025 (including habitat, otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.
Ecology and Biodiversity	6.11.6. Overall, it is Place Services' assessment that the scope of ecology survey results presented is by-in-large suitably comprehensive and compatible with the survey methodology as was presented within the PEIR.	The Applicant notes and welcomes this comment.
Ecology and Biodiversity	*Notable impact assessments for Essex LPAs* 6.11.7. The **ES Chapter 8 [APP-158]**, Table 8.23 impacts assessment summary includes assessments of predicted impacts pre-mitigation, which is useful transparency and best practice. Some of the assessed 'negligible' magnitude residual impacts could be argued to be more accurately classifiable as 'small'	This approach reflects standard Environmental Impact Assessment practice, in which the residual effects section presents the final significance outcome, with the underlying factor, such as duration, embedded within the earlier magnitude assessment rather than restated. This approach is in accordance with the approach as outlined within the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**.

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	magnitude (per the **ES Chapter 8 [APP-158]**, Table 8.6 criteria), but that would not change the predictions of no significant effect. The residual impact assessments could be more transparent by providing assessments of predicted impacts in the short – medium terms and not just long term.	
Ecology and Biodiversity	6.11.8. The predicted construction phase impacts on all County Wildlife Sites ("CWS") and Local Wildlife Sites ("LWS") falling within the Order Limits are rated as minor, temporary, and reversible, and the residual impacts post mitigation are all appraised as negligible. For Colchester City Council, this includes possible hydrological impacts to Black Brook LWS, and potential for accidental encroachment into ancient woodland at Harrow Wood LWS. For Chelmsford City Council, this includes the potential for accidental encroachment into ancient woodland at Parson's & Queen's Wood LWS, and Osborne Wood LWS, tree loss at Langley's Deer Park LWS, oversailing at Great/Little Edney Woods LWS, and removal and undergrounding of 11 kV UKPN overhead line at Writtle-Writtlepark Woods LWS. Place Services does not disagree with these assessments in principle, although see later comments on the criticality of appointing an Ecological Clerk of Works ("ECoW") to assure that mitigation measures are implemented as detailed.	The Applicant notes these comments.
Ecology and Biodiversity	6.11.9. The operational phase impact potentials for all designated sites are assessed as negligible. **The Appendix 8.8 Wintering and Passage Bird Report [APP-167-170]** provides a reasonable evidence base for this assessment with respect to the qualifying species and assemblages of the Blackwater Estuary SPA & Ramsar site and the possibility of Annex 1 species at Ardleigh Reservoir.	The Applicant notes these comments.
Ecology and Biodiversity	6.11.10. Given the length and nature of the project, impacts to Priority Habitats within the Essex LPA areas are inevitable. Embedded mitigation (routing for avoidance) has reportedly been applied to avoid key habitat as best as possible. The impact potential of the project on 'important' hedgerows (as classified under the Hedgerows Regulations 1997 using the wildlife and landscape criteria) and other Priority Habitats is rated by Arcadis as negligible based on the assumption of the effective execution of a combination of replacement planting and compensation planting (some of which would not be in the same locations). The analysis underpinning the proposed disapplication of the Hedgerow Regulations in the DCO is being assessed to inform ECC's response on this issue.	The Applicant notes these comments.
Ecology and Biodiversity	6.11.11. Some potential impacts on protected species are not yet fully measured. For some species, the practicality of applying seasonal avoidance mitigation measures (e.g. breeding birds – general and Schedule 1) is to be decided on a per situation basis post DCO consent. For others (e.g. badger, water vole), surveys have been completed but certain further surveys will be needed pre-construction to account for potential changes between the original survey dates and the eventual start of works.	All ecological impacts on habitats and protected species have been assessed in full within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Where updated pre-construction surveys are required these have been set out within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Pre-construction surveys are required to ensure valid surveys, due to the time frame associated with both the planning process and the construction programme. This is a standard requirement of a project of this scale. Pre-construction surveys would ensure all survey results are up to date in line with survey validity windows for each survey type in turn as outlined by good practice guidelines.

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	6.11.12. With respect to bats, aerial inspections and/or emergence surveys of trees rated for roosting bat potential as Further Assessment Required (FAR) or Potential Roosting Feature – Multiple Bats (PRF-M) are planned to be undertaken post DCO consent.	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. This commitment is included within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and is a standard requirement of projects of this scale to ensure up to date data is considered. Where the presence of a bat roost is confirmed mitigation measures, as agreed with Natural England, will be employed under licence to ensure no impact on the favourable conservation of bats.
Ecology and Biodiversity	6.11.13. Place Services disputes the assumptions in the statement in the **oCoCP [APP-307]** Commitment Reference B16 that, "Natural England will only issue a derogation licence in relation to a development proposal if the licensed actions are reasonably anticipated to maintain the favourable conservation status of a species or provide a conservation benefit. Thus, overall effects are anticipated to be neutral/beneficial". Place Services considers that the widespread lack of effective post mitigation licence monitoring makes 'reasonable anticipation' as to when a mitigation proposal is likely to be successful, a highly uncertain prospect at best. For now, acceptance that significant negative impacts to protected species' district-level conservation statuses will be prevented, requires a confidence in the ongoing survey effort completion (to a good standard) and in the total efficacy of the planned mitigation measures. This is not a sound approach; impacts on protected species need to be assessed with reasonable confidence and the proposed mitigation considered appropriate, prior to determination, to support a lawful decision. Whilst Bat Conservation Trust ("BCT") guideline-compliant survey efforts for every PRF-M tree predicted for impact may not be a reasonable expectation, it is believed further survey effort prior to DCO consent is feasible (i.e. climbing inspection). Climbing will not be possible for every tree, but enough surveys should be possible to allow for a data-based estimation of the percentage of the PRF-M trees that evidently (or very likely) support a significant level of bat roosting and will be lost to the project. This would allow for a worst-case scenario estimation of impact and the design of a more confidently proportionate mitigation/compensation scheme.	The bat roost survey scope was agreed with Natural England, as the statutory authority for roosting bats, in advance of surveys being undertaken. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** includes a reasonable worst-case assessment of impacts on potential roost features. Barbastelle bats are the rarer bats in the area that could be affected by the Project and so targeted surveys have been undertaken to confirm whether these bats are roosting in trees affected by the Project including aerial surveys, emergence, back-tracking and radio tracking. Where roosts have been confirmed for barbastelle bats the route was amended to avoid these roosts. 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 employed under licence to ensure no impact on the favourable conservation of bats.
Ecology and Biodiversity	6.11.14. Hazel dormouse populations were confirmed at Survey Areas 18 (King Wood), 19 (Bosmore Wood), and 20 (Bushy Wood and Osborne's Wood), which all fall within the Margaretting area of Chelmsford City Council. Based on the information submitted, the negligible residual impact assessments for these hazel dormouse sites are not disputed. 6.11.15. Survey completion can be reconsidered after November 2025 when more survey results are anticipated. Ultimately, a satisfactory completeness of ecological survey must inform the DCO to support any Examining Authority recommendation.	6.11.14 - The Applicant notes this comment. 6.11.15 - Survey results from 2025 (including habitat, otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.
Ecology and Biodiversity	*Mitigation* 6.11.16. The 'Embedded' mitigation for the project is described in **the ES Chapter 8 sections 8.62. – 8.6.6. [APP-158]**. 'Standard' and 'Additional' mitigation measures are detailed in the ES Chapter 8 sections 8.6.7 – 8.6.26, the **oCoCP [APP-300]**, and **oLEMP [APP-321]**. Natural England were reportedly consulted	A Great Crested Newt Impact Assessment and Conservation Payment Certificate has been obtained and counter signed by Natural England. Draft licence applications for badger, water vole and dormouse have been submitted to Natural England. The Applicant is working closely with Natural England towards Letters of No Impediment for these protected species and are expecting receipt during the Examination phase. These draft licence applications include any requirement for monitoring of licensable species and associated mitigation. No otter holts were identified through further survey work and therefore no otter licence is currently required. The Natural England

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	regarding the mitigation approaches for great crested newt, bats, hazel dormouse, otter, water vole, and badger.	Statement of Common Ground submitted at Deadline 1 **(5.9.13 Draft Statement of Common Ground - Natural England [Revision B])** outlines the current status of these protected species licences draft.
Biodiversity Net Gain	6.11.17. Place Services understands that the non-mandatory BNG scheme offered by the Applicant will inform the area habitats, hedgerow, and watercourse compensation requirement, which must be delivered first. Additionally, the BNG scheme will deliver the new habitat creation/enhancement such that will provide a 10% increase in respective habitat units over the baseline habitat unit calculations as calculated via BNG Metric. Details are yet to be resolved as to where off-site habitat creation will be for Essex LPA areas, and who will be responsible for management and monitoring.	The Applicant has committed to delivering at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits, despite it not yet being mandatory for Nationally Significant Infrastructure Project applications. The exact number of off-site BNG units required would be determined following detailed design and a re-run of the statutory biodiversity metric. The Applicant is committed to delivery of off-site BNG units through third-party providers, with sites registered on the Natural England register, to ensure reliable delivery. Long-term management of these off-site BNG habitats would fall to the third-party providers in line with the habitat management plan for the specific site.
Ecology and Biodiversity	6.11.18. The reliabilities of the residual ecological impact predictions stated within the **ES Chapter 8 [APP-158]** Table 8.23 are dependent upon the correct execution of the prescribed 'Standard' and 'Additional' mitigation measures. Of course, that is the case with any development proposal. However, when the scale of development is as large as it is with Norwich to Tilbury project, the negative consequences from the poor execution of mitigation could become cumulatively significant. 6.11.19. There are multiple ways in which the 'Standard' and 'Additional' mitigation measures could fall short of expectation. There could be errors in construction exclusion zone placement and maintenance. Errors could be made in following protected species mitigation licence conditions, which may not always be rectifiable after the fact. Replacement plantings may not be suitably managed or replaced until reliably established, given that the 5-year post completion time limit for habitat reinstatement is considered too short. Where the project's replacement planting will be outside of the Applicant's land control and only 5-years post completion time monitoring will be achievable, ECC advise that the Essex LPAs should ask that a mutually agreed replacement planting failure percentage be factored into the compensation requirement.	All mitigation would be secured through the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]**. Compliance with the final versions of these documents is required by the Requirement 4 of the draft Development Consent Order [APP-056]and therefore it would be a criminal offence for National Grid not to comply and appropriate enforcement action can be taken by the relevant local authorities. Measures have been included within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** such as the provision of an Ecological Clerk of Works with support of other species specialists to ensure successful delivery.
EIA Approach and Methodology	6.11.20. Phrases of "where practicable" (and other proviso-type equivalents) are included in multiple of the mitigation measures / environmental commitments statements within the ES Chapter 8, **oCoCP [APP-300]** and **oLEMP [APP-321]**. It is understood that there are circumstances where having stipulations is realistic and unavoidable. Nevertheless, any provisos to applying mitigation will be open to subjective interpretation of necessity and could therefore see varying degrees of diligence.	The use of the phrase 'where practicable' provides the flexibility required for a Project of this scale at this point in the Project. Once detailed design has been developed, the final Landscape and Ecological Management Plan and final Code of Construction Practice would provide more certainty on any exceptions.
Ecology and Biodiversity	6.11.21. The Ecological Clerk of Works ("ECoW") functionality during the construction works is going to be critical to determining what ecological impact the Norwich to Tilbury project does or does not have. The **oCoCP [APP-300]** and **oLEMP [APP-321]** both state the ECoW responsibilities in their respective Table 3.1. The **oLEMP [APP-321]** section 11 Implementation mentions commitments to site checks during the works and monitoring post construction; however, these are brief and undetailed statements.	The Ecological Clerk of Works (ECoW) would be suitably qualified and have sufficient experience based off industry good practice. Protected species specialists, with relevant Natural England surveyor licences, would be used where required as identified within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Further detail on the ECoW would be provided in the final Landscape and Ecological Management Plan post consent.

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	Given the critical importance of the ECoW oversight and influence throughout the construction stage of the Norwich to Tilbury project, a commitment should be made as to the qualifications/experience of the ECoWs to be used. Clarification is also sought of ECoW decision capability and hierarchy, assuming that there will be multiple ECoWs employed on the project.	
Biodiversity Net Gain	6.11.22. Those concerns aside, Place Services acknowledges that the project's commitment to BNG and (by-in-large) Natural England trading rules is positive. The BNG provisions should provide considerable ecological gains, though it will be important to ensure that Essex LPA areas receive their fair share of any off-site provision. The BNG gains will provide an offset to any mitigation/compensation/habitat reinstatement failures that become apparent over the long term. That is not the intended purpose of BNG but, this is something to recognise. BNG has a narrow focus on habitats, so designing BNG habitat units' creation that also provides improvements for targeted species groups will require focused planning.	The Applicant has committed to delivering at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits, despite it not yet being mandatory for Nationally Significant Infrastructure Project applications. Biodiversity is not bound by Local Authority area and therefore off-site BNG would be considered across the length of the Project. However as detailed within the **7.1 Biodiversity Net Gain Report [APP-299]**, the aim is to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Off-site BNG sites will be selected based on a site-selection criteria which will consider a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others.
Ecology and Biodiversity	*Ecology Conclusions* Place Services considers that the ecological survey scoping, methods, and execution for Norwich to Tilbury, as they have been reported to date, have generally been achieved to a good standard. It understands that the Applicant will provide missing information in the dataset shortly. Further assessment is still required on roosting bats in trees along the project length, and this is a matter is currently unagreed within the LPAs' SoCG.	Survey results from 2025 (including habitat, otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken. The bat roost survey scope was agreed with Natural England, as the statutory authority for roosting bats, in advance of surveys being undertaken. Results from further bat surveys, in line with the agreed approach with Natural England, are included within the updated November reports.
Ecology and Biodiversity	Place Services considers that the ecological impact assessments are largely transparent and thorough, and the impact predictions are reasonable. The planned mitigation measures are also thorough and apply good practice. However, the ecological impact assessments for the project generally have a heavy reliance on either the quality execution of surveys to be completed post DCO consent or/and on the proper implementation of mitigation measures across a very large constructions works area and throughout an extended construction period. Further commitment to ensuring a high- 43 quality ECoW oversight of the project is thought to be the best means of avoiding significant mitigation failures.	All ecological impacts on habitats and protected species have been assessed in full within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Where updated pre-construction surveys are required, these have been set out within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Pre-construction updated surveys are required to ensure valid surveys, due to the significant time frame associated with both the planning process and the construction programme. This is a standard requirement of all projects of this scale. Pre-construction surveys will ensure all survey results are up to date in line with survey validity windows for each survey type in turn as outlined by good practice guidelines. The Ecological Clerk of Works (ECoW) would be suitably qualified and have sufficient experience based off the industry good practice. Protected species specialists, with relevant Natural England surveyor licences, would be used where required as identified within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Further detail on the ECoW will be provided in the final Landscape and Ecological Management Plan post consent.
Historic Environment	*6.12. Historic Environment* 6.12.2. The Applicant and their consultants have positively engaged with the Historic Environment advisors (ECC Place Services) during the pre-application stage and has submitted a detailed Environmental Statement (**Document 6.11 Environmental Statement Chapter 11 [APP-208 to APP-219]**). There is no objection in principle to the scheme, however there are some areas of concern that will need to be addressed to ensure agreement can be reached for the topics included in the SoCG. 6.12.3. There are 3 principal areas of concern:	The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as **Supplementary Environmental Information [AS-068 to AS-083]**, of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,440 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

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	6.12.4. Completion of archaeological/geoarchaeological evaluation - A programme of geophysical survey and archaeological trial trenching was proposed for areas identified as High Priority due to either design constraints and/or the presence of archaeological remains of potential high significance. This stage of fieldwork has not been completed. There is concern that the appropriate level of evaluation is not going to be completed within the determination period. The level of fieldwork that has been completed to date is not sufficient to fully understand the nature, extent and significance of archaeological and geoarchaeological deposits that may be present within the scheme. This would be considered in conflict with paragraph 207 of the National Planning Policy Framework (2024).	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.
Historic Environment	6.12.5. Mitigation - Without a full programme of archaeological, geoarchaeological, and palaeoenvironmental evaluation to establish archaeological/geoarchaeological potential and inform a robust mitigation strategy, the scheme risks causing avoidable harm to the Historic Environment. This would be contrary to EN-1 section 5.9, which requires impacts (both direct and indirect) to be understood, and harm avoided or minimised through design and mitigation, with loss of archaeological assets preserved by record where justified. An **Outline Archaeological Mitigation Strategy ("OAMS")** and **Outline Written Scheme of Investigation ("OWSI")** has been submitted **[APP-328]**. The document still needs to clarify the scope and extent of further evaluation required prior to any agreed mitigation. This will include further geophysical survey, archaeological trial trenching and geoarchaeological investigation. This will allow all parties to be clear about the scope and level of evaluation that may be required should consent be given. Archaeological mitigation measures are secured through Requirement 5 in the **Draft DCO [APP-056]**. Should the scheme be granted based on the current levels of evaluation, any DCO condition should explicitly allow for a separate evaluation stage of archaeological work, before securing a detailed investigation stage as mitigation.	The Project proposes to update the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the Examination period in consultation with the Local Planning Authority Archaeological Advisors. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than that undertaken by many other Nationally Significant Infrastructure Projects which have been completed and consented by the Secretary of State. 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 preservation in situ should highly significant remains be identified.
Historic Environment	6.12.6. EIA assessment conclusions - There is potential for archaeological and geoarchaeological deposits of local to national significance to be present within the proposed scheme that may be negatively impacted by the groundworks required for elements of the scheme, including foundation bases for proposed new towers and substations, construction of new accesses, haul routes and compounds. The undergrounding of sections of the proposed route also has the potential to cause significant impact due to the width of the working corridor required for the burial of the cables, typically 120m in width (**5.6 Planning Statement [APP-085]**). Geoarchaeological and palaeoenvironmental deposits could be impacted in areas of underground cabling and directional drilling locations. In addition, during pre-application meetings it became clear that there would be further impact to known and potential unknown archaeological remains through	There are measures in place through Requirement 5 of the **3.1 Draft Development Consent Order [APP-056]** and the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** to secure agreement of any further evaluation and/or mitigation prior to the start of works and which provides protection for currently unknown archaeology. 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.

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	temporary and permanent ecological and landscape mitigation areas. Archaeological evaluation has taken place in some of the High Priority Areas and is currently continuing but the results of these will be difficult to integrate into the documentation already submitted as part of the application and the full impact of the scheme on the historic environment will not be fully defined or assessed pre-determination. Similarly, with the geoarchaeological report, no scientific dating or further assessment of the deposits has been carried out to inform of the significance of the deposits. There is potential that the assessment conclusions will be based on insufficient evidence.	
Historic Environment	6.12.7. To assist in resolving concerns, the Historic Environment Advisors request additional information to be submitted including: • Submission of all archaeological fieldwork data in a report format prior to the determination of the application. • Plan of all completed fieldwork and areas of future evaluation identified and included within the OWSI/AMS; and • Further details for geoarchaeological /palaeoenvironmental investigation that could be completed prior to the determination of the application to establish significance. 6.12.8. ECC Place Services Historic Environment (Archaeology) will provide detailed comments on the submitted documents in the Local Impact Report.	All completed interim reports for trial trenching were submitted with the application for development consent in **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]**). Further interim reports and assessment reports for priority trial trenching areas and the final report for the Phase 1 priority areas geophysical survey were submitted to the Planning Inspectorate as Supplementary Environmental Information in January 2026, prior to the start of Examination [**AS-068 – AS-083**]. The assessment reports for the Phase 2 geophysical survey and trial trenching will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed and agreed at monthly meetings and set out in the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. The Supplementary Environmental Information Report also includes a Project-wide figure indicating the progress of the priority evaluation areas and Phase 2 geophysical survey (**6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [AS-082]**). The Applicant proposes to update the **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, which will include figures detailing the completed and planned evaluation. The **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** already includes provision for further geoarchaeological/ palaeoenvironmental work.
Historic Environment	*6.13. Historic Buildings* 6.13.1. Place Services has considered the impact of the project on built heritage with reference to Tendring, Colchester, Brentwood and Basildon districts within Essex. Braintree and Chelmsford retain their own heritage advice so will comment separately. 6.13.2. The project area is split into sections: Section C includes Colchester and Tendring districts, D relates to Colchester only, E is within Braintree, F is within Brentwood, and G covers sections of both Brentwood and Basildon. There is no distinction within the Applicant's assessment tables between districts and the full address of the asset is also not included, which does result in difficulty determining the effect on individual local authorities.	**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]** are largely split by local authority. The Applicant is not required to split the assessment by local authority.
Historic Environment	6.13.3. The Applicant has conducted assessments of how the proposed Norwich to Tilbury project will affect heritage assets within or close to the proposed Order Limits. There are no designated heritage assets within the Order Limits, however there many instances where the Order Limits contains areas of land	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**

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	which form part of the setting of designated heritage assets. There are also instances where the proposals will directly affect non-designated heritage assets, however Place Services understands that these are only archaeological (below ground) assets, and that no non-designated built assets (above ground) have been identified or assessed as part of the walk-over survey conducted by the Applicant. This is, ultimately, a concern. Place Services is particularly concerned that the scope and scale of the assessment conducted by the Applicant place a lower value on non-designated building of historic or architectural interest, meaning they were automatically scoped out of their assessment. This is particularly unfortunate when it relates to locally listed buildings.	**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. This is common for many types of developments and should be considered in the context of the planning balance which accounts for the benefits of the Project. All non-designated heritage assets were assessed to determine their value in accordance with the **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.
EIA Approach and Method	*Mitigation* 6.13.5. The embedded and standard mitigation measures are acceptable in principle. Regarding additional mitigation measures, the document reads: 11.6.10 As a result of the assessment within this ES, as defined in Section 11.7, additional mitigation is required. Any mitigation for historic buildings or historic landscapes would be secured through the measures set out in embedded and standard mitigation above". Place Services assumes that this meant to read 'additional mitigation is not required'.	The existing phrasing is correct and indicates that mitigation for historic buildings and historic landscapes is accounted for in embedded and standard mitigation. Additional mitigation requirements have been identified over and above those set out in embedded and standard mitigation for archaeology, for which paragraph 11.6.11 provides further detail in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**.
Historic Environment	6.13.6. Following the review and assessment of the Applicant's conclusions on the impact of the project on heritage assets, Place Services considers that the application of the embedded mitigation measures should be increased regarding the following assets: • Tendring: Bounds Farmhouse (1147743), Fountain Farmhouse (1253912) • Colchester: Aldham Hall (II*, 1306270), Wagon Lodge to North of Aldham Hall (1337391) • Brentwood: St Mary's Church (II*, 1264434) Buttsbury, Ingatestone and Fryerning TQ69NE (1207790), Wardopers Farm (1293259), Dunton Hills (1208245) • Basildon: Sudbury's Farm (1170946), Botney Hill Farmhouse (1322862) 6.13.7. In all instances, positioning the Order Limits, associated access roads and pylons further away from the listed buildings than proposed, would be beneficial, better retaining the current undeveloped, agricultural qualities of their settings. Place Services appreciates that care has been taken to avoid settlements, but the resulting change to the countryside will still be notable in the landscape surrounding these buildings. It is, nevertheless, agreed this change results in 'less than substantial' harm, as is discussed in the following sections and does not dispute the resulting level of harm to the significance of these assets ascribed by the Applicant in their conclusions. In the case of Bounds Farmhouse, moving the position of the proposed	The Project would lead to no harm or less than substantial harm to listed buildings and conservation areas, including those listed by Essex County Council. Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in the **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. 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. Regarding embedded mitigation, the **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. Given the assessment concludes at worst, less than substantial harm, and given the mitigation hierarchy has been followed, the Overarching National Policy Statement for Energy EN-1 (2024) does not require the Applicant to take any further measures.

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	substation further east, away from the listed building, would be beneficial.	
Historic Environment	6.13.8. In the case of the Grade II listed bridge over the River Wid (Ingatestone and Fryerning TQ69NE) in Brentwood, the map of the Order Limits suggests that Ingatestone Road may form part of the access roads to this section of the new pylons. Ideally, this will not be used as part of the works to hopefully prevent any undue effects of increased loads etc. Clarification and any necessary assessment of this structure would be beneficial either by redrawing the Order Limits further away from the bridge or the submission a specific survey regarding the potential effects use of this bridge during construction will have, to be provided to the local authority and the Examining Authority during examination. Place Services identifies that the project will result in mid-less than substantial harm to the significance of this bridge due to changes to its setting, however it remains unclear if any direct impacts of the proposal have been considered as part of the assessment.	There is no proposal to use the Grade II listed bridge 'Ingatestone over the River Wid (that part in Brentwood District)' (1207790) for any construction access as it is not on a Primary Access Route or within the Order Limits.
Historic Environment	6.13.9. 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).	Details of on-site tree and hedgerow replacement planting will be provided following detailed design in accordance with the Final Landscape and Ecological Management Plan which is secured by Requirement 4 within the **3.1 Draft Development Consent Order [APP-056]** and subject to approval by the relevant Local Planning Authorities.
Historic Environment	6.13.10. Place Services 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 the **7.4 Outline Landscape and Ecological Management Pan [AS-046]**. 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.
Historic Environment	H07: Commitment NV04 (see Outline CoCP (document reference 7.2)) will be applied in relation to any designated historic buildings with potential to be impacted by construction vibration. 6.13.11. The expansion of H07 is recommended 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 monitor effects.	**6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** did not identify any heritage assets in Colchester, Braintree, Brentwood, Basildon or Thurrock that would be impacted by vibration from the Project. The vibration assessment identified one historic structure, the Grade II listed Little Bromley War Memorial (1493299), in Tendring that has potential to be impacted. As this is not a residence, the current approach in H07 and the associated NV04 (**7.2 Outline Code of Construction Practice [APP-300]**) is considered to be appropriate.

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Historic Environment	6.13.12. Place Services agrees that in many cases, the introduction of measures such as additional planting to screen the proposed development in views from, towards and including built heritage assets would not be desirable where it would have the effect of curtailing or truncating views across an open agrarian landscape setting which contributes to the understanding of an asset's historic function and which helps reveal its architectural interest. Therefore, Place Services understands and appreciates why this has not been suggested as an additional mitigation measure.	The Applicant can confirm that the approach is to ensure that any mitigation is carefully tailored, proportionate, and sensitive to both the asset and its wider setting, in line with good practice and relevant policy guidance.
Historic Environment	6.13.13. Following a 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, ECC requests that further details are provided 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, the **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. The **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.
Noise and Vibration	*Construction Vibration Effects on Buildings and Structures* 6.13.14. In document **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-2569]** 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 in 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 approximately 10 metres south of the Fox 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.	The properties in question are located approximately 7 m from proposed works. This is beyond the 2 m 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 in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** considers reasonable worst-case assumptions, and the Main Works Contractor(s) would specify mitigation measures to reduce vibration levels as set out in the **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]**. These measures would also reduce vibration levels at the properties to the south of the Haywain.
Noise and Vibration	6.13.15. Construction Noise and Vibration Mitigation measures NV04 and NV05 are relevant but measures should be put in place to avoid damage to these structures 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. No structures or buildings have been identified where there is the potential for damage from vibration from potential piling activities in any project section.	The applicant notes and agrees with this comment. Reference should also be made to commitment NV01 of the **7.2 Outline Code of Construction Practice [APP-300]** which requires the Main Works Contractor(s) to implement best practicable means (BPM) to reduce vibration (and noise) levels. As such, measures would be put in place to avoid damage, rather than rectifying damage after the fact. Commitment NV04 is relevant in situations where, despite the implementation of BPM, vibration levels may still be high. However, this is very unlikely.

Topic	Summary of matters raised	National Grid's response
Historic Environment	Impacts of the Project on Designated Heritage Assets 6.13.17. The level of less than substantial harm to significance identified by the Applicant has been expressed on a scale of Lower, Mid and Upper. The highest level of less than substantial harm to the significance of a designated heritage asset that has been identified by the Applicant during the Construction and Operational phase of the project, is Mid less than substantial harm. The Applicant notes that none of the harm it has identified to the significance of designated heritage assets throughout all project sections and phases has been classified as Upper less than substantial harm. 6.13.18. Detailed commentary on the impacts of the project on Designated Heritage Assets will be provided by each of the relevant Essex District Councils and ECC supports the commentary put forward.	The Applicant can confirm the approach to the assessment of impacts on designated heritage assets is set out within **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and its appendices and that the highest level of harm identified for any designated heritage asset during both the construction and operation (and maintenance) phases is 'Mid less than substantial harm'. No designated assets have been assessed as experiencing 'Upper less than substantial harm' or substantial harm from the Project. In addition, as the Project is classified as critical national priority as set out in Section 4.2 of National Policy Statement EN-1 (2024) there is a presumption that it will meet the test for public benefit that outweighs harm, even if substantial harm were identified, as set out in paragraph 4.2.15–4.2.17 of NPS EN-1 (2024).
Historic Environment	*Impacts of the Project on Built Non-Designated Heritage Assets ("NDHAs")* 6.13.19. Table 11.3 on page 27 of 6**.11 Environmental Statement Chapter 11 – Historic Environment (Final Issue A) [APP-208]** provides the Heritage value assessment criteria for different types of designated and non-designated heritage assets. Locally listed buildings 'or those of equivalent quality in their fabric or historical associations' and 'Assets of local importance' have been assigned a Low Value/Sensitivity in National Grid's Assessment Methodology. Paragraph 11.4.25 on page 26 of the same document says: '…The settings of all negligible and low value non-designated heritage assets have not been assessed…, due to the lack of potential for any impacts to these assets to result in significant effects…' 6.13.20. It also says that this approach was discussed and agreed with stakeholders in February 2025. However, Place Services does not recall reaching this agreement regarding the decision not to carry out an assessment of the setting of non-designated built heritage assets. 6.13.21. The failure to consider the effects of the proposed development on the setting and significance of built NDHAs is not in accordance with paragraph 5.9.7 of the Department for Energy Security and Net Zero overarching National Policy Statement for Energy (EN-1) which states: "The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan making process by plan-making bodies, including 'local listing', or through the application, examination and decision making process). This is on the basis of clear evidence that such heritage assets have a significance that merits consideration in that process, even though those assets are of lesser significance than designated heritage assets". 6.13.22. It also prevents a balanced judgement being carried out as required by paragraph 5.9.33 of the same document: "In weighing applications that directly or indirectly affect non-	All non-designated heritage assets were assessed to determine their value in accordance with the **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. Overarching National Policy Statement for Energy EN-1 (2024) paragraph 5.9.9 includes instructions regarding the Applicant's assessment: '*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*', and in several places 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. The historic environment thematic group meeting held on 27 February 2025 was principally focused on the updated **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. A draft of this was shared with all historic environment stakeholders on 13 February 2025, and had been produced in accordance with the approach of not including a written settings assessment for non-designated heritage assets of low and negligible value. This element of the methodology was briefly discussed during the meeting and no objections were raised. The effects of the development on built non-designated heritage assets have been carried out and a written settings assessment is presented for those built non-designated heritage assets that are of medium value or above and have the potential to experience significant effects from the Project.

Topic	Summary of matters raised	National Grid's response
	designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."	
Historic Environment	6.13.23. It is acknowledged that some NDHA's have been assigned Medium Value/Sensitivity, namely "Assets that contribute to regional research objectives and/or have exceptional quality in their fabric or historical associations" and assessments of the impact on their setting and significance arising from the proposed development have been carried out. Those that appear to include built heritage are farmsteads, some of which are associated with listed buildings including 2441 Moat Farm (Barking Farm), however no clear distinction has been made between built NDHAs and archaeological (below ground) NDHAs in the assessment tables and clarification should be provided.	**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** is organised geographically and by period and includes baseline information on non-designated historic buildings. All assessed heritage assets were referred to in text across all documents either by their National Heritage List for England number in the case of designated assets, or a Project ID number for non-designated assets. The baseline report and assessment tables are not structured by asset type as some heritage assets can contain both above ground built elements and archaeological remains.
Socio-economics Recreation and Tourism	*6.14. Community Benefits and Compensation* 6.14.1. The project will have clear and extensive residual impacts that will adversely affect the local economy and environment, as well as the health and wellbeing of communities in Essex, and which cannot be sufficiently mitigated or compensated through the planning regime. Furthermore, ECC contends that while the Norwich to Tilbury project will deliver significant benefits at a national level, this will not offset the harm at the local level. This is not acceptable to ECC.	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 (2024) and NPS EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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). NPS EN-1 (2024) 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 NPS EN-1 (2024) confirms the urgent need for CNP Infrastructure to achieving the UK's 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-145]** and **5.6 Planning Statement [APP-085].** NPS EN-1 (2024) paragraph 4.1.7 provides *'… 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'.* 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 NPS EN-1 (2024) and NPS EN-5 (2024). 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.
Socio-economics Recreation and Tourism	6.14.2. ECC is therefore of the opinion, that the Norwich to Tilbury project should deliver significant beneficial socio-economic effects to the host communities, to offset impacts. It however, is concerned this issue and especially the associated social value opportunities around skills, training, and future employment, have not been fully assessed by the Applicant and needs to be as a matter of priority. 6.14.3. Mindful of the above, ECC is hopeful that the Applicant will respond positively to the issue of social value and community benefits as set out in our response to the statutory consultation in 2024, particularly having regard to the Government's recently published Community Funds for Transmission Infrastructure. This will certainly be a key issue of disagreement at the Examination process unless clarity is provided as soon as practically possible.	**6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** assessed a potential not significant beneficial effect on the local economy during construction and a potential not significant adverse effect on the tourism economy. In relation to skills and workforce, please refer to paragraphs 6.7.1 to 6.7.9 of this RR above. The Government has published guidance on community funds for transmission infrastructure. 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 the Applicant's developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order.

Appendix P.
Essex Wildlife Trust

nationalgrid

Appendix P
Essex Wildlife Trust

Table P1.1 outlines the Applicant's comments on the Relevant Representation (RR) provided by **Essex Wildlife Trust [RR-1090]**. The Applicant has held a number of meetings with Essex Wildlife Trust during the development of the Project and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 **(5.9.19 Draft Statement of Common Ground - Essex Wildlife Trust [Revision B])**, which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table P1.1 Summary of comments and National Grid's response

Topic	Comments	National Grid's response
Ecology and Biodiversity	3. Essex Wildlife Trust is supportive of renewable energy and associated infrastructure required to upgrade the electrical network, providing impacts on wildlife and habitats can be avoided through careful siting, design and high-quality mitigation. However, we have some particular concerns about the Norwich to Tilbury scheme's impacts on biodiversity. Our ecological concerns centre around the impacts of the overhead line route through Essex on designated nature conservation sites, irreplaceable habitats, and protected species. Our focus during the Examination will be on securing comprehensive mitigation and compensation for potential impacts.	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on designated nature conservation sites, irreplaceable habitats and protected species. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. Chapter 8: Ecology and Biodiversity of the ES **(6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026])** assesses the effects on important ecological receptors.
Environmental assessment	Designated Nature Conservation Sites The scheme affects internationally designated sites within Essex including the Stour and Orwell Estuaries Ramsar/SPA and the Thames Estuary and Marshes Ramsar/SPA, as well as nationally designated SSSIs and Local Wildlife Sites. Our concerns include, but are not limited to: • the adequacy of the Habitats Regulations Assessment (HRA), particularly regarding functionally linked land (FLL) for SPA qualifying species	The Habitat Regulations Assessment (HRA) report **(5.3 Habitats Regulations Assessment Report [APP-082])** provides a comprehensive evaluation of all potential impact pathways between the Project and internationally designated sites, including the Stour and Orwell Estuaries Special Protection Area (SPA)/Ramsar and the Thames Estuary and Marshes SPA/Ramsar. Functionally Linked Land was assessed using vantage point and transect survey data, habitat suitability mapping and species-specific behavioural information. Areas with potential connectivity to qualifying avian species were screened into the Appropriate Assessment where relevant. The HRA concludes that the Project will result in no adverse effect on the integrity of any European Site, with mitigation secured through embedded design measures and construction controls. Natural England has confirmed agreement with the HRA approach and conclusions, as set out in the Statement of Common Ground submitted at Deadline 1 **(5.9.13 Draft Statement of Common Ground - Natural England [Revision B])**.
Ecology and Biodiversity	• the assessment of collision risk for birds using internationally important sites and the adequacy of collision risk modelling, with bird diverter installation proposed at only two locations (River Waveney and Ardleigh Reservoir) across the 180 km route despite significant bird activity recorded at multiple vantage points	Collision risk has been assessed using vantage point survey data, species-specific flight behaviour and established modelling methodologies. A key embedded mitigation measure is the undergrounding of cables throughout the Dedham Vale National Landscape, which removes collision risk for birds moving along the Stour corridor to and from the Special Protection Area/Ramsar. Bird diverters are proposed on a precautionary basis at the River Waveney, reflecting potential future increase in bird use following the Waveney and Little Ouse Recovery Project and at Ardleigh Reservoir, where higher-risk species are regularly recorded. At other locations, survey data indicated low levels of flight activity at conductor height or limited functional connectivity with designated sites, and diverters were therefore not required. The HRA report **(5.3 Habitats Regulations Assessment Report [APP-082])** concludes that, with this evidence-led and proportionate approach, collision risk would result in no adverse effect on the integrity of any European Site. Natural England are in agreement with the conclusions of the HRA as stated within the Statement of Common Ground submitted at Deadline 1.
Ecology and Biodiversity	• disturbance to bird populations during construction through noise, lighting, and human activity	The HRA report **(5.3 Habitats Regulations Assessment Report [APP-082])** assesses potential disturbance effects on relevant European Sites and associated Functionally Linked Land (FLL), including noise, lighting and human activity during construction. Embedded mitigation measures include seasonal restrictions, buffer zones, directional lighting and construction management controls secured through the Outline Code of Construction Practice (Outline CoCP) **(7.2 Outline Code of Construction Practice [APP-300])**. Natural England has agreed

Topic	Comments	National Grid's response
		that, due to the temporary nature of works within FLL associated with the Stour and Orwell Estuaries Special Protection Area (SPA)/Ramsar, sufficient alternative habitat is available within the wider landscape to accommodate species such as lapwing and golden plover. With these measures in place, the HRA concludes that disturbance effects would result in no adverse effect on the integrity of the Stour and Orwell Estuaries SPA/Ramsar or any other European Site.
Ecology and Biodiversity	• impacts on SSSIs and Local Wildlife Sites	**6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026]** presents the assessment of potential impacts on Sites of Special Scientific Interest (SSSIs) and Local Wildlife Sites in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Through careful routeing and siting of the Project, direct impacts on designated sites have been avoided, and indirect effects (such as disturbance, habitat loss or hydrological change) have been minimised through embedded design and construction controls. Following the application of mitigation measures secured through the Outline Landscape and Ecological Management Plan (Outline LEMP) **(7.4 Outline Landscape and Ecological Management Plan [AS-046])**, the assessment concludes that no significant residual effects on SSSIs or Local Wildlife Sites are predicted.
Ecology and Biodiversity	5. Ancient Woodlands and Veteran Trees Ancient woodlands are irreplaceable habitats. The scheme identifies six ancient woodland sites (1.7 ha) within the Order Limits and 34 ancient woodland sites within the 15m root protection zone buffer. Additionally, 112 veteran trees have been surveyed with four requiring removal. Our concerns include, but are not limited to: • Four ancient woodlands in Essex where impacts are confirmed as unavoidable: Rivenhall Thicks (Section E); Writtle-Writtlepark Wood (Section F); Little Bladen's Wood (Section G); and Clapgate Wood (Section G). Rainbow Wood and Ashen Shaw (Section H/G) - no direct impacts from this project, but affects LTC mitigation planting area	Although unavoidable, the impacts to the ancient woodlands within Essex are minimal and appropriate mitigation has been provided to ensure no long-term impacts. A full breakdown of the impacts to each ancient woodland and a site-specific mitigation/compensation solution has been provided within 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])**.
Ecology and Biodiversity	• The four irreplaceable ancient trees, currently flagged as requiring removal, for which we would expect avoidance proposals. The Ancient Woodland and Veteran Tree Strategy states that "full compensation is unachievable"	**6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** provides a worst-case assessment of tree impacts. During and following detailed design, the Main Works Contractor(s) would seek to reduce impacts and avoid trees, where practicable. 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.
Ecology and Biodiversity	• reliance on the 15m buffer as the sole protective measure when Natural England's standing advice, currently under review, states this is a minimum for exclusion of activity that may be insufficient depending on site-specific factors	The application of a 15 m buffer from ancient woodland is currently the standing advice available and is considered appropriate for the temporary works associated with the Project. Natural England is in agreement that the approach to ancient woodland, as detailed within 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])**, is appropriate, and this agreement is recorded within **5.9.19 Draft Statement of Common Ground - Essex Wildlife Trust [Revision B]** submitted at Deadline 1.
Ecology and Biodiversity	• access rights across ancient woodlands causing soil compaction and root damage	Right of access routes would only be used during the overhead line/underground cable maintenance period and any use would be generally limited to small vehicles with limited movements. This potential impact is identified, where relevant, to individual ancient woodlands, within 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])** and appropriate mitigation measures are set out within the document. These measures will ensure no significant residual effect on ancient woodlands are encountered as a result of right of access routes.
Ecology and Biodiversity	• adequacy of the compensatory planting strategy	Compensation for any loss of veteran trees would be agreed with stakeholders as outlined in the Ancient Woodland and Veteran Tree Strategy **(7.4 Outline Landscape and Ecological Management Plan Appendix B**

Topic	Comments	National Grid's response
		- Ancient Woodland and Veteran Tree Strategy [APP-323]) and will be confirmed in the final LEMP. No compensation planting is proposed for ancient woodland for this Project.
Ecology and Biodiversity	6. Hedgerows and Habitat Connectivity The scheme will result in temporary removal of 5.36 km of species-rich 'Important' hedgerows across Essex sections. Our concerns include the time taken for reinstatement to restore ecological functionality and the loss of mature hedgerow connectivity fragmenting habitat networks critical for species movement.	The effect of habitat fragmentation has been assessed within Chapter 8: Ecology and Biodiversity of the ES **(6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026])**. Where a potential significant effect has been identified, mitigation measures have been put in place, such as the use of artificial bat flyways at key locations to ensure connectivity, with details provided within the Outline LEMP **(7.4 Outline Landscape and Ecological Management Plan (LEMP) [AS-046])**. Early opportunities for reinstatement planting will also be considered in line with the commitments made within the Outline LEMP.
Ecology and Biodiversity	7. Protected Species Three European Protected Species are affected: Hazel Dormouse (confirmed at five Essex locations), bats (extensive activity recorded with incomplete roost surveys) and European Otter (confirmed holts including breeding site); in addition, Water Voles (fully protected under Schedule 5 (Section 9) of the Wildlife and Countryside Act 1981 [as amended]) have been confirmed in multiple sections (with 72 watercourses not surveyed). Our concerns include, but are not limited to: • habitat fragmentation during multi-year construction isolating Hazel Dormouse populations	Survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated Chapter 8: Ecology and Biodiversity of the ES **(6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026])** which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken. A draft dormouse licence has been prepared and agreed with Natural England as referenced in the Statement of Common Ground submitted at Deadline 1 **(5.9.13 Draft Statement of Common Ground - Natural England [Revision B])**. The habitat loss in and around the confirmed dormouse sites is minimal with design and routeing carefully undertaken to avoid and minimise impacts. As agreed with Natural England, there would be no significant connectivity loss for hazel dormouse during the construction period at any of the confirmed dormouse sites. Impacts to suitable dormouse habitat is limited to temporary gaps in hedgerows and woodland habitats, to facilitate the construction of haul roads. The size of the gap would be a maximum of 12 m wide and therefore would not cause fragmentation of dormouse habitat in line with current guidelines. Connected hedgerows around the sites would remain and dormouse would travel more than 12 m across open ground. All dormouse habitats would be reinstated following the completion of the works.
Ecology and Biodiversity	• bat flyway crossing structures proposed at limited locations may be insufficient for extent of habitat severance and efficacy of any such structures, given clear evidence demonstrating highway crossing structures do not work (e.g. A11)	The artificial bat flyways are proposed at key locations where the survey data has indicated a high usage feature by foraging/commuting bats, to ensure connectivity is maintained during construction. The approach to bat commuting/foraging mitigation and the proposed locations for the bat flyways, has been agreed with the Local Planning Authorities through consultation on the Outline LEMP **(7.4 Outline Landscape and Ecological Management Plan [AS-046])**, as outlined within the relevant LPA Statements of Common Ground submitted at Deadline 1. The structures proposed are effectively temporary artificial replacements of the sections of hedgerows removed and are not the same or do not have the same purpose as the permanent bat bridges used for the A11. These artificial flyways have been used successfully on other Nationally Significant Infrastructure Projects for relatively short sections of temporary impact. The Applicant welcomes further discussions on the design of the proposed temporary bat flyways at the detailed design stage, beyond the principles outlined within the Outline LEMP **(7.4 Outline Landscape and Ecological Management Plan [AS-046])**.
Ecology and Biodiversity	• impacts on Otter natal holt with kits requiring displacement during breeding season	Further otter surveys were undertaken over 2025, with camera trapping completed at any potential holt/resting site. The 2025 surveys confirmed that none of the potential locations supported otter. This additional survey data has been included within the updated Chapter 8: Ecology and Biodiversity of the ES **(6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026])**. Therefore, there is no displacement concern for kits at otter natal holts as part of this Project.
Ecology and Biodiversity	• incomplete Water Vole surveys and unclear displacement methodology	Water vole surveys in 2025 have now been undertaken and the results of the surveys provided within the updated Chapter 8: Ecology and Biodiversity of the ES **(6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026])** and associated appendix (**6.8.A13 ES Appendix 8.13: Otter and Water Vole Report [AS-039]**). A draft water vole licence has been prepared which includes detail on the water vole displacement methodology and has been agreed with Natural England.
Ecology and Biodiversity	8. Habitats of Principal Importance The scheme will cause significant temporary losses of lowland mixed deciduous woodland, coastal and floodplain grazing marsh, lowland dry acid grassland, important hedgerows, and rivers.	All impacts to habitats would be mitigated through a combination of on-site replacement planting following completion of works and habitat creation/enhancement at the identified Environmental Areas, details of which are presented within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (BNG) with environmental and societal benefits for the Project. The BNG metric takes account of the technical difficulties and time lag associated with specific

Topic	Comments	National Grid's response
	While termed 'temporary', these losses will persist for several years, and full ecological restoration will take decades.	complex habitat types including woodland, acid grassland and river habitats. Further details are within **7.1 Biodiversity Net Gain Report [APP-299]**.
Ecology and Biodiversity	9. Survey Deficiencies Currently the baseline ecological assessment is incomplete. The ES acknowledges that 12.5% of the site had not yet been surveyed for habitats at ES submission, protected species surveys are incomplete, and surveys are continuing into 2025. We may wish to comment on the updated impact assessment and adequacy of proposed mitigation measures. We may wish to comment on the updated impact assessment and adequacy of proposed mitigation measures.	Survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated Chapter 8: Ecology and Biodiversity of the ES **(6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026])** which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.
Biodiversity Net Gain	10. BNG The BNG Report predicts an on-site net loss of -8.25% for Area Habitats requiring 1,165.95 off-site units. While Essex Wildlife Trust has engaged actively and expressed willingness in principle to work with National Grid on off-site BNG delivery, we may wish to comment on BNG methodology and habitat creation proposals, which should follow best practice guidance. The delivery of BNG should be aligned with the Essex Local Nature Recovery Strategy wherever possible. While we acknowledge that the 10% BNG commitment is not mandatory, we retain the view that the 10% BNG commitment does not adequately reflect the magnitude of likely biodiversity losses or our expectation that such a significant national scheme should make a meaningful contribution to nature's recovery, with clear, measurable enhancements for key species and specific habitats.	The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for development (subject to certain exemptions); however, this requirement is not yet in force for development consented pursuant to a Development Consent Order. Current indications suggest that it will apply to development consent applications submitted from May 2026; although this is yet to be confirmed. Notwithstanding that the application has been submitted in advance of the mandatory requirement, the Applicant has committed to deliver 10% BNG together with wider environmental and societal benefits for the Project. The 10% BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitments. In the absence of any guidelines, the BNG assessment methodology was defined and broadly agreed with Natural England. The details of the BNG methodology have been presented within the Biodiversity Net Gain Report **(7.1 Biodiversity Net Gain Report [APP-299])**. This includes an approach to strategic significance and commits to align with the Local Nature Recovery Strategies, where practicable.
Cumulative Effects	11. Cumulative and In-Combination Effects We may wish to discuss further the assessment of cumulative impacts with other developments in Essex. Essex is subject to multiple major infrastructure projects that will cumulatively fragment ecological networks and reduce habitat connectivity. The ES states that "The inter-project effects for ecology and biodiversity receptors during construction and operation were assessed as negligible and not significant." This conclusion appears to underestimate the genuine cumulative burden on Essex's biodiversity from multiple concurrent major infrastructure projects.	Chapter 17 - Cumulative Effects of the ES **(6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281])** has been developed in accordance with the Scoping Report **(6.19 Scoping Report [APP-288 to APP-296])** and the **Scoping Opinion (6.20 Scoping Opinion [APP-297])**. No significant cumulative biodiversity effects have been identified on biodiversity within Essex. This is also concluded within the HRA report **(5.3 Habitats Regulations Assessment Report [APP-082])**.
Ecology and Biodiversity	12. Legislative and Policy Compliance We may wish to comment on whether the scheme as currently proposed complies with The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), the NERC Act 2006 Section 40, the Environment Act 2021, the NPPF (December 2024) paragraphs 185, 186, and 187, and National Policy Statement EN-1.	The Applicant considers that the environmental assessment is compliant with The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), the Natural Environment and Rural Communities (NERC) Act 2006 section 40, the Environment Act 2021, the National Planning Policy Framework (NPPF)[109] paragraphs 192 -195, and National Policy Statements EN-1 (2024) and EN-5 (2024).

[109] Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework*

Appendix Q.
Exolum Pipeline Systems Ltd

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Appendix Q
Exolum Pipeline Systems Ltd

Table Q1.1 outlines the Applicant's comments on the RR provided by **Exolum Pipeline Systems Ltd [RR-1103]**. The Applicant has held a number of meetings with the Exolum Pipeline Systems Ltd during the development of the Project and has been progressing a Statement of Common Ground (SoCG). An updated SoCG **(5.9.28 Draft Statement of Common Ground - Exolum International UK Ltd [Revision B])** is provided to the Examining Authority at Deadline 1, which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table Q1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
Health and wellbeing	Exolum has a responsibility to ensure the integrity and safety of its pipeline network. The application has the potential to contravene Exolum's ability to safely access and maintain its assets under their legal rights as set out in Part IV of The Energy Act 2013. Due to the potential for breach(s) of the Health & Safety at Work Act 1974 with specific concerns around Regulation 15 of the Pipeline Safety Regulations 1996 and the potential for any subsequent work close to the High-Pressure Pipeline to impact both the safety of the pipeline and those doing the work.	The Applicant has had significant engagement with Exolum, as detailed in **5.9.28 Draft Statement of Common Ground – Exolum International UK Ltd [Revision B]**, to ensure a mutually agreeable design within the Development Consent Order (DCO) application. Detailed design engagement between the Applicant's delivery contractors and Exolum is ongoing to ensure adequate protection and access to existing assets and operational sites is provided and maintained. Shapefiles, along with a master scoping document detailing all known Norwich to Tilbury interactions with Exolum assets, were provided on 17 March 2025 and subsequently updated on 14 April 2025. These interactions were further refined in collaboration with Exolum to agree the final extent of all interfaces, ensuring that appropriate safety measures can be implemented when working within the vicinity of Exolum assets to protect both those doing the work and the pipeline itself. This process, including the engagement timeline, is recorded within **5.9.28 Draft Statement of Common Ground – Exolum [Revision B]**. In addition, The Applicant and Exolum are progressing discussions to agree protective provisions in favour of Exolum.

Appendix R.
Lower Thames Crossing Project

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Appendix R
Lower Thames Crossing Project

Table R1.1 below contains the Applicant's responses to the Relevant Representation (RR) provided by the **Lower Thames Crossing (LTC) Project [RR-2215]**.

The Applicant has held a number of meetings with National Highways during the development of the Project. Since submitting the application for development consent, the Applicant has continued to engage with National Highways regarding the likely geographic and temporal interactions between the Project and the LTC Project, including at a technical workshop on 21 January 2026 and through the agreed programme of fortnightly technical meetings.

During this engagement, National Highways raised concerns about the inclusion of two potential options (referred to as Scenarios A and B in the Design Development Report **(5.15 Design Development Report [APP-122])** for completing the Project's electrical connection to Tilbury North Substation. This connection requires the YYJ 400 kV circuit to be diverted and tied into Tilbury North Substation, which would intersect the LTC Project.

Scenario A involves replacing part of the ZB line with a short section of cable to allow the YYJ to be diverted as an overhead line. Under Scenario B, the YYJ circuit would instead be diverted via short underground cable sections beneath the LTC corridor before re-emerging to reconnect with the existing overhead line, as described in section 11.4 of the Design Development Report **(5.15 Design Development Report [APP-122])**. National Highways has requested that the Applicant proceed solely with Scenario B, as this approach would remove one of the key interfaces between the two projects.

Following consideration of this request, the Applicant confirms that it will now progress only with Scenario B, and has formally notified the Examining Authority (ExA) of its intention to adopt this approach. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.

The decision to proceed with Scenario B has resolved several of the issues raised by National Highways in its Relevant Representation. These are captured in the table below. The Applicant will continue to engage with National Highways through fortnightly technical meetings, with the aim of addressing the remaining matters raised.

A Statement of Common Ground (SoCG) is provided to the Examining Authority at Deadline 1 **(8.3.4 Draft Statement of Common Ground – Lower Thames Crossing)**, reflecting the latest position. The Applicant has considered this RR and directs the Examining Authority to where comments have been addressed in the application.

Table R1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Draft DCO	The principal areas of concern are primarily related to the conflict and incompatibility between the LTC DCO and N2T proposals, and the consequent significant adverse impact on the ability to deliver the LTC DCO. The concerns can be summarised as follows and are set out in further detail in Appendix A [*provided and responded to in the remainder of this table]* [Given the outstanding issues…] NH is not satisfied that the impacts of the proposed development on the LTC DCO have been sufficiently considered and dealt with. These matters cannot be left for resolution until the detailed design stage. Accordingly, NH is in a position where it objects to the proposals as contained in the N2T DCO application. Consequently, NH's position is that it is unable to remove this objection unless resolution is reached on all outstanding matters (as raised in both representations) prior to the Examining Authority's recommendation to the Secretary of State. The NH LTC team requests that the Applicant provides the following as soon as possible to enable it to engage in a more meaningful and targeted way: the N2T construction programme, to enable NH LTC team to undertake a full risk assessment of the impact on the delivery of LTC; and an overlay of the N2T and LTC plans.	The Applicant notes and acknowledges the concerns raised by National Highways as regards the interface between the Project and the Lower Thames Crossing (LTC) Project. However, the Applicant considers that all of National Highways' outstanding concerns are capable of resolution in a manner which would ensure the successful delivery of both projects. To that end, the Applicant is pleased to note the constructive dialogue which exists between the two parties. The Applicant intends for this dialogue to facilitate the prompt resolution of the substantive matters of concern noted in **National Highways' RR [RR-2215]**, and as further documented in the following rows of this table. The Applicant notes that the specific information requested by National Highways has been provided in the context of the ongoing engagement between the parties.
Cumulative Effects	Appendix A – NH's Principal Areas of Concern *Overlap of Order Limits* In principle, absent a detailed construction programme and further detailed drawings the NH objects to the Order Limits as proposed owing to the perceived overlapping between the two projects and the potential impediment to the design development and delivery of the LTC. Overlap of Order Limits at Buckingham Hill Road NH is concerned regarding the Order Limits as shown at Buckingham Hill Road insofar that they overlap with LTC's proposed Work Nos E21 and E26 – further details regarding construction proposals and timings are required Overlap of Order Limits at Hoford Road NH is concerned regarding the Order Limits as shown at Hoford Road insofar that they overlap with LTC's proposed Work Nos E23 and E24 and E25 – further details regarding construction proposals and timings are required. Overlap of Order Limits at Muckingford Road Primary Access Bellmouth TN-B015 and TN-B016 on Muckingford Road requires further coordination with LTC owing to them conflicting with Work Nos 6B, MU35 and MU36 as shown on Sheet 24 of the LTC DCO Works Plans.	The Applicant acknowledges the overlap of Order Limits at the locations identified. Each requires the development of an agreed solution and these are the subject of ongoing discussions with relevant technical experts from both parties. The Applicant is taking the necessary steps to ensure that conflicts are resolved at the earliest opportunity, including regular engagement involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.

Topic	Summary of matters raised	National Grid's response
Cumulative Effects	*Conflict in relation to 400k YYJ Route and the 275kV ZB Route* Both the LTC DCO and the draft National Grid (Norwich to Tilbury) Order require works to the same existing National Grid routes, namely the 400kV YYJ Route and the 275kV ZB Route. These works are authorised in Schedule 1 to the LTC DCO by virtue of Work Nos. OH6 and OH7, and are proposed to be authorised in Schedule 1 to the Norwich to Tilbury DCO by virtue of Work No 19, 20, 21, 22, 23 and 24. NH acknowledges that these works require significant planning and coordination to ensure continuity of service for this nationally critical infrastructure. The works will incur significant costs, with a real potential for abortive costs for either party whilst differing solutions for each project exist. Separately, the N2T proposals also give rise to wider concerns regarding a detrimental impact on the delivery of the LTC. It is noted that the draft Norwich to Tilbury DCO contains optional provision for these works at Requirement 14 of Schedule 3 [Volume 3: Draft Development Consent Order, Final Issue A, August 2025 Pg.109].	As detailed in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference. This avoids direct impact on the LTC Project, subject to co-ordination (which the Applicant welcomes) of outages and shared haul roads and work areas, which would align with National Highways' preference. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.
Alternatives	NH's position is that the interface issues between works by both projects to the YYJ and ZB Routes can be significantly reduced if a singular option were to be progressed, which is the underground connection from the proposed Tilbury North Substation to the YYJ Route and the omission of works to the ZB Route (as seen at Works Plans Sheet 5 EN020027-000256-2.3 Works Plans – Section H.pdf). In NH's opinion the omission of Work No. 21 and Work No. 20 (being the temporary diversion of the ZB route to complete Work No 21) would resolve one of the interface issues between the parties and significantly reduce the risk of delay to the construction of the LTC Project. NH would therefore support an application being made by the Applicant to the Examining Authority, at the earliest opportunity, to amend the draft DCO and supporting plans such that only the single option preferred by NH is pursued. NH assumes that this would align with those works as listed within Column (3) of Requirement 14, however it would reserve the right to review and comment on the amended proposals as they come forward.	As detailed in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference. This matter has therefore been resolved. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.
Draft DCO	NH would also welcome discussions regarding the transfer of benefit of provisions in the draft DCO for Work No 23b, such that NH could be authorised to install those ducts, subject to consent and further agreements, at such time that it is constructing its own works. This has the potential to avoid more technically onerous and costly construction methods for the Applicant.	The Applicant is, in principle, amenable to National Highways' suggestion, subject to the outcome of ongoing further discussions between the parties on this matter. The Applicant welcomes National Highways' willingness to explore undertaking the installation of the ducts associated with Work No. 23b as part of its own construction activities, recognising that this could provide efficiencies were the timing of works to align. Based on the draft construction programmes shared to date by both parties, the Applicant currently anticipates that it will reach the relevant workfront ahead of National Highways and, therefore, expects to undertake the installation of the ducts itself. Nevertheless, the Applicant wishes to retain appropriate flexibility, and remains open in principle to further consideration of National Highways installing the ducts should future programme development indicate that this would offer a coordinated and efficient solution. Any such arrangement would remain subject to further technical, programme and approval processes.

Topic	Summary of matters raised	National Grid's response
		The Applicant is taking the necessary steps to ensure that this matter is resolved at the earliest opportunity, including regular engagement involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.
Traffic and Transport	*Access at Brentwood Road for access to the proposed substation in conflict with LTC's compound CA6* The proposed access at Brentwood Road for access to the proposed substation as shown on Sheet C would conflict with LTC's Compound CA6 – the Brentwood Road Compound (Work No CA06) and the proposed Brentwood Road construction (Work No 6D). The alignment proposed by the Applicant is unacceptable to NH owing to the potential of impact to programme delivery however NH acknowledges it is a matter that could be developed between the parties.	The Applicant acknowledges the conflict at the location identified. This requires the development of an agreed solution which is subject to ongoing discussions with relevant technical experts from both parties. The Applicant is taking the necessary steps to ensure that this conflict is resolved at the earliest opportunity, including regular engagement involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.
Draft DCO	*Proposed temporary tower ZB17T located in the LTC proposed A122 southbound carriageway* Absent a detailed construction programme from the Applicant, NH must assume that the tower will be constructed and occupy the area, and exclude NH from the construction of its works, including for the adjoining spans (ZB18-ZB17T-ZB16) for the period of 2027 through 2031. Whilst NH strongly objects to the imposition of this constraint on the delivery of its own works and requires the Applicant to reconsider the siting of ZB17T, in agreement with NH, to a site that mitigates the potential of impact to the delivery of the A122, NH acknowledges the Applicant's own technical constraints when undertaking these works. As such, the Applicant is requested to continue to work with NH to develop proposals that mitigate or omit the perceived constraint on NH's own programme of works. NH also requires the Applicant to remove any temporary foundations installed and reinstatement of that land to such condition as was first occupied by the Applicant that interface with or are in proximity of the LTC's proposed alignment or ancillary works horizontally and vertically, as to be agreed between the parties.	As detailed in in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference. Based on the construction programmes exchanged between the parties (with the Applicant sharing its draft programme on 23 December 2025 and 21 January 2026, and National Highways sharing its draft programme on 3 February 2026), the constraints associated with Scenario A, including the temporary tower ZB17T, are no longer applicable and this matter has therefore been resolved. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.
Cumulative Effects	*Conflict of proposals shown on Sheet D of the Works Plans* The proposals of the Applicant as shown on Sheet D do not accord with the proposals of the LTC DCO (2.6 Works Plans Sheets 28 & 29) within this region. Whilst NH acknowledge consultation is undertaken regarding the site as existing and for those consented developments only, the proposals at Sheet D do not reflect the site as proposed nor the rights and facilities that are to be afforded to the Applicant as part of the LTC DCO by virtue of Work No OH6 and OH7. No further comments are provided regarding the N2T proposed Order Limits and working proposals where it interfaces with the proposed relocated Gammonfields Traveller Site (Work No 7R as shown on 2.6 Works Plans Sheet 29) at this time, however NH will continue to work with the Applicant to develop proposals that ensure the delivery of both Projects in this region.	As detailed in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference. In the Scenario B design, the Project requires no works in the vicinity of the Gammonfields Traveller Site (LTC Work No. 7R) therefore this interaction between the two schemes is removed. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.

Topic	Summary of matters raised	National Grid's response
Cumulative Effects	*Relocated Gammonfields Traveller Site* Crossover Bellmouth TN-B001 (North) on Long Lane conflicts with the proposed LTC relocated Gammonfields Traveller Site (LTC DCO Work No 7R as shown on 2.6 Works Plans Sheet 29) and requires amending. Furthermore, LTC's current position regarding the relocation of the Gammonfield Way Travellers site (LTC DCO Work 7R) is that LTC require the land of, and suitable working around the GWT site to construct and then the occupation of that site without any impediment from N2T.	As detailed in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference. Under the Scenario B design, no works are required to be carried out as part of the Project to the west of the A1013 Stanford Road. Consequently, no access is required from the A1013 west of the A1089; the site access and crossover points west of the A1089 are not required; and no works are proposed in the vicinity of the Gammonfields Traveller Site (LTC Work No. 7R). Therefore, the interaction between the two projects at this location is removed. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.
Traffic and Transport	*Conflicts relating to haul roads* Haul roads proposed by N2T require coordination with the LTC team – they conflict with the proposals of the LTC such as the construction of Brentwood Road, the A122 or the diversion of existing utility assets required by the LTC project. The LTC would be keen to develop a proposal that achieves the needs of LTC and N2T and affords those diversions of those same lines required by LTC (Work No OH6 as shown on sheets 24, 27, 28, 29, 33 and 34 of the works plans and OH7 as shown on sheets 24, 27, 28, 29, 33, 35, 38 and 41 of the works plans) to mitigate impacts to third party land, archaeology and the environment reducing environmental effects and costs associated with haul roads for both parties.	The Applicant acknowledges the conflict of the proposed haul roads with the LTC Project proposals. This requires the development of an agreed solution which is subject to ongoing discussions with relevant technical experts from both parties. The Applicant is taking the necessary steps to ensure that this conflict is resolved at the earliest opportunity, including regular engagement involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.
Ecology and Biodiversity	*Site selection for the 400kV Gas Insulated Switchgear substation* NH requires further evidence regarding the site selection process for the revised 400kV Gas Insulated Switchgear (GIS) substation than that contained within the Design Development Report owing to its proposed location within LTC's required environmental mitigation land and the potential of requiring modifications to LTC's access road from Brentwood Road and adjacent landscape proposals. The location of the 400kV GIS substation as proposed in the N2T application conflicts with the delivery of compensatory habitat secured by the consented LTC DCO. Appendix 5.6 Project Air Quality Action Plan (PAQAP) sets out LTC's approach in relation to the finding that there is a possibility of degradation of habitat quality on a number of ecological designated sites affected by the LTC, due to an increase in nitrogen deposition. The PAQAP sets out NH's robust consideration of making the environmental impacts of the LTC acceptable in environmental terms. It concludes that the way to do this is to provide compensatory habitat, and consequently sets out the detailed methodology and assessment of how areas for compensatory habitat are to be located and assessed. One of the compensation areas identified as being required is the Hoford Road site. The NG proposed GIS substation is located in this parcel of land, substantially impacting on the LTC's ability to provide compensatory habitat. The commitment for the LTC to provide this is found in the LTC Outline Landscape and Ecology Management Plan, a certified	The Applicant considers that the selection of the site for the proposed new Tilbury North Substation has been appropriately evidenced and justified in Section 11.4 of the Design Development Report **(5.15 Design Development Report [APP-122]).** The potential effect on LTC's proposed nitrogen deposition mitigation site, to the east of Orsett Golf Course, is acknowledged. A detailed review of LTC's Project Air Quality Action Plan (PAQAP) report has been undertaken and following the same criteria as detailed within the PAQAP, a suitable alternative location has been identified. This alternative site allows for the same area of tree/grassland mitigation planting to be undertaken in a location close to the LTC Project, within the same key 'cluster' and, importantly, with connectivity to the wider ecological network. This alternative site, located to the west of Orsett Golf Course, has been included within the Project's Order Limits and appropriate rights sought through the DCO for long-term planting. The Applicant is willing to work with the LTC Project to ensure that there is no breach of existing obligations within the LTC DCO. Please refer to the rows below in this table for further details.

Topic	Summary of matters raised	National Grid's response
	document, compliance with which is secured through Requirement 5 of the LTC DCO. The proposed location of the substation is therefore inconsistent with NH's obligations under the LTC DCO and its inability to provide this compensatory area would mean that it would be in breach of the LTC DCO. NH therefore need to understand why the Applicant proposes for the substation to be in this parcel of land specifically. Additionally NH needs to understand the Applicant's proposals in respect of the reduction in compensation provided by LTC project – including: • the provision of an appropriate alternative compensatory area (and the methodology for its selection) in another location in its DCO Order Limits, should the substation remain in its current proposed location; and • how the Applicant proposes ensuring that LTC is not put in breach of its DCO obligations (eg by securing appropriate amendments to the LTC DCO commitments through the N2T DCO).	
Traffic and Transport	*Environmental area north of Brentwood Road* The proposed environmental area promoted north of ZB17T at Brentwood Road is the site of the proposed LTC Compound CA6 – the Brentwood Road Compound (Work No CA06). It will be occupied by LTC during the construction of the LTC and as such may not be available for N2T in accordance with their programme of works. N2T are to obtain all relevant consents from the relevant landowner for those areas of land to be returned to the landowner upon completion of the LTC construction. N2T are to ensure their proposals accord with the protective/restrictive covenants afforded the utility network owners once their assets have been diverted into the region as part of the LTC's works. NH will not commit to a date at which to vacate the location at this stage of its design development however NH will work with the Applicant where reasonable and feasible to ensure the projects can progress together.	The Applicant acknowledges the conflict at the location identified. This requires the development of an agreed solution which is subject to ongoing discussions with relevant technical experts from both parties. The Applicant is taking the necessary steps to ensure that this conflict is resolved at the earliest opportunity, including regular engagement involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.
EIA Approach and Method	*Orsett golf course – concerns about the ability of National Grid to provide environmental areas.* NH and the Applicant require further discussions regarding those areas around the proposed substation and the Orsett Golf Course to ensure proposals for "environmental areas" promoted by N2T align with the commitments and requirements of the LTC DCO and achieve the intended function as promoted by NH. Where LTC's proposals cannot be delivered in accordance with the N2T proposals, NH requires the Applicant to determine how those impacts will be mitigated.	The Applicant acknowledges the concerns identified. This requires the development of an agreed solution which is subject to ongoing discussions with relevant technical experts from both parties and Orsett Golf Course. The Applicant is taking the necessary steps to ensure that this conflict is resolved at the earliest opportunity, including regular engagement involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.
Alternatives	Lack of detail relating to the decision to underground parts of the ZB Route as opposed to the YYJ Route.	As detailed in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference.

Topic	Summary of matters raised	National Grid's response
	The LTC requires further evidence regarding the decision to underground sections of the ZB Route oppose to the YYJ Route and alternatives considered that resulted in a lengthy construction programme, significant overlapping of the Order Limits and the requirement for ZB017T to be located within the proposed southbound carriageway of the proposed A122.	The works to underground the ZB route are associated with design scenario A at this location. This matter has therefore been resolved. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.
Underground Cables	*Installation of the ZB route underground.* NH requires further details regarding the implications (such as protective covenants) of installing the ZB route underground (ZB13RB to ZB15RB) so it can develop its own construction, landscaping, planting and maintenance proposals accordingly.	As detailed in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference. The works to underground the ZB route are associated with design scenario A at this location. This matter has therefore been resolved. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.
Traffic and Transport	*Hoford Road works* The N2T proposals give rise to other concerns of NH including, works to and on the overhead lines from Hoford Road west which will interface with multiple works of the LTC including the diversion of other utility networks, the construction of the A13/A1089/A122 junction and the construction of the revised A1013 Stanford Road. Whilst the works at Muckingford Road may not have a direct interface with the LTC's proposals, there are overlapping working areas at Coal Road and Linford Road which will require coordination to ensure they are free from impediment for the delivery of the LTC Project. NH require further detail from the Applicant regarding these matters.	The Applicant acknowledges the interface at the locations identified. This requires the development of agreed solutions which are subject to ongoing discussions with relevant technical experts from both parties. The Applicant is taking the necessary steps to ensure that this conflict is resolved at the earliest opportunity, including regular engagement involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.
Cumulative Effects	*Need for effective collaboration between the Applicant and NH.* Works to UK Power Networks routes LTC requires works to UKPN's PAB Route (PAB12 through PAB19 – Work No OH5), N2T to PAB20 to PAB23. Owing to the proposed construction period overlaps of both the LTC and the N2T, NH would welcome joint discussions with UK Power Networks, the owner of the PAB Route, to realise any opportunities that may exist to undertake both works at the same. *Utility outages* The LTC shall not facilitate any N2T required outages on utility networks or to third party infrastructure required by both projects without prior discussion between the parties and being afforded the opportunity to consider those impacts on the delivery of its own programme of works. *Brentwood Road permanent access route* The proposed permanent access route from Brentwood Road requires coordinating between LTC and N2T to ensure a solution is promoted that affords the requirements for both projects whilst ensuring that access to Brook Farm and the gas infrastructure is maintained during construction and operation of both projects. *Coordination of shared access* The LTC and N2T projects require a coordinated approach to shared access areas (or those in proximity), or those parts of the Local Road Network (LRN) intended to be utilised by both the	UK Power Networks (UKPN) have been made aware of the construction period overlaps between both projects, the required UKPN works and the potential opportunity this presents to them to detail a holistic design. A triparty discussion will be facilitated to further consider UKPN's network impact of the full diversionary works required. The Applicant acknowledges the conflict at the locations identified. This requires the development of agreed solutions which are subject to ongoing discussions with relevant technical experts from both parties. The Applicant is taking the necessary steps to ensure that this conflict is resolved at the earliest opportunity, including regular engagement involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.

Topic	Summary of matters raised	National Grid's response
	LTC and N2T, or in instances where either are promoting works that would impede the use of the LRN for other users with an aim to mitigate those impacts on others such as the A1013 Stanford Road, Buckingham Hill Road, Hoford Road, Brentwood Road, Muckingford Road, Heath Road and Gammonsfield Way. The LTC Control Plan requires the establishment of a Traffic Management Forum to which N2T will be an attendee for any instances where the two overlap. Routes across site from TN-B004A on Heath Road to Crossover Bellmouths TN-B005 and TN-B006 on Hornsby Lane require coordinating with the significant amount of utility works required by the LTC around Hornsby Lane to ensure no impediment to the delivery of the LTC. Primary Access Bellmouth TN-B014 on Buckingham Hill Road is to be coordinated with LTC to ensure any impediment to vehicle movements on Buckingham Hill Road are mitigated so far as reasonably practicable.	
Cumulative Effects	*Collaboration in relation to land and property* Further information from N2T with regards to land and property matters. These matters include rights, CPO powers, proposals within overlapping land, rights for the Applicant over land to be acquired by NH, and details regarding how those rights and provisions will be considered/managed where the two proposals are for differing needs that cannot co-exist (such as planting versus permanent infrastructure). The LTC and N2T projects have overlapping demands on third party land which may give rise to ambiguity for those landowners. At the earliest opportunity, NH requires the Applicant to engage and agree a landowner engagement strategy.	The Applicant acknowledges the conflict at the locations identified. This requires the development of agreed solutions which are subject to ongoing discussions through a series of fortnightly technical meetings between the parties with relevant technical experts from both parties. The Applicant is working towards reaching a conclusion to these discussions during the Examination, and this will be confirmed in the relevant Statement of Common Ground. The Applicant remains committed to proactively engaging with the LTC Project to reach agreement in a timely manner. The Applicant's Lands team will continue to engage with the LTC Project Lands team on a landowner engagement strategy that suits both projects. Heads of Terms correspondence was first issued to the LTC Project for comment and review before being issued to affected landowners, to ensure consistent messaging between both projects.
Draft DCO	*Lack of information relating to the construction and operation of lines YYJ123RC through YYJ123RA and YYJ124RB through YYJ124RD.* NH requires further information regarding the construction and operation of lines YYJ123RC through YYJ123RA and YYJ124RB through YYJ124RD and how those proposals could impact the development of LTC's proposals and safe delivery and operation of its own project.	As detailed in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference. These elements relate to Scenario A, which the Applicant proposes to no longer progress. There is therefore no anticipated impact on the LTC Project proposals. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.

Topic	Summary of matters raised	National Grid's response
Draft DCO	*Lack of information relating to the implications of Work No.OH6 and OH7* NH requires information from the Applicant as to the implications these proposals have on its own consented works, Work No OH6 and OH7 owing to restringing and conductor replacement proposed from towers ZB14 and YYJ124, with earthing works proposed at ZB13 and YYJ125 including those works which, if undertaken in accordance with the LTC DCO and its proposed construction programme, would result in abortive works and not represent value for money to the public purse.	As detailed in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference. As a consequence of the decision to proceed with Scenario B, there is no longer any impact anticipated on LTC Project's proposals in respect of Work No. OH7 (the ZB route overhead line). The Applicant also notes that Work No. OH6 is no longer intended to be brought forward by LTC. In respect of the remaining overlapping works (which the Applicant considers are limited to restringing and conductor replacement works), the Applicant notes that these are the subject of ongoing discussions with relevant technical experts from both parties.
Impact on developers – further information required	*Lack of information to allow NH to undertake a full risk assessment* NH requires the production of a series of drawings showing the N2T proposals overlaid on to the LTC Works Plans (2.6 and 2.17) and General arrangement drawings (2.5) to ascertain the potential impacts of each other being delivered concurrently and to mitigate the potential of NH undertaking abortive works. Those proposals contained within Thurrock 3 consultation may be mis-interpretated by NH and a key matter missed. NH requires the production of a series of drawings for consultation specific to the proposed amendments to the LTC DCO granted 25 March 2025 proposed by the Applicant.	A meeting between the Applicant and National Highways was held on 6 January 2026 to agree the scope and format of the overlay plans. The Applicant subsequently shared overlay land plans on 23 February 2026.
Traffic and Transport	*Interfaces at Brentwood Road*. If both projects were to be delivered at the same time, NH would prefer the Primary Access Route (PAR) at Buckingham Hill Road to be developed. If both projects were to be delivered at differing times, assuming the LTC would be constructed first, a PAR via Brentwood Road could be coordinated with agreed modifications to the site from Brentwood Road, to be consented by N2T.	The Applicant acknowledges the preference noted. This requires the development of agreed solutions which are subject to ongoing discussions with relevant technical experts from both parties. The Applicant is taking the necessary steps to ensure that this conflict is resolved at the earliest opportunity, including regular engagement involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.
OHL	*Crossing protection* The LTC reserves the right for N2T to install different or additional crossing protection to that shown to accord with the development of the LTC at N2T's expense. The siting of crossing protection inside of the LTC's Order Limit Boundary for the purpose of constructing N2T is subject to agreement with NH.	As detailed in the introductory text above, the Applicant can confirm that it proposes to progress with Scenario B, which aligns with National Highways' preference. In the Scenario B design, the Project proposed a crossing of the LTC Project as underground cable and therefore there will be no overhead line crossing the LTC Project requiring crossing protection, and so the interface has been removed. The Applicant will work with the ExA to update the relevant application documents at an appropriate future deadline.
Draft DCO	*Utility diversions* The LTC DCO has consented provisions to divert existing utility networks between Muckingford Road and Long Lane. The Applicant will have to consider the diversions of those assets in their developing designs or provide suitable provisions acceptable by the asset owner in consultation with NH, to discuss any associated impacts as part of their consent.	The Applicant is aware of the utility network diversions between Muckingford Road and Long Lane proposed to be undertaken as part of the LTC Project and confirms that those diversionary works have been taken into account in the development of both Scenario A and Scenario B (noting the intention is to now progress the latter). Whilst further engagement with National Highways is required in order to ensure appropriate temporal coordination of works during construction, the Applicant considers that, in principle, those diversions are capable of co-existing satisfactorily alongside the Project proposals.
Traffic and Transport	*Establishment of environmental areas by the LTC* The site of the proposed Tilbury North Compound and other work areas prevent the early establishment of environmental areas by the LTC. This is in contrast to the DCO and gives rise to potential	The Applicant acknowledges the concern identified. This requires the development of agreed solutions which are subject to ongoing discussions with relevant technical experts from both parties. The Applicant is taking the necessary steps to ensure that this conflict is resolved at the earliest opportunity, including regular engagement

Topic	Summary of matters raised	National Grid's response
	abortive works. NH require a detailed construction programme and overlay of working areas so it can programme those works accordingly and omit the instances of abortive works. N2T are to fund LTC's specialists review of any proposed replacement site.	involving fortnightly meetings between both parties. The outcome of this ongoing engagement will be recorded in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing**.
Overhead lines	*Operational impacts* NH expect the Applicant to construct the new overhead powerlines in such a manner that future operation and maintenance of those networks does not impede the operation of the A122. Whilst further details would be required to demonstrate this, a catenary support system is assumed suffice (and typical for these instances elsewhere on the network).	This representation relates to Scenario A where the A122 would be crossed by the Project with an overhead line, which the Applicant proposes to no longer progress. As detailed in the introductory text above, the Applicant is now proposing Scenario B. As this crossing is to be made via an underground cable solution, no impact is anticipated on the future operation of the A122 at this location.
Draft DCO	*No explicit mention of the need to modify the LTC DCO as a result of the proposed development* Information relating to the LTC DCO and the requirement to modify or amend it for the benefit of N2T is not explicitly and completely communicated. Any and all modifications required to the LTC DCO are to be developed, agreed and consented by the Applicant as part of the N2T DCO. At the earliest opportunity, the Applicant is to commence engagement with NH regarding proposed protective provisions required to deliver N2T that overlap, conflict or modify the proposals of LTC. These provisions are to be contained within the N2T DCO to adequately manage the interface with the LTC.	The Applicant acknowledges that certain elements of the existing LTC Project DCO are likely to require modification and amendment in order to ensure compatibility between the two projects. It is noted that provisions allowing for such amendment and modification are capable of being included in the Applicant's draft DCO in accordance with section 120(5) of the Planning Act 2008 and, indeed, that there is recent precedent to support that approach. The Applicant therefore intends to work with National Highways to agree the scope of those provisions, noting that the exact content of such provisions will likely be contingent upon the resolution of certain other substantive matters as set out in **National Highways' RR [RR-2215]**.
Costings approach	*Costs* NH will incur costs as a result of its engagement in the N2T DCO process and will seek to recover these under the Infrastructure Planning (Fees) Regulations 2010. NH will also incur additional construction costs as a result of the N2T Project. Both of these matters require discussion with the Applicant at the earliest opportunity.	The Applicant notes National Highway's request for a cost recovery agreement. This matter was discussed at a meeting with National Highways on 6 January 2026, and the Applicant awaits a breakdown of projected costs from National Highways.

Appendix S. National Gas Transmission

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Appendix S
National Gas Transmission

The Applicant has provided comments on the Relevant Representation (RR) provided by **National Gas Transmission [RR-2656]**. The Applicant has been engaging with National Gas Transmission since the Project started and has been progressing a Statement of Common Ground (SoCG) **(5.9.28 Draft Statement of Common Ground - National Gas Transmission**). An updated SoCG will be submitted at an appropriate future deadline. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table S1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Statutory Undertakers	NGT will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGT's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land or NGT's apparatus, NGT will require appropriate protection and further discussion is required on the impact to its apparatus and rights.	These issues will be addressed by the provision of Protective Provisions for the benefit of National Gas Transmission (NGT) in the draft DCO **(3.1 Draft Development Consent Order [APP-056])**. NGT has been provided with draft Protective Provisions for consideration and a meeting was held with their legal advisors on 12 January 2026 to discuss these. NGT's comments are awaited and it is hoped that an agreed form of Protective Provisions can be reached promptly and an update can be provided in due course.
Statutory Undertakers	NGT have infrastructure within the proposed Order Limits The transmission pipeline forms an essential part of the gas transmission network in England, Wales and Scotland. NGT owns or operates the following infrastructure within the proposed Order Limits for the Project: Transmission Pipelines: • Feeder 5 – Yelverton to Stowmarket • Feeder 5 – Braintree to Horndon • Feeder 5 – Roxwell to Abridge • Feeder 18 – Stapleford Tawney to Tilbury Thames North • Feeder 5 –Horndon to Tilbury Thames North • Feeder 18 – Stapleford Tawney to Horndon • Feeder 5 – Horndon to Stanford-Le-Hope Freehold Land: • EX657488 • EX991889 • EX427073	The Applicant is aware of the assets noted by NGT. These assets are included within the site-specific detailed design ongoing with NGT. The Applicant is seeking to agree the details of the interaction with NGT.
Statutory Undertakers	Protection of NGT Assets As a responsible statutory undertaker, NGT's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGT has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. As noted, NGT's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits should be maintained at all	It is not anticipated that the Project will necessitate the diversion of NGT's assets and accordingly their assets and land rights will remain in situ and be protected by the Protective Provisions for the benefit of NGT once these are agreed and included in the Applicant's draft DCO **(3.1 Draft Development Consent Order [APP-056])**, and these will avoid any material detriment to the NGT apparatus as a result of the Order.

Topic	Summary of matters raised	National Grid's response
	times and access to inspect and maintain such apparatus must not be restricted.	
Draft DCO	NGT will require protective provisions ("PPs") to be included within the draft Development Consent Order (the "Order") for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGT is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required. At the tie of writing NGT's preferred draft PPs have been sent to the Applicant via the parties' solicitors but we await comments. NGT requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will ensure protection for those NGT assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow NGT to properly discharge its statutory obligations. NGT will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.	Draft Protective Provisions for the benefit of NGT have been provided by the Applicant to NGT and discussed with NGT's legal advisors. The Applicant will continue to progress discussions on the Protective Provisions with a view to reaching an agreed format of Protective Provisions as soon as possible.
Draft DCO	Compulsory Acquisition Powers in respect of the Project As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land, NGT will require further discussion with the Applicant.	The Applicant will continue to engage with NGT and is seeking to agree a Statement of Common Ground to reflect an agreed position between both parties. Furthermore, discussions are underway to agree a set of Protective Provisions denoting further the terms of the Compulsory Acquisition Powers applied for within the Applicant's draft DCO **(3.1 Draft Development Consent Order [APP-056])**.
Land acquisition	Book of reference NGT has noted that the following plot numbers which NGT have an interest in appear to not be recorded in the Book of Reference, we would therefore request that the Applicant review the following list and update the Book of Reference as necessary: Plot Number Section Rights 8/79 B Class 2 - Compulsory Acquisition of Rights - Overhead line 9/48 B Class 2 - Compulsory Acquisition of Rights - Overhead line 9/62 B Class 2 - Compulsory Acquisition of Rights - Overhead line 9/73 B Class 2 - Compulsory Acquisition of Rights - Overhead line 7/52 F Class 7 - Temporary Use 7/44 F Class 7 - Temporary Use 7/55 F Class 7 - Temporary Use 8/38 F Class 2 -Compulsory Acquisition of Rights - Overhead line 8/61 F Class 7 - Temporary Use 8/74 F Class 5 - Compulsory Acquisition of Rights -Access 8/93 F Class 7 - Temporary Use 2/144 G Class 4 -Compulsory Acquisition of Rights - Overhead line and underground cable system 3/6 G Class 2 - Compulsory Acquisition of Rights - Overhead line 3/11 G Class 2 - Compulsory Acquisition of Rights -Overhead line 3/9 G Class 4 - Compulsory Acquisition of Rights -Overhead line and underground cable system 4/18 G Class 7 -Temporary Use 4/23 G Class 7 - Temporary Use 4/66? G Class 7 -Temporary Use 4/67? G Class 7 - Temporary Use 4/141 G Class 7 - Temporary Use 4/143 G Class 7 - Temporary Use 1/49? H Class 7 - Temporary Use	The Applicant notes NGT's comments regarding the listed Book of Reference (BOR) **(4.3 Book of Reference [APP-064])** entries and will review and make amendments to the BOR where required and in line with the examination deadlines.

Appendix T. National Highways Limited

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Appendix T
National Highways Limited

Table T1.1 outlines the Applicant's comments on the RR provided by National Highways Limited [RR-2657]. The Applicant has held a number of meetings with National Highways Limited during the development of the Project and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (5.9.20 Draft Statement of Common Ground - National Highways [Revision B]), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table T1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Traffic and Transport	1.3 NH objects to the DCO and the Authorised Development for the following reasons: 1.3.1 The Transport Assessment and sections of the Environmental Statement, including the Outline Construction Traffic Management Plan, include assessments and conclusions about the forecast impacts of the scheme during construction, including matters which are material to the SRN. Consequently, the DCO includes proposals for mitigation at several junctions on the SRN. However, NH has several concerns with the assessments and is not yet in a position to agree with the conclusions set out in the DCO application documents. Further, it is not yet possible to conclude whether the full impact of the proposed development is properly understood and mitigated. These concerns relate solely to the construction stage of the project.	The Applicant acknowledges National Highways' concern and will continue to engage with National Highways throughout the DCO Examination to resolve the concerns raised. This will be documented in **5.9.20 Draft Statement of Common Ground - National Highways.**
Key Legislation and Planning Policy Context	[NH objects to the DCO and the Authorised Development for the following reasons:] 1.3.2 The Book of Reference as submitted by the Applicant identifies 154 plots of land owned or occupied by NH for the purposes of its undertaking ("Plots") in respect of which compulsory acquisition powers are sought. The compulsory acquisition powers sought are described in the book of reference as Acquisition of Land, Acquisition of Rights: Overhead Line, Acquisition of Rights: Underground Cable System, Acquisition of Rights: Overhead Line and Underground Cable System, Acquisition of Rights: Access, Acquisition of Rights: Drainage and Temporary Use ("Compulsory Powers"). To safeguard NH's interests and the safety and integrity of the SRN, NH objects to the inclusion of the Plots in the DCO and to Compulsory Powers being granted in respect of them. The Plots constitute land acquired by NH for the purpose of maintaining its statutory undertaking and, accordingly, this representation is made under section 127 (Statutory Undertaker's Land) and 138 (Extinguishment of rights, and removal of apparatus, of statutory undertakers etc) of the Planning Act 2008. NH considers that there is no compelling case in the public interest for the Compulsory Powers over the Plots (operational land or otherwise and in relation to rights) land that the grant of the DCO with such provisions would result in serious detriment to the SRN in respect	In relation to concerns regarding National Highways' ability to discharge its statutory duties, it is the Applicant's position that, the acquisition of land or rights should not cause a material detriment to National Highways' ongoing land management and ability to ensure safe and efficient operations. The Applicant will continue to engage with National Highways regarding all of their individually affected plots and a further meeting has been diarised to take place in February 2026.

Topic	Summary of matters raised	National Grid's response
	of NH's ability to ensure the safe and efficient operation of the SRN.	
Cumulative Effects	[NH objects to the DCO and the Authorised Development for the following reasons:] 1.3.3 The Authorised Development will impact on NH's major capital project, the A122 (Lower Thames Crossing) Development, the DCO for which was granted on 25 March 2025 (SI 462). It is necessary for the protection of this project that the Applicant agrees to co-operate with NH in the delivery of the Authorised Development, in a way that safeguards the significant public investment that has been made by NH. A separate Relevant Representation will be submitted by NH as undertaker of the Lower Thames Crossing project, specifically in relation to this project.	The Applicant has provided detailed responses to the **Lower Thames Crossing (LTC) Relevant Representations [RR-2215]**.
Draft DCO	[NH objects to the DCO and the Authorised Development for the following reasons:] 1.3.4 The DCO includes a number of provisions which authorise the interference with statutory powers belonging to NH and/or grant the Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through NH's protective provisions. An analysis of the Articles and NH's concerns in relation to the same is included in section 6 of this Relevant Representation.	A response to these issues is appended.
Cumulative Effects	2.7 NH's concerns relate to the potential impact of the proposed development on the SRN, which, in the vicinity of this proposal includes the A47, A11, A14, A12, A120, A1089, and a section of the A13.	The Applicant notes this comment and will continue to engage with National Highways to resolve the concerns raised.
Key Legislation and Planning Policy Context	*Protecting the SRN* 3.1 Unlike other statutory consultees involved in the consenting of nationally significant infrastructure projects, NH is a very active promoter of development consent orders and understands keenly the pressures and requirements placed on applicants to balance the delivery of the scheme with the protections afforded to statutory consultees. NH has been at the vanguard of DCO-consented development since the Planning Act 2008 was introduced and has offered many commitments for the protection of electricity and gas apparatus, water and drainage infrastructure, railway undertakings and other infrastructure owned by statutory consultees as a consequence of its own development consent orders. The SRN deserves the same measure of protection, proportionate to the extent of interference caused by the Authorised Development.	The Applicant notes this comment and the Applicant also responds to this point under the heading Draft DCO below.
Draft DCO	3.2 NH understands the need for proportionality in the context of such protections and considers that a proportionate level of protection in all cases and as a minimum standard where there is the potential for impact to the SRN should be the following: 3.2.1 that NH be held harmless from the impact of third party development;	The draft DCO **(3.1 Draft Development Consent Order [APP-056])** includes Protective Provisions for the benefit of National Highways in Schedule 16, Part 5. Whilst National Highways' proposed Protective Provisions provided at Appendix 1 of its Relevant Representations are not agreed at this stage, the Applicant will continue to liaise with National Highways to seek to fully agree a set of Protective Provisions that addresses all of National Highways' concerns.

Topic	Summary of matters raised	National Grid's response
	3.2.2 that NH procedures put in place for the protection of property and persons are adhered to in accordance with NH's strict requirements on network occupancy; 3.2.3 that any works carried out to the highway, on NH land, underneath the highway, above the highway and to apparatus forming part of the highway estate should be certified by NH and approved by NH on completion of the works; 3.2.4 that financial provision should be put in place to ensure that in the event of the Applicant commencing works which may impact the SRN (including for example, underground works beneath the SRN or oversailing above it) and falling into financial difficulty or defaulting on completion of the works, NH has the resources needed to put the SRN and the highway estate into the position it was in before the Applicant commenced works; 3.2.5 that NH be indemnified for any loss or damage to the SRN or the highway estate as a result of the works; 3.2.6 that the Applicant requests approval from NH before exercising any powers under the DCO in relation to the SRN or the highway estate (such approval not to be unreasonably withheld) to enable proportionate rights and reservations to be secured for the protection of the SRN through private treaty; 3.2.7 that emergency procedures be agreed for NH to access the SRN to carry out works or remove dangerous obstacles resulting from the Authorised Development which pose a risk to life. 3.3 These provisions are included in the NH protective provisions, which are appended to this document (Appendix 1).	
Draft DCO	3.4 NH considers that without the NH protective provisions, there is a considerable risk of serious detriment to the SRN, as any damage or injury to the SRN or wider highway estate would require funding to rectify that is not within NH's budget. There is no recourse to public funding for emergency works of this nature and a reserve of funding is not available. Without prejudice to whether the Authorised Development would cause a serious detriment to the SRN, it remains the case that the public purse should not be left to meet or subsidise costs of impacts caused by third party development to the SRN.	The draft DCO **(3.1 Draft Development Consent Order [APP-056])** includes Protective Provisions for the benefit of National Highways in Schedule 16, Part 5. The Applicant will continue to liaise with National Highways to seek to fully agree a set of Protective Provisions.
Draft DCO	3.5 Further, NH's estate comprises more than just the corpus of the highway (the 'top two spits'). Unlike local roads, where the local highway authority typically controls only the highway strata and sufficient vertical limits above and beneath the highway to maintain necessary apparatus and street furniture, in most cases NH controls the freehold of the land beneath the highway to the centre of the earth and to the heavens above. This estate is held for the benefit of the statutory undertaking, to ensure that the SRN is not compromised and that maintenance or improvement works at any required depth can take place free from risk of trespass or ransom. Where apparatus is co-located in the highway (which is commonplace), that apparatus has been authorised by NH or has been installed through industry standard processes (such as under the New Roads and Street Works Act 1991), where	The Applicant will continue to liaise with National Highways in relation to the acquisition of all necessary land rights in National Highways' estate and will continue to liaise with National Highways to seek to fully agree a set of Protective Provisions for the benefit of National Highways.

Topic	Summary of matters raised	National Grid's response
	statutory protection is afforded to NH as the highway or street authority. Whilst NH is prepared to grant a sub surface interest or right to co-locate apparatus in the highway, where it is geotechnically possible and respecting other apparatus that is in, on, under or over the highway – the interest must be proportionate and necessary and cannot be to the detriment of NH, the SRN or other undertakers. It cannot be acceptable that apparatus is placed in, on, under or over the SRN through a DCO by disapplying statutory protections that NH has and not accepting to acquiesce to the terms which are required by NH to manage its network in accordance with regulatory requirements.	
Key Legislation and Planning Policy Context	3.6 For the sake of clarity and transparency, NH has no desire to stymy development or to impose requirements on the Applicant which are disproportionate to the potential harm that could be caused to the SRN. NH is legally obliged to co-operate with third parties exercising planning or highway functions, which includes the Applicant in this statutory process. NH is prepared to engage fully and assist in whatever way is reasonable to ensure that the Authorised Development proceeds as quickly and efficiently as possible.	The Applicant notes this comment.
Draft DCO	4. The impact of the Proposed Development on the SRN *Overhead crossings* 4.1.3 For the sections of overhead lines crossing over the top the SRN, a Section 169 Agreement is required with an Approval in Principle by NH. It is understood that this has not yet been undertaken. Therefore, the principle of the crossing the SRN cannot yet be agreed.	The requirement for a Section 169 Agreement, and the details of such engagement, will be detailed and agreed within the Statement of Common Ground, a draft of which has been included in the application for development consent **(5.9.20 Draft Statement of Common Ground - National Highways)**.
Draft DCO	*Underground crossings* 4.1.4 For the section of underground cabling crossing the A12 an Approval in Principle by NH is required. It is understood that this has not yet been undertaken. Therefore, the principle of the crossing the SRN cannot yet be agreed. 4.1.5 NH only permits Trenchless Crossing techniques on the SRN, with Horizontal Directional Drilling the preferred method. 4.1.6 From the information submitted, we are unable to determine the geotechnical risks on the A12. Any proposed directional drilling under the SRN will require compliance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). We advise the Applicant to review the requirements of CD622, which can be found on the Standards for Highways website. Consideration should also be given to the potential impact of drilling upon other SRN assets, such as drainage, with evidence provided for NH's review. Additional asset impact may require further approval processes. NH's standard protective provisions (as appended in Appendix 1) secure these approvals and requirements. 4.1.7 All cable works will require monitoring and assurance, with safety risks assessed for monitoring, and survey works within the proximity of the A12 live carriageway.	The Applicant notes National Highways' requirements set out in its Relevant Representation and will continue to liaise with National Highways, as part of the preparation of an Approval in Principle, over the technical detail of the underground crossing of the Strategic Road Network.

Topic	Summary of matters raised	National Grid's response
Traffic and Transport	4.2 Traffic and Transport Construction Impacts *Traffic Assessment - Assumptions* 4.2.2 Assumptions regarding the workforce indicate that overhead line workers would first sign in at their allocated temporary construction compound before travelling on to their work sites, whilst cable and substation workers would travel directly to their respective locations. It is stated within the TA that approximately 10% of workers would be drawn from the local labour market, with the remainder comprising trained specialists sourced from an existing pool of approved contractors. No clear assumptions have been set out on the use of hotels or minibus transport for non-local workers. 4.2.3 Access is proposed via primary access routes (PARs) which are defined as routes on the public highway designated for use by construction vehicles (typically for HGVs) to travel from the Strategic Road Network/Major Road Network to the site access point (SAP). 4.2.4 Any changes to these assumptions regarding the working hours and sign-in procedures of construction staff could impact the development's trip generation and trip distribution and, therefore, the conclusions reached within the TA. Therefore, NH requests that those items that could impact the conclusions of the TA in respect of traffic volumes on the SRN should be highlighted and included within the Construction Traffic Management Plan (CTMP) and, should any changes be forthcoming, NH should be consulted.	4.4.2 – It will be the responsibility of the Main Works Contractor(s) to manage how their workers travel to and from the Project, as set out in the Outline CoCP **(7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311])**. Once the location of accommodation for non-local workers is confirmed, appropriate transport options, including the potential provision of staff minibuses, will be considered. 4.2.3 – The Applicant notes this comment. 4.2.4 – The Outline CTMP **(7.3 Outline Construction Traffic Management Plan [APP-309])** sets out how the trip generation has been determined against the draft construction programme and will be therefore subject to change upon finalisation of the construction programme by the Main Works Contractor. The construction workforce traffic movements will be managed though the monitoring and management mechanisms outlined in Section 8 of the Outline CoCP **(7.3 Outline Construction Traffic Management Plan - Appendix B Outline Construction Worker Travel Plan [APP-311])**. Robust arrangements will be available to monitor and review these traffic movements and the proposed mitigation measures. The Applicant will liaise with National Highways to discuss any changes to the assumptions of construction worker travel during the Examination. This will be documented in **5.9.20 Draft Statement of Common Ground - National Highways**. Section 8 of the CoCP (**7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311])** details of the mechanism of capturing the workforce actual shift start and end times, which will inform the monitoring review report issued every quarter.
Traffic and Transport	*Proposed changes to SRN Roads* 4.2.5 Permanent highway works proposed for the project include widening junctions and lanes to support construction access, including: widening and extending merge lanes at the A120 Hardwick Road/Bentley Road and A12 Ipswich Road/B1070 junction; widening of Bullen Lane, Bentley Road, and Ardleigh Road; and lane marking alterations at the A14 J55 Copdock Interchange. It is not yet clear whether an assessment of compliance with the Design Manual for Roads and Bridges (DMRB) has been undertaken for each of these proposed changes on the SRN. This should be confirmed by the Applicant. If a DMRB assessment has not yet been undertaken, this is required for any proposed changes to the SRN. Details of the proposed changes should be provided to NH for review.	All preliminary designs for proposed changes to the Strategic Road Network (SRN) have been developed in accordance with the Design Manual for Roads and Bridges (DMRB), and subject to Stage 1 Road Safety Audits (RSAs). The Applicant has engaged with National Highways throughout the development of these proposals. Within the RSA1 process undertaken, these preliminary designs were submitted to National Highways for review and acceptance. Notwithstanding the above, the Applicant will continue to engage with National Highways at the next stage of design development and, should a further assessment of compliance with the DMRB be required, will liaise with National Highways to complete this process.
Traffic and Transport	4.2.6 Road Safety Audits have been carried out for the alterations on the A120/ Bentley Road, A12 on slip at the A12 Ipswich Road/B1070 junction, as well as the Primary Access Route Access from the A120 at Surrex. However, NH notes that no RSA has been received regarding the lane marking alterations at the A14 J55 Copdock Interchange. This will be required to assess the safety impact on the SRN to ensure that the proposed alterations do not result in highway safety issues.	Preliminary design proposals for the lane marking alterations at the A14 J55 Copdock Interchange are being developed, and will be subject to appropriate Road Safety Audits and discussed with National Highways.

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Traffic and Transport	4.2.8 It should be noted that the A120 Colchester Road, Coggeshall, has recently been subject to a permanent speed reduction to 50mph as part of a NH scheme. As a result, the Draft DCO should be updated to reflect the current posted speed limit of 50mph.	The Applicant notes this comment. Traffic Regulation Order Schedule 13 Part 1 of the draft DCO **(3.1 Draft Development Consent Order [APP-056])** will be updated (removal of the proposed Traffic Regulation Order to restrict the speed limit to 50 mph).
Traffic and Transport	4.2.10 NH was not made aware of the requirement for temporary Traffic Regulation changes as part of the pre-application discussions. NH is therefore unable to confirm the acceptability of the changes, having not been advised of their duration and Discussion is required with the Applicant on these matters.	The Applicant notes this comment and would welcome the opportunity for discussion with National Highways on the Traffic Regulation Order proposals.
Traffic and Transport	4.2.11 There is also a temporary No Overtaking order proposed on the A120 Colchester Road, Coggeshall Between points TRE-001 and TR-E-004 as shown on Section E, Sheet, which requires discussion with NH.	The Applicant notes this comment and would welcome the opportunity for discussion with National Highways on the Traffic Regulation Order proposals.
Traffic and Transport	*Assessment Scope* 4.2.12 The TA contains a list of the SRN junctions assessed by the Applicant's transport consultants and states that this has been agreed with NH. Whilst NH agreed to the list of junctions to be modelled, it was explained that this was not an exhaustive scope and that further junctions may need to be assessed. A list of further junctions which NH considers may be adversely affected by the proposed development and should therefore be modelled is provided in the "Junction Modelling" section 4.2.22 to 4.22.27 below.	The Applicant notes this comment. A response is provided for 4.2.22 and 4.22.27 below.
Traffic and Transport	*Road Safety* 4.2.13 Personal Injury Collision (PIC) data for the SRN has been obtained from DfT Road Safety Data for the four-year period 2019, 2021-2023 at the SRN junctions included in the assessment. NH observes that this timeframe does not include a full five-year period. The Applicant is requested to adopt the standard approach for the PIC analysis to cover a full 60-month period, excluding data gathered between March 2020 and September 2021 (when periods of COVID-19 lockdowns were in place), to better reflect 'normal' road conditions. The analysis of PIC data within the TA notes collision clusters at A14 Junction 50, A14 Junction 52, A14 Junction 55, and A12 Junction 26 where there are notable bends in the road alignment. This analysis could indicate underlying issues with the road layout at these junctions. NH requests that the Applicant investigates any causation factors in the road layout. The PIC analysis should also include any SRN junctions forecast to experience a material increase (>30/peak hour) in traffic flows from the proposed development.	Within the Transport Assessment **(7.11 Transport Assessment [APP-333])**, collision analysis was undertaken for all junctions where the Strategic Road Network (SRN) connected to the Primary Access Routes. The Applicant notes National Highways' request and an update to collision analysis will be undertaken for a full 60 month period following further engagement to agree the analysis period to be assessed (excluding time period indicated as a result of COVID-19 restrictions). A review of SRN junctions to be analysed will be agreed with National Highways.
Traffic and Transport	*Committed Developments* 4.2.14 Appendix D of the TA contains an overview of the committed developments and transport schemes considered in the assessment of traffic on the PARs. A sifting process has been undertaken to determine whether the developments should be included as a committed development. NH is aware of some large developments, proposed and consented, that do not appear to	The Applicant has engaged with the Local Highway Authorities and National Highways throughout the Development Consent Order process. This is demonstrated within the **6.16.A1 Environmental Statement Appendix 16.1 - Engagement Undertaken Relevant to Traffic and Transport [APP-272]** and the **7.11 Transport Assessment - Appendix B - Consultation on the Scope of the Assessment [APP-335]**. As part of this engagement, the Applicant requested a review of those committed developments initially identified for assessment and requested details of any additional developments that may impact the Project. All relevant and known developments that might impact the Primary Access Routes (PARs) or the junctions connecting to the

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	have been included within the assessment of Committed Developments, such as Tendring Colchester Borders Garden Community, Bathside Bay Container Terminal, and Norfolk Vanguard and Boreas Wind Farms. National Highway, therefore, request that confirmation should be sought from the relevant Local Planning Authorities that all relevant committed developments have been included within the initial assessment.	Strategic Road Network/Major Road Network were identified and considered in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and the **7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]**. The developments identified by National Highways were not provided to the Applicant as needing to be reviewed as part of the cumulative assessment and are located a notable distance from the PARs. However, a review has been undertaken, and it was found that the Tendring Colchester Borders Garden Community had no formal planning application submitted for any phase of this development at the cut-off stage (1 April 2025). The development would have been excluded from the Project assessment as no traffic flows were publicly available. The construction of the Bathside Bay Container Terminal (BBCT) was anticipated to start in 2024 with Green Energy Hub operation commencing in 2026 (at the earliest). The application for BBCT's Environmental Statement (ES) outlines that '*Due to the A120 being a large A-road with little interaction with local sensitive receptors, the impacts of severance, amenity and highway geometry are considered to be not significant and are scoped out of this assessment*'. Furthermore, the ES states regarding highways safety that the impacts on highway safety are negligible, i.e. the low magnitude flows are unlikely to lead to cumulative effects. Therefore, this development would have been excluded from the Project assessment due to traffic flows being not significant. The Heavy Goods Vehicle construction routes for both the Norfolk Vanguard and Boreas Wind Farms projects overlap with the Strategic Road Network used by the Project, most notably for the multi-modal assessment. The construction of the Norfolk Vanguard project started in 2023 and is expected to be completed by 2028 prior to the Project's peak construction. For the Boreas Wind Farms Project, the indicative Construction Programme indicates construction would end by 2027. These developments would therefore be excluded from the Project's cumulative assessment as daily movements, where overlapping, would not be significant.
Traffic and Transport	4.2.15 Additionally, Appendix D of the TA contains a summary of the SRN junctions which are forecast to experience an increase in usage due to the committed developments. Whilst this summary is welcomed, NH consider that it would be useful to provide the numbers, and turning movements, of vehicles at each of the SRN junctions associated with each of the committed developments to better understand the impact of the committed developments at SRN junctions.	The Applicant notes the request for further information relating to traffic flows and movements for committed developments at junctions on the Strategic Road Network impacted by the Project. This information will be provided to National Highways for review.
Traffic and Transport	*Trip Generation* 4.2.18 The total daily peak hour construction vehicle trips, for the peak week of construction for each year, are reported in the TA at a county scale, as shown in the table below. This information provides insufficient evidence for the impact on the SRN. Therefore, NH requests that the estimated peak hour trip generation for each construction activity should be presented within the TA. Further, the impact of the construction traffic on individual SRN junctions should also be presented in the TA. This could be through the use of traffic flow diagrams indicating traffic routeing from each PAR.	The Applicant notes the request for further information relating to construction traffic profiles, traffic flows and movements for committed developments at junctions on the Strategic Road Network impacted by the Project. The Applicant will continue to engage with National Highways regarding the required traffic information.
Traffic and Transport	4.2.19 Additionally, the trip generation associated with worst-case construction activities is only shown for SRN links. No information has been provided regarding the methodology for how trips associated with the development would be distributed and assigned across the road network, nor have the resultant junction trip assignment figures been provided. A detailed trip distribution and assignment methodology should be established in the TA. It is recommended that the number of peak hour construction trips should be presented for the appropriate SRN junctions. Any	The Applicant notes the request for further information relating to trip assignment, construction traffic profiles, traffic flows and movements for committed developments at junctions on the Strategic Road Network impacted by the Project. The Applicant will continue to engage with National Highways regarding the required traffic information.

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	junction experiencing an increase of 30 vehicles or greater due to the proposed development in a peak hour should be subject to a junction capacity assessment.	
Traffic and Transport	*Trip Distribution/Trip Assignment* 4.2.20 The TA considers that all construction vehicle trips will access the project via PARs, which themselves are accessed from the SRN. The TA does not state how the construction vehicle trips have been distributed from the point that they access the SRN, nor how the construction vehicle trips have been assigned to routes. 4.2.21 NH notes that the junction modelling contains turning movements due to development trips at each of the junctions modelled. It is not clear how the turning movements associated with the development trips have been determined. NH requests that full details of the methodology used to distribute construction traffic on the SRN is provided. Information regarding the method used to assign these trips to the SRN should also be provided. NH also requests that traffic flow diagrams are provided to show how development trips move through the SRN. These should be used to determine whether any other SRN junctions are required to be modelled.	The source of materials was unknown at the time of the development consent application submission. Therefore, assumptions were made on the distribution of the related construction traffic movements at the Strategic Road Network junctions. The Applicant will continue to engage with National Highways regarding the required traffic information.
Traffic and Transport	*Junction Modelling - Unsignalised Junctions* 4.2.22 AECOM have undertaken a review, on behalf of NH, of the geometry of the ARCADY and PICADY models and the model build. The traffic flow inputs have not been reviewed as these have not yet been agreed. Additionally, as the trip generation, trip distribution, and trip assignment have not yet agreed, no future scenarios were considered. 4.2.23 Although, the junction modelling results for the 2024 Base scenario were provided by the Applicant to NH and have therefore been reviewed, NH considers them to be subject to the agreement of the baseline traffic flow inputs. When considering the baseline traffic flows, NH required evidence of traffic survey data should be provided, alongside any growth factors applied to traffic survey data, and traffic flow diagrams detailing the flow of development traffic through the highway network to be provided.	The Applicant notes the request for further information relating to trip assignment, construction traffic profiles, traffic flows and movements for committed developments at junctions on the Strategic Road Network impacted by the Project. The Applicant will continue to engage with National Highways regarding the required traffic information. The Applicant notes the need for National Highways to review the survey data and growth factors. This information will be provided to National Highways for review.
Traffic and Transport	4.2.24 NH's position regarding the models and baseline results for each junction assessed by the Applicant is as follows. Please note that "Site" corresponds with references in the Transport Assessment. a) *Site 1: A47/Ipswich Road junction* The review found several discrepancies between the modelled entry radii and the conflict angles for various arms and those determined by AECOM. The effective flare length for the Ipswich Road (N), A47 (NE), and A140 (S) arms are potentially overestimated in the model, and the entry radii for the A47 (NE) and A47 (SW) arms are potentially underestimated in the model. Additionally, differences were found with the conflict angle measurements between those	The Applicant notes National Highways' comments on junction geometry at Sites 1, 12, 21, 26, 36, 39, 40, 47, 56, 62. In response, the Applicant has provided National Highways with a schedule of responses and the CAD files and background imagery used for the model geometry. The Applicant acknowledges National Highways' concerns regarding Sites 48 and 89 and will continue to engage with National Highways to resolve the concerns raised. For Site 48: A120/Long Green/B11018/Cressing Road junction (Galley's Corner), the temporary impacts of the Project construction phase were modelled using local junction modelling and it is considered that it is proportional to the temporary nature of the impact. For Site 89: A1089/Thurrock Park Way/Dock Road (ASDA Roundabout), the Applicant notes National Highways' comment that whilst the Applicant consider that this level of queueing is considerable, it is noted that the queue does not extend back to the previous junction.

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	calculated by AECOM and those modelled. Whilst there is a degree of subjectivity involved when determining the model geometry, significant differences in these measurements could lead to unrealistic modelling results. Therefore, NH requests that the CAD file used to inform the model geometry of this junction should be provided for review. NH note that there is no significant queuing showing in the baseline scenario, although these results are, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved. *b) Site 12: A11 Thetford Bypass/A134/A1066 (Mundford Road) Roundabout* The review of the geometry found several discrepancies between the effective flare length, entry radii, and the conflict angle for various arms within the model and those determined by AECOM. The effective flare length measurement on the A11 Thetford Bypass (E) arm is potentially overestimated, as are the entry radii for the same arm and the A11 Thetford Bypass (W) arm. The conflict angles on both A11 Thetford Bypass arms as well as the A1066 Mundford Road (S) arm are potentially overestimated. Therefore, NH requests that the CAD file used to inform the model geometry of this junction is provided. The results indicate that all of the approaches to this junction operate within or very close to capacity in the AM peak 2024 base scenario, with the highest RFC recorded in the AM peak being 0.85 on the A11 Thetford Bypass (E) arm. The greatest queue lengths are 5.9 PCUs for the A11 Thetford Bypass (E) arm in the AM peak and therefore no significant queueing is experienced in the AM baseline scenario. The results also indicate that all of the approaches to this junction operate within or very close to capacity in the PM peak 2024 base scenario with the highest RFC recorded being 0.85 on the A11 Thetford Bypass (W) arm in the PM peak. The greatest queue lengths are 6.0 PCUs on the A11 Thetford Bypass (W) arm in the PM peak and therefore no significant queueing is experienced in the PM baseline scenario. The results are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved. *c) Site 21: A14 Junction 50* This review found several discrepancies for the geometry when compared to those determined by AECOM, particularly the entry radii for the A1120 (NE) arm, the A1120 (S) arm (which appear to be significantly underestimated), and the A14 arm. Additionally, the effective flare lengths for the A1120 (NE) arm and the A14 arm appear to be potentially overestimated, and some discrepancies on the conflict angle were noted too.	The Applicant understands that Site 40: A12 Junction 28 and Site 41: A1341 Via Urbis Romanae / United Way junctions are to be subject to a new highway layout constructed as part of an approved planning application made by others. The new junction layout should be in place prior to the peak construction activity for the Project. The Applicant requested design drawings and modelling for the proposed junction from the Design Consultants to allow for an assessment of potential impact from the Project. However, currently this is still not available due to design updates. Further engagement will be undertaken with National Highways and Essex County Council on this matter. The Applicant also notes National Highways' comments on traffic flow inputs and will continue to engage with National Highways regarding the required traffic information.

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	Therefore, NH requests that the CAD file used to inform the model geometry of this junction should be provided. The approaches to this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved. *d) Site 26: A14 Junction 52* This review found several discrepancies between the effective flare length and entry radii for two of the arms and those determined by AECOM, notably the entry radii for the Ipswich Road (E) arm and the B1113 Bramford Road (W) arm, and the effective flare length of the A14 (N) arm and the B1113 Bramford Road (W) arm. Therefore, National; Highways requests that the CAD file used to inform the model geometry of this junction is provided. The approaches to this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved. *e) Site 36: A12/Ipswich Road junction* This review found a significant difference in the effective flare length between the developer's measurement and AECOM's measurement for the Birchwood Road (E) arm. Therefore, NH requests that the CAD file used to inform the model geometry of this junction is provided. The approaches to this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved. *f) Site 39: A120/Bentley Road junction* This review found no significant discrepancies with the model layout or geometry and therefore agree with the model build. No issues were identified with traffic flows at this junction. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved. *g) Site 40: A12 Junction 28* This review found no significant discrepancies in the measurements between those modelled and those calculated by AECOM. However, it is noted that AECOM's measurement for the effective flare length of the A1341 Overbridge approach to the A12 Junction 28 south roundabout is greater. This is considered unlikely to affect the results of the modelling. However, AECOM have not been able to review the measurements of the Cuckoo Farm Way arm of the southern	

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	roundabout as Google Maps™ imagery is not up to date. Therefore, it would be helpful if the Applicant could provide the CAD file used to inform the model geometry of this junction, so that the geometry of this arm can be verified. Regarding the North Roundabout, no capacity or queuing issues were identified. However, it should be noted that, should queueing on the Overbridge arm worsen, there is a possibility that the operation of the southern roundabout at A12 Junction 28 could be impacted. Regarding the South Roundabout, the results indicate that all of the approaches to this junction operate well within capacity in the AM peak 2024 base scenario except the Via Urbis Romanae (south) arm, with the greatest RFC recorded being 0.85 in the AM peak. This arm is part of the local road network. The highest queue lengths are 5.4 PCUs for the A1341 Via Urbis Romanae arm in the AM peak and therefore some queueing is experienced in the AM baseline scenario. In the PM peak, all of the approaches to this junction operate well within capacity in the PM peak 2024 base scenario, with the exception of the A1341 Via Urbis Romanae arm, with the highest RFC recorded being 1.03 on this arm in the PM peak. The greatest queue length noted is 43.4 PCUs on the Via Urbis Romanae (south) arm in the PM peak and therefore significant queueing is experienced in the PM baseline scenario. However, this queueing occurs on the local road network and is unlikely to affect the SRN so is more of a matter for the Local Highway Authority. These results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved. *h) Site 47: A120 Coggeshall Road/Great Tey Road junction* This review found no discrepancies with the model layout or geometry and therefore agree with the model build. The results indicate that the SRN arms of this junction are operating without capacity issues. However, the results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed. *i) Site 48: A120/Long Green/B11018/Cressing Road junction (Galley's Corner)* This junction was modelled using ARCADY. AECOM, however, have advised NH that a microsimulation model (using software such as Vissim) would be more suitable to assess the impact at this junction. This is due to the interactions between the Galley's Corner roundabout, the A120/A131 Marks Farm roundabout to the north, and the B1018/Millenium Way roundabout to the south. NH notes that there is a history of serious congestion in this area, with queues frequently backing between the junctions. This occurs over an extended peak period, with congestion on	

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	the A120 eastbound starting early in the afternoon. There is also an early AM peak due to the 'early commute' towards the M11, whilst the presence of the nearby shopping village also results in congestion on a Saturday. Additionally, whilst the development traffic flows are not agreed at this stage, it is noted from the traffic flow matrices within the Galley's Corner ARCADY model that there approximately 178 vehicles assigned to the Marks Farm roundabout in the AM Peak and approximately 151 in the PM peak. Therefore, NH strongly advises that a microsimulation model, that includes the A120/A131 Marks Farm and B1018/Millenium Way roundabouts, should be used to assess the impact at this junction and provide assurance that the SRN will not be adversely affected by the development in this area. *j) Site 56: A120/A131/Pod's Brook Road junction (Panners Roundabout and Great Notley Roundabout)* The junction is formed of two roundabouts (Panners Roundabout and Great Notley Roundabout) and has been modelled as a single entity, which we welcome. The review found a significant difference between the entry radius for the Pod's Brook Road arm on the North Roundabout (Panners Roundabout) within the model and that determined by AECOM. Whilst AECOM notes that there is a degree of subjectivity involved when determining the entry radii, the significant difference in this measurement could lead to inaccurate modelling results. Therefore, NH requires that consideration is given to this aspect of the geometry of the model, or that the CAD file used to inform the model geometry is provided. The approaches to this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved. *k) Site 62: A12 Junction 15* The junction has been modelled as a single entity, which is welcomed. This review found discrepancies between the effective flare length, entry radii and the conflict angle for the A12 eastbound off-slip on the North Roundabout and those determined by AECOM. Therefore, NH requires that consideration is given to these aspects of the geometry of the model, or that the CAD file used to inform the model geometry is provided. The approaches to both roundabouts this junction operate well within capacity in both the am and pm peaks. However, these results are considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.	

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	l) Site 89: A1089/Thurrock Park Way/Dock Road (ASDA Roundabout) The ARCADY model for the A1089/Thurrock Park Way/Dock Road (ASDA) roundabout was provided by the Lower Thames Crossing project team. The results of the modelling indicate that all of the approaches to this junction operate within capacity in the AM peak 2024 base scenario except the A1089 Dock Road North arm, which shows the highest RFC recorded at 0.99 in the AM peak. The greatest queue length is shown to be 23.1 PCUs on the A1089 Dock Road North arm in the AM peak. Whilst we consider that this level of queueing is considerable, we note that the queue does not extend back to the previous junction. The results also indicate that all of the approaches to this junction operates within capacity in the PM peak 2024 base scenario with the highest RFC recorded being 0.84 on the A1089 Dock Road North arm in the PM peak. The greatest queue length is shown to be 7.1 PCUs on the A1089 Dock Road North arm in the PM peak. These results are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.	
Traffic and Transport	4.2.26 Additionally, a Vissim model has been developed for Site 88: A13/A128/A1013/Brentwood Road (Orsett Cock) junction. This is a partially signalised junction. *a) Site 29: A14 Junction 55 (Copdock Interchange)* This review found a discrepancy between the Do Minimum (DM) model, where Arm 3 Lane 3 does not connect to Arm 8 Lane 1, and in the Do Something (DS) model, where this movement is permitted. Therefore, NH requests that the movements in the DS model should be updated so that it is consistent with the DM model, or that further explanation is provided for this. Furthermore, it is noted that there are several differences in the lane lengths between the modelled measurements and AECOM's measurements, such Arm 8 Lane 3 where the difference between the respective two is 29.9m. It appears as though the lengths for each of the circulatory lanes have been considered to be identical. However, this is not necessarily the case when considering the available space on a link for vehicles to stack without blocking an exit. Therefore, NH requests that consideration is given to the lane lengths of the circulatory within the model, or that the CAD file used to inform the model geometry is provided. The results of the modelling indicate that the A14 (eastbound) off-slip and A12 (northbound) arms of this junction are forecast to operate with a DoS of 92.1% and 94.3%, respectively in the AM peak. However, we note that the queueing experienced on	The Applicant notes National Highways' comments on the junction modelling for Sites 29, 38, 46, 90, 88 and has provided responses below. *a)Site 29: A14 Junction 55 (Copdock Interchange)* The movement permitted in the DS model reflects the proposed changes to lane designations on the A12 northbound approach. Currently, the nearside lane (Arm 3 Lane 1) is marked as left-only, and the middle lane (Arm 3 Lane 2) is ahead towards the circulatory. However, downstream markings on the circulatory allow for a two-lane exit onto the A14 eastbound on-slip. Observations indicate that a small proportion of traffic currently uses Arm 3 Lane 2 to join the A14 eastbound, albeit at a lower volume than would be expected if the lane were designated for both ahead and left movements. As part of the mitigation, we propose updating the road markings so that Arm 3 Lane 2 accommodates both ahead and left movements. This change will distribute flows more evenly towards the A14 eastbound and create additional gaps for weaving from Arm 3 Lane 3 into Arm 8 Lane 1. Given the available circulatory length (approx. 190 m between stoplines), it is reasonable to assume that these improvements will enable the weaving movement to operate effectively. We acknowledge the differences noted between the modelled lane lengths and AECOM's measurements. In the current model, total stopline-to-stopline distances have been used, consistent with the assumed connector speed of 35 km/h. To address storage concerns without altering link lengths – which could impact signal offsets – we propose applying an excess queue limit check to ensure that queues do not exceed available storage capacity on circulatory links.

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	these arms is able to be contained within the available space. Notable queueing is also reported on the North Circulatory and East Bridge arms of the junction. Should the length of these queues increase, there is a possibility that the operation of both the A12 and A14 could be impacted. The results also indicate that the only arm operating with a DoS of 90% or greater in the PM peak is the A1214 (southbound) arm, which is part of the local road network. As with the AM peak, there is notable queueing on the North Circulatory and East Bridge arms of the junction. The results, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.	
Traffic and Transport	*b) Site 38: A12 Junction 29* This review found no discrepancies with the model layout or geometry and therefore NH is satisfied with the model build. The modelling results indicate that, in the AM peak, the A120 westbound off-slip and eastern circulatory arms of the junction are forecast to operate with a DoS of greater than 90%. Indeed, these two arms experience the longest queues, but the extent of the queueing on these arms is able to be contained within the link. The only link to experience a queue length greater than the link length is on the A1232 Ipswich Road arm. This link is, however, part of the local road network so would be a concern for the Local Highways Authority rather than NH. In the PM peak, no links within this junction model experience a DoS of 90% or greater, or a MMQ that is greater than the link length. The results are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed.	*b) Site 38: A12 Junction 29* The Applicant notes that National Highways has confirmed that the model layout and geometry are satisfactory. The Applicant notes the observations regarding the AM peak results, where the A120 westbound off-slip and eastern circulatory arms operate with a Degree of Saturation (DoS) greater than 90%, and that queues on these arms are contained within the available link lengths. We also acknowledge that the only instance of a queue exceeding link length occurs on the A1232 Ipswich Road arm, which forms part of the local road network and would therefore be a matter for the Local Highway Authority. For the PM peak, the Applicant notes that no links experience a DoS of 90% or greater, nor any Mean Maximum Queue (MMQ) exceeding link length.
Traffic and Transport	*c) Site 46: A12 Junction 26* AECOM have undertaken a review of the geometry of the A12 Junction 26 LinSig model, against the geometry found within the LinSig model of A12 Junction 26 built by AECOM on behalf of NH. AECOM were commissioned by NH in June 2022 to build this model. This review found discrepancies between the Applicant's LinSig model and AECOM's A12 Junction 26 LinSig model. For example, there appears to be a discrepancy between the modelled lane connectors on the circulatory and those present at the junction. These apparent discrepancies are also present when comparing with satellite imagery. Additionally, the modelled length of the overbridge arms appears to be greater than found at the junction when considering the available stacking capacity of these links. Therefore, NH requires that	*c) Site 46: A12 Junction 26* The Applicant's LinSig model geometry differs from AECOM's model and satellite imagery as a weaving connector was included with locked flows for a specific movement based on observed lane flows, which indicated minor weaving at those locations. The locked flow for the key movement aligns with baseline observations. While a conflicting weaving connector is not standard practice, it was necessary to reflect actual lane usage at this junction. Discrepancy in length of overbridge arms affecting stacking capacity have been reviewed. Stopline-to-stopline distances were taken from Google Earth, as connectors rely on travel speeds rather than times. Using non-blocking storage would distort travel times and queue profiles. The queues displayed by the model are accurate and reflect observed conditions. A CAD file was not available and therefore geometry was derived from Google Earth measurements. Saturation flows were based on video observations from the MCC surveys undertaken in October 2024 where possible. For the remaining lanes, we applied a local adjustment factor in line with Department for Transport

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	consideration is given to these aspects of the model, or that the CAD file used to inform the model geometry is provided. We also noted that Saturation Flows appear to have been manually input into the model. It is not clear whether this information has been taken from traffic surveys. Please can this be clarified. The modelling results indicate that, in both the AM and PM peak periods, the A1124 Halstead Road (southbound) arm of the junction is forecast to experience a DoS of greater than 90%. The reported queueing on this arm does not, however, extend beyond the length of the link. No other links are reported to have a DoS of 90% or greater in either peak period. The only link to experience a length of queue greater than the link length is on the northern circulatory (A12 EB Internal) arm, which occurs in both the AM and PM peak periods. Excessive queueing at this location could restrict the ability for vehicles to exit the A12. The are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved. AECOM also noted that, during 2024, NH was in the process of undertaking road surfacing works on the A12 in the vicinity of A12 Junction 26. It should be confirmed that the traffic surveys undertaken were not affected by these works. There is a possibility that base traffic flows could be underreported due to those with local knowledge avoiding the area.	guidance (RR67)[110] to ensure the flows reflect local conditions and geometry characteristics. Where observations were completely not feasible (due to demand profiles or camera angles), a default of 1,800 Passenger Car Units (PCU)/hr was applied (acknowledged as potentially conservative). The survey company reviewed roadworks prior to commissioning and did not identify any issues at this location during the survey period. No evidence of underreporting was found; the survey conditions were considered valid. The Applicant notes the query on why the queue does not extend beyond the link length despite high DoS on A1124 Halstead Road (southbound). This arm is an entry link and cannot exceed its link length unless severely over theoretical capacity (e.g. >200% DoS). Where video footage is limited it was difficult to see the back of queues. However, absence of measured queue data above 60 m is entirely typical rather than unusual due to lack of suitable positioning of equipment. Nevertheless, the available contextual evidence aligns well with the model output. Google's live traffic colouration for this arm shows slow speeds extending back towards the T-junction. This does not represent stationary queues; Google's red bands indicate reduced movement. A stationary queue of around 100 m at the stopline would naturally result in slow-moving vehicles feeding into it from upstream, and Google's speed-based mapping can easily display a red section longer than the stationary queue itself. The Applicant agrees that excessive queueing on the northern circulatory may restrict vehicles exiting the A12, and could affect the exit towards A1124 Halstead Road northbound. The results have been calibrated and validated against existing conditions and are considered fit for use. Issues highlighted (stacking capacity and exit blocking) reflect potential on-site conditions rather than modelling errors. Worst-case queues exceeding stacking capacity occur on A12 EB Internal (16.1 PCUs in DM and 16.8 PCUs in DS scenarios). The impact of temporary construction traffic is not considered severe enough to warrant further investigation.
Traffic and Transport	*d) Site 90: M25 Junction 30* This review found discrepancies in the connectors within the model and the lane markings present in satellite imagery. Furthermore, there appear to be some significant differences in the lane lengths, specifically Arm 1 Lane 3, Arm 2 Lane 3, and Arm 4 Lane 3 where the differences are over 200m for each arm. Therefore, NH requires that consideration is given to these aspects of the geometry of the model, or that the CAD file used to inform the model geometry is provided. AECOM also noted that Saturation Flows appear to have been manually input into the model. It is not clear whether this information has been taken from traffic surveys. Please can this be clarified. AECOM also noted that the M25 Junction 30 LinSig model has a base year of 2022, whilst all other models reviewed have a base year of 2024. Please can the reason for this and whether it would make a material difference be explained. The modelling results indicate that the M25 northbound off-slip and southern circulatory links are forecast to experience a DoS of greater than 90% in the AM peak. Indeed, these two	*d) Site 90: M25 Junction 30* MCC surveys were undertaken at identified junctions in October and November 2024. Originally the Applicant was led to believe that the Lower Thames Crossing project would have a network model that could be used to assess the impact of the Project. However, this was not the case. Due to the required approvals and Project programme, we were unable to commission a MCC survey at Site 90 at the time of the initial modelling exercise undertaken due to the required approvals and programme, and the need to survey within a neutral month as requested by LHA and National Highways. As a result, the model data was extracted from an existing Transport Assessment prepared by others for the London Gateway Logistics Park, LDO 2 planning application, along with the 2022 baseline traffic data. This information was cross-checked against the signal information we received from Connect Plus to ensure consistency and approach was discussed and agreed with National Highways at junction modelling specific meetings. We have subsequently undertaken new traffic surveys at this junction on a typical weekday in October 2025. These updated surveys have allowed us to review the comments raised by AECOM and National Highways. As part of this review, we will ensure that link lengths and geometry are correct in the updated model. Original lane lengths were measured stopline-to-stopline using Google Earth. Entry links were initially set to default lengths; these will be updated where necessary in the revised model. The updated model will reflect accurate measurements and address discrepancies noted in the review. The original model included weaving connectors to reflect observed traffic behaviour on a large spiral-marked roundabout.

[110] Kimber, R, McDonald, M. and Hounsell, N. (1986) *Research Report 67 The Prediction of Saturation Flows for Road Junctions Controlled by Traffic Signals*

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	links experience the greatest reported level of queueing, although the lengths of the queues are not longer than the length of the links. In the PM peak, the M25 northbound off-slip, southern circulatory, and western circulatory links are forecast to experience a DoS of greater than 90%. The reported queueing on these links, however, are all able to be contained within the links. The results are, however, considered to be provisional until the assumptions regarding the traffic flow inputs have been agreed and the issue raised above regarding the model geometry has been resolved.	These will be reviewed and adjusted if required based on updated survey data. Saturation flows were based on video observations where possible or factored RR67 calculations using information from observed approaches with similar conditions. Where observations were not feasible as video footage was not available to review, defaults of 1,900 PCU/hr were applied, which is standard for large roundabouts such as those on the M25. The original base year of 2022 was used because traffic surveys were not available at the time, and data was sourced from a Transport Assessment prepared for the London Gateway Logistics Park, LDO 2 to support the planning application. The model has been updated to a 2025 base year to utilise the latest traffic data obtained and updated traffic flow data received from the Lower Thames Crossing (LTC) Transport Team. We will provide an updated model incorporating revised geometry, link lengths, and validated traffic flows.
Traffic and Transport	e) *Site 88: A13/A128/A1013/Brentwood Road (Orsett Cock) junction* Whilst the Orsett Cock junction is part of the Major Road Network (MRN), as opposed to the SRN, it is located approximately 1.5km to the east of the SRN. Therefore, we have undertaken a high level review of the results of the Vissim modelling undertaken at this junction to determine whether queueing at this junction could impact the operation of the SRN. It should be noted that AECOM's high-level review has taken the reported queueing figures at face value, and no review of the model or the trip demand at the junction have been undertaken. The forecast queue lengths on the A13 eastbound off-slip arm of this junction are all less than 100m, compared to the length of the off-slip arm of approximately 340m. We have concluded therefore that there is unlikely to be an impact on the operation of the SRN due to queueing experienced at this junction.	*e) Site 88: A13/A128/A1013/Brentwood Road (Orsett Cock) junction* The Applicant notes National Highways' comment that the key issues at this site impact the local road network and are unlikely to be an impact on the operation of the Strategic Road Network. Subsequent to the submission of the development consent application, the Applicant has updated the modelling for this junction following further engagement with the LTC Transport Team. Engagement with the LTC Team regarding mitigation at this junction is ongoing. Further engagement with National Highways and Thurrock Council will be undertaken and updated modelling provided for review.
Traffic and Transport	*Junction Modelling - Summary* 4.2.27 AECOM's review of the junction models suggests discrepancies in the constructions of the models of the following locations: • A47/Ipswich Road junction • A11 Thetford Bypass/A134/A1066 (Mundford Road) Roundabout • A14 Junction 50 • A14 Junction 52 • A12/Ipswich Road junction • A12 Junction 28 • A120/A131/Pod's Brook Road junction (Panners Roundabout) and A120/A131/B1256 junction (Great Notley Roundabout) • A12 Junction 15 • A1089 Dock Road North/Amazon UK Service Access/Dock Road South/A1089 St Andrew's Road/Thurrock Park Way junction (ASDA Roundabout). • A14 Junction 55 (Copdock Interchange)	The Applicant notes National Highways' comments on junction geometry and queue length discrepancies (see comments provided for 4.2.24 and 4.2.26). The Applicant has provided National Highways with the CAD files and background imagery used for the model geometry. The Applicant will continue to work with National Highways' consultants to resolve these comments.

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	• A12 Junction 26 • M25 Junction 30 Further information and/or modelling is required to address the issues raised.	
Traffic and Transport	4.2.28 The initial review suggests that there may be potential concerns with congestion and queuing at the following locations: • A11 Thetford Bypass/A134/A1066 (Mundford Road) Roundabout • A12 Junction 28 • A1089/Thurrock Park Way/Dock Road (ASDA Roundabout) • A14 Junction 55 (Copdock Interchange) • A12 Junction 26 • M25 Junction 30 NH recommends an early discussion with the Applicant following submission of this Relevant Representation to seek resolution of these issues.	The Applicant notes National Highways' comments on junction geometry and queue length discrepancies (see comments provided for 4.2.24 and 4.2.26). The Applicant has provided National Highways with the CAD files and background imagery used for the model geometry. The Applicant will continue to work with National Highways' consultants to resolve these comments.
Traffic and Transport	4.2.29 NH strongly recommends a microsimulation model is applied to the following locations collectively: • A120/Long Green/B11018/Cressing Road junction (Galley's Corner) • A120/A131/B1256 (Marks Farm) Roundabout • B1018/Millenium Way	The Applicant modelled the Project's construction phase using local junction modelling and considered that this approach is proportional to the temporary nature of the impact. A meeting has been held to discuss this matter with National Highways, at which a request for construction traffic profiles was requested. The Applicant will continue to engage with National Highways regarding the required traffic information.
Traffic and Transport	4.2.30 NH considers that addition modelling may be required at the following locations, subject to agreement of the trip generation and distribution methodology and outputs:	The Transport Assessment **(7.11 Transport Assessment [APP-333])** identified the methodology for the selection of junctions to be modelled which involved a sifting process carried out to identify the sensitive junctions based on existing congestion or potential capacity issues due to the increase in traffic on certain approaches. The sifting process did not take into account the expected increase in traffic volumes (absolute or percentage) as a criterion for selecting or excluding junctions. This sifting approach was shared and agreed in principle with the Local Highway Authority (LHA) and National Highways at thematic group meetings. The selection methodology and list of junctions deemed sensitive through the sifting process was provided for review by LHA and National Highways at the thematic group meeting held in April 2024, and feedback was used to refine the final selection. As a result of this engagement, several additional junctions were incorporated into the assessment scope, e.g. M25 J30 which does not connect to a Primary Access Route. The Applicant presented an early draft of the Transport Assessment **(7.11 Transport Assessment [APP-333])** to the LHAs and National Highways at the Thematic Group Meeting in January 2025 and again ran through the methodology of junction sifting process, junction assessment methodology and cumulative assessment. Feedback was requested from LHA and National Highways in February 2025, and a response was provided to the Applicant from National Highways in April 2025. As agreed, the Applicant is committed to working with National Highways to discuss this matter further.
Traffic and Transport	• A11 Wymondham Bypass/Browick Road (Browick Road Interchange)	A11 Wymondham Bypass/Browick Road This junction did not show any capacity issues during the AM or PM peak periods as per Google Typical Traffic information. The expected maximum number of vehicles is 21 Heavy Goods Vehicles (HGVs)/h entering the junction from Wymondham Road and 21 HGVs/h exiting onto Wymondham Road over a short two-week period. Given current capacity and the short temporary impact, modelling of the junction is not considered necessary by the Applicant.
Traffic and Transport	• A12 Junction 21 (Merge/Diverge assessment)	A12 J21 (Merge/Diverge assessment)

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		During the sifting process, the A12 widening scheme documentation was reviewed. This junction was part of the improvements of the scheme; in particular, it also proposed a change of highway layout. As no capacity issues were expected the junction was not included within the list of junctions to be modelled. The Applicant is aware that the A12 scheme was withdrawn in July 2025, just prior to development consent application submission. A review of this junction has now been undertaken, and modelling of the junction is not considered necessary by the Applicant as the expected maximum number of vehicles entering the A12 would be 9 HGVs/h and there would be 9 HGVs/h exiting onto Hatfield Road over a two-week period
Traffic and Transport	• A12 Junction 14 (Ivy Barns Lane/ Wantz Road/ Writtle Road junction)	A12 J14 (Ivy Barns Lane/ Wantz Road/ Writtle Road junction) This junction will not be used by construction traffic relating to the Project. Therefore, modelling of the junction was not required. All Abnormal Indivisible Load (AIL) movements will be coordinated through the Electronic Service Delivery for Abnormal Loads (ESDAL) system and in coordination with the Local Highway Authorities, to reduce disruption where possible. Further details can be found within the Outline CTMP **(7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310])**.
Traffic and Transport	• A12 Junction 31, Holton Saint Mary	A12 J31 Holton Saint Mary This junction was included as part of the preliminary assessment undertaken following the sifting process. It was found that the junction capacity should be able to accommodate the peak construction flows, and junction modelling was therefore not required. Details can be found within the Transport Assessment **(7.11 Transport Assessment - Appendix F - Junction Capacity Assessment [APP-339])**.
Traffic and Transport	• A12/Turnpike Close junction, immediately to the north of A12 Junction 29 (Merge assessment)	A12/Turnpike Close immediately to the north of A12 Junction 29 (Merge assessment) This slip road was not identified as having capacity issues during the AM or PM peak periods during the initial assessment. The expected maximum number of vehicles entering the A12 will be 6–7 HGVs/h over a short four-week period. Given the existing capacity of the slip road, and the low number of construction peak hour traffic expected, modelling of the slip road is not considered necessary by the Applicant.
Traffic and Transport	• A12 Junction 25.	A12 J25 During the sifting process, junctions that were improved as part of the A12 widening scheme were not considered as having potential capacity issues as the A12 scheme improved capacity. As the A12 scheme was withdrawn in July 2025, just prior to development consent application submission, it was not possible to carry out further assessment of this junction. The Applicant would welcome engagement with National Highways on this matter to allow the junction to be modelled and the impact of the Project to be identified and suitable mitigation proposed where required.
Traffic and Transport	4.2.31 NH notes specifically that A12 Junction 25 is included within assessments such as the PIC analysis but is not included within the list of SRN junctions that have been modelled. NH requires a justification to be provided for any junctions scoped out of the modelling exercise that are expected to see a material increase in trips due to the proposed development. It is noted that, from the information provided in the junction modelling traffic flows, A12 Junction 25 is expected to be impacted by over 120 trips in both the AM and PM peaks, which would suggest a junction capacity assessment is required.	Within the Transport Assessment (**7.11 Transport Assessment [APP-333])**, Personal Injury Collision data was shown for all Primary Access Routes and their connection to the Strategic Road Network/Major Road Network. During the sifting process, junctions that were improved as part of the A12 widening scheme were not considered as having potential capacity issues as the A12 scheme improved capacity and would likely be able to accommodate the anticipated number of construction vehicles which use all approaches. As such, this junction was not highlighted by National Highways as a concern during thematic group meetings when the junction selection process and short list was reviewed with the assumption of the junction upgrade being in place. However, as the A12 scheme was withdrawn in July 2025, just prior to development consent application submission, it was not possible to carry out further assessment of this junction. The Applicant would welcome engagement with National Highways on this matter to allow the junction to be modelled and the impact of the Project to be identified, with suitable mitigation proposed where required.
Traffic and Transport	4.3 Environmental Statement (ES) *6.16 ES Chapter 16 – Traffic and Transport Paragraph* 16.8.2 states that number of HGV movements would be re-examined when the appointed Main Works Contractor(s) has sufficiently progressed its construction method and detailed programming of the works. NH should be notified of any changes	The Applicant is engaged with the Main Works Contractor(s) regarding the construction programme and associated trip generation. The Main Works Contractor(s) are aware of the trip generation levels which were included within the junction modelling assessment. Initial discussions and assessments undertaken with the Main Works Contractor do not indicate any increases in trip generation. The monitoring and management principles detailed within the Outline CTMP **(7.3 Outline Construction Traffic Management Plan [APP-309])** include monitoring of the number of construction vehicles utilising the Primary Access Routes throughout construction. It is anticipated that the Main Works Contractor(s), in partnership with

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	to HGV trip generation. Should changes to the number of HGV movements be forthcoming, additional junction modelling may be required which should be agreed with NH.	the Local Highway Authority, will monitor key junctions on the network where temporary or permanent mitigation has not been proposed. The requirement for any additional junction modelling will continue to be discussed with National Highways in the context of the Statement of Common Ground between National Grid and National Highways.
Cumulative Effects	*6.17 ES Chapter 17 – Cumulative Effects* No additional information has been provided regarding cumulative impacts relevant to NH as the Zone of Influence of the Traffic and Transport chapter of the Environmental Statement is limited to the PARs NH requests that the scope for assessment of the cumulative effects of the construction should be extended to include points on the SRN where a material development impact is forecast.	The cumulative effects assessment has been undertaken in accordance with the Scoping Report **(6.19 Scoping Report [APP-288 – APP-296])** and Scoping Opinion **(6.20 Scoping Opinion [APP-297])**. National Highways were consulted as part of the scoping process and during statutory consultation; however, this point was not raised. The impact on those sensitive SRN junctions connecting to the Primary Access Routes has been assessed within the Transport Assessment **(7.11 Transport Assessment [APP-333])** and considers the cumulative flows from other developments. An assessment of the temporary impact of the Project construction traffic on key Strategic Road Network (SRN) links can be found within the Transport Assessment **(7.11 Transport Assessment [APP-333])**. The assessment summarises the forecast changes in traffic flow by direction on key SRN segments during the peak construction year and within the AM and PM peak hours. The change is shown for total traffic flow and for Heavy Goods Vehicles for the Project. The Applicant will continue to work with National Highways' consultants to presents findings of the cumulative assessment undertaken on the wider SRN network.
Traffic and Transport	4.4 Construction Management Documents *7.3 – Outline Construction Traffic Management Plan (OCTMP):* 4.4.1 We note the following proposed junction capacity measures are put forward in the OCTMP: • A47/A140 – Temporary signage to warn of peak hour congestion • A14 J55 Copdock – Change to lane and destination arrow markings on the A1214 and A12 approaches to the roundabout, and on the circulatory carriageway. • A120 Harwich Road/Bentley Road - Widening of junction bellmouth and lengthening of merge taper onto A120 NB mainline • A120 Ardleigh Crown Interchange – Further discussions to be undertaken with LHA/NH. The proposed mitigation is to be agreed with the LHA and finalised within the CTMP. • A12 Eight Ash Green Interchange – Signal Optimisation • A120 Coggeshall Road/Great Tey Road – Further discussions to be undertaken with LHA/NH. The proposed mitigation is to be agreed with the LHA. • A120 Braintree Bypass/B1018 Braintree Rd – Further discussions to be undertaken with LHA/NH. The proposed mitigation is to be agreed with the LHA. • M25 J30 – Signal Optimisation 4.4.2 The changes to the A120/Bentley Road junction agreed to support the Five Estuaries and North Falls Offshore Wind Farms are included in the OCTMP. 4.4.4 The measures listed above are to be discussed and agreed with NH	The Applicant notes this comment. The Applicant will continue to liaise with National Highways during the Examination to discuss and agree the junction capacity mitigation measures. This will be documented in **5.9.20 Draft Statement of Common Ground - National Highways**.
Traffic and Transport	4.4.5 NH advises that Walking, Cycling, and Horse-riding Assessment and Reviews (WCHAR) are needed at any point on the SRN where changes are proposed.	A WCHAR has been prepared for the following locations where changes to the Strategic Road Network are proposed: • A120/ Bentley Road • A12 on slip at the A12 Ipswich Road/B1070 junction.

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		The Applicant will issue the WCHARs to National Highways and will continue to liaise with National Highways to address any comments on the WCHARs so that these can be approved.
Traffic and Transport	4.4.6 National Highways welcomes the measures included in the OCTMP to manage traffic to the levels forecast in the TA and the proposals for enforcement. It is noted that interventions to address any non-compliances will be agreed with the Local Highways Authority. Please can the Applicant confirm that this is intended to include National Highways.	The Outline CTMP **(7.3 Outline Construction Traffic Management Plan [APP-309])** sets out that, where non-compliances are identified, the Applicant will carry out an investigation to identify appropriate corrective actions. Where needed, corrective actions will be agreed with the relevant Local Highway Authority (LHA) and/or community members prior to implementation. Where a corrective action is identified, the LHA will be informed. It is assumed that, in relation to these actions, the reference to LHA includes National Highways.
Traffic and Transport	4.4.8 NH notes that the trip generation exercise, as presented in the TA, has assumed that construction worker vehicles would have an occupancy of two, and office-based staff would have a vehicle occupancy of one. A vehicle occupancy of 1.3 personnel per car roughly equates to four staff across three cars (two of every three vehicles would be single occupancy vehicles). As the total numbers of construction staff and office-based staff are not known, it is not clear how the minimum average occupancy target of 1.3 personnel per vehicle was derived. NH requests that the staff vehicle occupancy figures used to inform the traffic impact assessment of the development is explained.	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 Transport Assessment **(7.11 Transport Assessment [APP-333])** provides an overview of the construction staff occupancy assessments. The office-based staff uses a vehicle occupancy of one as a worst case, as less information about their movement patterns are known. The Overhead Line and Cables and Substation workers are assumed to stay in similar hotels, and hence a vehicle occupancy of two has been used, with an inherited 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.
Traffic and Transport	*5.2.4 OCTMP Appendix B - Outline Construction Worker Travel Plan (OCWTP)* 4.4.9 Whilst NH welcomes the measures set out in the OCWTP to encourage sustainable travel, they do not provide the necessary assurances that the proposed occupancy target of 1.3 personnel per vehicle is achievable. This is due to the remote nature of the construction compounds and requirement for staff to work in various locations across the project of the lifecycle of the construction. Once the vehicle occupancy has been explained and agreed (as requested above), it is recommended that this should be explored further with NH.	The Applicant notes this comment and will continue to liaise with National Highways during the Examination to discuss the methodology and assumptions relating to construction worker travel. This will be documented in **5.9.20 Draft Statement of Common Ground - National Highways**.
Traffic and Transport	*7.3 – OCTMP Appendix A – AIL Access Strategy* 4.4.10 NH understand the project will require abnormal loads for specific equipment and materials to the site on the SRN. It should be noted that approval to move by road is not automatic. NH implements a Water Preferred Policy which promotes use of water transport for the largest/heaviest abnormal loads (such as nearest suitable coastal ports, inland water/ rivers, beach landings). This is intended to keep the road usage to a minimum wherever possible to minimise disruption to other road users. Once a strategy for movement has been agreed, we issue what is called an 'Agreement in Principle'. This is in addition to any route feasibility work that we may agree to carry out. 4.4.11 As stated within the Application documents, a specialised haulage service will be appointed to allow Abnormal Indivisible Loads (AILs) to be transported, with the necessary escort, permits and traffic management in place. The Applicant will consult with the relevant highways authorities to ensure the correct permits are obtained. The police will also be given advanced notification under the Road Vehicle Authorisation of Special Types Order 2003. 4.4.12 The Applicant has been in discussions with NH regarding a number of potentials AIL routing strategies. NH have identified the	The Applicant notes this comment and will continue to coordinate with National Highways regarding the transportation of abnormal loads, including obtaining the necessary escorts and permits, as noted in the Outline CTMP Abnormal Indivisible Load (AIL) Access Strategy **(7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310])**. The schedule of AIL movements is anticipated to be further developed and shared when appropriate, following confirmation of the construction programme by the Main Works Contractor(s). This includes formal notification of abnormal load movements through the Electronic Service Delivery for Abnormal Loads (ESDAL) system and will follow all formal processes required, which encompasses verification of structures along the access routes prior to movements taking place. Notwithstanding this, the Applicant would welcome further discussion on an agreed approach for completing structural surveys.

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	potential requirement for some structural surveys for structures along the desired routes. This is understood to be taking place following the completion of the DCO when the known haulage service has been appointed and final routes have been finalised. 4.4.13 NH must be contacted 8–10 weeks prior to the planned movement, at which point the haulier should initiate contact. During this period, route suitability will be reassessed in coordination with all relevant structure owners and highway authorities. An application must then be submitted to NH, and if approved, the permit will be valid for six months. The Applicant should note that there remains a legal obligation to notify us of the exact date and time of each movement at least 5 days in advance.	
Compulsory Acquisition	**5 Compulsory Acquisition** 5.1 The Applicant's draft DCO includes powers of compulsory acquisition and temporary possession and the acquisition of rights in respect of a significant number of land interests owned by NH as referred to in the Book of Reference. The land information provided in the Book of Reference is in a format which makes it extremely and disproportionately onerous for NH to check the ownership status of each land parcel, given the large number of plots involved. Therefore, NH requires that the Applicant provides the shape files to enable the information to be cross-referenced accurately. Once the shape file is received, NH will undertake checks of the information provided to ascertain whether NH assets and operations would be adversely affected by the proposals and whether there are additional interests impacted by the development that are omitted from the Book of Reference. Once adequate information is received, it is NH's intention to respond fully to the proposed Compulsory Acquisition of its land and rights on a plot by plot basis. 5.2 In the meantime, it is noted that there are proposals to permanently acquire the freehold interest of NH land. NH object to the compulsory acquisition of operational land to ensure that the safe and efficient operation of the SRN can be maintained by NH. Some of the plots pertain to operational Highway and compulsory acquisition of such land is unacceptable and would prevent NH from discharging its statutory duties.	The Applicant have shared Shapefile information with National Highways and will liaise with National Highways to seek to address their concerns with the impact of compulsory acquisition and temporary possession powers on National Highways' operational land.
Draft DCO	**6 Draft DCO** *[National Highways has provided a detailed commentary on the drafting of the DCO with suggested amendments. This is not replicated in detail in this document to aid legibility]*	A response to these issues is appended.
Draft DCO	**8 Protective Provisions and Appendix 1 [Draft Protective Provisions]** *[National Highways has provided draft Protective Provisions at Appendix 1 of its Relevant Representation, and a detailed justification for the Protective Provisions in Section 8. This is not replicated in detail in this document to aid legibility.]*	The Applicant has included Protective Provisions for National Highway's benefit in the draft DCO **(3.1 Draft Development Consent Order [APP-056])** in Schedule 16, Part 5. Whilst National Highways' proposed Protective Provisions provided at Appendix 1 of its Relevant Representations are not agreed at this stage, the Applicant is continuing to liaise with National Highways to seek to fully agree a set of Protective Provisions.

Table T1.2 National Grid's response to Section 6 of National Highways' Relevant Representation

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
Article 11: Street Works	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: a) break up or open the street, or any sewer, drain or tunnel within or under it; b) tunnel, drill or bore under the street, or carry out any works to strengthen or repair the carriageway; c) remove or use all earth and materials in or under the street; d) place and keep apparatus in the street (including signage); e) maintain, renew or alter apparatus or furniture (including signage) in or on the street or change its position; f) reinstate or construct new pavement; g) execute any works to provide or improve sight lines required by the highway authority; h) execute and maintain any works to provide, renew or alter hard and soft landscaping, drainage and any other works for the benefit or protection of the environment; i) carry out re-lining and placement of new temporary markings; and j) execute any works required for or incidental to any works referred to in sub-paragraphs (a) to (i). 2. 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 above and paragraph 3 of article 8. 3. If a street authority that receives an application for consent under paragraph (2) above fails to notify the undertaker of its decision within 28 days that authority will be deemed to have granted consent	This article gives the Applicant the power to break open the streets, place and keep apparatus in or under the street etc to those streets referred to in column (2) of Schedule 5. The Schedule includes the A12 Ipswich Road, the A12, the A120 Ipswich Road, the A13 Stanford Le Hope Bypass and the A1089 Dock Approach Road which form part of the strategic network that NH is responsible for at the following locations marked on the Access, Rights of Way and Public Rights of Navigation Plans. • Section C, Sheet 8 • Section C, Sheet 16 • Section G, Sheet 1 • Section H, Sheet 4 • Section H, Sheet 7 This article will give the applicant the power to break open the streets, place and keep apparatus etc. beneath the above mentioned roads. Additionally, please note it is NH's requirement that any apparatus installed under the strategic road network is carried out by Horizontal Directional Drilling (HDD) rather than an open cut method to minimise disruption to road users. As the highway authority for the A12, A120, A13 (in part) and A1089 NH must have control over the operations being carried out on and under its network in order to comply with its duty to co-ordinate the execution of works of all kinds (including works for road purposes) under section 59 of the New Roads and Street Act 1991. Road space booking will be required in connection with these works so NH can comply with this duty. This is critical from a safety perspective and to protect the structure of the street and the integrity of apparatus in it. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article. Such consent should not be subject to deemed consent. Please see comments in this regard below. In addition, the general power to enter on so much of any other street whether or not within the Order limits for the purposes set out in 11(1)(a) to (j) and the deemed consent provisions is unacceptable. Whilst the need for flexibility is acknowledged, NH must have control over the operations being carried out on and under its network to ensure the safe operation of the SRN.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 12: Application of the Permit Schemes	This article deals with the relationship between the Order powers and the traffic management permit schemes operated by Norfolk County Council, Suffolk County Council, Essex County Council and Thurrock Council (together "the Permit Schemes").	NH would welcome confirmation that permit schemes for the purposes of this article do not apply to NH.	The Applicant can confirm that the Permit Schemes do not apply to the Strategic Road Network.

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
	Article 12(1) confirms that the Permit Schemes apply and will be used by National Grid (or, where appropriate, UKPN) in connection with the construction and maintenance of the authorised development, subject to the qualifications in paragraphs (2) and (3).		
Article 13: Application of the 1991 Act	This article sets out how the 1991 Act will apply to the authorised development.	NH object to the automatic disapplication of the provisions on the 1991 Act as listed in Article 13. The applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 14: Power to alter layout, etc. of streets	1. The undertaker may, without the consent of the street authority, and for the purposes of carrying out the authorised development, permanently or temporarily alter the layout of, or carry out any works in, a street specified in column (1) of Part 1 or 2 of Schedule 6 (streets subject to alteration of layout) in the manner specified in relation to that street in column (2). 2. Without limitation on the specific powers conferred by paragraph (1), but subject to paragraph (4), the undertaker may, for the purposes of constructing and maintaining the authorised development, permanently or temporarily alter the layout of any street (and carry out works ancillary to such alterations) whether or not within the Order limits and the layout of any street having a junction with such a street and, without limiting the scope of this paragraph, the undertaker may: a) increase the width of the carriageway of the street by reducing the width of any kerb, footpath, footway, cycle track, central reservation or verge within the street; b) alter the level or increase the width of any such kerb, footpath, footway, cycle track, central reservation or verge; c) reduce the width of the carriageway of the street; d) execute any works to widen or alter the alignment of pavements; e) make and maintain crossovers, turning lanes and passing places; f) execute any works of surfacing or resurfacing of the highway;	The applicant has the power **without** the consent of the street authority to permanently or temporarily alter the layout and carry out works to the streets specified in column (1) of Part 1 (streets subject to permanent alteration of layout) or 2 (streets subject to temporary alteration of layout) of Schedule 6. This also includes streets whether or not within the Order limits. This power to far too wide and vague to be acceptable to NH. The A12 Ipswich Road at Junction with B1070 Hadleigh Road and the A120 Ipswich Road referred to in Schedule 6, Part 1 (streets subject to permanent alteration of layout) forms part of the SRN that NH is the highway authority for. Please also see our comments at the end of this table in relation to deemed consent. The applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
	g) carry out works for the provision or alteration of parking places, loading bays, footpath, footway, and cycle tracks; h) execute any works necessary to alter or provide facilities for the management and protection of pedestrians; and i) execute any works to provide or improve sight lines required by the highway authority. 3. The undertaker must restore to the reasonable satisfaction of the street authority any street that has been temporarily altered under this article. 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). 5. If a street authority which receives an application for consent under paragraph (4) fails to notify the undertaker of its decision before the end of the period of 28 days, **it is deemed to have granted consent**.		
Article 16: Temporary closure of streets and public rights of way	This article provides for the temporary closure, alteration or diversion of streets or public rights of way shown on the access and rights of way plans or within the Order limits. In relation to those streets and public rights of way listed in Schedule 8, National Grid must first consult with the relevant street authority. In relation to streets and public rights of way not listed in the Schedule, the consent of the street authority (which may impose reasonable conditions) must be obtained (such consent not to be unreasonably withheld or delayed)	This article provides that the following streets or PROW's may be temporarily closed, altered or diverted (following consulting with the street authority) or any other street or PROW (with the consent of the street authority)(consent not to be unreasonably withheld or delayed) and temporary diversion provided. A14 and A12 eastbound merge, A12 east bound diverge, A12 Ipswich Road Southbound, A12 Ipswich Road Northbound, A12 Ipswich Road Southbound, A12 Ipswich Road Northbound, A120 northbound merge, A120 northbound diverge, A120 Colchester Road, Coggeshall, A12 Westbound, A12 Eastbound, A127 Southend Arterial Road Eastbound, A127 Southend Arterial Road Westbound, A13 Stanford-le-hope Bypass Westbound, A13 Stanford-le-hope Bypass Eastbound, A13 Stanford-le-hope Bypass Eastbound diverge to A1089 Dock Approach Road, A13 Stanford-le-hope Bypass Eastbound diverge from A1089 Dock Approach Road, A13 Stanford-le-hope Bypass Westbound diverge to A1089 Dock Approach Road, A13 Stanford-le-hope Bypass westbound diverge from A1089 Dock Approach Road, A1089 Dock Approach Road (Southbound), A1089 Dock Approach Road (Southbound), A1089 Dock Approach Road (Northbound), A1089 Dock Approach Road (Northbound). The applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article. The applicant ought also be required to secure road space booking in advance of exercising the powers in Article 16. Please also see our comments at the end of this table in relation to deemed consent.	The draft Protective Provisions in favour of National Highways proposed in Part 5 of Schedule 16 of the draft DCO **(3.1 Draft Development Consent Order [APP-056])** prevent National Grid from exercising Article 16 (Protective Works) without the consent of National Highways.

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
Article 17: Access to works	This article confers upon the undertaker powers for the purposes of the authorised development to provide or improve both permanent and temporary accesses at the locations specified in Schedule 9 (access to works). Similar powers are conferred in relation to any other locations within the Order limits reasonably required for the authorised development so long as the relevant planning authority consents, following consultation with the highway authority (such consent not to be unreasonably withheld or delayed).	17(1)(a) – This article provides the applicant with powers to form and lay out means of access, or improve existing means of access in the locations specified. This includes reference to the A120 Colchester Road at Surrex. 17(1)(b) - This article provides the applicant with powers to carry out works to form and lay out such means of access or to improve existing means of access at any location within the order limits with the consent of the relevant street authority. NH network, forms part of that order limits. Deemed consent provisions apply. Please see comments below in this regard. NH must have control over the operations being carried out on its network and accesses from its high speed network. This is critical from a safety perspective and to maintain the integrity of the asset. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article. Please also see our comments at the end of this table in relation to deemed consent.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 18: Construction, alteration and maintenance of streets and other structures	Article 18 creates a mechanism for any street constructed or area of street altered or diverted under the Order to be adopted for maintenance at public expense, if it is completed to the reasonable satisfaction of the local highway authority and after a set maintenance period.	Article 18 is not acceptable and should exclude the SRN. NH do not agree to deemed adoption and the Applicant would need to comply with the adoption and maintenance provisions included in NH's standard proposed protective provisions. The applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 20: Discharge of Water	This article sets out the circumstances in which the undertaker is entitled to discharge water into a sewer, watercourse or drain. Essentially, this can be undertaken with the consent of the owner of the sewer, watercourse or drain (such consent not to be unreasonably withheld or delayed).	This article allows the applicant to use any watercourse, public sewer or drain for the drainage of water in connection with the authorised development. It is unclear whether or not this article applies to NH's drainage system as drafted or whether this applies to public drains only. NH's drainage system is not a public drain and connection to it is not permitted. NH is concerned this provision potentially allows the applicant to make use of highway drainage infrastructure for the benefit of their authorised development. Paragraph 59 of the Draft Circular 01/2022 which contains government guidelines NH are required to comply with, sets out the following: 59. To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity. Please also see our comments at the end of this table in relation to deemed consent.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
Article 21: Protective Works	This article sets out the circumstances in which protective works can be carried out to land, buildings, structures, apparatus or equipment, within the Order limits or which may be affected by the authorised development.	This article provides the Applicant with the power to carry out protective works to any land, building, structure, apparatus or equipment lying within the order limits. NH must have control over the operations being carried out on its network and land, structures, apparatus and equipment it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land NH has an interest in. NH must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	The draft Protective Provisions in favour of National Highways proposed in Part 5 of Schedule 16 of the draft DCO **(3.1 Draft Development Consent Order [APP-056])** prevent National Grid from exercising Article 21 (Protective Works) without the consent of National Highways.
Article 22: Authority to survey and investigate the land	This article confers the power to enter land (which under the Act includes land covered with water) within the Order limits or land which may be affected by the authorised development, for the purpose of surveying, monitoring or investigating it, including a power to make trial holes, boreholes, excavations and/or take horizontal cores (e.g. inclined boreholes for the purpose of geological fault modelling), carry out ecological or archaeological investigations or monitoring, and to use and leave apparatus (including attached to buoys) on the land for these purposes. The power of entry is subject to a requirement to give 14 days' notice to owners and occupiers of the land.	This article allows the applicant to enter any land within the order limits affected by the authorised development or enter on any land upon which entry is required in order to carry out monitor or survey in respect of the authorised development and, carry out surveys or investigations, trial holes, bore holes, ecological or archaeological investigations and place leave or remove apparatus on land in this regard. Whilst it is noted consent is required from the highway authority at sub paragraph 5 for any trial holes, bore holes and trenches for land located within the highway boundary, consent is not required for the wider use of the powers granted within this article such as access to land for surveys etc. Consent is also not required for any land NH own that is outside of the highway boundary and the applicant is only required to serve notice on the landowner prior to exercising this right. This is also a right that extends beyond the order limits. NH must have control over the operations being carried out on its network and land it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land NH has an interest in. NH must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article. Such consent should not be subject to deemed Consent. Please see comments below in this regard below.	The draft Protective Provisions in favour of National Highways proposed in Part 5 of Schedule 16 of the draft DCO **(3.1 Draft Development Consent Order [APP-056])** prevent National Grid from exercising Article 21 (Protective Works) without the consent of National Highways.
Article 24: Compulsory acquisition of land	This article authorises the compulsory acquisition by National Grid of so much of the Order land listed in the Book of Reference as is required for the construction, operation or maintenance of the authorised development (including UKPN Works) or is incidental to it or necessary to facilitate it. These powers are also afforded to UKPN, albeit limited to the extent that the	NH objects to the inclusion of the plots in the DCO and to Compulsory Powers for the acquisition of land (whether operational or otherwise) being granted in respect of them. Please refer to our comments in paragraph 1.3.2 above. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and	National Highways' position is noted. This is a matter of ongoing discussion between the parties following the Compulsory Acquisition Hearing 1 held on 11 February 2026. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
	land is required for the construction, operation and maintenance of the UKPN Works.	this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	Provisions in favour of National Highways.
Article 25: Compulsory acquisition of rights	This article allows the undertaker to acquire rights (and impose restrictions) over the Order land, including by creating new rights for the purpose of the authorised development.	NH objects to the inclusion of the plots in the DCO and to Compulsory Powers for the acquisition of rights (whether operational or otherwise) being granted. Please refer to our comments in paragraph 1.3.2 above. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter of ongoing discussion between the parties following the Compulsory Acquisition Hearing 1 held on 11 February 2026. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 26: Acquisition of subsoil or airspace only	This article allows National Grid to acquire land lower than ground level or airspace above ground level, rather than having to acquire all of the land.	NH objects to the inclusion of the plots in the DCO and to Compulsory Powers for the acquisition of subsoil or airspace only. Please refer to our comments in paragraph 1.3.2 above. NH must have control over the operations being carried out on its network. NH require control over the subsoil vested in it and airspace over the SRN. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter of ongoing discussion between the parties following the Compulsory Acquisition Hearing 1 held on 11 February 2026. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 27: Temporary use of land by National Grid	This article which applies only to National Grid, allows the land set out in Schedule 11 to be occupied temporarily by National Grid in connection with the carrying out of the authorised development, as well as any other Order land which may be subject to compulsory acquisition of land or rights but in respect of which National Grid has not yet served a notice of entry or made a general vesting declaration.	This article provides the applicant with the power to take temporary possessions of the land referred to in schedule 11 and any other order land without the consent of NH. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 28: Temporary use of land by UKPN	This article is similar to article 27 (Temporary use of land by National Grid) and provides that UKPN may, in connection with the carrying out of the UKPN Works	Please see comments above in respect of Article 27.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
	(only) take temporary possession of the Order land specified in Schedule 11.		Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 29: Temporary use of land for maintaining the authorised development	This article provides for entry upon, and the taking temporary possession of, land within the Order limits (except for houses, gardens and any other building for the time being occupied) reasonably required to maintain the authorised development. At least 14 days' notice must be given (save in emergencies).	This article grants the applicant with the right to take temporary possession of any land for the purposes of maintaining the authorised development within the order limits without the consent of NH, during the maintenance period (period of five years beginning with the date on which that part of the development is replacement or landscape planting where the maintenance period means 5 years beginning with the date on which that part of the replacement or landscape planting is completed). NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 30: Use of subsoil under or airspace over streets	This article, which closely follows article 27 of the general model provisions (save for the inclusion of reference to purposes ancillary to the authorised development), provides that National Grid may use streets within the Order limits for the authorised development without being required to acquire any part of the street or any easement or right in the street. Provision is made for the payment of compensation to persons who suffer losses as a result of the exercise of this power.	NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 37(6)(b) Application of Part 1 of the 1965 Act	Article 37(6)(b) seeks to amend Part 1 of the 1965 Act by inserting a new paragraph 30 which reads: "PART 4 INTERPRETATION 30. In this Schedule, references to entering on and taking possession of land do not include doing so under article 21 (protective works), 27 (temporary use of land by National Grid), 28 (temporary use of land by UKPN) or 29 (temporary use of land for maintaining the authorised development) of the National Grid (Norwich to Tilbury) Order 20[xx]."	Please can the Applicant explain the purpose of this inclusion which does not seem to follow the structure of the articles. In any event NH object to the substance of the wording which suggests that entering on and taking possession of land do not apply to the articles listed which does not make sense.	Article 38(6) ensures that references to entering on and taking temporary possession of land under Schedule 2A (as introduced by the Housing and Planning Act 2016) do not include entering on and taking temporary possession under the Order. This reflects the fact that Schedule 2A has two processes for the serving and determination of counter-notices depending on whether or not the acquiring authority is in possession of the land. The interpretation clause makes it clear that the undertaker will not be deemed to be in possession of the land where it is exercising its power under Articles 21, 27, 28 or 29.

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Article 38: Extinguishment and suspension of private rights	This Article provides for the extinguishment or suspension of private rights over land subject to compulsory acquisition and the extinguishment of private rights over land subject to the compulsory acquisition of rights (in so far as the continuance of the existing right would be inconsistent with the right acquired or a breach of a restriction as to the user of land arising by virtue of contract) from the date of the acquisition of the land or rights, or the date of entry, whichever is earliest.	NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 39: Power to override easements and other rights	The provision allows for an approach whereby only those rights which obstruct the authorised development will be overridden, avoiding the extinguishment of rights, the continued use of which can be accommodated by the authorised development.	It seems this article permits the Applicant to interfere with any right or interest NH may have within the order limits. This raises a concern however it is not clear whether there will be a temporary interference or permanent extinguishment of NH's interests. Please can the Applicant confirm how this is going to apply relating to NH's interests. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 40 – Statutory authority to override easements and other rights	This article provides that, by virtue of section 158 of the Act, in carrying out or using the development authorised by the Order and doing anything else authorised by the Order, National Grid may interfere with any easement, liberty, privilege, right or advantage annexed to land and affecting other land, including any natural rights of support, or breach any restriction as to user of land arising by virtue of contract.	It seems this article permits the Applicant to interfere with any statutory easement or other right NH may have in relation to the Order (within or outside the order limits). This raises a concern however it is not clear whether there will be a temporary interference or permanent extinguishment of NH's interests. Please can the Applicant confirm how this is going to apply relating to NH's interests within or outside the order limits. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 41: Extinguishment of private rights and restrictive covenants relating to apparatus belonging to National Grid or	This Article provides that all private rights over land that is temporarily occupied by National Grid or UKPN are suspended and unenforceable for the duration of the occupation insofar as inconsistent with the exercise of the Order powers. Under this article, rights in relation to apparatus which is removed from the land	Those comments made in relation to Article 27 and Article 28 apply equally in relation to this Article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
UKPN removed from land subject to temporary possession	are extinguished when National Grid or UKPN no longer remains in lawful possession of the land.		Provisions in favour of National Highways.
Article 44: Statutory undertakers	Subject to the protective provisions in Schedule 16 of the Order, it authorises the undertaker (1) to compulsorily acquire land belonging to statutory undertakers described in the Book of Reference (document reference 4.3), (2) to extinguish rights of statutory undertakers, as well as the removal or repositioning of apparatus belonging to statutory undertakers, (3) acquire compulsorily existing rights, create and acquire new rights and impose restrictive covenants over land belonging to statutory undertakers described in the Book of Reference, (4) construct the authorised development in a way that crosses statutory undertakers' apparatus and (5) construct and maintain any necessary track or roadway over, including the power to install any necessary service media.	NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of NH's proposed protective provisions would address NH's objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 45: Apparatus and rights of statutory undertakers in stopped-up streets	Article 45 protects the powers and rights of any statutory undertaker whose apparatus is located under, in, on, along or across any street which is stopped up under Article 15 (Permanent stopping up of streets and public rights of way). It also provides that, upon the undertaker's reasonable request, the statutory undertaker must remove or alter the position of existing apparatus or provide other apparatus in substitution.	NH are currently investigating whether it has any interest in land within Schedule 7. In any event, NH would object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of NH's proposed protective provisions. This would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 47 (Application of Landlord and Tenant)	This article governs the undertaker leasing any part of the authorised development for the purposes of its construction, operation or maintenance to any other person. It allows the terms of the lease to override any statutory provisions relating to landlord and tenant law.	NH do not have sufficient information to understand whether this article is likely to affect NH. In any event, NH would object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of NH's proposed protective provisions. This would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	This article relates to National Grid having the ability to lease any part of the authorised development for the purposes of its construction, operation or maintenance to any other person.
Article 49: Traffic regulation	This article allows National Grid to regulate traffic on the roads to the extent specified in Schedule 13 or to any other extent that is expedient or necessary, with the consent of the traffic authority, for the purposes of the authorised development or for purposes ancillary to the construction or maintenance of the authorised development	NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of NH's proposed protective provisions at Appendix 1.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.
Article 50: Felling or lopping	This article provides the Applicant with the power to fell or lop any tree or shrub near any part of the authorised development.	NH are making checks internally to ascertain whether NH have any environment mitigation commitments that may be affected by the authorised development to ascertain whether this article may put NH in breach of its own statutory obligations. If works undertaken to trees affect any NH BNG commitments a replacement tree or trees would need to be provided to satisfy that existing commitment at a location to be agreed.	National Highways' position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
		NH object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of NH's proposed protective provisions. This would address NH objection to this article, which requires the applicant to obtain NH consent before exercising their right under this article.	Provisions in favour of National Highways.
Article 55: Procedure requiring certain approvals etc.	The article clarifies the procedure which applies in respect of these additional consents.	Article 55(3) refers to paragraph 3, 4 and 5 of Schedule 4 (discharge of Requirements). Paragraph 3(2) of Schedule 4 should be amended to provide that NH are not liable for a refund in the event that refund falls due to matters outside NH's control.	Paragraph 3(2) of Schedule 4 relates to applications that are rejected, failed to be determined, withheld or refused by the relevant authority, all of which are within the discharging authority's control.
Article 58: Application, disapplication and modification of legislative provisions	This article makes provisions applying, modifying and excluding the statutory provisions set out in Schedule 17.	This article refers to Schedule 17 which seeks to exclude the provisions of the Highways Act 1980 in relation to the sections set out in Schedule 17. No explanation is provided in the Explanatory Memorandum seeking to justify the exclusion of the noted sections in the Highways Act 1980. In any event, NH object to the disapplication of the Highways Act 1980 in this regard. NH must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset.	This is to prevent conflict or duplication with legislative provisions whereby the activities managed by the legislative provisions will be dealt with under the DCO articles or National Highways' Protective Provisions.
Article 60: Certification of Documents		NH reserve the ability to request the addition of any required plans/documents etc to the plans and documents identified in Schedule 19.	The Applicant notes this comment.
Deemed Consent Note		There are a number of articles which contain deemed consent provisions which would apply where NH does not provide its consent or approval to any provisions under the order within 28 days of it being requested where no response is received. 28 days is not considered a reasonable period of time to consider every application that may come through under this DCO, some may be more involved than others. 8 weeks would be considered reasonable. In any event, NH is concerned with the deemed consent given the safety implications of works being carried out to or under the strategic road network that may have bypassed its approval processes. This is a fundamental issue of public safety that should not be compromised to enable a private developer to achieve a quicker build programme. NH has statutory obligations to behave reasonably and support sustainable development and so it should not be forced to work under the pressure of deemed consent. The potential implications from a safety perspective of something going wrong far outweigh the Applicant's case for such a provision. Inclusion of paragraph 7(7) of NH proposed protective provisions at Appendix 1 would address NH concerns which would seek to disapply the above referenced articles in the context of any consent relating to the strategic road network. The affect of this is to prevent the Promoter from exercising powers over the SRN or land in which NH has an interest without deemed consent applying. The justification is to ensure open dialogue between the parties so that NH has control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. As a public body, NH is under a duty to act reasonably and this is expressly provided in paragraph 7(4) of NH's protective provisions. Please note that the position applies to all articles which include deemed consent provisions.	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 circumstances outside the control of the Applicant. National Grid has reviewed the wording proposed by National Highways in paragraph 7(7) of the Protective Provisions and will revert as part of ongoing discussions in relation to the draft provisions between the parties.

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
Requirements (Schedule 3)			
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 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 including National Highways where any amendments affect the Strategic Road Network or land NH have an interest in. 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 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. 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.	In addition to the approval of the Local Planning Authority, NH approval should be sought where any amendments to documents, details or schemes affect the SRN or land NH has an interest in. For any variations to the approved documents and plans, NH must ensure that changes do not adversely impact the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN. Inclusion of drafting in red would address NH's concern.	The definition of "discharging authority" set out in Requirement 1 of Schedule 3 of the draft DCO **(3.1 Draft Development Consent Order [APP-056])** is drafted widely enough to include National Highways and as such, the Applicant does not consider it necessary to amend the drafting.
7. Construction hours	1. Subject to sub-paragraphs (2) to (5) work may only take place between the hours of 07.00 and 19.00 Monday to Friday and 07.00 and 17.00 on Saturdays, Sundays, bank holidays and other public holidays (the core working hours), unless otherwise approved by the relevant planning authority (in consultation with NH where any work	NH would wish to be consulted on any variation to hours given the potential for impact on the SRN.	National Highways' position and proposed wording is noted. Any consequential amendments to the draft DCO **(3.1 Draft Development Consent Order [APP-056])** will be reflected in the next revision of the Order.

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
	affects the Strategic Road Network or land NH have an interest in). 2. 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 (in consultation with NH where any work affects the Strategic Road Network or land NH have an interest in). 3. Subject to sub-paragraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant highway authority. 4. The following operations may take place outside the core working hours and, as the case may be, the hours referred to in sub-paragraph (3): a) trenchless crossing operations including beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses; b) the installation and removal of conductors, pilot wires and associated protective netting (included but not limited to) across highways, railway lines or watercourses; c) the jointing of underground cables; d) the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused; e) any highway works requested by the highway authority to be undertaken on a Saturday or Sunday or outside the core working hours; f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities; g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities; h) activity necessary in the instance of an emergency where there is a risk to persons or property; i) security monitoring; j) non-intrusive surveys; k) intrusive surveys; l) oil processing of transformers or reactors in substation sites;		

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
	m) delivery to the transmission works of abnormal indivisible loads and any highway works requested by the highway authority to be undertaken outside the core working hours; and n) mechanical and electrical installation works within buildings once erected and enclosed. 5. The core working hours exclude start up and close down activities up to 1 hour either side of the core working hours. 6. The severe weather conditions referred to in sub-paragraph (4)(4)(g) means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) and, as the case may be, the hours referred to in sub-paragraph (3) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access or otherwise) or being contrary to safe working practices.		
8. Retention and removal of trees, woodland and hedgerows	1. Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may commence until, for that stage, a plan showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage has been submitted to and approved by the relevant planning authority (in consultation with NH where any trees, groups of trees, woodlands and hedgerows affects the Strategic Road Network or land NH have an interest in). 2. The plan submitted under sub-paragraph (1) must include details of the location, species and condition of the trees, groups of trees, woodlands and hedgerows to be removed and/or retained during that stage of the authorised development. 3. The plan submitted under sub-paragraph (1) must be in accordance with the outline landscape and ecological management plan (or the final landscape and ecological management plan if approved pursuant to requirement 4) and the trees and hedgerows to be removed or managed plans. 4. All trees, groups of trees, woodlands and hedgerows shown on the relevant plan for that stage of the authorised development must be retained and/or removed in accordance with the relevant plan as approved under sub-paragraph (1) for that stage of the authorised development, unless otherwise agreed by the relevant planning authority (in consultation with NH where any trees, groups of trees, woodlands and hedgerows affects the Strategic Road Network or land NH have an interest in).	As per NH's comments on Article 50, if works undertaken to trees, woodlands or hedgerows affect any NH BNG commitments a replacement trees or hedgerows would need to be provided to satisfy that existing commitment at a location to be agreed. NH would therefore want to be consulted on the proposals	The definition of "detailed design information" within the Protective Provisions in favour of National Highways includes "site clearance details" which are subject to National Highways' approval under the process prescribed at paragraph 7 of the Protective Provisions.

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
9. Reinstatement planting plan	1. Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may be brought into operational use until, for that stage, a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated during that stage has been submitted to and approved by the relevant planning authority (in consultation with NH where the reinstatement planting affects the Strategic Road Network or land NH have an interest in). 2. The reinstatement planting plan submitted under subparagraph (1) must include a schedule of trees, hedgerows or other plants or seedlings to be planted, noting numbers, species, sizes and planting density of any proposed planting or seedlings. 3. The reinstatement planting plan submitted under subparagraph (1) must be in general accordance with the outline landscape and ecological management plan (or the final landscape and ecological management plan if approved pursuant to requirement 4). 4. Unless otherwise agreed with the relevant planning authority, all reinstatement planting works approved under sub-paragraph (1) must be implemented at the earliest opportunity and no later than by the first available planting season after that part of the authorised development to which the reinstatement planting works apply is first brought into operational use. 5. All reinstatement planting works approved under subparagraph (1) must be carried out in accordance with the approved reinstatement planting plan for that stage of the authorised development, unless otherwise approved by the relevant planning authority (in consultation with NH where any reinstatement planting works affect the Strategic Road Network or land NH have an interest in). 6. All reinstatement planting works approved under subparagraph (1) must be implemented, monitored and maintained in accordance with the 'Aftercare' section of the landscape and ecological management plan approved pursuant to requirement 4. 7. Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting (or such other period as is specified in the landscape and ecological management plan approved pursuant to	As per NH's comments on Article 50, if works undertaken to trees, woodlands or hedgerows affect any NH BNG commitments a replacement trees or hedgerows would need to be provided to satisfy that existing commitment at a location to be agreed. NH would therefore want to be consulted on the reinstatement planting proposals.	As noted in the Applicant's response in respect of Article 50 above, this is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
	requirement 4), are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority (in consultation with NH where any reinstatement planting works affect the Strategic Road Network or land NH have an interest in).		
10. Reinstatement schemes	1. Subject to sub-paragraphs (2) and (3), any land within the Order limits which is used temporarily for construction is to be reinstated to a condition suitable for its former use, or such condition as the relevant planning authority may approve, within ~~21 months~~ 6 months of completion of the construction of the stage of authorised development for which it was required, or such further time as may be approved by the relevant planning authority (in consultation with NH where any work affects the Strategic Road Network or land NH have an interest in). 2. The requirement to reinstate the land to a condition suitable for its former use does not apply to land above or within 10 metres of underground cables installed as part of the authorised development. 3. The requirement to reinstate the land to a condition suitable for its former use is subject to the provisions of article 27 (temporary use of land by National Grid), article 28 (temporary use of land by UKPN) and article 29 (temporary use of land for maintaining the authorised development).	NH seek the reinstatement of the A120 verge within 6 months following the use of the access ceasing. This is in the interest of maintaining the safe and efficient operation of the SRN. 21 months is an unreasonably long period. Inclusion of the drafting in red would address NH's concern.	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 the draft DCO **(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.
Discharge of Requirements - Schedule 4			
Paragraph 1	1. Paragraph 1 states "(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 period of 28 days beginning with: a) where no further information is requested under paragraph (2), the day immediately following that on which the application is received by the authority; b) where further information is requested under paragraph (2), the day immediately following that on which further information has been supplied by the undertaker; or	NH cannot agree to the inclusion of 1(2) which is effectively deemed consent. 5 days is not long enough, and in any event the provisions of 2(4) are considered disproportionate and NH cannot agree to the same. 28 days would be a more reasonable period.	National Highways' position in relation to deemed consent is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.

Article/Schedule	Summary of the Applicant's drafting	Suggested amendments	National Grid's Response
	c) such longer period as may be agreed in writing by the undertaker and the relevant authority." 2. Subject to sub-paragraph (3), in the event that the relevant authority does not determine an application within the period set out in sub-paragraph (1), the relevant authority is taken to have granted all parts of the application (without any condition or qualification) at the end of that period.		
Paragraph 2	Under Further information stipulates that where an application has been made under paragraph 1 the relevant authority may request such reasonable further information from the undertaker as it considers is necessary to enable it to consider the application. If the relevant authority considers further information is necessary and the Requirement does not specify that consultation with a requirement consultee is required, the relevant authority must, within 5 days of receipt of the application, notify the undertaker in writing specifying the further information required. If the relevant authority does not give the notification mentioned it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker.	5 days is not long enough, and in any event the provisions of 2(4) are considered disproportionate and NH cannot agree to the same. 28 days for requesting further information would be a more reasonable period.	Given the Project's status as a project of critical national importance, the Applicant considers 5 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. 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. Paragraph 1(4) of Schedule 4 to the draft DCO **(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. 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.

Appendix U.
Natural England

nationalgrid

Appendix U
Natural England

Table U1.1 outlines the Applicant's comments on the Relevant Representation (RR) provided by **Natural England [RR-2658]**. The Applicant has held a number of meetings with Natural England during the development of the Project and has been progressing a SoCG. An updated SoCG (**5.9.13 Draft Statement of Common Ground - Natural England [Revision B])** is provided to the Examining Authority at Deadline 1, which reflects the latest position. National Grid has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table U1.1 Summary of comments and National Grid's response

Topic	Comments	National Grid's response
Landscape and Visual	Summary of Advice: Natural England considers that the majority of issues relating to this development have been resolved through extensive engagement with National Grid. The project will require extensive construction within a National Landscape and its setting however we consider that proposed undergrounding is appropriate and that impacts during the operational phase with therefore be minimised. The nature and location of development is of limited risk to nationally and international designated sites. There are a few matters that still need addressing but nothing that we consider to be fundamental.	Noted.
Ecology and Biodiversity	*Internationally designated sites* Natural England notes that the final line of the summary within the [App-082] 5.3 Habitats Regulations Assessment Report (Final Issue A) that it is stated that 'The conclusions of this report have been agreed with Natural England (refer to Appendix B: Consultation Documents).' This is broadly accurate; however, it should be noted that the advice provided in the appended letter remains valid. In relation to Norfolk Valley Fens SAC, Natural England advised that: *"Where relying on a CoCP or other document is important that the key elements relied upon to conclude that there will be no adverse effects are drawn through into the Appropriate Assessment.'* We also provided a link to a document which outlined another developer's approach to avoiding/mitigating the potential impacts of a frac out caused by HDD upstream of a designated site. In that case the key to our conclusion that impacts could be avoided was a flow diagram illustrating what would occur in the event of a pollution incident and we consider that something similar is required here.	Natural England's advice in the letter dated 19 August 2025 stated that: *"Where relying on a CoCP or other document it is important that the key elements relied upon to conclude that there will be no adverse effects are drawn through into the Appropriate Assessment."* We can confirm that this advice has been fully addressed. The mitigation measures relied upon from **7.2 Outline Code of Construction Practice [APP-300]** have been explicitly drawn through into the **5.3 Habitats Regulations Assessment Report [APP-082]**. The proposed 400 kV overhead line would only oversail the minor watercourse hydrologically linked to the Norfolk Valley Fens SAC. It is the existing UK Power Networks 11 kV overhead line, which is proposed to be undergrounded, that would physically cross the watercourse. **5.3 Habitats Regulations Assessment Report [APP-082]** and **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** assessed both an open cut or trenchless solution, concluding no significant effects on the SAC. A 'Trenchless Method Statement and Contingency Plan' for the 11 kV crossing, will be submitted during the examination phase. This method statement will provide further details on the construction methods, construction mitigation measures and procedure to be followed in the unlikely event of a frac-out, to ensure no detrimental impact on the SAC. The commitment for a trenchless method statement (G12) is within **7.2 Outline Code of Construction Practice [APP-300].** The Applicant remains committed to ongoing engagement with Natural England and will continue to work collaboratively through the Statement of Common Ground process.
Contaminated Land Geology and Hydrogeology	[APP-181] 6.9 Environmental Statement Chapter 9 - Contaminated Land Geology and Hydrogeology (Final Issue A) and Table 6.1 Mitigation measures / environmental commitments of [APP-300] Document: 7.2 Outline Code of Construction Practice state that the provision of a drilling fluid breakout method statement will be developed by the Main Works Contractor however, where relied upon to inform the conclusion of no	The minor watercourse linked to Norfolk Valley Fens Special Area of Conservation (SAC) is proposed to be directly impacted only by the 11 kV UKPN third-party undergrounding works. These works would be small scale and occur over a short time period. **5.3 Habitats Regulations Assessment Report [APP-082]** and **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** assessed both an open cut or trenchless solution, concluding no significant effects on the SAC. A 'Trenchless Method Statement and Contingency Plan' for the 11 kV crossing, will be submitted during the examination phase. This method statement

Topic	Comments	National Grid's response
	adverse effects on integrity, the core elements of an approach should be established and reference within the assessment document. Natural England remains strongly of the view that impacts upon Norfolk Valley Fens SAC through "*hydrological changes should be avoidable*" and remains committed to supporting National Grid in this regard.	will provide further details on the construction methods, construction mitigation measures and procedure to be followed in the unlikely event of a frac-out, to ensure no detrimental impact on the SAC.
Ecology and Biodiversity	In relation to Thames Estuary and Marshes Special Protection Area ('SPA') and Ramsar and Stour and Orwell SPA and Ramsar Natural England is content that the construction and operational stages of Norwich to Tilbury can be carried out without impacting on SPA species using either designated or functionally linked land.	Noted.
Ecology and Biodiversity	*Nationally designated sites* With reference to paragraph 8.5.7 of [APP-158] 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity (Final Issue A) Natural England are surprised to see that there is no reference to Wortham Ling SSSI and Langdon Ridge SSSI anywhere in the document given the proximity of the red line boundary to these designations and our previous representations and discussions with the applicant (notably our s42 response). We have also previously advised that we would prefer the route to run to the east of Middle Wood, Offton SSSI rather than between the two parcels of woodland. The above, notwithstanding, Natural England have not raised any fundamental concerns in relation to these SSSIs. Natural England also notes paragraph 8.6.22 of **[APP-158]** which acknowledges the project will impact upon land identified by Lower Thames Crossing for nitrogen deposition mitigation around the new Tilbury Substation. We welcome the identification of an alternative site and are working with all interested parties to ensure that commitments made under the LTC DCO are achieved.	*Wortham Ling SSSI and Langdon Ridge SSSI* No impact pathways have been identified that would affect Wortham Ling SSSI or Langdon Ridge SSSI. Wortham Ling SSSI is a dry heathland site located outside the Order Limits to the west. The only potential impact pathway would have been construction dust affecting air quality; however, this was scoped out at the scoping stage on the basis that standard dust control measures would be secured and implemented through the Outline Code of Construction Practice (CoCP) **(7.2 Outline Code of Construction Practice [APP-300])**. No operational impacts have been identified for either SSSI and therefore both SSSIs were scoped out of the assessment. The land within the Order Limits lies downstream of the watercourses located at the edge of Wortham Ling SSSI. Implementation of the standard pollution prevention measures set out in the Outline CoCP) **(7.2 Outline Code of Construction Practice [APP-300])** would ensure that habitats downstream of the Order Limits remain protected. Surveys also confirmed that the land within the Order Limits does not support the habitats or notified features of either SSSI, nor the invertebrate or plant species for which they are designated. *Middle Wood, Offton SSSI* Natural England's comments regarding Middle Wood, Offton SSSI are acknowledged. The Project has been carefully routed in accordance with the Holford Rules and with consideration of a wide range of environmental constraints. While a direct impact on Middle Wood has been avoided, it has not been possible to route the alignment to the east of the woodland parcels due to other design constraints in the wider area. Routeing between the two woodland parcels therefore represents the most appropriate option available. Natural England has not raised any fundamental concerns regarding this SSSI, which the Applicant acknowledges. *Nitrogen deposition mitigation land (Lower Thames Crossing)* The Applicant acknowledges Natural England's comments regarding the land identified by Lower Thames Crossing (LTC) for nitrogen deposition mitigation around the new Tilbury Substation. Detailed discussions with LTC are ongoing to identify suitable alternative sites. The Applicant is seeking a separate agreement with LTC on this matter and will continue to engage Natural England throughout this process.
Ecology and Biodiversity	*Protected species* Natural England is working with the applicant towards the issuing of LONIs.	Draft licence applications for badgers, water vole and dormouse have been submitted to Natural England. The Applicant is working with Natural England towards obtaining Letters Of No Impediment (LONIs) for these species and is expecting receipt during the examination phase. A Great Crested Newt District Level Licence certificate of payment has also been secured and signed by both parties. The above protected species licensing requirements are detailed within the **Consents and Licences Required Under Other Legislation [APP-084].**
Ecology and Biodiversity	*Biodiversity net gain* We welcome the commitment to delivering BNG on this project. We recommend that the targeted increase in BNG of 10% across all biodiversity unit types is secured by a suitably worded requirement in the DCO.	The Applicant has prepared Heads of Terms regarding a unilateral undertaking (UU) to be given by the Applicant 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 a 10% biodiversity net gain as part of the Project. As it will not be achievable to secure a 10% net gain entirely through on-site habitat enhancement and creation measures alone, the Applicant will seek to acquire biodiversity units from third-party biodiversity gain providers, to make up the shortfall from on-site habitat creation and enhancement. A s.106 UU is seen as the most appropriate

Topic	Comments	National Grid's response
		option to legally secure the Applicant's commitment to delivering a 10% biodiversity net gain 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.
Landscape and Visual	*Impact on Dedham Vale Area National Landscape* The proposed development scheme affects the Dedham Vale Area National Landscape, which is a nationally designated landscape, and its 'setting'. A key concern for Natural England is that the Statutory purpose of the AONB is upheld. Natural England has previously engaged with National Grid in relation to this issue and we welcome the proposal to utilise underground cables within Dedham Vale National landscape and within 'the setting' of Dedham Vale National Landscape in the Great Horkesley area. Undergrounding within 'the setting' of Dedham Vale AONB to reduce the visual impact of overhead lines from views with the National Landscape is fully justified by the national importance of this landscape. Natural England commend acknowledgement that there would be significant adverse effects on special qualities within Dedham Vale National Landscape during the construction period including major adverse impacts on 'Iconic lowland river valley associated with the artist John Constable RA, the views he painted are still recognisable today' and 'A sense of relative tranquillity' but would support any further measures put forward to reduce the impact. With reference to paragraph 13.7.27 we are generally content that effects on the special qualities of Dedham Vale National Landscape (in a mitigated scenario) would reduce to minor and not significant (adverse) during operation once the underground cables are covered over and land use and landcover reinstated as far as practicable. We would welcome commitment to trenchless crossing technique within Church Wood adjacent to St Mary's Church (Grade 1 Listed) and Church Farm (formerly the Glebe Farm, Grade 2 Listed) within the Dedham Vale AONB on the Langham Hall Estate. Other organisations and individuals may have more detailed site-specific knowledge and experiences which a national organization such as NE does not. We advise, in particular, that due consideration should be given to the Dedham Vale National Landscape Partnership and whether they consider that the duty to 'further the purposes' of the national landscape as conferred by section 85 of the Countryside and Rights of Way Act (2000) as amended by section 245 of the Levelling Up and Regeneration Act (2023) has been satisfied and secured.	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 will be significant effects during construction, these will reduce and be not significant during operation. The assessment presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** is based on the Project design as described in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. No further measures to reduce impacts are proposed beyond those set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]).** However, the Applicant will seek to minimise effects on the National Landscape during construction through development of the detailed design (e.g. by minimising tree loss). Although a trenchless crossing was previously proposed at Church Wood adjacent to St Mary's Church and Church Farm changes were made in response to, feedback received at statutory consultation, the Applicant made a change move the underground cable alignment to the west and therefore avoid Church Wood and move it further away from Church Farm. The assessment presented in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** is based on the Project design as presented in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. Under s85 Countryside and Rights of Way Act 2000 the Applicant has a duty to seek to further the purposes of Dedham Vale National Landscape. The overall approach to the 'seek to further' duty has been, and continues to be, discussed with relevant stakeholders (which includes but is not limited to the Dedham Vale National Landscape and Stour Valley Partnership) and follows the guidance published by Defra in December 2024 '*Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes*'[111]. The approach the Applicant is taking to meet the 'seek to further' duty in relation to the Project is detailed in **5.10 National Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]**. The document details how the National Landscape and 'seek to further' duty has been taken into consideration during Project development and proposes further measures to be secured through the DCO. Draft Heads of Terms for the legal agreement to secure the 'Furthering the Purposes' measures was shared with the National Landscape Partnership and Suffolk County Council on 21 October 2025.
Agriculture and Soils	*Soils and best and most versatile agricultural land* Natural England has previously agreed the study area, assessment methodology and ACL *[sic]* predictive mapping with National Grid. It is noted that a temporary negative effect which	Noted. Temporary impact on best and most versatile (BMV) land has been stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] as being significant in EIA terms. This was also discussed with Natural England in a meeting on 13/01/2026 where it was stated this was likely a comment where the risk rating could be changed to Green. It was confirmed that engagement with the Natural England Soil Specialist had been undertaken to discuss the proposed approach to restoration of land required

[111] Department for Environment, Food and Rural Affairs (Defra) (2024) Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes

Topic	Comments	National Grid's response
	would be of major significance is anticipated for best and most versatile soils.	temporarily. Natural England stated they would review with the specialist and confirm if this could be changed to Green.
Historic Environment	*Ancient woodland and ancient/veteran trees* National Grid have notified us that their scheme interacts with parcels of Ancient Woodland recently added the Ancient Woodland Inventory. We will provide further advice on this matter in due course.	Noted, the Applicant awaits further information from Natural England. Changes will be captured in a stand alone document submitted into the Examination once updated Ancient Woodland information is received.
Landscape and Visual	The main issues raised by this application is the potential impact on National Landscapes. Natural England is broadly content with the undergrounding as proposed and would encourage National Grid to reach agreement with the Dedham Vale National Landscape Partnership regarding meeting their duty to 'further the purposes.' Natural England has raised a HRA issue but considers that it can be easily addressed through setting out relatively standard measures for addressing a pollution event caused by Horizontal Direct Drilling. We are committed to providing further advice on ancient woodland and on the use of mitigation land associated with the Lower Thames Crossing DCO but do not consider, at this point, that it is likely that our attendance of the examination would be necessary	This summary is noted and the Applicant has responded to the specific points raised within this table. The Applicant notes the points made regarding attendance during Examination.
Landscape and Visual	*[Part II Table 1 of RR – tabulated summary of the Natural England RR]*	The Applicant acknowledges the summary of Natural England's position as provided in Part II Table 1 of the Relevant Representation. It is anticipated that positive progress will be made on these matters through ongoing engagement which will be reported within the Statement of Common Ground.

Appendix V.
Network Rail

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Appendix V
Network Rail

Table V1.1 outlines the Applicant's responses to the Relevant Representation (RR) provided by **Network Rail [RR-2671]**. The Applicant has been engaging with Network Rail since the Project started and has been progressing a **Statement of Common Ground (SoCG) 5.9.24 Draft Statement of Common Ground - Network Rail [APP-111]** which reflects the latest position. An updated SoCG will be submitted at a future deadline. The Applicant as considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table V1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
Property acquisition	The Promoter seeks authority and powers in the draft Order to: • Permanently acquire land over which Network Rail has rights; • Temporary use of land over which Network Rail has occupation and/or ownership; • permanently acquire rights over land in the ownership and occupation of Network Rail; and • permanently acquire rights over land in which Network Rail is an occupier in respect of rights. The Scheme impacts over 400 plots which either Network Rail owns or has an interest in. Due to the significant number of plots, we have not sought to list them in this representation.	Noted.
Draft DCO	Network Rail wishes to ensure that the Scheme will not have a detrimental impact on the operation of the Railway and that the safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the Scheme. As the Promoter proposes to compulsorily acquire new rights over railway land as well in close proximity to railway assets, Network Rail hereby objects to the making of the Order in principle on the ground that the powers sought are likely to interfere with the safe and efficient operation of the Railway and cause a serious detriment to the carrying on of Network Rail's statutory undertaking.	The Applicant acknowledges Network Rail's request for Protective Provisions and to negotiate agreement over land rights. Protective Provisions for the benefit of Network Rail are proposed to be included in **3.1 Draft Development Consent Order [APP-056]** once agreed (or, if no agreement is reached, at a later deadline). The Protective Provisions will provide for an Asset Protection Agreement to be entered into, which will protect the safety of the railway during construction of the Project. Protection for Network Rail in relation to the acquisition of land rights will be addressed through the Protective Provisions and the Framework Agreement required by Network Rail (on which, see the response below).
Draft DCO	At present, the draft order does not contain any protective provisions for the benefit of Network Rail. Accordingly, in order for Network Rail to be in a position to withdraw its objection Network Rail will require adequate protective provisions to be included within the Order (and for the avoidance of doubt Network Rail require these Protective Provisions to be in the form set out at Appendix 1 to this Relevant Representation) and an agreement with the Promoter to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway. Network Rail is continuing to review the Promoter's plans, draft Order and application documents, and will continue to work constructively with the Promoter to clarify any issues raised. The Examining Authority and the Secretary of State will need to be satisfied that railway safety and operations will not be compromised by the making of the Order.	Discussions are ongoing between the Applicant and Network Rail, and our respective legal advisers are in direct communication. Regarding the status of these negotiations, we note that: • Comments on Network Rail's template form of Protective Provisions were provided to their legal adviser on 3 October 2025 and a response to these comments is awaited. • Draft heads of terms for an agreement over the land rights were issued to Network Rail on [4th December 2025] and we await their comments. • We are awaiting Network Rail's proposed first draft of the Framework Agreement.

Topic	Comment	National Grid's response
	Network Rail hereby requests that the Examining Authority treats Network Rail as an Interested Party for the purposes of the Examination and Network Rail reserves the right to produce additional and further grounds of concern when further details of the Scheme and its effects on Network Rail's assets are available.	
Draft DCO	Appendix 1 – Protective Provisions *[Network Rail has included protective provisions proposed to be included in the draft DCO.]*	The form of Protective Provisions provided by Network Rail is not accepted, and (as noted above) the Applicant and Network Rail are seeking to negotiate an agreed set of Protective Provisions. Failing agreement, the Applicant will put forward a revised set of Protective Provisions for Network Rail's benefit in a later version of **3.1 Draft Development Consent Order [APP-056]** submitted at a subsequent deadline.

Appendix W. Norfolk County Council

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Appendix W
Norfolk County Council

Norfolk County Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the Relevant Representation (RR) provided by Norfolk County Council.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG (**5.9.1 Draft Statement of Common Ground - Norfolk County Council [Revision B]**) is provided to the Examining Authority at Deadline 1, which reflects the latest position. National Grid has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table W1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Draft DCO	2.8 It is particularly important that open floor hearings ("OFHs") are hosted at locations close to the impacts, as they provide a valuable opportunity for communities to make their voices heard in a context which is not dominated by technical matters and professional representation. 2.9 NCC will participate in the PM and issue specific hearings ("ISH") to the extent that they cover matters within the expertise and interest of the County Council. In our experience, OFHs are the appropriate venue for the political leadership of local authorities to speak to the overall position, reserving the ISHs for more detailed submissions from officers. To facilitate this, NCC would suggest that local authorities are given the opportunity to nominate a specific representative of their political administration to address the OFH. An approach that has worked well for other projects is for a short slot to be reserved near the beginning of the hearing for these representatives to speak, allowing 5 or 10 minutes per nominated representative.	The Applicant acknowledges the comments raised, and notes that these are points for the Examining Authority to consider.
	Article 11 (street works) 3.2 Without a suitable highways side agreement in place (or agreed protective provisions), article 11(1) should be subject to the consent of the street authority. The same principle operates in relation to articles: 14(1) (power to alter layout, etc. of streets), 15(1) (permanent stopping up of streets and public rights of way), and 16(1)(a) (temporary closure of streets and public rights of way). Paragraphs (3) to (7) of article 11 may need consequential edits to apply to consents granted under paragraph (1) as well as under paragraph (2).	The Applicant has incorporated draft protective provisions into **3.1 Draft Development Consent Order [APP-056]** ('the draft DCO') and has sought engagement with relevant highway authorities on these provisions. The Applicant will continue to engage with the authority throughout the Examination process.
	3.3 Paragraph (3) provides that consent is deemed to have been granted if the street authority does not notify the undertaker of its decision within 28 days. While NCC will do its best to deal with applications for consent as quickly as possible, 28 days is an unrealistically short timeframe in a context in which NCC is the street authority for a number of consented DCOs including the Hornsea Three Offshore Wind Farm Order4, the Norfolk Boreas Offshore Wind Farm Order5, the A47/A11 Thickthorn Junction DCO6, the A47 Blofield to North Burlingham DCO7, the A47 North Tuddenham to Easton DCO8, the Norfolk Vanguard	The principle of deemed discharge provisions in relation to the discharge of Requirements is not unique to this Project. The principle has precedent in The National Grid (Bramford to Twinstead Reinforcement) Order 2024. It is essential that a project of this scale and critical national importance incorporates these deemed approval provisions to ensure that matters outside the Applicant's control do not unnecessarily frustrate the delivery of the Project. 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

Topic	Summary of matters raised	National Grid's response
	Offshore Wind Farm Order, and the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order. In addition to consented projects, there are also ten proposed NSIPs in Norfolk at various stages of project development for which NCC expects to be a street authority. 3.4 NCC resists 'deemed consent' provisions in general but considers that if deemed consent provisions are to be included, 56 days would be a more appropriate time limit. For the same reasons, we also request that 28 days is replaced with 56 days in the following provisions: 14(5) (power to alter layout, etc. of streets); 16(8) (temporary closure of streets and public rights of way); 17(2) (access to works); 20(9) (discharge of water); 22(8) (authority to survey and investigate land), 49(10) (traffic regulation) and 50(5) (felling or lopping).	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 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.
Draft DCO	3.5 If deemed consent provisions are included, then NCC considers the requirement for consent not to be 'unreasonably withheld or delayed' is redundant. Besides which, NCC is already prevented from making decisions in an 'unreasonable' way by the ordinary principles of public law.	The Applicant acknowledges the authority's position. The words 'not to be unreasonably withheld or delayed' are intended to account for instances where smaller or less contentious applications for consent have been submitted to the relevant authority to avoid unreasonable delays where decisions could reasonably be made within a shorter time period.
Draft DCO	*Article 16 (temporary closure of streets and public rights of way)* 3.6 NCC considers that clarification is needed as to what might constitute a 'reasonable time' for the purpose of paragraph (1) of article 16, which enables the undertaker to 'temporarily close, alter or divert any street or public right of way shown on the access, rights of way and public rights of navigation plans or within the Order limits and may for any reasonable time—(a) divert the traffic from the street or public right of way; and (b) subject to paragraph (3), prevent all persons from passing along the street or public right of way.' (emphasis added). 3.7 Paragraph (5)(b) refers to the street authority's ability to attach reasonable conditions to consents under article 16. For the avoidance of doubt, NCC considers that other provisions which provide for consents should also explicitly state that reasonable conditions may be applied (notwithstanding the earlier point that NCC may not lawfully behave unreasonably in any case). 3.8 In addition, the Council considers that article 16 should provide that any temporary diversion specified in column (4) of Part 1 or Part 3 of Schedule 8 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.	What might constitute a 'reasonable time' will be specific to the particular facts in each instance, therefore, a definition or clarification of what this might be in **3.1 Draft Development Consent Order [APP-056]** ('the draft DCO') would be impractical and potentially imprecise. Information regarding the time for which Public Rights of Way (PRoWs) will be temporarily closed and diverted is contained within **7.6 Outline Public Rights of Way Management Plan [APP-329]** ('the Outline PRoW Management Plan'). In summary, the strategy is to maintain access along PRoWs at all times throughout the construction period, either through managing access along them on their existing alignment, or through provision of appropriate diversions. The approach proposed for each affected PRoW, and the indicative timescales involved, are detailed in Section 8 of the Outline PRoW Management Plan and have been kept as short as possible within the constraints of the works being carried out that will affect them. The Applicant's Main Works Contractor will further develop the construction programme during detailed design, and refined durations and closure dates will be communicated to Norfolk County Council as part of ongoing engagement. The Applicant considers that the safeguards sought by Norfolk County Council in relation to both highway and PRoW diversions are already secured through the draft DCO and its relevant management plans. Under Requirement 4 of the draft DCO, the final PRoW Management Plan and Construction Traffic Management Plan must be submitted to, and approved by, the relevant Local Highway Authority before works commence on any stage of the Project. This approval process will include agreement of the details, sequencing and suitability of any temporary diversions affecting streets or PRoWs. For highways, **7.3 Outline Construction Traffic Management Plan [APP-309]** commits to coordinating all temporary traffic management with the relevant local highway authorities through the use of the applicable Permit Schemes and/or Traffic Regulation Order or Temporary Traffic Regulation Order processes. These processes require diversion routes to be identified, appropriate and agreed with the highway authority in advance, thereby ensuring that suitable diversion arrangements are secured prior to any closure taking effect. For PRoWs, the Outline PRoW Management Plan commits to advance notification to the local highway authority PRoW Officer for all temporary closures, identification of diversion routes where required, and provision of appropriate signage and management measures. These provisions ensure that diversion arrangements must be agreed and ready to implement before any closure is enacted. The Outline PRoW Management Plan also commits to reinstatement being completed to the reasonable satisfaction of the local highway authority PRoW Officer. The inclusion in paragraph 5(b) of Article 16 of an express ability to attach conditions to a consent is because the streets or PRoWs referred to in that paragraph are not already identified in Schedule 8, hence the ability to attach

Topic	Summary of matters raised	National Grid's response
		conditions allows the relevant authority to bring any consents to these streets or PRoWs in line with the details for those agreed under the approvals processes referred to above. Taken together, the requirement for the relevant street authority's approval of the final Plans, the statutory procedures governing highway closures, and the commitments within the outline Plans ensure that no PRoW or highway is temporarily stopped up, altered or diverted until suitable diversion arrangements have been agreed and can be made available. The Applicant therefore considers that Article 16 already provides adequate control and that no amendment is necessary.
Draft DCO	*Schedule 4 (discharge of requirements)* 3.9 The timescales in schedule 4 are too short and should be changed so that they are at least no shorter than those set out in PINS' Advice Note Fifteen: drafting Development Consent Orders11, which is 42 days or, preferably, 56 days accounting for the unusually high volume of NSIPs being handled in Norfolk. 3.10 NCC finds the justification for shorter timescales given in the draft Explanatory Memorandum (that 'shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the Project is intended to address'12) 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.	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 circumstances outside the control of National Grid. In each instance, **3.1 Draft Development Consent Order [APP-056]** ('the draft DCO') allows for the relevant decision-making authority and the undertaker to agree 'such other period' as may be appropriate in the circumstances. Likewise, there is scope within paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) in the draft DCO, to extend the 28-day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority. The Applicant notes the authority's comment that longer periods are well precedented on other projects which also meet an urgent need as defined by NPS EN-1 (2024), however, the Project is vastly different in nature and scale to many other of these projects, passing through 13 host local authorities. 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.
Draft DCO	*Schedule 16 (protective provisions)* 3.11 NCC notes the inclusion of protective provisions for the protection of drainage and flood authorities (in part 3) and for the protection of the highway authorities (in part 4). Neither set of protective provisions have been agreed with NCC. 3.12 In the case of the flood authority provisions, negotiations have been ongoing with the developer since August this year. In relation to the highway authority provisions, NCC would strongly prefer for all local highway authorities to agree a framework highways agreement with the applicant which allows for more detailed agreements to be made in relation to specific works.	The Applicant will continue to engage with relevant stakeholders on matters including the draft protective provisions.
Alternatives	4.1 Since the project's first non-statutory consultation in 2022, Norfolk County Council has consistently asked for further consideration of alternatives, including underground (either wholly or in sections), offshore, the upgrading of existing lines, the use of shorter pylons or pylons of a more sympathetic design. 4.2 At the time of the section 42 statutory consultation in 2024, NCC's response drew on three new pieces of evidence: • An independent review of the strategic options undertaken by Hiorns Smart Energy ("the Hiorns review") commissioned jointly with Suffolk County Council ("SCC") and Essex County Council ("ECC");	NPS EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way[112]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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

[112] Electricity Act 1989, Section 9

Topic	Summary of matters raised	National Grid's response
	• The Electricity Systems Operator ("ESO") East Anglia Network Study; and • The Valued Landscape Assessment study of the Waveney Valley ("the VLA") by Alison Farmer Associates commissioned jointly by NCC and SCC. 4.3 The Hiorns Review suggested that the upgrade is not needed until 2035 and not as National Grid have indicated by 2030. The ESO Study (March 2024) considered a wide range of alternative options for upgrading the network. This led to the conclusion by NCC that the project should be paused to consider these alternatives and an objection was raised. NCC's response maintained support for an offshore option and where this was deemed unfeasible an underground option for the most sensitive landscape affected in Norfolk: the Waveney Valley. The VLA demonstrates the special qualities of the Waveney Valley and confirms its sensitivity as a valued landscape	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. The Applicant's position regarding the Hiorns report is set out below in response to Appendix A of the RR submitted by NCC. In summary we do not accept the Report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register.
Alternatives	4.4 At the time of the statutory consultation the project's consultation materials included a Waveney Valley Alternative, which consisted of undergrounding a 2km stretch of the route through the Waveney Valley. This was strongly supported by NCC on the basis that undergrounding would virtually eliminate the residual major and significant adverse landscape effects on the Waveney Rural River Valley and the residual major and significant adverse visual effects on Roydon and Diss which are predicted by the ES. 4.5 The Waveney Valley Alternative does not form part of the present application. National Grid's rationale for rejecting the alternative is contained at the start of Table 3.17 of Environmental Statement Chapter 3 – Alternatives and in paragraph 4.6.17 of the Design Development Report. EN-5 imposes a requirement under paragraph 2.9.14 for the applicant to 'demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line'. On this basis, NCC would ask that the applicant provide more detail to justify the statement at paragraph 4.6.16 of the Design Development Report that tunnelling (as opposed to horizontal directionless drilling or driven pipe methods) 'would be possible but at a level of cost not considered to be compatible with National Grid's duties to be economical'.	A judgement on cost can be made without the need to develop a fully costed tunnel solution. In this case a tunnel of at least 1 km would be expected to be required which would more than double the anticipated cost of the Waveney Valley Alternative. In view of the consideration of the level of effects arising in the context of policy (National Policy Statements EN-1 (2024) and EN-5 (2024)) and particularly that the effects did not meet the threshold set out in NPS EN-5 (2024) paragraph 2.9.23, the Applicant judged this level of cost not to be justified.
Landscape and Visual	4.6 NCC is deeply disappointed that the use of underground cables through the Waveney Valley cannot be achieved without environmentally disruptive, technically uncertain or disproportionately costly techniques. It is NCC's strong view that the absence of an undergrounded alternative for the Waveney Valley leaves a hole in the project's mitigation for landscape and visual effects which urgently needs to be filled. NPS EN-1 is clear at paragraph 4.2.11 that 'Applicants must apply the mitigation hierarchy and demonstrate that it has been applied […] Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated'. The failure of a feasible	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].** Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. At Statutory Consultation Stage, the Applicant presented two possible approaches for the Project to cross the Waveney Valley on the Norfolk and Suffolk border encompassing pylons between and near RG80 to RG92. These were an overhead line alternative and an underground cable alternative (referred to as the Waveney Valley Alternative (WVA)). The WVA was presented on the basis that the effects of an overhead line on the combination of local heritage, socio-economic and landscape character and visual amenity may have engaged consideration of underground cable in line with Paragraph 2.9.23 of NPS EN-5 (2024) and the associated Secretary of State decision-making

Topic	Summary of matters raised	National Grid's response
	undergrounding option does not absolve the applicant from the need to consider ways in which impacts can be reduced, mitigated or compensated for. We would welcome discussions with the applicant to explore these opportunities.	criteria in Paragraph 2.9.25 (noting too that the use of underground cable may also have effects on landscape character and visual amenity in the short to medium term, especially if the installation method leads to tree removal). Considering feedback from the 2024 statutory consultation and refinement of the overhead line design, 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)). 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 the **2025 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. No additional measures beyond the standard and embedded mitigation have been identified within the development consent application. NPS EN-5 (2024) paragraph 2.9.11 is however 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'. Please refer to the Applicant's response to paragraph 10.20 of the RR below in relation to its position on landscape compensation. Notwithstanding the above point regarding compensation, the Applicant is having discussions with the WaLOR scheme in relation to Biodiversity Net Gain (BNG). This project is seeking to deliver a number of BNG units in addition to the delivery of the WaLOR scheme and the Applicant has discussed the opportunity to deliver approximately 600 area habitat units. The Applicant welcomes further discussion on this matter through the Statement of Common Ground process.
Ecology and Biodiversity	4.7 NCC has been made aware of disagreement over the alignment of the cable route at Meadow Wood near Bunwell which is detailed in section 4.4 of the Design Development Report. The alignment has been routed to avoid the Brick Kiln Land County Wildlife Site but now is set to over sail a woodland which contains a number of individual trees of high arboricultural value. NCC is concerned that the presence of overhead electrical cables will mean that a considerable number of valuable trees are removed or cut back for maintenance or safety reasons. It is not clear where in the ES the impacts on this location are reckoned, or, given that there appear to be feasible alternatives presented in the Design Development Report, where the relative harms of these alternative alignments are explicitly weighed against each other. 4.8 NCC is in contact with the Norfolk Wildlife Trust to get a greater understanding of the context of this issue, and we hope to be able to provide clearer information on impacts in our LIR. It is NCC's initial view that this particular alternative would benefit from dedicated attention at an ISH.	The proposed route of the overhead line avoids woodland impacts within the Brick Kiln County Wildlife Site (CWS) further to the east, but as a result unavoidably increases the effects on the adjacent area of woodland within the Tas Valley. 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 Environmental Statement, 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. However, based on our survey results the woodland as a whole does not meet the criteria to be considered ancient woodland. The woodland is also not listed on Natural England ancient woodland inventory[113]. 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 Impact Plans 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).

[113] Natural England (Oct 2025) Ancient Woodland Revised England Counties

Topic	Summary of matters raised	National Grid's response
		It will be necessary to undertake some tree removal within the woodland to provide clearance for the overhead line, but this will be limited to only the amount of tree cover necessary to meet safe electrical clearance requirements. Typically, tree removal is potentially required close to the alignment (20 m to either side of the centreline) with canopy management (rather than tree removal) for a further 8 m beyond the 20 m. 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]**.
Ecology and Biodiversity	5.1 With regard to Biodiversity Net Gain ("BNG"), the project has stated that 12.5% of the habitats within the order limits have been assessed under the condition assessment. This should be increased to meaningfully contribute to the BNG assessment to generate a realistic BNG unit value.	This statement is incorrect. At the time of the submission of the development consent application, habitat surveys had been undertaken at 87.5% of the Order Limits, with 12.5% outstanding, representing a sufficient baseline dataset on which to base the Biodiversity Net Gain metric. 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. The Biodiversity Net Gain metric will be updated post-consent following detailed design.
Ecology and Biodiversity	5.2 Most of the protected species surveys are in date as of the examination. It is important that some surveys are updated pre-construction as the timeline of the project can mean baseline conditions are different to those found prior to construction. Certain pre-construction checks should be undertaken in line with best practice, for example, immediately prior to the start of site clearance the site should be re-surveyed for badgers. Should evidence of setts or signs of use by badgers be found, it may be necessary to obtain a licence from Natural England before works can proceed. Re-survey reports should be sent to the local planning authority within 2 months of completion.	Where updated pre-construction surveys are required, these have been set out within Section 6 of the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Pre-construction surveys are required to ensure valid surveys, due to the time frame associated with both the planning process and the construction programme. Pre-construction surveys would ensure all survey results are up to date in line with survey validity windows for each survey type in turn, as outlined by good practice guidelines. Any required protected species licences required following these pre-commencement surveys would be obtained from Natural England in advance.
Ecology and Biodiversity	5.4 The Environmental Statement ("ES") outlines that the proposal will use district level licencing for Great Crested Newt mitigation. NCC notes that this will need to be agreed with Natural England.	A Great Crested Newt Impact Assessment and Conservation Payment Certificate has been obtained and countersigned by Natural England.
Ecology and Biodiversity	5.5 For water voles, there is an opportunity in Norfolk for the applicant to use a Water Vole Strategic License approach.	A draft licence application for water vole has been submitted to Natural England. The Applicant is working closely with Natural England towards obtaining a Letter of No Impediment for water vole and expecting receipt during the examination phase as is typical of the development consent process. The Applicant is discussing with Natural England the potential use of the strategic water vole licensing approach for the Project. The current status of these protected species draft licences is outlined within **5.9.13 Draft Statement of Common Ground - Natural England [APP-101]**.
Ecology and Biodiversity	5.6 NCC is currently in discussions with the applicant about a planning obligation which seeks to provide compensatory tree planting. We hope to be able to provide an update on progress as the examination progresses.	As NCC will be aware, the Applicant has prepared Heads of Terms in relation to: 1. A unilateral undertaking to be given pursuant to s.106 of the Town and Country Planning Act 1990 ("a s.106 agreement") to secure the provision of Biodiversity Net Gain, as set out in the BNG Report; 2. A s.106 agreement to secure the off-site compensation planting of replacement trees.
Contaminated Land, Geology and Hydrogeology	6.1 NCC wrote to the applicant on 15 October 2025 to seek changes to Chapter 9 and Figure 9.3 of the Environmental Statement to reflect the fact that the Norfolk Minerals and Waste Local Plan ("NM&WLP") was adopted on 20 May 2025 and supersedes the policy which is quoted in the ES as submitted. This seems to us to be a straightforward factual correction so we trust that the applicant is willing to make the necessary changes.	The Environmental Statement (Volume 6 of the DCO Application) considered Local Plans and other legislation changes up until 1 April 2025. Changes to Local Plans since that time have been captured within **8.4.2 Policy Compliance Tracker**, as requested by the ExA in their **Rule 6 letter [PD-009]**. It is also noted that the updates to the Norfolk Minerals and Waste Local Plan do not change the outcome of the assessment presented within **6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure Assessment [APP-183]**.

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Historic Environment	8.1 NCC notes that the information submitted with the application indicates that the impact of the overhead portions of the scheme on below-ground archaeology is likely greater than previously indicated by the applicant's archaeological consultants.	The Applicant is not clear to which previous information the Council is referring. The preliminary assessment presented in the Preliminary Environmental Information Report at Statutory Consultation has been superseded by the detailed assessment presented in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-68]** and its appendices. The assessment presented in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** identified moderate adverse and significant effects to nine non-designated heritage assets during construction and moderate adverse and significant effects to eight non-designated heritage assets during operation (and maintenance). All other effects to non-designated heritage assets were not significant.
Historic Environment	8.2 In relation to below-ground archaeology, the documents submitted with the application need to make a clearer distinction between pre-consent work which the NPPF terms as 'evaluation', and post-consent archaeological work which is usually termed as 'mitigation'.	The Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination phase in consultation with the Local Planning Authority archaeological advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England, and will ensure these terms are clarified. The update and scope of the document will be informed by the findings of the ongoing evaluation and the document will identify areas of phase 2 evaluation and areas where mitigation will be required for both priority and phase 2 areas of evaluation. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
Historic Environment	8.3 NCC suggests the WSI needs to be clearer regarding at what stage of the project any remaining elements of requirement 5 are to be considered discharged. We normally consider this appropriate when post-excavation assessment and the updated project design report are complete and approved, and resources for archiving, publication and other dissemination have been secured.	Although a draft of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** was shared with the Council and this comment was not raised, this will be considered as part of the updates to **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be updated 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.
Historic Environment	8.4 There is a lack of clarity regarding the role of local authority archaeological advisors, who advise the authorities who will determine applications to discharge the archaeological requirement. 8.5 There is a need for a more formal construction finds reporting protocol that includes some degree of training of construction operatives.	Although a draft of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** was shared with the Council and this comment was not raised, this will be considered as part of the updates to **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be updated 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.
Historic Environment	8.6 In practice, there is no difference between 'detailed excavation' and 'strip, map and sample excavation'. Due to this, section 4.3 should be removed and section 4.2 called 'Excavation'	Although a draft of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** was shared with the Council and this comment was not raised, this will be considered as part of the updates to **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be updated 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.
Hydrology, Land Drainage and Flood Risk	9.2 Surface water flooding is inadequately considered (in contrast to fluvial and coastal risk) in the sequential test and the Flood Risk Assessment. This is concerning as the National Planning Policy Framework ("NPPF") is clear that flooding from all sources should be considered.	The National Planning Policy Framework was updated in December 2024 to expand the scope of the Sequential Test to include all types of flooding, including surface water. The strategic routeing and siting studies for the Project were undertaken prior to this update. However, as detailed in Section 4 of **7.9 Flood Risk Assessment [APP-331],** surface water flood risk to and arising from the Project has been assessed and the **7.2 Outline Code of Construction Practice [APP-300]** secures a range of measures to manage this; and mitigation impacts where surface water flood risk zones cannot be avoided.
Hydrology, Land Drainage and Flood Risk	9.3 There is a lack of clarity over the scale and location of drainage arrangements for temporary construction compounds, haul roads, laydown areas and bellmouths. There is no confirmation that a sustainable drainage systems ("SuDS")	Commitment W13 within **7.2 Outline Code of Construction Practice [APP-300]** secures a commitment to adopting a Sustainable Drainage System (SuDS) approach for these elements of temporary works, stating '*Surface water drainage features, based on Sustainable Drainage System (SuDS) techniques, will be installed at temporary compound sites and laydown areas during construction*' […] '*Access roads and haul roads, as well as*

Topic	Summary of matters raised	National Grid's response
	approach will be used for all components, including haul roads and access tracks. 9.4 Little or no infiltration testing has been taken to ensure that proposed discharge rates are achievable. Ground conditions around South Norfolk vary greatly and the ability to infiltrate cannot be taken for granted.	*areas where impermeable material will be installed where heavy equipment would be used, will also have suitable drainage provisions via appropriate SuDS that will provide attenuation and treatment of runoff'.* With regard to the scale and location of construction drainage elements, further detail is included in **Document 8.2 Drainage Strategy** submitted at Deadline 1. The Strategy has been drafted in accordance with both the National Standards for SuDS[114] and Lead Local Flood Authority guidance, which is evidenced. Further details regarding infiltration-based drainage measures is included in **Document 8.2 Drainage Strategy**.
Hydrology, Land Drainage and Flood Risk	9.5 NCC is concerned that culverts used in haul roads to cross watercourses could be undersized because there is no reference in the project description to the need for volume of flow to be based on an assessment of the catchment area. Inappropriately sized culverts could result in an increase in flood risk on site and elsewhere.	Commitment W03 within **7.2 Outline Code of Construction Practice [APP-300]** ('the outline CoCP') secures that temporary culverts would be sized to convey flows generated by upstream catchments to maintain the current land drainage regime and that during culvert installation, downstream flows would be maintained. There is therefore no risk that temporary culverts would be undersized.
Hydrology, Land Drainage and Flood Risk	9.6 The documentation states that haul roads (and their culverts) "are likely to be removed"24 but leaves open the possibility that culverts will be retained if they offer a long-term improvement in agreement with the landowner, LLFA and/or the Environment Agency. NCC's position is that a decision on the retention of culverts needs to be made before they are designed because this will impact the acceptable design parameters. We would expect a robust technical justification to retain any culverts beyond the construction phase because culverting results in a loss of open channel capacity and potentially increases long-term flood risk.	Commitment W14 within the Outline CoCP secures that temporary bridges and culverts (associated with the construction haul roads) will only be retained by exception, e.g., if the new temporary structure has replaced an existing one in poor repair. When these locations are confirmed, crossings would be designed to reflect their permanence, e.g., sizing to accommodate allowance for the predicted effects of climate change on rainfall and river flows.
	9.7 This need for clarity applies to other types of drainage infrastructure which may be retained post-construction. Temporary drainage features which are left in place without appropriate design life or maintenance arrangements could potentially increase flood risk on-site and elsewhere.	It is not intended that drainage features serving only temporary works would be retained. Further assurance on this matter will be secured by the addition of a new commitment within the next iteration of the Outline CoCP. The operational phase of the development has been subject to detailed assessment within **7.9 Flood Risk Assessment [APP-331]** and a range of flood risk and drainage controls and management measures have been secured for this development phase. Commitment W08 in **7.2 Outline Code of Construction Practice [APP-300]**, surface water runoff from operational above ground infrastructure would be captured using sustainable drainage techniques that would be designed to allow for climate change resilience and with consideration of exceedance flow routes; and these features would be managed in accordance with the requirements and standards of the relevant Lead Local Flood Authority and maintained for the Project's lifetime.
Hydrology, Land Drainage and Flood Risk	9.8 The Outline Flood Warning and Evacuation Plan (FWEP) lacks clarity on: • Roles and responsibilities for signing up to warning services. • Use of third-party properties as evacuation points without confirmed agreements. • Availability and accessibility of emergency plans on site. • Monitoring triggers and decision-making processes during flood events. 9.9 NCC expects the plan to be aligned with Environment Agency and ADEPT guidance, with robust justification for any departures.	**7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]** is a live document that will be taken on by the Main Works Contractor(s). The additional detail on the points raised would be included in the final plan. The outline plan submitted with the DCO application has drawn on the joint Environment Agency and the Association of Directors of Environment, Economy, Planning & Transport (ADEPT) guidance[115] as far as this is applicable to an energy infrastructure project.
Hydrology, Land Drainage and Flood Risk	9.10 The Environmental Statement and Flood Risk Assessment lack site-specific modelling, detailed drainage design annexes, and consistent application of stated methodologies. NCC is	**7.9 Flood Risk Assessment [APP-331]** has been scoped and prepared in liaison with the Environment Agency and Lead Local Flood Authorities, in accordance with the methodology that is described in Section 4 of the report. Drafts of the FRA were shared prior to submission and comments taken on board by making refinements to the

[114] Department for Environment, Food and Rural Affairs (2025) National standards for sustainable drainage systems (SuDS)

[115] Environment Agency/ADEPT (2019) Flood Risk Emergency Plans for New Development

Topic	Summary of matters raised	National Grid's response
	concerned that the assessment assumes mitigation measures will reduce impacts to negligible levels without providing supporting evidence.	report. Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]**, further details regarding proposals for surface water management (including calculated attenuation volumes, specified discharge rates/limits) will be shared with Norfolk County Council and are available in **Document 8.2 Drainage Strategy** submitted at Deadline 1. The Strategy has been drafted in accordance with both the National Standards for SuDS[116] and Lead Local Flood Authority guidance[117], which will be evidenced.
Landscape and Visual	10.2 The section of the route within Norfolk transitions through several distinct Landscape Areas […] 10.3 It is also worth noting that whilst this is the route itself, the wider LVIA study area does expand into other Landscape Character Types and Areas. 10.4 Many of these areas are sensitive to change due to their open skylines, rural character and visual connectivity. NCC concludes that the LVIA baseline descriptions provided in the ES are broadly accurate, however some of the tranquillity of the Waveney Valley is understated in the ES narrative. During construction the effects are likely to be major adverse, and this cannot be overlooked in a landscape such as this.	The Waveney Valley is underlain by three Landscape Character Types (LCT) or Landscape Character Areas (LCA): Waveney Rural River Valley LCA; Wooded Valley Meadowlands and Fens LCT; and Rolling Valley Farmlands and Furze LCT. The assessment of effects on landscape character is set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. The following effects are identified during construction and operation: • Waveney Rural River Valley LCA (high sensitivity) - the assessment notes that there would be adverse effects on the *'peaceful and tranquil character'* which is identified as a key characteristic of the LCA (para 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 *'sense of quiet and rural isolation'* which is identified as a key characteristic of the LCT (para 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 *'effects on the tranquil setting of Wortham Ling and the adjacent Waveney Valley'* (para 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 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 has been re-checked 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.
Landscape and Visual	10.7 The applicant has not identified any additional mitigation measures beyond the embedded and standard measures as being required to further reduce significant environmental effects. Whilst we understand how this position has been reached, and the embedded and standard mitigation already proposed, there is potential for improvement which will result in minimising some of the impacts and effects. 10.8 The mitigation strategy is generic in approach and does not account for the varied landscape of Norfolk. Our strong view is that the mitigation package should be more ambitious so that it can better address the significant adverse residual effects and aim for enhancement.	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]**. Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Measures to reduce landscape and visual effects have included sensitive routeing and siting of the alignment and Order Limits and landscape planting around the existing Norwich Main Substation and its extension. NPS EN-5 (2024) also recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. The consideration of residual effects falls to the planning balance, which the Applicant considers within Chapter 8 of the **5.6 Planning Statement [APP-085]** in accordance with the NPS EN-1 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. EN-1 paragraph 4.1.7 provides *'… 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'.* 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.

[116] Department for Environment, Food and Rural Affairs (2025) National standards for sustainable drainage systems (SuDS)

[117] Suffolk County Council (2023) Suffolk Local SuDS Guidance; Norfolk County Council (2025) Lead Local Flood Authority Guidance for Developers; Thurrock SuDS Guidance, accessed at https://www.thurrock.gov.uk/flood-risks/sustainable-drainage; Essex County Council (2020) The Sustainable Drainage Systems Design Guide for Essex

Topic	Summary of matters raised	National Grid's response
		The residual environmental effects identified by Norfolk 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.
Landscape and Visual	10.11 The LVIA concludes that in areas where construction activity is taking place there would be significant adverse landscape effects during construction including the temporary loss of some landscape features. Furthermore, there would be significant adverse visual effects within all Visual Receptor Areas (VRAs) related to the construction of the scheme, especially where in close proximity, and in places these effects could extend to 1.5km where there are open or elevated views.	The Landscape and Visual Impact Assessment is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. This identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km.
Landscape and Visual	10.12 We understand that the applicant has considered this generally for the whole route and specifically for the Dedham Vale National Landscape. Whilst the Waveney Valley is not a National Landscape, we would like to see further consideration given due to the recognised sensitivity of this area, especially where cumulative effects of construction occur with existing pylons and overhead lines.	The Waveney Valley is underlain by three Landscape Character Types (LCT) or Landscape Character Areas (LCA): Waveney Rural River Valley LCA; Wooded Valley Meadowlands and Fens LCT; and Rolling Valley Farmlands and Furze LCT. The assessment of effects on landscape character is set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. Existing overhead lines are considered as part of the landscape baseline, against which the effects of the Project are assessed. The following effects are identified during construction and operation: • Waveney Rural River Valley LCA (high sensitivity) - 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) - 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) - 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 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. Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13: Landscape and Visual [APP-226]**. Further detail on mitigation is provided in the response to paragraph 4.6.
Landscape and Visual	10.16 Again, we note that the applicant has, understandably, considered the effects on Dedham Vale National Landscape separately, but we would encourage a closer consideration on the Waveney Valley valued landscape. Although not designated as a national landscape, it does reflect many of the characteristics and sensitivities of a designation, as demonstrated by the Alison Farmer Associates VLA.	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[118]. This defines landscape value as '*the relative value or importance attached to different landscapes by society on account of their landscape qualities*' (page 3). The value judgements were informed by a range of sources including the Waveney Valley Valued Landscape Assessment[119].
Landscape and Visual	10.17 As the proposals stand there are substantial impacts on both Visual receptors and on Landscape Character that will not reduce by Year 15 of operation of the scheme. Some of these effects are considered Significant Adverse and therefore are of utmost concern. It is understood that in matters such as overhead lines and pylons, there are not readily available options such as advanced planting, screening or mitigation that can either hide or	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 up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Whilst no additional measures beyond the standard and embedded mitigation have been identified within the development consent application. NPS EN-5 (2024) paragraph 2.9.11 is explicit that mitigation is not expected to

[118] Landscape Institute (2021) TGN 02/21: Assessing landscape value outside national designations

[119] Alison Farmer Associates (2024) Valued Landscape Assessment - Waveney Valley

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	improve the impacts, however consideration should be given to alternative ways to balance the visual and landscape impacts on the Norfolk Landscape should this scheme go ahead.	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'. Please refer to the Applicant's response to paragraph 10.20 of the RR below in relation to its position on landscape compensation. Notwithstanding the above point regarding compensation, the Applicant is having discussions with the Waveney and Little Ouse Landscape Recovery (WaLOR) scheme in relation to Biodiversity Net Gain (BNG). This project is seeking to deliver a number of BNG units in addition to the delivery of the WaLOR scheme and the Applicant has discussed the opportunity to deliver approximately 600 area habitat units.
Landscape and Visual	10.18 The applicant proposes in the Outline LEMP and LVIA to monitor and manage any reinstatement planting (woodland, trees and hedgerows) for a period of 5 years following construction to ensure successful establishment and regrowth. For a project of this scale and magnitude, particularly given the slow establishment of native woodland and hedgerows, we consider this to be insufficient to secure successful integration and establishment in the landscape. Therefore, we would propose a minimum of a 10 year aftercare period and the consideration of measures including annual survival rate targets, and monitoring of plant growth and visual screening effectiveness where being relied on through fixed point photography.	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 [AS-046]** which includes like for like replacement or consideration of alternative species based on site by site conditions and the reasons for failure. Requirement 9(7) (Reinstatement Planting Plan) 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 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]**.
Landscape and Visual	10.19 As stated above, even with the proposed mitigation, the LVIA identifies adverse residual landscape and visual effects within Norfolk after year 15. Undergrounding the cable route in the most sensitive landscapes (and in particular the Waveney Valley) would have been the most comprehensive way to avoid operational landscape impacts of the cable route. If the ExA and the Secretary of State for Energy Security and Net Zero ("the SoS") agree with NGET that undergrounding is not practical, NCC argues that the National Policy Statement for electricity networks infrastructure ("EN-5") requires proposals for additional mitigation beyond embodiment of good design principles.	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 up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**.Measures to reduce landscape and visual effects have included sensitive routeing and siting of the alignment and Order Limits and landscape planting around the existing Norwich Main Substation and its extension. Further detail relating to undergrounding in the Waveney Valley is provided in the response to paragraph 4.6 above.
Landscape and Visual	10.20 It is clear that mitigation alone will not restore the baseline character and views of the area. Since EN-1 requires the application of the mitigation hierarchy, we consider that a programme of landscape compensation and enhancement is required to offer balance in terms of the long-term loss of rural character and tranquillity. Potential options could include: • Offsite hedgerow and tree reinstatement in the wider landscape • Small woodland and copse planting in visually exposed areas • Management of existing woodland and vegetation to improve structure and biodiversity • Enhancements to and integration of the public rights of way network to strengthen access to the countryside and local landscape experience. • Further consideration of enhancements in the Waveney Valley area to improve landscape experience and visual obtrusiveness of the proposals	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].** Whilst compensation is part of the mitigation hierarchy, EN-1 or EN-5 do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. 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'. 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. 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 CNP presumption in section 4.2 of EN-1.

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		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. The above aligns with the Bramford to Twinstead (BTNO) 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.
Landscape and Visual	10.21 The Waveney Valley, Diss, Roydon corridor represents one of the most sensitive and valued parts of the South Norfolk Landscape and whilst NCC recognises the project's strategic importance, further assessment of the effects and landscape treatment and compensation is needed in this area to prevent long term harm to the landscape character and settlement setting. With a more robust monitoring programme, a considered assessment of the sensitive Waveney Valley and a full Landscape Compensation commitment the scheme has the potential to deliver meaningful landscape integration and leave a genuine positive legacy for Norfolk's Landscape.	The value of the landscape has been considered and the approach to making judgements on the value of landscape receptors is set out on pages 12-18 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 02/21 Assessing landscape value outside national designations[120]. This defines landscape value as '*the relative value or importance attached to different landscapes by society on account of their landscape qualities*'. The value judgements were informed by a range of sources including the Waveney Valley Valued Landscape Assessment[121]. In the context of all the landscapes considered in the LVIA, the relative value of LCA A5: Waveney Rural River Valley and the Wooded Valley Meadowlands and Fens LCT are judged to be medium. The basis for these judgements is contained within Tables A8 and A10 in Annex A Landscape Value Assessment of **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. Considering the judgements of susceptibility and value, overall sensitivity is judged to be high for LCA A5: Waveney Rural River Valley and medium for the Wooded Valley Meadowlands and Fens LCT. The basis for these judgements is set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]** at 13.3.156 to 13.3.158, and 13.3.199 to 13.3.201 respectively. 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 [AS-046]** which includes like for like replacement or consideration of alternative species based on site by site conditions and the reasons for failure. Requirement 9(7) (Reinstatement Planting Plan) 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 serious damaged or diseased. The Applicant's position regarding landscape compensation is set out above in response to paragraph 10.20 of the NCC RR.
Socio-economics, Recreation and Tourism	11.2 We acknowledge NGET's ongoing initiatives, including Grid for Good, partnership programmes, and the Community Grant Programme. These are welcome contributions to skills development across the region. However, we continue to believe that a formal ESP, with defined outputs, is essential and proportionate given the scale of investment, duration of construction, and level of local impact associated with this delivering this nationally significant infrastructure project. An Employment and Skills Plan would ensure: i) Skills investment commensurate with scale and impact. The assessment of workforce needs based solely on the number of direct jobs (e.g., 172 FTE peak, 480 jobs over four years) underestimates the wider economic footprint of this project. The project involves major construction activity over several years,	The Applicant recognises the importance of skills development and employment support, particularly in relation to the green economy, and values ongoing dialogue with Local Authorities on these matters. The scale of construction employment arising from the Project is modest. Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalents (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265**] concludes that the Project would not give rise to significant adverse socioeconomic effects in relation to employment or workforce requirements. Given these considerations, a DCO requirement for a Skills and Employment Plan would not be proportionate or necessary for the Project. However, the Applicant will work with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. Post-construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. This will be delivered outside the

[120] Landscape Institute (2021) TGN 02/21: Assessing landscape value outside national designations

[121] Alison Farmer Associates (2024) Valued Landscape Assessment - Waveney Valley

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	affecting multiple local authority areas, communities, and supply chains. An ESP ensures local residents and businesses benefit proportionately to the scale and impact of the project. ii) Alignment with Regional Skills Strategies. The opportunity for this project to align with Local Skills Improvement Plans (LSIP), the Norfolk local Growth Plan and Norfolk's Employment and Skills Framework of Asks (attached) ensuring a lasting skills legacy. iii) Clarity, accountability, and transparency. NGET's response refers to regional commitments and community benefit programmes outside the DCO process. While welcome, these lack formal mechanisms for monitoring and accountability linked directly to this project. A DCO-secured ESP would ensure clear, measurable commitments rather than aspirational outcomes delivered outside statutory frameworks. iv) Alignment with precedent from other Nationally Significant Infrastructure Projects. Regional and UK infrastructure schemes (for example, HS2 and Hinkley Point C) have embedded Employment and Skills Plans within their consent frameworks, recognising their role in delivering social value, local employment benefits and legacy skills development. The precedent exists for such plans to be proportionate, tailored and deliverable even on projects with smaller workforces. 11.3 As such, we would request a project-specific Employment and Skills Plan to be developed and included within the DCO process, ensuring Visibility of local skills needs and training opportunities; Collaboration with local authorities, colleges, and training providers; Commitments to apprenticeships, work placements, and supply chain engagement; and Monitoring and reporting mechanisms aligned with local economic development priorities. 11.4 This would ensure lasting socio-economic value, skills development, and public confidence in the benefits of hosting nationally significant infrastructure.	development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance[122].
Socio-economics, Recreation and Tourism	11.5 NGET will be aware that their preferred route corridor passes close to Tibenham Airfield and Priory Farm Airstrip and will need to ensure that the siting of power lines does not impact on the commercial operation of these airfields. NCC recognises that detailed issues relating to aviation safety are best expressed by the airfields themselves and by the Civil Aviation Authority.	**6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** describes the consultation approach undertaken to inform the Applicant's assessment of aviation impacts in accordance with its responsibilities as defined in the Overarching National Policy Statement for Energy (EN-1 (2024)), recognising 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 Airfields Advisory Team to advise operators in relation to safeguarding. Paragraphs 15.4.9-15.4.11 and 15.4.22-15.4.25 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** provide detail of impact assessments relating to Priory Farm and Tibenham aerodromes respectively, recognising their proximity to the proposed Project alignment and its presence as an obstacle to aviation operations. Conclusions for both aerodromes are that distances from the runway ends to the proposed Project are sufficient to enable safe overflight clearance margins. Furthermore, adverse effects on Priory Farm and Tibenham aerodromes, including business impacts, are summarised within **6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3km Study Area [APP-266]** with residual effects for both aerodromes assessed to be temporary, short-term,

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

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		neutral and not significant during construction; and permanent, long-term, neutral and not significant during the Project's operation and maintenance.
Traffic and Transport	12.2 NCC asks that construction activities are limited to 07:00 to 13:00 on Saturdays and no activities taking place on Sundays and bank holidays, except for special operations agreed in advance with NCC as the local highway authority.	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday – Friday: 0700 to 1900 • Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700 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] (draft DCO).** The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the project. The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest.
Traffic and Transport	12.3 Construction working patterns have a direct impact on network peaks so it is important that start up and close down activities are included in the controlled construction working hours. 12.4 The range of activities listed in the outline Code of Construction Practice [APP-300] paragraph 2.2.6 (i.e. the list of activities which may take place outside of core working hours) appears very broad, and its scope should be narrowed or clarified.	Requirement 7 (5) of **3.1 Draft Development Consent Order [APP-056]** permits start up and close down to take place for an hour either side of the core working hours. It is anticipated that the HGVs associated with start up and close down activities will remain on site and will be delivered and removed during the core working hours. The staff movements associated with the activities will be travelling outside of the core working hours, as they are expected to be on site for 07:00. The numbers of vehicle trips associated with the workforce have already been included within the assessment of traffic impacts, outside of the core working hours. The Applicant anticipates that the majority of vehicles associated with start up and close down activities (with the exception of staff), will already be on site. Requirement 7(4) of Schedule 3 of **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. 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

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		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. Importantly, any activities undertaken outside core construction hours remain subject to the controls and mitigation measures set out in **7.2 Outline Code of Construction Practice [APP-300]** 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]** within the final Code of Construction Practice and Construction Traffic Management Plan.
Traffic and Transport	12.5 We require clarification as to whether temporary access to pylons during construction will be directly from the highway network or via haul routes. We also require clarification as to whether maintenance access during the operational phase will be through existing field accesses or whether new access points are required. 12.6 NCC prefers a construction access strategy which uses haul routes to minimise the number of individual accesses. Wherever possible, access should be from main roads which are suitable for the weight of construction traffic.	The applicant anticipates that access to the pylons throughout construction will be via the Primary Access Routes, and the haul roads, following the routeing strategy detailed in the **7.3 Outline Construction Traffic Management Plan [App-309]**. The Applicant envisages that access during the operational phase of the Project will be through any site access points which remain as legacy accesses (where agreed with local highway authorities) and existing field accesses where agreed with landowners. Infrequently, HGVs would be needed, however, access would typically be made on foot, by 4x4, or by tractor and trailer. Further details on operation and maintenance can be found within **6.4 Environmental Statement Chapter 4: Project Description [APP-130]** (Section 4.10).
Traffic and Transport	12.7 The New Roads and Street Works Act 1991 ("the 1991 act") and Traffic Management Act 2004 ("the 2004 act") should be referenced in the Traffic and Transport documentation, including the **Outline Construction Traffic Management Plan ("oCTMP") [APP-309]**.	**7.3 Outline Construction Traffic Management Plan [APP-309]** includes reference to and details of the New Roads and Street Act 1991 in Section 2.4. The permit scheme (which is an alternative framework to the notification system under the 1991 Act) would work alongside the powers secured within the final Development Consent Order.
Traffic and Transport	12.8 Accident data referred to in the ES27 appear to date from 2019 (i.e. pre-covid). Given the observed changes to working and travelling patterns since covid, NCC would request that more recent data is used. 12.9 Although paragraph 16.5.35 of **[APP-271]** indicates collision rates are generally on par with national averages and Table 16.11 outlines mitigation (e.g., signage), clarification is requested on whether such measures will be maintained for the full operational period of RG56.	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 (2019-2023). A review of the latest available collision data including 2024 and 2025 (to be provided by NCC) will be undertaken to understand whether there are any changes to cluster sites along the junctions as well as on the Primary Access Routes. The Applicant anticipates that the signage (additional details on types of signage are included within **7.3 Outline Construction Traffic Management Plan [APP-309]**) will be in place for as long as construction is taking place at RG56. Agreement on duration of signage will be discussed with the local highway authority with the Main Works Contractor
Traffic and Transport	12.10 That the A1066 is part of the National Cycle Network should be considered when planning LGV and HGV movements. It is not clear from the documentation whether this has been taken into account.	The Applicant is aware of the National Cycle Network (NCN), has noted that the A1066 forms part of the NCN and has taken it into account. **7.3 Outline Construction Traffic Management Plan [APP-309]** includes details of a driver management pack which will include details of the areas where increases in pedestrians and cyclists are expected. The A1066 NCN route will therefore be identified in this driver information pack. The NCN crossing of the A1066 was raised in the initial assessment of the Primary Access Routes, as part of the construction strategy.
Traffic and Transport	12.12 Right-turning movements at the B1113/Wymondham Road junction should avoid peak AM periods, particularly for HGV and LGV traffic.	The results presented within the Transport Assessment (**7.11 Transport Assessment [APP-333]**) for Site 3 B1113/ Wymondham Road Priority Junction capacity assessment, shows that the B1113 right turn into Wymondham Road already exceeds practical capacity in the Future Base plus committed development scenario. The results of the AM peak hour modelling assessment identified that the Project construction movements at the junction would have a marginal increase in the right turn queue length compared with the predicted future baseline with committed development flows. This is due to the low number of Project construction flows for the right turn from B1113 onto Wymondham Road on the worst-day during peak construction with a total of seven HGVs per hour over a short one-week period.

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		As such, the speed limit reduction is considered appropriate mitigation for this junction, as agreed with NCC in February 2026.
Traffic and Transport	12.13 Traffic counts at Sites 6–9 (Diss / A1066 corridor) confirm NCC's concern with any routing via Diss during both AM and PM peaks. The LRN junction mitigation for Sites 6–10 has been discussed with NCC but is not accepted; with the flows in Tables 7.51, 7.54, 7.56, 7.58, 7.62, the evidence suggests adverse effects from any traffic using the A1066 via Diss.	This is noted by the applicant. The modelling results within the **7.11 Transport Assessment [APP-333]** indicate that there will be an impact on capacity at junction sites 6-9 should traffic be routed through Diss during the peak hours and off peak periods. The overall daily (7am-7pm) traffic and transport construction effect along PAR 8 (A1066/A1066 Victoria Road/A1066 Park Road/A1066 High Road) is considered overall as slight and the not significant, as outlined within **6.16 Environmental Statement Appendix 16.4 - Traffic and Transport Effects [APP-275].** The total number of construction vehicles travelling through Diss along Link PAR 8 is less than a 10% increase when compared to future baseline, and existing facilities for sensitive receptors are already provided such as footways, pedestrian crossings, and off-carriageway cycle tracks. Any effects to driver or public transport passenger delay at junctions will be temporary in nature and standard mitigation is proposed within **7.3 Outline Construction Traffic Management Plan [APP-309]**. The Applicant is committed to working with Norfolk County Council on this matter as part of ongoing engagement.
Traffic and Transport	12.14 In Table 5.9 of the outline CTMP, clarification is sought on Site 1 regarding whether congestion signs will be only on County roads or also on the A47 (Trunk Road); additionally, Sites 6–15 reference access via Diss, a route that has not been confirmed.	The Applicant anticipates that warning signage will be placed in appropriate locations to ensure the signs are visible to, and therefore warnings are heeded by, those who may be impacted. The Applicant will work with the affected local highway authorities to ensure the signs are placed in the correct locations. For Site 1, it is expected that signs will be located on the A47. With regard to Sites 6 to 15, an assessment of the impact of construction traffic has been completed on the roads through Diss and Thetford. Sites 6 to 15 are therefore included in Table 5.9 for completeness, as the Applicant's preference is for access through Diss. However, the Applicant will continue to discuss this matter with the Norfolk County Council.
Traffic and Transport	12.15 Mitigation measures for junctions 1 to 5 have not yet been agreed, and current figures suggest issues will persist even if HGV movements are shifted to off-peak times.	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.
Traffic and Transport	12.16 Future baseline flows should be internally consistent: PAR 2 flows should be similar to PAR 1 where PAR 1 is the sole access at that location; and PAR 8 shows higher vehicle numbers than PAR 9 even though most HGVs are expected to use PAR 9—this requires reconciliation.	Within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** Link PAR 2 – Mangreen Lane includes the flow on a single Primary Access Route (PAR). Link PAR 1 A140 Ipswich Road includes construction vehicle movements to Mangreen Lane and cumulative movements from several other PARs located to the south of the Mangreen Lane junction. Therefore, the Project traffic volumes are higher in Link PAR 1 than in Link PAR 2. The baseline data for Link PAR 8 - A1066/A1066 Victoria Road/A1066 Park Road/ A1066 High Road through Diss were obtained from 2024 Automated Traffic Counters. For Link PAR 9 - A1066 High Road/A1066 Low Road/A1066 Diss Road/A1066 The Street/ A1066 Thetford Road/A1066 Hurth Way/ A1066 Mundford Road (alternative) through Thetford, the data were obtained from 2023 Department for Transport (DfT) counts[123] obtained online. Therefore, the use of multiple dataset sources will create a slight discrepancy in the number of HGV movements along the local network through Diss and Thetford. Data sources was discussed and agreed during thematic group meetings, with MCC surveys also used as a spot check om DfT count data. A comparison of the 2024 Manual Classified Count (MCC) data at junctions in Thetford was undertaken with the 2023 DfT data. It was found that the HGV baseline flows for link PAR 9 (Thetford) are higher in 2024 when compared to the DfT data. Therefore, as the HGV movements used to calculate the future baseline traffic flows within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** are lower, a more robust assessment has been undertaken and findings presented within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** remain valid. Within **7.11 Transport Assessment [APP-333]**, the data from the 2024 MCC have been used for the assessment of the junctions. The Applicant is satisfied that its data is robust and appropriate.
Traffic and Transport	12.17 The A140 Ipswich Road (Link PAR 128) has a weight-restricted railway bridge south of the access, which must	This has been noted. Within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**, Link PAR 1 A140 Ipswich Road has been assessed between the A47 and Mangreen Lane. We do not envisage

[123] 2023 Department for Transport (DfT) counts - Road Traffic website - Count points

Topic	Summary of matters raised	National Grid's response
	be treated as a highway restraint. PAR 1 (A140 Ipswich Road) is part of the Major Road Network and therefore should be treated as a sensitive link.	any vehicles that exceed the weight restriction, using the railway bridge. Therefore, we do not believe the sensitivity of Link PAR 1 is affected.
Traffic and Transport	12.18 The Highway Authority is aware of existing right-turn issues at A140 Ipswich Road/Mangreen Lane (Site 2).	This has been noted. Within **7.11 Transport Assessment [APP-333]** the results of the junction capacity assessments at Site 2 - A140 Ipswich Road/Mangreen Lane identified the need for mitigation in the form of avoiding the AM peak hour due to the insufficient right turn capacity to accommodate predicted future year increased queues. This mitigation is proposed within **7.3 Outline CTMP [APP-309]**.
Traffic and Transport	12.19 For PAR 7 (B1134 Station Road/Long Row), confirmation is required from Network Rail that additional traffic is acceptable.	The Applicant is coordinating with Network Rail to confirm the suitability of the level crossing on the B1134 Station Road (structure reference provided by Network Rail: Tivetshall AHB 101m 42ch LTN1) for the HGV and Large Mobile Crane traffic required to deliver the Project.
Traffic and Transport	12.20 Due to the sensitivity of the road link (referred to as PAR 829) HGV traffic should not travel via Diss on the A1066. Instead, traffic should be routed via PAR 9, which connects the same pylon construction areas to the A11. LGVs should also avoid the A1066 because RG56 will operate as a satellite compound. There is a recorded pedestrian collision on PAR 8 which highlights our concerns with using this route.	The Applicant has undertaken an assessment on the proposed construction access strategy through and around Diss. PAR 8 was chosen as an access route due to the construction corridor being aligned with the A140, and other Primary Access Routes being routed off the A140. The Applicant anticipates that there will be deliveries that need to access the construction compound south of Diss and those off PAR 6. If HGVs were only to be routed via Thetford (PAR 9), they would be subject to a 103 km diversion, with an additional journey time of 1 hour to 1 hour 40 minutes in the peak periods. This will have a critical impact on delivery of the programme with time-sensitive material deliveries. Light goods vehicles are required to use the A1066 through Diss to access the haul road to the north of the River Waveney. There is a Main Site Compound to the south of Diss, where overhead line construction workers will be reporting for work, before travelling though Diss on the A1066 to access the haul road. If construction workers in LGVs are unable to travel along the A1066 through Diss, they will be required to drive an additional 1hr40minutes to access the haul road. This is unfeasible given that construction workers are expected to travel outside of peak hours. It is expected that these movements will be by crew vehicles carrying six, thus minimising the number of trips. The Applicant confirms that one collision involving a pedestrian was recorded on PAR 8 and was considered within the assessment undertaken within the **6.16 Chapter 16 - Traffic and Transport [APP-271]**.
Traffic and Transport	12.21 The promoter should liaise directly with stakeholders on traffic management and mitigation. 12.22 Other promoters' works that require closures or restrictions on the access routes cannot be halted for the duration of this project; paragraph 5.4.21 of the outline Construction Traffic Management Plan provides related context. 12.23 Hethel Roundabout works are programmed to start in January 2026 with completion by end-2026, and pre-commencement works are underway in October–November 2025.	The Applicant has developed **7.3 Outline Construction Traffic Management Plan [APP-309]** ('the OCTMP') in which, Section 5.8 details the proposals for traffic management measures. It is expected that the exact proposed management, timings and locations of the proposed management will be discussed and agreed with the local highway authorities. A summary of the previous consultation on the Outline CTMP is detailed in **5.1 Consultation Report – Appendix A: Meetings and correspondence with stakeholders [App-067].** In accordance with Article 12 of the **Draft DCO [App-056]** the Applicant is proposing to use the permit schemes in place and operated by Norfolk County Council to best coordinate the street works required for the project. The Applicant acknowledges that other construction events and road closures could be in place on some of the Primary Access Routes throughout the period of construction. The OCTMP details that the Applicant will seek to provide contingency routes in the instance of the above happening. The Applicant will be actively engaged with the local highway authority throughout the construction period and any advance notice of proposed closures or restrictions on Primary Access Routes would be appreciated if the timeframe is prior to OneNetwork timescales. If, and when, a contingency route is required, the Applicant will liaise with the local highway authority. The Applicant notes the dates provided for the proposed completion of the Hethel Roundabout which are prior to the start of works for the Project. The Applicant has developed the OCTMP which details an indicative construction timescale of 2027 to 2031 for the Project. It is anticipated that the Main Works Contractor(s) will review the construction programme for the Hethel Roundabout and liaise with the local highway authority, on any residual impact. As noted in the OCTMP, the Main Works Contractor(s) will use OneNetwork to understand potential impacts of other works on the Primary Access Routes. **7.11 Transport Assessment [APP-333]** provides a list of key transport schemes which have been assessed in terms of impact probability in relation to the Project.
Traffic and Transport	12.24 The Traffic and Transport Baseline Conditions appendix of the Environmental Statement currently only references Footpath	Within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** the rationale for selection of those PRoWs to be surveyed is provided. The list of PRoWs to be surveyed included routes likely to have high

Topic	Summary of matters raised	National Grid's response
	14 in Norfolk in relation to public rights of way ("PRoW"). This is an incomplete representation of the PRoW network affected by the proposed development. In addition to FP14, the following footpaths should be identified and assessed within the ES: Ashwellthorpe FP5; Forncett FP25 and FP26; and Roydon FP2 and FP4. These routes are of local importance and may be directly or indirectly impacted by construction activities.	number of users and extensive connectivity and/or social significance. The list of sites was shared with the local authorities in July 2024 and their feedback taken into account. At the time of arranging the PRoW surveys, the PRoWs that would be subject to diversion were not known, and therefore, Ashwellthorpe FP5, Forncett FP25 and FP26, and Roydon FP2 and FP4 were not surveyed. The number of users has not been a criterion for defining the sensitivity of PRoWs or the significance of effect, as agreed in **6.19 Scoping Report - including appendices B to K [APP-296]** for pedestrian, cyclist and horse-rider delay. **7.6 Outline Public Rights of Way Management Plan [APP-329]** contains a list of all PRoWs affected by the Project along with the management approach proposed for each and the timescales involved. It includes all the footpaths mentioned.
Needs Case	**Appendix A** Hiorns Review of NGET proposals for East Anglia Network reinforcement with a focus on the need and timing of the proposed 400kV line from Norwich to Bramford to Tilbury 400kV Substations *[Independent report reviewing the N2T proposals, raising concerns around scale of electricity generation (needs case) and timing for delivery.]*	At each key stage of the consultation and submission process the Needs Case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Transmission Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 in as set out in **Strategic Options Backcheck and Review [APP-355].** The timing and urgency for electricity infrastructure is referred to within The Overarching National Policy Statement for Energy (EN-1): *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.* The National Policy Statement for Electricity Networks infrastructure (EN-5) also states the following regarding Transmission Owners. *2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.* *2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.* **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** Appendix A Page A3 sets out the Applicants Transmission Owner Licence obligations providing detail to the duties referred to within The National Policy Statement for Electricity Networks infrastructure (EN-5) *Condition D2: "Obligation to provide transmission services", which includes "responding to requests for the construction of additional transmission system capacity".* *Condition D3 "Transmission system security standard and quality of service" which includes "Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')"* Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS are in place. The factors above show the 2025 updated Needs Case continues to indicate the urgent need for reinforcement for both Contracted and ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report was published in April 2024 and is available

Topic	Summary of matters raised	National Grid's response
		on the Project website. In summary, we do not accept the report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register. Furthermore, a delay to the Project would result in additional cost to the consumer. 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.
Alternatives	**Appendix B** Electricity Systems Operator East Anglia Study *[Independent study assessing ten different onshore, offshore, and hybrid network configuration options for the East Anglia electricity transmission network.]*	The Applicant is aware of this study and provided a response at paragraph 2.3.4 of **5.15 Design Development Report [APP-122]** which references a detailed response having been published, which is available on the National Grid Project website.
Alternatives	**Appendix C** Alison Farmer Associates Valued Landscape Assessment: Waveney Valley *[Provides an independent review of the Waveney Valley Alternative to demonstrate that it is a valued landscape of regional significance that should be conserved and enhanced through informed planning and cross-boundary collaboration.]*	Judgements on landscape value were made as part of the assessment of effects on landscape character in **6.13.A2 Environmental Statement Appendix 13.2: Landscape Baseline and Assessment [APP-228]**. The value judgements were informed by a range of sources including the Waveney Valley Valued Landscape Assessment (Alison Farmer Associates, 2024).
Hydrology, Land Drainage and Flood Risk	**Appendix D** 01 October 2025 letter from Norfolk County Council as Lead Local Flood Authority to Norwich to Tilbury with detailed comments relating to the Environmental Statement *[Includes a review of the Environmental Statement, raising concerns and requests for clarification regarding flood risk, drainage design, temporary and permanent works, and surface water management.]*	The Applicant has compiled responses to these comments, which have been shared directly with Norfolk County Council.
Hydrology, Land Drainage and Flood Risk	**Appendix E** Table containing Norfolk County Council as Lead Local Flood Authority detailed comments on the Outline Code of Construction Practice and Outline Landscape and Ecology Management Plan. *[Includes Norfolk County Council's comments and National Grid's response to date on the OCoCP and OLEMP for N2T, raising concerns about flood risk management, emergency planning and the need for further information. Specific items of detail for comment have been included in the rows below]*	The Applicant has compiled responses to these comments, which have been shared directly with Norfolk County Council.
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** In section 6.1.14 to 6.1.15 there is reference to other documents regarding the proposed mitigation measures that are in place. However, on review of the OLEMP there was a cross reference for more detail in the OCOCP for more detail. For example, in section 7.7.1 of the OLEMP the applicant states "Measures relating to pollution prevention are set out in the Outline OCoCP (document reference 7.2)." However, in the OCOCP in section 6.1.15, the applicant states "Construction	The Final Landscape and Ecological Management Plan and the Final Code of Construction Practice would be developed to include more detail and discharged by the Main Works Contractor(s) and the Lead Local Flood Authority would have opportunity to comment on the detail provided at that time.

Topic	Summary of matters raised	National Grid's response
	and operation phase management measures in relation to the water environment are contained in the following documents: Mitigation measures / environmental commitments in Table 6.1, Outline Flood Warning and Evacuation Plan (see Appendix G), Outline LEMP (document reference 7.4)". In Table 5.1 in OCOCP on mitigation measures / environmental commitments, the details in the table are currently incomplete and not site specific to account for local guidance and constraints across the region. The LLFA is concerned that this circular cross referencing results in relevant details not being provided in the relevant sections of the reports. Further clarification is required to ensure that appropriate information is contained within each of the reports and confirmation of where the base information is provided. **LLFA comment October 2025:** The LLFA has reviewed the text in the OCoCP and notes that section 6.1.15 is now 6.1.16. Little has changed in regard to the circular cross referencing. Further work is required to resolve unproductive circular cross referencing.	
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025**: In Table 6.1 W11, the LLFA support this commitment and requests the principle is extended where possible to surface water flood flow routes as a loss of capacity in the flood flow route is likely to have similar effects and would result in an increase in flood risk elsewhere. Additional commitment is sought and further information is required. **LLFA comment October 2025:** Neither W08 and W10 mention surface water flow route. Initial comment remains.	Within **7.2 Outline Code of Construction Practice [APP-300]** there are existing commitments to maintaining surface water flood flow routes (overland flow routes): W08 states that '*Measures to manage surface water runoff from operational above ground infrastructure and to **maintain existing overland flow routes** will be developed liaising with the LLFAs. Such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's lifetime.'* W10 is specific to haul roads, stating: '*Where construction haul roads pass within or cross watercourses and/or their floodplains **and key overland flow routes**, the haul road design will include flood mitigation/drainage to allow for the flow of water….'* These provide for maintaining key surface water flow routes to prevent flood risk increases.
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** (In Table 6.1 W12, the applicant identifies that "For access roads and haul roads, the Project requires the crossing of multiple ditches, drains and watercourses." The remaining text in the W12 then focuses solely on the mitigation and management approach for crossing main rivers and those with a WFD status. There is no discussion on the mitigation and management approaches for other watercourses without these designations. Further information is required.) **LLFA comment October 2025:** Initial comment remains and requires addressing.	Mitigation approaches for watercourses that are not designated as main river or which have a WFD waterbody ID are secured by a range of other commitments within **7.2 Outline Code of Construction Practice [APP-300]**, including those which cover pollution control and culvert design. These include measures W02, W03, W14 and GG32).
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** In Table 6.1 W14, the applicant states that "Temporary bridges and culverts (associated with the construction haul routes) will only be retained by exception". This will need to be decided in advance to ensure the design for these permanent structures is appropriate and does not increase flood risk on site or elsewhere. Further information is required. **LLFA comment October 2025:** The LLFA notes that text of W14 has since been ammended and better reflects the approach.	The Applicant agrees and confirms that the permanence of watercourse crossing structures would be verified during the detailed design of the Project. Commitment W14 in **7.2 Outline Code of Construction Practice [APP-300]** secures that permanent watercourse crossings would be designed to reflect their permanence e.g. culvert sizing to accommodate climate change allowance.

Topic	Summary of matters raised	National Grid's response
	However the permanance of the structure will need to be determined prior to the installation of the structures.	
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** It is not clear whether or not this plan has been prepared in accordance with the Joint Environment Agency and ADEPT guidance on Emergency Flood Plans. Further information is required. **LLFA comment October 2025:** The majority of the guidance is applicable to any type of development and therefore like any guidance it should be applied while using suitable professional judgement. Therefore, the LLFA requires the appropriate application of the guidance and robust technical explaination for departures from guidance where appropriate.	The joint Environment Agency and Association of Directors of Environment, Economy, Planning & Transport (ADEPT) guidance is primarily tailored towards emergency flood plans for developments that would have regular occupants, which is not the case for the Project. The guidance has therefore been applied as appropriate to the type of activities/ development that is proposed.
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** The LLFA notes there is more information about temporary works and haul road locations in the OFWEP than within the OCoCP. This location information along with other information should also be included in the OCoCP. In addition, Norfolk LLFA requires the modelled flood depth range for each location to be included in the risk summary table to indicate the flood risk potential. Further work is required. **LLFA comment October 2025:** The LLFA notes that the pre development flood depths from the Environment Agency's strategic flood mapping has been provided but no site specific or post development modelled depths have been provided. In addition, this information has not been used in the environmental assessment.	Project details are included at a high level in **7.2 Outline Code of Construction Practice [APP-300]**, with reference to **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** for further Project design details. Modelled flood depth range data for areas at high risk of surface water flooding have been added for each project specific location in the risk summary table. No surface water modelling has been undertaken as this was not part of the scope of the agreed methodology for **7.9 Flood Risk Assessment [APP-331]**. However, due to the nature of the temporary works proposed and the commitment to reinstatement, post development surface water flooding depths are not expected to be significantly different to the data that is reported.
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** In Table 2.1 the project interactions with areas at high and medium risk of surface water flooding during the construction phase. However, it is not possible to determine which locations are at high or medium risk. At the end of each section there is a non-specific paragraph that relates to medium risk of surface water but is too generic to identify any locations. Further information is required. **LLFA comment October 2025:** While some additional information has been added, it remains unclear about which locations are at high and / medium surface water flood risk. Further clarity required. (Table 2.1)	Table 2.1 has been updated to provide further clarification as requested. The information in the table is supplemented by **Document 6.12.F2 Environmental Statement Figure 12.2 - Flood Risk Areas [APP-224]**, which maps the high and medium surface water flood risk zones with the Projects Order Limits and key components overlaid**.**
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** The LLFA notes that in section 4 it is not clear who from the construction site personnel is required to sign up to the Environment Agency and Met Office warning services and whether there are any additional staff to sign up as backup. The LLFA also note that only the details for the sign up to the Environment Agency Flood Warning service are provided. Further information is required.	**7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]** ('the Outline FWEP') is a live document that would be taken on by the appointed Main Works Contractor(s) to be supplemented and kept up to date (and discharged). These details would be determined by the appointed Main Works Contractor(s) and the next iteration of the FWEP would be shared with the Lead Local Flood Authority when this information is confirmed prior to discharge.

Topic	Summary of matters raised	National Grid's response
	LLFA comment October 2025: While the LLFA understands that named staff are not possible to determine at this time, the activity could be associated with a role type such as Site Manager. Initial comment yet to be addressed.	
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** In section 5, it is noted that all the key personnel listed are construction workers. It is appropriate for key client personnel to be listed to ensure site staff are able to contact the client in an emergency. Further information is required. **LLFA comment October 2025:** While the LLFA understands that named staff are not possible to determine at this time, the activity could be associated with a role type such as Consents Manager. Initial comment yet to be addressed.	**7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]** ('the Outline FWEP') is a live document that would be taken on by the appointed Main Works Contractor(s) to be supplemented and kept up to date (and discharged). These details would be determined by the appointed Main Works Contractor(s) and the next iteration of the FWEP would be shared with the Lead Local Flood Authority when this information is confirmed prior to discharge.
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** The LLFA notes that it is not clear whether a paper copy will be kept available as well as a digital version of this plan for staff to access. Furthermore, it is not clear where copies of the emergency plan will be stored and readily available to staff either digitally or in hardcopy form. Further information is required. **LLFA comment October 2025:** This is a copy and pasted answer that is not applicable to the concern raised. The initial comment is yet to be addressed.	The formats in which the Plan would be available would be decided by the construction Site Managers and this would be clarified in the Full Flood Warning and Evacuation Plan.
Hydrology, Land Drainage and Flood Risk	**Appendix E** **LLFA comment June 2025:** The LLFA notes that a private property and a community hall are proposed to be used as Evacuation Points for the River Tas. It is similar for the River Waveney. It is not clear to the LLFA whether the applicant has obtained permission / agreement from these property owners for their contractors to use and access these third party properties. NPPF is clear that the Emergency Plan is required to be agreed. Confirmation of agreement is required. Further information is required. **LLFA comment October 2025:** Noted. The LLFA would expect to see agreements in principle from the relevant third parties to ensure the arrangements (including expectations of the types of vehicles anticipated etc) have been agreed in accordance with the NPPF wording.	**7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]** ('the Outline FWEP') provides information on potential evacuation routes and muster points. However, the Outline FWEP is a live document that would be taken forward by the appointed Main Works Contractor(s) and submitted for approval prior to commencement of the authorised development in accordance with Requirement 4 of **3.1 Draft Development Consent Order [APP-056].** Evacuation routes and muster points would be reviewed by the appointed Main Works Contractor(s) who would be responsible for securing any necessary agreements with property owners, and is duty bound to comply with relevant planning policy. The next iteration of the FWEP would be shared with the Lead Local Flood Authority when this information is confirmed prior to discharge.

Appendix X.
Norfolk Wildlife Trust

nationalgrid

Appendix X
Norfolk Wildlife Trust

Table X1.1 outlines the Applicant's comments on the Relevant Representation (RR) provided by **Norfolk Wildlife Trust [RR-2756]**. The Applicant has held a number of meetings with the Norfolk Wildlife Trust during the development of the Project and has been progressing a Statement of Common Ground (SoCG). An updated SoCG (**5.9.17 Draft Statement of Common Ground - Norfolk Wildlife Trust [Revision B])** is provided to the Examining Authority at Deadline 1, which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table X1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Ecology and Biodiversity	4. Our ecological concerns centre around the impacts of the overhead line route through Norfolk on designated nature conservation sites, irreplaceable habitats, and protected species. Our focus during the Examination will be on securing comprehensive mitigation and compensation for potential impacts.	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on designated nature conservation sites, irreplaceable habitats and protected species. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation in line with the mitigation hierarchy. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys have been undertaken over the 2022-2025 period, the findings of which inform the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats and species and additional mitigation measures, as appropriate. Following the implementation of mitigation, no significant residual effects have been identified as a result of construction or operation (and maintenance) of the Project. Environment Act 2021 introduces a mandatory requirement for 10 % Biodiversity Net Gain (BNG) for new Development Consent Order (DCO) developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10 % BNG with wider environmental and societal benefits across the Project. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment.
EIA Approach and Method	5. Norfolk Wildlife Trust seek assurances that a strict adherence to the Mitigation Hierarchy will be followed, including evidence that impacts are being avoided and enhancement is being delivered. Where mitigation, compensation, and enhancement are delivered – be it for Biodiversity Net Gain, landscape, or for targeted species – we seek to ensure the best possible outcomes for biodiversity.	The mitigation hierarchy, as detailed in Section 7 of **5.6 Planning Statement [APP-085],** has been applied throughout the routeing, siting and design process, with avoidance of impacts on biodiversity receptors prioritised wherever practicable and minimisation measures incorporated where complete avoidance is not possible. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** secure commitments to mitigation, compensation and enhancement, including measures for targeted species and habitats and landscape planting. **7.1 Biodiversity Net Gain Report [APP-299]** sets out the approach to delivering Biodiversity Net Gain, which includes habitat creation, enhancement and long-term management to ensure measurable benefits for biodiversity. The Main Works Contractor will be required to adhere to all commitments within **7.4 Outline Landscape and Ecological Management Plan (LEMP) [AS-046]** and **7.2 Outline Code of Construction Practice (CoCP) [APP-300]**, ensuring that the mitigation hierarchy is implemented and that the best possible outcomes for biodiversity are achieved when developing the final LEMP and CoCP.
EIA Approach and Method	6. Norfolk Wildlife Trust note that currently ecological survey data has not been provided for c. 12.5% of the project, and while it is not anticipated by the Project Team that this will significantly change the assessment, it may result in additional concerns for Norfolk Wildlife Trust being raised.	Survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.

Topic	Summary of matters raised	National Grid's response
Ecology and Biodiversity	*County Wildlife Sites* 7. We have concerns regarding the proposed pylon route between pylon 48 and 49 which could impact Meadow Wood Nature Reserve candidate CWS (as shown on the map below in dark green shading). NWT surveyed this site in June 2025 and found it to meet the criteria for woodland CWS on points 2,4,5 and 6 (see CWS HANDBOOK_2014). We will be putting the site forward for designation in the 2026 CWS update. As such, we are concerned about the siting of the Norwich-Tilbury pylon route going immediately adjacent to this particular section of woodland and the loss of the adjacent woodland habitat. We are unclear where in the ES the impacts on this location are evaluated. Given that there appear to be feasible alternatives presented in the Design Development Report, we would wish to see the relative harms of these alternative alignments explicitly weighed against each other. We take the position that the loss of this habitat and a significant number of pollards will be ecologically damaging and strongly recommend that an alternative routing in this area is sought. 8. Care in selection of pylon route to avoid impacts to the richest habitat is essential. To compensate for any loss, effort to enhance the nearby CWS should be considered. Norfolk Wildlife Trust are keen to engage and discuss impacts to this CWS in more detail. 9. We also have some concerns about impacts to Norton's Wood CWS, which will be 1.3 m from the temporary haul road near pylon RG19 and seek assurances that the highest standards of working practices will be followed in this area to ensure that impacts are avoided.	The area of land indicated as being a candidate Local Wildlife Site between RG48 and RG49 in the Tas Valley, due to its woodland habitat, has been captured in our environmental assessment under the woodland ecological receptor category in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. While not considered as a Local Wildlife Site in the assessment, the woodland has been included as priority habitat and as such has been given significant weighting in routeing design decisions. Mitigation proposals for the candidate site would relate to the impact on woodland habitat and this is clearly set out within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. No compensation requirement for impacts on candidate local wildlife sites has been identified as necessary. Through careful routeing and siting, including considering a number of veteran trees in the adjacent woodland (which are all avoided) the Project has avoided all direct impacts on Norton's Wood County Wildlife Site (CWS). The temporary haul road is the closest construction feature to the woodland and commitments detailed within **7.2 Outline Code of Construction Practice [APP-300]** will ensure no indirect effects on the CWS occur throughout the construction period. Document reference **5.15 Design Development Report from paragraph 4.6.18 [APP-122]** reports on the consideration of alternative routes including deviating more extensively to the west but found these to be less preferred due, amongst other things, to greater ecological effects. An alternative to the east was considered, paragraph 4.4.4. but less preferred due to greater effects on heritage and reduced proximity to the airfield. We also considered localised alignment changes and can confirm that all such localised changes either impact more trees or raise broader siting questions.
Ecology and Biodiversity	*River Waveney Crossing* 10. We support comments made by Suffolk Wildlife Trust regarding the River Waveney Crossing, and impacts to the Waveney and Little Ouse Landscape Recovery Project (WaLOR). The Norwich to Tilbury project should not undermine the ability of the WaLOR project to deliver significant biodiversity uplift in this area of the Waveney Valley. 11. We support comments made by Suffolk Wildlife Trust regarding Roydon Fen LNR, which lies adjacent to the route, and share their concerns about the potential for impacts to the sensitive onsite hydrology and the impacts from vegetation management required for the construction and operation of overhead lines.	The Main Works Contractor(s) would seek to engage with the WaLOR project team during detailed design development, to reduce any potential for conflicts between the two projects. The Applicant is committed to ongoing collaboration with the WaLOR project team to ensure successful delivery of both projects. The ecological assessment at Roydon Fen identified hydrological connections as the only potential impact pathway. There would be no direct impacts on habitats within the County Wildlife Site (CWS). These potential effects are mitigated through the water-quality protection measures set out in commitments W01 to W16, as presented in Table 6.1 of **7.2 Outline Code of Construction Practice [APP-300]**. With these mitigation measures in place, no significant residual ecological effects are anticipated on this CWS.
Ecology and Biodiversity	*Bats* 12. We have concerns that bat flyway crossing structures proposed at limited locations may be insufficient for the extent of habitat severance and efficacy of any such structures, given clear evidence demonstrating highway crossing structures do not work (e.g. on the A11). 13. Norfolk Wildlife Trust are interested in the proposed compensation and mitigation provided to retain hedgerow connectivity for bats. We are aware that previous research on	Noted. The artificial bat flyways are proposed at key locations where the survey data have indicated a high usage feature by foraging/commuting bats, to ensure connectivity is maintained during construction. The approach to bat commuting/foraging mitigation and the proposed locations for the bat flyways, has been agreed with the Local Planning Authorities (LPA) through consultation on **7.4 Outline Landscape and Ecological Management Plan [AS-046]** as outlined within the relevant LPA Statements of Common Ground submitted at Deadline 1 **[APP-089 to APP-100]**. The structures proposed are effectively temporary artificial replacements of the sections of hedgerows removed and are not the same, or do not have the same purpose as the permanent bat bridges used for the A11. These artificial flyways have been used successfully on other DCO projects for relatively short sections of temporary impact. The Applicant welcomes further discussions on the design of the proposed

Topic	Summary of matters raised	National Grid's response
	mitigation measures in Suffolk has been undertaken as part of infrastructure works, which was shared with National Grid by Suffolk Wildlife Trust; this research highlights the need for more data and Norwich to Tilbury provides a highly suitable opportunity to provide this, adding insight into the effectiveness of mitigation measures aiming to provide temporary connectivity across hedgerows during and immediately after proposed works.	temporary bat flyways at the detailed design stage, beyond the principles outlined within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. There is currently no requirement to monitor the bat flyways during construction as part of this Project, however the Applicant is open to further conversations with Norfolk Wildlife Trust on a monitoring study sitting outside of the DCO requirement process.
Ecology and Biodiversity	*Habitats of Principal Importance* 14. The scheme will cause significant temporary losses of lowland mixed deciduous woodland, coastal and floodplain grazing marsh, lowland dry acid grassland, important hedgerows, and rivers. While termed 'temporary', these losses will persist for several years, and full ecological restoration will take decades.	All impacts to habitats would be mitigated through a combination of on-site replacement planting following completion of works and habitat creation/enhancement at the identified Environmental Areas, details of which are presented within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. In addition, the Applicant has committed to deliver 10 % Biodiversity Net Gain (BNG) with wider environmental and societal benefits across the Project. The BNG metric takes account of the technical difficulties and time lag associated with specific complex habitat types including woodland, acid grassland and river habitats. The potential impacts to habitats of principal importance are assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, which concludes that following the application of mitigation, the impact to habitats of principal importance would be negligible and there would be no significant residual effect.
Biodiversity Net Gain	*Biodiversity Net Gain* 16. Under BNG's additionality rules, habitat measures delivered to mitigate or compensate for impacts to protected sites and species can only count towards, and not beyond, no-net-loss. To ensure additionality of the Project's 10% BNG, habitat created or enhanced to meet statutory mitigation or compensation for impacts to protected sites or species should be clearly identified in the BNG assessment. 17. We welcome the confirmation in Table 3.2 of Document 7.1 Biodiversity Net Gain Report that any habitat loss will only be considered temporary if reinstatement to the original habitat type and condition within two years is possible, as per statutory Biodiversity Net Gain guidance. Where this is not possible, habitat loss must be treated as permanent and its replacement required to demonstrate a minimum 10% Biodiversity Net Gain. Where temporary haul roads are made or hedgerows removed this position is essential to ensure the mitigation hierarchy is duly followed.	Noted. Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for development (subject to certain exemptions), however, this requirement is not yet in force for development consent pursuant to a Development Consent Order (DCO). Despite submitting the DCO before it is mandatory, the Applicant has committed to delivering 10 % BNG with wider environmental and societal benefits for the Project. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. In the absence of guidelines for NSIPs, the approach and methodology for the BNG assessment has been agreed in principle with Natural England and Local Planning Authorities. The BNG rules around additionality have been applied to the Project. Full details are presented within **7.1 Biodiversity Net Gain Report [APP-299]**.
Ecology and Biodiversity	*Ancient Woodlands and Veteran Trees* 18. We support comments made by Essex Wildlife Trust regarding Ancient woodlands, which are irreplaceable habitats. The scheme identifies 6 ancient woodland sites (1.7 ha) within the Order Limits and 34 ancient woodland sites within the 15m root protection zone buffer. Additionally, 112 veteran trees have been surveyed with 4 requiring removal. 19. Norfolk Wildlife support all other comments made by Essex Wildlife Trust and Suffolk Wildlife Trust	Although unavoidable, the impacts to the ancient woodlands within Norfolk are minimal and appropriate mitigation has been provided to ensure no long-term impacts. A full breakdown of the impacts to each ancient woodland and a site-specific mitigation/ compensation solution has been provided within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**. Section 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [AS-46]** confirms that following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows (this includes the four veteran trees) as far as practicable and will take further account of tree canopies and overall tree size. This is also recorded as Commitment reference GG14 in the Outline Code of Construction Practice **(7.2 Outline Code of Construction Practice [APP-300]**).

Appendix Y.
Northumbrian Water Limited

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Appendix Y
Northumbrian Water Limited (trading as Essex and Suffolk Water)

Table Y1.1 outlines the Applicant's comments on the Relevant Representation (RR) provided by **Northumbrian Water Limited (trading as Essex and Suffolk Water) [RR-2764]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application. An updated version of the Statement of Common Ground (SoCG) with Northumbrian Water Limited **5.9.27 Draft Statement of Common Ground - Essex & Suffolk Water [APP-114]** is anticipated to be submitted at a future deadline.

Table Y1.1 Summary of comments and National Grid's response

Topic	Comments	National Grid's response
Draft DCO	At present, no protective provisions and/or asset protection agreements have been agreed between the Applicant and NWL, and as such NWL cannot confirm that it will not suffer serious detriment to the carrying on of its undertaking as a result of the compulsory acquisition of land or as a result of the acquisition of rights over land by the Applicant.	Engagement with NWL has been productive. Following initial early meetings and communication to define and understand the required protections, the Applicant has reviewed and issued a response to NWL's proposed form of bespoke protective provisions and asset protection agreement. Those comments and revisions were issued to NWL for consideration in September 2025 and any acceptance or comments are awaited.
Draft DCO	The provisions for the protection of Electricity, Gas, Water and Sewerage Undertakers set out in Part 1 of Schedule 16 to the Draft Development Consent Order (Document 3.1) are not in a form satisfactory to NWL. In particular, NWL (and without prejudice to further issues our client may raise in subsequent correspondence) has noted that the Land Plans Section F (Document 2.2 Rev B) and accompanying Book of Reference (Document 4.3 Rev B) show powers of temporary use in respect of land including and adjacent to Little Waltham Pumping Station, which is of significant concern to NWL. Little Waltham Pumping Station is a business critical asset essential to NWL's supply operations and NWL are strongly opposed to the acquisition of any powers by the Applicant which may impact or otherwise impede Little Waltham's operation.	NWL, Essex and Suffolk Water and the Applicant have engaged on this matter and the protections required for Little Waltham Pumping Station. Draft protections were prepared by the Applicant and were issued to NWL and ESW for consideration in September 2025. Any acceptance or comments on that draft is awaited.
Cumulative Effects	NWL is also in the process of assessing the interaction between the Project and other proposed schemes (both internal upgrade schemes and other NSIPs) in the context of impact upon NWL's assets and must reserve its position pending the outcome of those assessments.	The Applicant will continue to engage with NWL throughout the examination process and in matters of detailed design so as to fully convey the specifics of each proposed interface on NWL's assets and facilitate an agreed crossing interaction.
Draft DCO	As a result of the matters set out above, NWL must at this stage register its objection to the proposed DCO pending the agreement of suitable protective provisions and/or asset protection agreements (as well as the conclusion of the assessments set out above). We are in the process of engaging with the Applicant's representatives regarding the required protections and will endeavour to reach agreement at the very earliest opportunity.	Engagement between the Applicant and NWL is ongoing and progressing on a site-specific interaction basis so as to understand and mitigate NWL concerns on proposed interactions.

Appendix Z. Pylons East Anglia Ltd

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Appendix Z
Pylons East Anglia Ltd

Table Z1.1 outlines the Applicant's comments on the Relevant Representation (RR) provided by **Pylons East Anglia Ltd (also known as Essex Suffolk Norfolk Pylons or ESNP) [RR-2973]**. The Applicant undertook ongoing engagement with the group during the development of the Project, including interactions at public information events, email queries, consultation feedback, and meetings. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application. The Applicant does not have a Statement of Common Ground with Pylons East Anglia Ltd.

Pylons East Anglia Ltd submitted a number of appendices with the RR, some of which are documents that have previously been provided to the Applicant in response to consultation. The Applicant has generally summarised the content of these appendices and provided a response, and in some cases has identified specific information in the appendices that requires detailed comment. This is included in the table below.

Table Z1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
Consultation	1. Introduction 1.1. As the region's coordinating campaign group fighting for an alternative to the Norwich to Tilbury Pylons, we represent 40,000 people who have signed our petition. Our committee includes members in Essex, Suffolk and Norfolk. 1.2. We have attempted to engage with National Grid throughout the two non-statutory consultations, the statutory consultation and the targeted consultations. We have submitted in-depth, evidence- and community-based arguments and documentation to each consultation, supported by professional advisers. A great deal of what we have attempted to raise with National Grid since 2022 has fallen on deaf ears. 1.3. In summary: 1.3.1. Consultation has not been lawful. A decision had already been made about technology and route before the first consultation, and consultation responses have not been given due consideration. The Opinion of Russell Harris KC dated 8th August 2025 does not provide a convincing response to the earlier opinions provided to Pylons East Anglia Ltd by Lord Banner KC. In places it is more in the nature of advocacy than a legal opinion. Amongst its shortcomings, which will be elaborated in due course, the Opinion is principally directed at whether as a general rule a prospective applicant for a DCO is obliged to consider and consult upon alternatives to proceeding with the project. The points made in the opinions provided to PEAL are more nuanced than that. In the present context, the particular issue is whether in the specific circumstances the applicant has failed to consult in a meaningful way, at a time when the development was still in a formative stage, on alternative ways of delivering the project, such as using HDVC rather than pylons (see eg. para 14 of the first Banner opinion);	All feedback submitted during the Applicant's consultations, including the two non-statutory consultations, statutory consultation in summer 2024, and targeted consultations in 2025, has been considered by the Project team. This includes the submissions from Pylons East Anglia Ltd. The points raised have been responded to in **5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068], 5.1 Consultation Report - Appendix C: 2023 non-statutory consultation [APP-069],** and **5.1 Consultation Report [APP-066].** These were submitted to the Planning Inspectorate as part of our application and can be found on their website, here. The Applicant has complied fully with the specific statutory requirements and the relevant guidance on consultation applicable to applications for development consent. The Applicant has considered a wide range of alternative means for the Project. These are set out in the following documents: • **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]**, published at the 2022 non-statutory consultation, • **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** published at the 2023 non-statutory consultation, • **7.17 Strategic Options Backcheck and Review [APP-355]** which contains the Strategic Options Back Check and Review published at the 2024 statutory consultation and the version submitted to the Planning Inspectorate in 2025. 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].** We note the comment about the various legal submissions. We respectfully do not agree with the position as presented by the Pylon East Anglia Ltd objection group. Mr Russell Harris KC's legal opinion **[APP-080]** is, in our view, clear and unambiguous in its summary and application of the legal duties placed on the Applicant, how they have been met and why the approach presented on behalf of Pylons East Anglia Ltd are incorrect.
Alternatives	1.3.2. There are credible alternatives to overhead lines which have not been consulted on, or even given adequate consideration. These include, HVDC undergrounding from	**5.15 Design Development Report [APP-122]** sets out from paragraph 2.5.2 the basis for consulting on the Project. The reasons for not preferring alternatives (including that they fail to meet our statutory duties) have been set out throughout the Project development including in **6.3 Environmental Statement Chapter 3 - Alternatives**

Topic	Comment	National Grid's response
	Norwich to Tilbury, integration offshore and upgrading the existing grid using grid enhancing technologies such as TS Conductor; 1.3.3. The harms from the chosen option are far outweigh than those from alternatives. Need can be met without the harms to businesses, habitats and communities. Critical National Infrastructure policy is not a get-out-of-jail free card for National Grid, and we address this in a separate paper.	**[APP-127]** and in the various reports describing the selection and backchecking of the strategic option and the development of routeing and siting **[APP-355 – APP-360].**
Alternatives	2. Key questions that must be asked during the Examination: 2.1. Why has underground HVDC not been presented for consultation? 2.2. Why has sub-sea HVDC not been presented for consultation? A skeleton proposal was sent to MPs but stakeholders have not been consulted.	EN-5 requires the Applicant to operate in an efficient, coordinated and economical way[124]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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. National Grid considered alternatives in the **7.19 2023 Strategic Options Backcheck and Review [APP-357],** with all on-shore alternatives of AC overhead Line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. The Applicant set out why a sub-sea HVDC was not preferred and hence was not being taken forward at each stage in public consultations and ongoing engagement with stakeholders. In all cases the HVDC on-shore 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 Chapter 15 of **7.19 2023 Strategic Options Backcheck and Review [APP-357]** the total capital cost for overhead line options EAN 4 and EAS 2 would be £895m whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5m (2020/21 price base). Even with cable sections identified to provide appropriate mitigation, costs remain below half that of HVDC alternatives with the less technical advantages. 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 1800MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800MW 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.
Existing infrastructure	2.3. What has National Grid done to upgrade the existing grid in East Anglia, and what increase in capacity does this bring? For example:	**7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 "Needs Case" table 3.3 page 31 sets out requirements in East Anglia boundaries EC5 and EC5N. Worldwide, 400 kV systems are limited to International Electrotechnical Commission (IEC) rating of 5000 Amperes (A), continuous (for example as identified in Circuit Breaker Ratings (IEC 62271-100)). This means that all electrical equipment installed at substations is rated to this current level. This 5000 A equates to • Equates Maximum Single circuit rating of 3,465 megavolt-ampere (MVA) per circuit

[124] Electricity Act 1989, Section 9

Topic	Comment	National Grid's response
		• (EC5N post fault) Equates Maximum Double Circuit rating of 6,930 megavolt-ampere (MVA) per double circuit (i.e circuits either side of pylons). • (EC5 post fault) 4 circuits Maximum Circuit rating of 13,860 megavolt-ampere (MVA) two sets of double circuit post fault. Therefore, with both boundaries operating to about 300MVA of their maximum. Further uprating does not resolve the need without additional circuit infrastructure set out below • 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
Needs Case	2.3.1. LineVision provides Dynamic Line Rating (DLR) sensors that monitor overhead transmission lines in real time, and has been used elsewhere in the UK, but not in East Anglia. This allows National Grid to increase capacity on existing lines without building new pylons, by safely adjusting ratings based on weather and conductor conditions. The technology helps reduce curtailment of offshore wind farms, saving millions in congestion costs.	Dynamic line rating (DLR) equipment is used by the Applicant. Our circuits have different ratings according to ambient temperature, which is such that in summer, lines can be rated 60-80% lower than in winter (in worst case conditions) which severely limits the system's capability. DLR allows us to observe that the ambient temperature is actually 20° rather than a worst case 35-40°. Then the line rating can be adjusted to match actual local ambient conditions and transmit more power based on actual conditions versus worst case. It still does not change the Maximum Continuous IEC 5000 A equipment rating but would allow a circuit restricted to 3000 A in summer (worst case) to operate at 4000 A on a 20°C day, for example.
Needs Case	2.3.2. TS Conductor. Why is this technology not being appraised, both to upgrade the existing grid or for new infrastructure? It has been approved for UK use.	TS conductor is a brand of High Temperature Low Sag (HTLS) technology which is deployed in very specific case - when trading off less efficient higher operating temperatures verses the need to increase the capacity of an overhead line that cannot be rebuilt. In such cases this conductor can be utilised to achieve 5000Ampre (A) continuous rating and 3465 megavolt-ampere (MVA) per circuit rating, where otherwise this rating would not be achievable. Such technology is therefore deployed on Pylon Designs that are not capable of carrying the normal conductor bundles required to achieve 5000Ampre (A) continuous rating and 3465 megavolt-ampere (MVA) per circuit rating. East Anglia in general has Pylon infrastructure capable of carrying conductor bundles that can achieve 5000 Ampere ratings, which is the limitation to circuits. Therefore, TS conductor would not provide further capacity as the circuits already can achieve the IEC 500Ampre rating.
Needs Case	2.3.3. Other grid enhancing technologies such as dynamic line ratings, advanced power flow controls, or transmission switching	The Applicant uses all the technologies listed. Both power flow control and transmission switching are used to redirect power flows to less utilised circuits. The **Need Case set out in 7.17 Strategic Options Backcheck and Review [APP-355]** shows a 9,928 MW capacity deficit across East Anglia EC5 Boundary and a 7,520 MW capacity deficit across EC5N Boundary. These deficits occur in spite of maximum transmission capacity, equivalent to the IEC 5000A rating, already being met on all boundary circuits in East Anglia. Therefore these technologies would not ressolve the need for additonal circiut infrastructure.
Needs Case	2.4. What difference the EC5 Constraint Management Intertrip Service (CMIS) made to constraints payments in the EC5N boundary? (It will contract with generators in the region to provide a more economical method of managing constraints than actions through the balancing mechanism. An interim service is now operational with over 900MW of generation contracted, with the launch of the enduring EC5 CMIS expected in 2026.)	EC5 Constraint Management Intertrip Service (CMIS) is a National Energy System Operator (NESO) Scheme. The Applicant and NESO have lots of such area-wide Intertrip Schemes which are used when constraints, caused by system outages, occur. These services are only allowed under maintenance outage conditions, to cover for faults that are not covered in intact conditions. The intact system for which the Need Case in **7.17 Strategic Options Backcheck and Review [APP-355]** is set out, cannot use intertrips for faults without maintenance outages. CMIS is therefore not relevant to the need for the Project, but for operational use during maintenance of the network only.
Needs Case	2.5. Why does National Grid claim an East Anglian grid capacity increase requirement of 28,000MW, when our research show that only 9380MW extra capacity is required by 2030? Why is National Grid seeming to wish to build for so much more capacity than required? (Note that only up to 2000 MW will be used in the region). Is 6GW of additional capacity required? Might 2 or 4GW be sufficient? Has National Grid carried out an up-to-date review or modelling? The Inspector should see the independent review by Andy Hiorns, December 2023.	At each key stage of the consultation and submission process the Needs Case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Transmission Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 in as set out in **7.17 Strategic Options Backcheck and Review [APP-355].** The timing and urgency for electricity infrastructure is referred to within The Overarching National Policy Statement for Energy (EN-1). *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*

Topic	Comment	National Grid's response
		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.* The National Policy Statement for Electricity Networks infrastructure (EN-5) also states the following regarding Transmission Owners. *2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.* *2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.* **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** Appendix A Page A3 sets out the Applicants Transmission Owner Licence obligations providing detail to the duties referred to within The National Policy Statement for Electricity Networks infrastructure (EN-5) *Condition D2: "Obligation to provide transmission services", which includes "responding to requests for the construction of additional transmission system capacity".* *Condition D3 "Transmission system security standard and quality of service" which includes "Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')"* Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS are in place. The factors above show the 2025 updated Needs Case continues to indicate the urgent need for reinforcement for both Contracted and ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report was published in April 2024 and is available on the Project website. In summary, we do not accept the report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register. Furthermore, a delay to the Project would result in additional cost to the consumer. 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.
Needs Case	2.6. Has National Grid factored in the additional capacity cushion provided by interconnectors, which can remove excess power from the East of England to the continent?	Interconnectors between the UK and Europe are commercially independent systems which commercially buy and sell energy between systems based on price. There is no provision in the NETS SQSS to treat Interconnectors any differently under the demand and generation criteria of the NETS SQSS, or for such provisions to be available due to the interactions between the connecting transmission system needs in the UK and Europe. Furthermore, if power is being provided to the UK, changing import to export quickly would require generation being bought on to the system to replace the power exported.
Alternatives	2.7. Why has the 2034 delivery date for an HVDC option presented to NESO for the 2024 Anglia Study been taken as gospel? It relied on National Grid submissions that supply chain issues for HVDC would cause delays. In fact, National Grid's own	As stated in this examination (ISH1), the global HVDC supply chain for both cable and converter are heavily constrained and the pipeline of HVDC projects globally is extensive. The Proposed Project will operate at three times the capacity of the best available technology and therefore would require three times the capacity in the market of a typical HVDC project. Notwithstanding other factors considered, it is highly unlikely that the Applicant

Topic	Comment	National Grid's response
	business plan states that it has access to one-third of the world's HVDC cables.	could secure this volume of market capacity in a timescale to meet the project needs case and comply with the Applicant's Licence Obligations.
Cumulative Effects	2.8. Why does National Grid ignore the National Policy Statements' requirement for coordination, and the huge body of evidence since 2011 which demonstrates that offshore coordination saves money and reduces harm? Why did National Grid delete a video that stated that offshore coordination is cheaper and better than the piecemeal approach from its website (twice) when it was discovered by the public?	The Applicant has considered all requirements for coordination set out in the National Policy Statements, including for coordination. The Project has been developed in accordance with the statutory and policy framework, including EN-1 and EN-5, and the duties imposed by section 9 of the Electricity Act 1989, which require the transmission system to be developed and maintained in an efficient, coordinated and economical manner. The reasons that an offshore underground option was not progressed, in line with policy, is set out in response to paragraphs 2.1 and 2.2 of this RR above. The video in question was one of a number of resources provided by National Grid Ventures on its website promoting its projects. That particular video shows how interconnectors between Britain and mainland Europe are an important part of our energy mix. The Applicant understands that National Grid Ventures took the video down following feedback from stakeholders in order to include more context in the script of the video. The Applicant strives to provide the right technology in the right places so we can deliver a reliable grid and connect electricity from where it is generated to our homes and businesses in the most affordable and sustainable way for electricity bill payers.
Planning Policy	2.9. How does National Grid justify not following the NPS's requirement to embrace new technologies?	Please refer to the Applicant's response to paragraphs 2.1-2.2 of the RR regarding its compliance with national policy and the use of overhead lines.
Needs Case	2.10. How can National Grid justify the statement on page 8 of the 'Backcheck', that, "Pg 8 The CPRSS concluded, taking all social-economic, environment, technical and cost factors, into account, that the preferred solution was…", when Treasury Green Book guidance which sets parameters for the appraisal of alternatives was not followed? How can National Grid appraise the difference between the socio-economic and natural capital impacts of the land-based options that it dismissed, given that they were not appraised using the Treasury Green Book, and therefore not quantified, and when other options have not been appraised at all? The Treasury Green Book is mandatory. We submit our own Green Book compliant analysis.	HM Treasury's The Green Book[125] is guidance issued by HM Treasury on how to appraise policies, programmes and projects. It is intended to ensure that public funds are spent effectively and is applicable to decisions requiring economic justification. Whilst The Green Book is not mandated for the Applicant's Development Consent Order (DCO) projects, its principles underpin the regulatory and appraisal process overseen by Ofgem and influence how development consent applications are prepared. The Applicant aligns its appraisals to satisfy Ofgem's funding requirements and demonstrate compliance with the economic, social and environmental objectives outlined in National Policy Statements. In all its processes they follow core principles to ensure economic, social and environmental appraisals align with value for money and efficiency goals.
Project Costs	2.11. National Grid's costs submitted to the Inspectorate show that it believes Norwich to Tilbury will cost nearly five times less per km than Bramford to Twinstead which, at £700million for 29km is £24million per km. Norwich to Tilbury would also be three times less costly per km than Hinckley, which, in today's money, cost £14.8m per km. How can Norwich to Tilbury at 180km cost only £5million per km (£895million in total)? Where is the cost breakdown for scrutiny? What are the cost savings made in the Norwich to Tilbury projects versus these other projects set out? (Note that the extra cost of T pylons at Hinckley has been stripped out by us). Itemised costs, such as compensation, will need to be challenged carefully, when they seem unrealistically low.	A full and transparent cost model is provided in both **7.20 2023 – Strategic Options Backcheck and Review [APP-357]** and **7.17 Strategic Options Backcheck and Review [APP-355] (Appendix D Economic Appraisal)**. The appendix sets out in transparent detail, how options appraisal costs were evaluated. The Bramford to Twinstead DCO project undertook a strategic options evaluation which formed part of its DCO submission, in its document 7.2.1 Strategic Options Report. When originally evaluated in 2011, the following table of costs was produced, as extracted from the aforementioned document for ease of reference:

[125] HM Treasury (2026) The Green Book – UK Government Guidance on Appraisal

Topic	Comment	National Grid's response

Common Works		
As described in chapter 8		£407.7m
Potential Strategic Option - Transmission Reinforcement Assets		
Resolving East Anglia Transmission Boundary and Negative Phase Sequence Currents	2 Additional AC Connection Bays at the Bramford 400kV Substation	£11.7m
	Construction of a new Bramford – Twinstead Tee 28km 400kV double circuit overhead line	£50.3m
Potential Strategic Option - Contingent Transmission Works		
Reconductoring of all Sizewell to Bramford Overhead Line Circuits		£75.2m
TOTAL – excluding common works		**£137.2m**
TOTAL		**£544.9m**

Table 10.1 – PS2a (AC Overhead Line) Capital Cost Summary

As shown in this evaluation table at strategic option stage of Bramford to Twinstead, the overhead line section was originally evaluated as 28 km at £50.3m or £1.7m/km in 2011. The final project included significant amounts of cable and other impacts that developed in the detailed design and construction phases.

7.17 Appendix B Strategic Options Backcheck and Review [APP-355] evaluates overhead line elements of £3.98m/km in 2020/21 cost base. Therefore, there is no discrepancy around the cost appraisal approach that has been undertaken in the projects referred to within the question.

It should be noted that the appendix D in the Bramford to Twinstead report was used to derive the 2020/21 cost base report and uses the same methodology and appendix layout.

Health and Wellbeing	2.12. We ask the inspector to give careful consideration to the risk of the project to human health, which we set out in our Soils paper.	**6.10 Environmental Assessment Chapter 10 - Health and Wellbeing [APP-192]** provides a comprehensive assessment of the potential impacts of the Project as they relate to physical and mental health and wellbeing. The methodology for undertaking the assessment has been developed in consultation with Local Planning Authorities.
Cumulative Effects	2.13. The examination should also consider the very significant cumulative harms arising from this project, particularly at key hub villages such as Ardleigh, in Essex, Bramford in Suffolk, and those with solar NSIPs as well as Norwich to Tilbury, such as the Forncetts, in Norfolk.	The inter-project effects assessment identifies significant cumulative effects as a result of the Project with other developments (including solar developments) on landscape and agricultural land. Proposed mitigation is set out in **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. As set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** significant cumulative landscape effects are anticipated during construction and operation within the Bromley Heaths Landscape Character Area (LCA), which encompasses Ardleigh. Significant cumulative visual effects are also identified for some receptors including those travelling on Ardleigh Road and the local PRoW network. This is as a result of the Project in addition to the North Falls and Five Estuaries substations, along with other planned development which includes battery storage, an extension to an existing quarry and a food storage and distribution facility. Significant cumulative landscape effects are anticipated during construction and operation within the Ancient Plateau Claylands Landscape Character Type (LCT) and Rolling Valley Farmland LCT, which encompass Bramford Substation and the surrounding area. Significant cumulative visual effects are also identified for some receptors. This is as a result of the Project in addition to Bramford to Twinstead, along with other planned development around Bramford Substation which includes solar farms and battery storage.
Historic Environment	2.14. Archaeology - we believe that the key areas of focus in the examination should be: 2.14.1. to what extent has National Grid avoided known sites of archaeological significance, whether scheduled or not (not least the sites in and around Fordham, Essex);	Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on archaeology. A comprehensive desk-based assessment and walkover have been undertaken (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**), along with archaeological evaluation (**6.11.A4 Environmental Statement Appendix 11.4: Geophysical Survey Results Report [APP-212]**, **6.11.A5: Environmental Statement Appendix 11.5 – Trial Trenching Results Report**

Topic	Comment	National Grid's response
		[APP-213], **6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**). This has identified archaeological sites, both scheduled and non-designated, along the proposed route. Where sites of archaeological significance were identified, the Applicant has sought to avoid direct impact. Where complete avoidance has not been feasible, the Applicant will ensure that any residual impacts are minimised and that appropriate mitigation measures are in place.
Historic Environment	2.14.2. a requirement for a thorough assessment of the setting of scheduled monuments and the landscapes within which they sit which may be harmed by construction, not least in Ardleigh, in Essex; 2.14.3. in particular, the residual and permanent effect of pylons;	The Applicant acknowledges that the settings of some scheduled monuments fall partially within the Order Limits and this is assessed within **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]**. 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 [APP-210]** for construction and operation (and maintenance) phases of the Project. The Project has also assessed the level of harm from construction and operation (and maintenance) phases of the Project 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. Consultation with Historic England pre-application has indicated, pending sight of their Written Representation, that they are in agreement with the assessment methodology and with the conclusion that the Project would not result in substantial harm. In addition, as the Project is classified as a critical national priority as set out in section 4.2 of NPS (EN-1 (2024)), this 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. Para 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.
Historic Environment	2.14.4. a requirement for thorough pre-determination field-based evaluation through fieldwalking, geophysical survey and trial-trenching;	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 Supplementary Environmental Information **[AS-068 to AS-083]**, of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,440 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.
Historic Environment	2.14.5. a requirement to avoid archaeology of national significance along the route of the project that is discovered by field-based evaluation.	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

Topic	Comment	National Grid's response
		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.
Property acquisition	2.15. To what extent has National Grid demonstrated its need case in relation to those whose land interests are to be the subject of compulsory purchase or compulsory acquisition of rights? The need has to be proved as part of the compelling case in the public interest which is necessary to justify any interference with Article 1 Protocol 1 ECHR. A National Policy Statement cannot override international law (including ECHR) or any enactment (including the Human Rights Act): see Planning Act s.104(4) and (6) – and therefore there can be no presumption of need in the compulsory acquisition context.	Section 122(3) of the PA 2008 requires there to be a compelling case in the public interest for land to be acquired compulsorily. The Applicant considers that there is a compelling case in the public interest for the CA and temporary possession. In strategic terms, the public benefits would strongly outweigh the generality of the public loss. In the case of policy, the Overarching National Policy Statement for Energy (EN-1) states that there is a need for infrastructure which is urgent and should be brought forward at pace (paragraph 3.3.65 of EN-1). The Project is critical national infrastructure, which is so urgent and important that it will, in general, outweigh any other residual impacts and should be progressed as quickly as possible. Further, the government is clear that there is a need for sufficient energy to meet demand and to avoid shortfalls and their consequences – and with a margin to accommodate unexpectedly high demand. The Government's Net Zero commitments also support a holistic, compelling case for urgent delivery. It is this manifold and urgent need which is the main thrust of the compelling case in the public interest. The need outlined as part of the compelling case in the public interest supports compliance with Article 1 of Protocol 1 of the European Convention on Human Rights, ensuring that any interference is lawful, necessary, and proportionate.
Alternatives	2.16. National Grid's rationale for its consideration of alternatives contains omissions and inconsistencies, and appears to cherry-pick arguments to post-justify its decision made prior to the first consultation in 2022 to build overhead lines. We will submit further evidence on this topic during the examination. We list below the documents that you will be receiving from us before 27th November, and which cover topics that we believe merit examination in greater depth. • Critical National Priority – our topic paper assessing this element of policy and the need case. • Heritage - summary of key points relating to heritage that should be covered during examination, by Virginia Brewer, Head of Heritage at Bidwells. • Landscape - key points relating to landscape that the examination should cover, by Simon Neesam of the Landscape Partnership. • Environmental Impact report. (We also draw your attention to the submissions of a Mr Nick Sheppard, which points to issues with methodology used by National Grid to survey for bats). • Soils by soils expert David Dent, including risk to human health. • Flood risk – appraisal of methodology by a flood modelling and hydrology consultant. • Bird collisions - we submit an updated paper, which accompanies our three papers previously submitted to National Grid in 2023 ('Bird collisions', 'Bird hotspots' and 'Priority Habitats' but not addressed. • Treasury Green Book analysis and report. • Consultation – our comments on the failure by National Grid to address our points raised about consultation deficiencies during the Statutory Consultation. We also attach our Targeted	The additional documents referenced by Pylons East Anglia Ltd were submitted as appendices with their RR and are considered in turn below.

Topic	Comment	National Grid's response
	Consultation submission which appears not to have been considered or addressed. • Public Rights of Way - updated list of PROWs affected by the project accompanies this submission. • Supporter surveys and input: – Local snapshots – parishes where we have looked in specific detail at National Grid's DCO maps and the impacts of the project. These are intended as case studies, and are not comprehensive. – Impacts on farmers. – Heritage survey – Business impact – Human impact – Viewpoints – we note from the routes taken by PINS during the unaccompanied site visits, that great swathe of countryside remain unvisited and that travelling along the A12 to view the proposed route is by no means an adequate way to establish the nature of the route and nature of the impact of the project. To assist PINS, we draw your attention to our supporter submitted viewpoints database. These give a far clearer picture of where the Inspectorate could be focusing attention.	
Hydrology, Land Drainage and Flood Risk	**Appendix 1 – Flooding** *[Photographic evidence and testimonies relating to existing flooding issues in the vicinity of the project and concerns that construction works and access routes would exacerbate flood risk.]*	A Flood Risk Assessment **7.9 Flood Risk Assessment [APP-331]** has been prepared for the Project, following a methodology that has been agreed with the Environment Agency and the Lead Local Flood Authorities and in accordance with the requirements of the National Planning Policy Framework[126] and its Flood Risk and Coastal Change Planning Practice Guidance[127]. **7.9 Flood Risk Assessment [APP-331]** includes historical flooding information and states (paragraph 4.6.2) that in several areas local to proposed Project activities, flooding from a range of sources causes issues. The measures described in the rest of Section 4 of **7.9 Flood Risk Assessment [APP-331]** illustrate how the Project would be designed and constructed to avoid contributing to these existing flooding issues. These measures are secured within **7.2 Outline Code of Construction Practice [APP-300]**.
Consultation	**Appendix 2 - Submission by Essex Suffolk Norfolk Pylons to National Grid Electricity Transmission (NGET) with regard to the Norwich to Tilbury (N2T) targeted consultations** *[Raises concerns about the N2T targeted consultations, such as procedural issues, community dissatisfaction and environmental and economic impacts of the changes consulted* upon.]	Please see the Applicant's response to paragraphs 1.1 to 1.3 of the RR above. In summary, the Applicant has complied fully with the specific statutory requirements and the relevant guidance on consultation applicable to development consent applications. The Planning Inspectorate has also stated that it is satisfied that the Applicant has complied with its statutory obligations. Appendix 2 was submitted as feedback during the targeted consultations in 2025. All feedback was carefully considered and responded to in **5.1 Consultation Report [APP-066]** submitted to the Planning Inspectorate.
Socio-economics Recreation and Tourism	**Appendix 3 - Impact of the Norwich to Tilbury Pylons Project on East Anglian businesses** *[Presents survey results from 63 local businesses highlighting concerns that N2T will cause significant economic disruption, loss of income, long-term harm to various sectors, anticipated financial losses and operational challenges.]*	The Applicant noted the survey results from 63 local businesses. **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]** has been undertaken in accordance with the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** and in consultation with the Local Planning Authorities. The assessment identified a total of eight businesses and built assets are anticipated to have a significant adverse effect during construction in EIA terms, and five of which are anticipated to have a significant adverse effect during operation in EIA terms. Mitigation measures are set out **7.2 Outline Code of Construction Practice [APP-300]**.

[126] Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework

[127] Ministry of Housing, Communities and Local Government (2024) Guidance – Flood risk and coastal change

Topic	Comment	National Grid's response
		The Project is anticipated to generate beneficial effects on the local economy and local employment during the construction phase. The beneficial effects are detailed in Paragraphs 15.7.2 to 15.7.14 of **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]**.
Landscape and Visual	**Appendix 4 - Summary of DCO LVIA matters to be considered at examination** *[Identifies concerns relating the LVIA to be tested at examination, including concerns relating to baseline conditions, assessment methodology, mitigation, monitoring and long-term management of mitigation.]*	**6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, has been undertaken as part of the Environmental Impact Assessment (EIA). The methodology for the LVIA is set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** and follows industry standard guidance including the Guidelines for Landscape and Visual Impact Assessment (GLVIA3)[128].
Health and Wellbeing	**Appendix 5 - Unquantified Risks to Human Life in the Farming Sector from working under 400kv lines** *[Identifies concerns that high voltage lines present unquantified and unmanaged risks to human life in the farming sector, including potential for electrical flashover, variable line clearances, operational challenges and safety uncertainties.]*	The Applicant's design for the Project is governed by its relevant statutory duties and obligations as set out in paragraph 5.3.50 of **7.15 Design and Access Statement [APP-353]**. Safe systems of work are expected to be implemented by third parties whenever they are near overhead lines to protect equipment and to protect all persons and animals in the area of the lines. Third parties may refer to: • Health and Safety Executive (HSE) specific agriculture information sheet, 'Working safely near overhead electricity power lines'[129]. • HSE general guidance HSE GS6 'Avoiding danger from overhead power lines'[130], and 'Look out, look up!'[131]. • NGET general guidance TGN287[132]. • Statutory clearances guidance in Electricity Networks Association ENA TS 43-08[133]. Including, but not limited to, guidance that irrigators, slurry guns and high-pressure hoses, or similar, should be 30 m from electrical conductors.
Consultation	**Appendix 6 - Deficiencies of Norwich to Tilbury Formal Consultation 2024** *[Raises concerns about the N2T Statutory Consultation in 2024 including limited participation, insufficient / misleading information, lack of alternatives and issues with process that undermine fair stakeholder engagement and effective feedback.]*	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP) and requires consent under the Planning Act 2008. The Planning Inspectorate publish guidance and advice on developing an NSIP Project for developers to follow. The Government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP Project for developers to follow. The authors of that guidance had specific regard to the Gunning principles as they apply to the context of NSIPs The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in **5.1 Consultation Report - Appendix N5: Legal Opinions [APP-080]**. The **5.1 Consultation Report [APP-066]** also provides a response to the document entitled 'Deficiencies' referenced in Appendix 6 which was submitted as part of Pylons East Anglia Ltd.'s feedback to the 2024 statutory consultation.
Agricultural and Soils	**Appendix 7 - Impact of National Grid's Norwich to Tilbury Pylon Proposals on Farmers and Landowners** *[Identifies concerns regarding the impact of N2T on farmers and agricultural land, including loss of agricultural land, operational*	**6.6 Environmental Statement Chapter 6 – Agriculture and Soils [APP-138]** states that a maximum 3,461 hectares of agricultural land would be temporarily removed from agricultural production during construction. This figure includes all agricultural land within the Order Limits required temporarily based on the Order Limits. In relation to any small areas of land outside the Order Limits which is deemed to be impractical to farm during the

[128] Landscape Institute (2013) Guidelines for Landscape and Visual Impact Assessment (GLVIA3)

[129] Health and Safety Executive (2012) Working safely near overhead electricity power lines

[130] Health and Safety Executive (2013) Avoiding danger from overhead power lines - Guidance Note GS6 (Fourth edition)

[131] Health and Safety Executive (2022) Look out, look up! National Grid Electricity Distribution's guide to the safe use of mechanical plant in the vicinity of electricity overhead lines

[132] National Grid Electricity Transmission (NGET) (2016) Technical Guidance Note 287: Third-party guidance for working near National Grid Electricity Transmission equipment

[133] Energy Networks Association (2016) Technical Specification 43-8 Overhead line clearances

Topic	Comment	National Grid's response
	and financial challenges, safety risks, biosecurity concerns, and long-term restrictions on land use and productivity.]	construction period as a result of fence lines, the Applicant will continue to engage and work with landowners to minimise impacts. All land temporarily required would be reinstated in line with **7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303]**, including land required for haul roads. The Outline Soil Resource Plan also details that there would be a requirement for an aftercare period where soils are being reinstated to ensure they have time to return to their previous condition (and thus productivity), or the condition required for their end-use. The aftercare plans would include requirements for monitoring and checks to confirm the point at which pre-construction conditions have reestablished. Temporary disruption to farming operations during construction (including disruption from haul roads) would be reduced through good practice, such as: maintaining/ providing alternative access and water supplies (including for irrigation systems), reinstating land drains, and communicating with landowners to support ongoing operations (commitments AS03, AS04, and AS05 within **7.4 Outline Code of Construction Practice [APP-300]**). All land required temporarily would be reinstated and compensation agreements would be available to landowners for loss of income due to the Project (for example in relation to temporary land take, reduced yields due to irrigation disruption, etc.). The Applicant recognises concerns that electricity infrastructure and associated rights may result in long-term restrictions on land use and agricultural productivity. In developing the Project, the Applicant has sought to minimise such effects by limiting permanent land acquisition and instead relying, wherever practicable, on the acquisition of defined rights rather than full ownership of land. The rights sought are confined to those necessary for the safe construction, operation and maintenance of the assets and are designed to enable the continued agricultural use of land beneath and around the infrastructure. The majority of affected agricultural land will remain in productive use following construction, subject only to proportionate restrictions that are typical for high-voltage transmission infrastructure, such as adhering to safety clearances. **7.2 Outline Code of Construction Practice [APP-300]** includes biosecurity measures (AS07, B04); a commitment is given that these would cover agricultural weed and nuisance species (which are not covered under the invasive non-native species classification or relate to a specific disease outbreak).
Alternatives	**Appendix 8 - Request for Network Modelling by NESO** *[Requests updated modelling from NESO to consider alternative transmission options for N2T e.g. offshore HVDC connections, brownfield site substations, and underground cables.]*	The Applicant has comprehensively set out its decision making on the general routeing arrangements and technology section in multiple documents over the course of the Project development process. This includes consideration of the latest position regarding the need for the Project and of alternatives covering the items raised in the Relevant Representation. This included documents published in support of consultation and the development consent application, including **4.1 Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [APP-060]**, **5.15 Design Development Report [APP-122]** and **[APP-355 to APP-360]**. Alternatives in the context of the EIA Regulations have been described in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. The Applicant remains of the view that the Project as proposed is consistent with the relevant policies, duties and programme within which it must be considered. We acknowledge that others may favour alternatives but the Applicant is clear that these fail to be consistent with various aspects of such policies, duties and programme requirements.
Hydrology, Land Drainage and Flood Risk	**Appendix 9 - Independent Technical Examination of 'Flood Risk Validity and Environmental Statement Chapter 12 '** *[Provides an independent review of ES Chapter 12, which concludes that while the assessment meets basic policy requirements it has significant weaknesses e.g. inadequate baseline data, lack of detailed hydraulic modelling and reliance on future mitigation plans that could leave local communities and agricultural land at greater flood risk during and after construction.]*	**7.9 Flood Risk Assessment [APP-331]**, which has informed **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]** was prepared following detailed engagement with the flood risk management authorities, including the Environment Agency and Lead Local Flood Authorities. The scope and methodology for the assessment were agreed and the mitigation measures and controls, that are secured by the Development Consent Order, were also shaped by feedback from these stakeholders. The Applicant is confident a robust assessment has been prepared. Reliance on future management plans for some mitigation is a standard approach for projects requiring a Development Consent Order. The mitigation plans are secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]** and would need to be discharged prior to the commencement of construction.

Topic	Comment	National Grid's response
Historic Environment	**Appendix 10 - Ongoing heritage implications of the Norwich to Tilbury proposed overhead pylon route** *[Identifies outstanding concerns regarding heritage matters that require examination, which in summary relates to whether the ES has adequately assessed, mitigated and justified the impacts of the proposed overhead pylon route on heritage assets, conservation areas, and historic landscapes in line with relevant legislation and policy.]*	**6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** has been prepared to meet the requirements of relevant legislation and policy, including NPS (EN-1 (2024)), NPS (EN-5 (2024)) and National Planning Policy Framework[134], with regard to heritage assets, including conservation areas and historic landscapes. All heritage assets were assessed 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 [APP-208]**. The assessment process included desk-based research, site walkovers, setting surveys, field evaluation with both geophysical survey and archaeological trial trenching (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212]**, **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213]**) and geoarchaeological and archaeological monitoring and assessment of the Geotechnical Investigation works (**6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**) to identify and understand the significance of potential affected heritage assets. Consultation with Local Planning Authorities, Historic England, and other stakeholders to inform both the methodology of the assessment, baseline and mitigation has been undertaken as set out in relevant Statements of Common Ground (**5.9 Draft Statement of Common Ground [APP-089 to APP-100 and APP-102]**). Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment and heritage assets. The impacts of the Project on the historic environment are assessed in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]**. The assessment considers the potential impact on heritage assets and includes assessment of potential for physical impact, impact through change to setting that affects the value of a heritage asset, and impact through indirect factors such as vibration or change in hydromorphology. The proposals in **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]** set out proposed mitigation for historic buildings and historic landscapes. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** sets out appropriate mitigation for archaeology.
Ecology and Biodiversity	**Appendix 11 - Bird species recorded at eBird Hotspots along proposed Great Grid Upgrade, Norwich to Tilbury** *[A 2023 report detailing a study which concludes that over 200 bird species are present along the route of N2T and at risk from collision and electrocution, with resulting significant potential impacts on bird populations.]*	Collision risk has been assessed within **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]**. 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 which is broadly similar to the species listed within the referenced 2023 report. NatureScot (2016)[135] guidance was used to determine Target Species and Secondary Species with regard to collision risk, and the distribution of these records have 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 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. On a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at the River Waveney and Ardleigh Reservoir as detailed in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The examples included in the referenced 2023 report outlining occurrences of suspected collisions with power lines, are situated on or close to the coast, and in very close proximity to Special Protection Areas (SPAs) designated for internationally important numbers of birds. In the case of Dungeness, this is also situated within the vicinity of a bird observatory and a large RSPB wetland nature reserve, which provide important wintering grounds and passage routes for birds. The Project is located further inland, with alignment allowing sufficient distance from European Sites wherever possible. The Project is located outside the Impact Risk Zone for the

[134] Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework

[135] NatureScot (2016) Guidance – Assessment and mitigation of impacts of power lines and guyed meteorological masts on birds.

Topic	Comment	National Grid's response
		majority of European Sites along the coast, except for the Stour and Orwell Estuaries SPA / Ramsar Site and the Thames Estuary and Marshes SPA / Ramsar Site (located 3.1 km and 1.7 km from the Project respectively) which were taken forward to Stage 1 Screening of **5.3 Habitats Regulations Assessment Report [APP-082]**. Survey results did not identify areas of notable concern as detailed above.
Ecology and Biodiversity	**Appendix 12 - Priority Habitat Inventory along proposed Great Grid Upgrade, Norwich to Tilbury** *[A 2023 report which maps 452 Priority Habitat patches along the N2T route, highlighting the presence of ancient woodland, lowland fen, and areas near SSSI and Local Nature Reserves. Concludes that the project poses significant risks of biodiversity loss and ecosystem service reduction due to habitat destruction and fragmentation.]*	The potential impact on priority habitats and designated sites, including ancient woodland, lowland fen, Sites of Special Scientific Interest and Local Nature Reserves, has been assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Information on priority habitats and statutory designated sites has been obtained from the Natural England Open Data Geoportal[136], which is the most up to date information available from desk-based sources. In addition, detailed habitat surveys have also been undertaken across the Order Limits, to ensure all habitats have been accurately identified. Every effort has been made to reduce the impacts on priority habitats and statutory designated sites through careful routeing and siting. Where impacts are anticipated, appropriate mitigation has been set out in line with good practice and relevant guidelines. **7.4 Outline Landscape and Ecological Management Plan [APP-046]** clearly sets out all ecological mitigation measures to be implemented including embedded, standard and additional mitigation. Following the application of mitigation, it is concluded that there would be an overall negligible magnitude of impact, with no significant residual effect on priority habitats or on statutory designated sites.
Ecology and Biodiversity	**Appendix 13 - Bird collisions with overhead power lines: Bird behaviour and the risks posed by power lines** *[A 2023 report considering the potential for overhead lines to cause significant bird mortality through collisions and electrocution and which concludes that National Grid has not adequately considered or consulted on less harmful alternatives such as underground or offshore cables.]*	Collision risk has been assessed in **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]**, **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and **5.3 Habitats Regulations Assessment Report [APP-082]**. A wintering and passage bird scope was produced (which detailed vantage point surveys to determine collision risk) and agreed with Natural England. Wintering / passage bird surveys were subsequently undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds 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 as agreed with Natural England. On a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire is proposed at the River Waveney and Ardleigh Reservoir as detailed in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The examples included in the referenced 2023 report outlining occurrences of suspected collisions with power lines, are situated on or close to the coast, and in very close proximity to Special Protection Areas (SPAs) designated for internationally important numbers of birds. In the case of Dungeness, this is also situated within the vicinity of a bird observatory and a large RSPB wetland nature reserve, which provide important wintering grounds and passage routes for birds. The Project is located further inland, with alignment allowing sufficient distance from European Sites wherever possible. The Project is located outside the Impact Risk Zone for the majority of European Sites along the coast, except for the Stour and Orwell Estuaries SPA / Ramsar Site and the Thames Estuary and Marshes SPA / Ramsar Site (located 3.1 km and 1.7 km from the Project respectively) which were taken forward to Stage 1 Screening of **5.3 Habitats Regulations Assessment Report [APP-082]**. Survey results did not identify areas of notable concern as detailed above.
Alternatives	**Appendix 14 - Local snapshots** *[Includes local case studies from residents along the proposed N2T route, detailing concerns about environmental damage, heritage impacts, traffic disruption, loss of biodiversity, inadequate consultation and the need for alternatives (e.g. underground or offshore transmission) to reduce or avoid impacts.]*	Please refer to the Applicant's response to paragraphs 2.1 to 2.9 of this RR, above, regarding consideration of alternatives, including offshore and underground connections and the reasons for the preference of an onshore and predominantly overhead line connection. The Environmental Statement (ES) (Volume 6 of the DCO application) presents the findings of the environmental impact assessment undertaken for the Project and has been prepared to meet the requirements set out in The Infrastructure Planning (Environmental Impacts Assessment) Regulations 2017. The ES has also been prepared in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**. The environmental impact assessment identified a suite of mitigation measures to avoid, prevent, reduce and offset

[136] Natural England. (n.d.). *Natural England Open Data*. https://naturalengland-defra.opendata.arcgis.com/

Topic	Comment	National Grid's response
		(where possible) adverse effects. These mitigation measures are secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]** within: • **7.2 Outline Code of Construction Practice [APP-300]** • **7.4 Outline Landscape and Ecological Management Plan [AS-046]** • **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** • **7.6 Outline Public Rights of Way Management Plan [APP-329]**. The consultation has not been inadequate (as confirmed by the adequacy of consultation responses from the Local Planning Authorities and **5.1 Consultation Report - Appendix M: Adequacy of Consultation Milestone (Final Issue A) [APP-079]**) and should not be conflated with a different opinion on the preferred Project arrangements, whether that relates to the strategic proposal, technology selection, or detailed routeing and siting arrangements.
Project Finance	**Appendix 15 - Norwich to Tilbury Project Green Book Analysis** *[An analysis of N2T using the HM Treasury Green Book, which concludes that the current proposal would cause significantly greater harm to communities, natural capital, property values and local businesses than underground or offshore alternatives.]*	The Treasury Green Book[137] is guidance issued by HM Treasury on how to appraise policies, programmes and projects. It is intended to ensure that public funds are spent effectively and is applicable to decisions requiring economic justification. Whilst the Treasury Green Book is not mandated for the Applicant's Development Consent Order (DCO) projects, its principles underpin the regulatory and appraisal process overseen by Ofgem and influence how DCO applications are prepared. The Applicant aligns its appraisals to satisfy Ofgem's funding requirements and demonstrate compliance with the economic, social and environmental objectives outlined in National Policy Statements. In all its processes they follow core principles to ensure economic, social and environmental appraisals align with value for money and efficiency goals.
Ecology and Biodiversity	**Appendix 16 - Expert Response to Environmental/Biodiversity-related content** *[A 2025 report which critiques the N2T draft DCO as failing to provide sufficient evidence and planning to meet statutory Biodiversity Net Gain requirements and highlights major omissions in baseline species surveys, ecosystem services valuation and bird collision risk. It concludes that there is a need for more rigorous and locally accountable environmental mitigation and compensation.]*	The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG), for development (subject to certain exemptions), however, this requirement is not yet in force for Nationally Significant Infrastructure Projects (NSIPs). Despite submitting the application for development consent before it is mandatory, the Applicant has committed to deliver 10% BNG with wider environmental and societal benefits for the Project. The 10% BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitment. In the absence of any guidelines for NSIPs, the BNG assessment methodology was presented to Natural England and Local Planning Authorities and a broad agreement on approach reached. The BNG mitigation hierarchy has been adhered to. The full details of the BNG methodology is presented in **7.1 Biodiversity Net Gain Report [APP-299]**. BNG is part of Environmental Net Gain. In line with NPS EN-1 (2024) paragraph 4.6.13 and the Applicant's commitment to deliver 10 % BNG with wider environmental and societal benefits, during the offsite site selection process, the Applicant will consider BNG sites that provide provider environmental and societal benefits as stated within **7.1 Biodiversity Net Gain Report [APP-299]**. The ecology baseline is presented in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. All survey scopes were agreed / discussed prior to submission with Natural England, the Environment Agency and/or Local Planning Authorities prior to the surveys being undertaken. The Environmental Statement assesses the impact on all relevant ecological receptors including bird collision risk. The assessment follows the mitigation hierarchy. **6.8.A7 ES Appendix 8.7 - Breeding Bird Report [AS-030]** has a particular focus on the breeding status of species within the UK; however, this is not without regard for international conservation status. The red, amber and green list used within the UK[138], takes account of the international status of birds, for example the red-list includes all species which are 'Globally Threatened' and the amber-list includes all those which have an unfavourable conservation status in Europe. All species mentioned in the comment are red-listed, with the exception of oystercatcher which is a UK amber-listed species (Near Threatened International status). Therefore, it is considered the conservation status used is appropriate for the impact assessment.

[137] HM Treasury (2026) The Green Book – UK Government Guidance on Appraisal

[138] Stanbury, A.J., Eaton, M.A., Aebischer, N.J., Balmer, D.E., Brown, A.F., Douse, A., Lindley, P., McCulloch, N., Noble, D.G., & Win, I. (2021) *The status of our bird populations: the 5th Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and 2nd IUCN Red List assessment of extinction risk for Great Britain*. British Birds, 114: 723–747.

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		The focus of the breeding bird assessment was on the potential impact of habitat loss and disturbance on breeding birds. The collision risk assessment is detailed in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and specifically in **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]**. This assessment covers the passage period when birds are most likely to flock together, including during the post-breeding period. The habitat across the Order Limits is primarily farmland, and it was considered that the main species present would be farmland passerines. The risk of collision to such species is considered low, particularly during the breeding season. Passerines are manoeuvrable in flight and in general, likely to fly at low levels while breeding and feeding young. A desk-based study (including habitat assessments and a review of available third-party reports and bird records) identified areas for breeding bird surveys. Where breeding bird surveys were carried out, results did not identify collision risk as a concern. The survey scope was agreed with Natural England and other stakeholders through the consultation. A comprehensive desk study was completed. Bird records were obtained 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 which is broadly similar to the species listed within the referenced 2023 report. The breeding bird report filters these records down to records made during the breeding season and presents their distribution within a map.
Ecology and Biodiversity	**Appendix 17 – DCO Notes** *[Provides comments on aspects of the DCO application, including public rights of way, bird strikes and ecology/habitats.]*	The Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**, is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRoWs would be closed without a diversion in place and no severance of the overall network is anticipated. Where PRoWs are affected, any necessary diversions and associated time periods have been kept as short as possible, with many diversions expected to be required for only a few days or weeks within the wider construction programme. Impacts, management proposals and indicative durations for each affected PRoW are contained in **7.9 Outline Public Rights of Way Management Plan [APP-329]** and will be developed further into detailed, site-specific management measures and temporary diversions by the Applicant and its Main Works Contractor, based on detailed design information. These will be discussed with PRoW Officers at the relevant Local Highway Authorities during preparation of the final **7.6 Outline Public Rights of Way Management Plan [APP-329]** and will be supported by Road Safety Audits where required. The final **7.6 Outline Public Rights of Way Management Plan [APP-329]** will be submitted to, and approved by, the relevant planning authority. Where PRoWs interact with haul roads or construction activities, appropriate safety measures such as signage, speed controls, physical segregation where required, and contractor-managed crossings will be implemented in line with **7.6 Outline Public Rights of Way Management Plan [APP-329]**. Advance signage and communication will be provided to ensure users are fully informed, and temporary PRoW closures and diversions will be coordinated with other local works to avoid concurrent impacts. All PRoWs will be reinstated as soon as practicable to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys. Notwithstanding the above, the Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRoW management arrangements are developed. The Applicant notes the comments provided list references to bird strikes through various reports submitted as part of the Norwich to Tilbury development consent application. A number of bird strikes attributed to overhead lines at Dungeness are also noted in the relevant representation together with the conclusion 'to eliminate bird fatalities from electrocution, the cables need to go underground or under the sea'. The Dungeness site is situated on a headland along the coast and borders a Special Protection Area (SPA) designated for internationally important numbers of birds. It is also situated within the vicinity of a bird observatory and a large RSPB wetland nature reserve, which provide important wintering grounds and passage routes for birds. The Norwich to Tilbury Project is located significantly further inland than the Dungeness site, with route design allowing sufficient distance from European Sites. The Project is located outside the Impact Risk Zone for the majority of European Sites along the coast, therefore only the Stour and Orwell Estuaries SPA / Ramsar Site and the Thames Estuary

Topic	Comment	National Grid's response
		and Marshes SPA / Ramsar Site (located 3.1 km and 1.7 km from the Project respectively) were taken forward to Stage 1 Screening of **5.3 Habitats Regulations Assessment Report [APP-082]**. 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]**. A wintering and passage bird scope was produced (which detailed vantage point surveys to determine collision risk) and agreed with Natural England. Wintering / passage bird surveys were subsequently undertaken to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitat along the estuaries / coast and inland habitat or cause mortality along such routes. The assessment did not identify locations which pose notable collision concern. On a precautionary basis mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at the River Waveney and Ardleigh Reservoir as detailed in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Please refer to the Applicant's response to paragraphs 2.1 to 2.9 of this RR, above, regarding consideration of alternatives, including offshore and underground connections
Alternatives	**Appendix 18 - OCSS Review** *[A 2025 report reviewing the Offshore Coordination Support Scheme (OCSS), concluding that the OCSS ended prematurely and did not sufficiently explore viable coordination options.]*	Government sets the policy and regulatory framework that the Applicant operates within and has commissioned various studies to improve efficiency and collaboration between offshore generation projects. It has considered the connection demands and published its conclusions including on the Offshore Coordination Support Scheme. Our response to the outcome of those studies is set out in **5.15 Design Development Report [APP-122]** from paragraphs 2.3.1.
Alternatives	**Appendix 19 - Inadequate consideration of alternatives** *[Raises concerns that the scheme as presented at the 2024 Statutory Consultation was inadequate in its consideration o and consultation on alternatives, and that the appraisal of alternative did not sufficiently adhere to the Treasury Green Book, as is legally required.]*	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 DCO application, This includes **Statement of Reasons - Appendix A - Compulsory Acquisition Schedule [APP-060]**, **5.15 Design Development Report [APP-122]** and **[APP-355 to APP-360]**. Alternatives in the context of the EIA Regulations have been described in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. Additionally, chapter 2 of **5.15 Design Development Report [APP-122]** sets out why we consult on a single project. We do present the alternatives and reasons for our preferences but it would be disingenuous to present alternatives by way of a choice in circumstances where the alternative fails to meet our duties. The Applicant has provided a further response regarding its compliant approach to consultation in response to Appendix 6 of the RR, above.
Planning Policy	**Appendix 20 - Critical National Priority Infrastructure**	The Applicant has reviewed the appendix and has sought to respond to specific points regarding CNP policy in detail below. Points made in the appendix regarding the needs case and alternatives, which reflect or repeat those made in the main RR, are considered above in this table.
Planning Policy	1.1. We agree that the East Anglian grid will need reinforcement over the coming years to contend with the additional generation capacity in the North Sea and some interconnectors, and concur that 'Norwich to Tilbury' meets the Critical National Priority (CNP) definition set out in National Policy Statement (NPS) EN-1.	The Applicant notes the agreement of Pylons East Anglia Ltd that the Project is Critical National Priority infrastructure as defined in NPS EN-1.
Planning Policy	1.4. We are also not in agreement that CNP status provides a get-out-of-jail free card that allows National Grid to fail to consult lawfully, to neglect alternatives that cause less societal, economic and environmental harm while still meeting need, to under-estimate the harms caused by the Norwich to Tilbury project and to fail to adhere to Treasury Green Book guidance. 1.5. Even IF Norwich to Tilbury is considered to be a CNP project, it remains the case that National Grid must still balance other factors, and we present evidence to demonstrate that it has not done so.	With regard to legally compliant consultation, please see the Applicant's response to paragraph 1.3.1 and Appendix 6 n this table. With regard to comments on the Green Book, please see the Applicant's response to additional Appendix 3 below. The Applicant can confirm that all legal duties on it have been fully complied with. The Applicant is not seeking to circumvent legal duties off the back of CNP (or any other) policy. Policy supports the Applicant's approach beyond the legal requirements as already met. Furthermore, the Planning Act 2008 legally requires applications to be determined in accordance with relevant policy. The Applicant recognises that under CNP policy, there remains an overall planning balance that must be considered. The Applicant provides a summary of this planning balance in Chapter 8 of the **5.6 Planning Statement [APP-085]** in accordance with the NPS EN-1 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects.

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		Pursuant to 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-145]** and **5.6 Planning Statement [APP-085]**. EN-1 paragraph 4.1.7 provides *'… 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'.* 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 of the Project 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.
Planning Policy	1.6. NPS EN-1 says, the below, of CNP – bold is our emphasis: "*1.1.6 To support the above, the network must be effectively planned to ensure that the appropriate investment and **right kind of technology** is brought online at the **right time**, in the **right places***." 1.7. This does not support any claim that overhead lines must be built between Norwich & Tilbury.	Critical National Priority references cannot be taken in isolation and must be considered in the context of NPS EN-1 (2024) and EN5 (2024) and our duties under other legislation including the Electricity Act 1989 and the Planning Act 2008. These variously identify the strong starting presumption for the use of overhead line for new electricity connections, the need to be economic and provide an emphasis on meeting legally binding connection dates. The Applicant considers the Project as submitted to meet these requirements.
	"*1.1.7 To facilitate this, strategic network planning exercises set out to ensure strategic and co ordinated onshore and offshore transmission network planning, considering the networks as a whole, with individual transmission projects subsequently brought forward in line with these network designs.*" 1.7. This demonstrates that National Grid's Norwich to Tilbury approach is a relic of a previous planning era, and that National Grid has neither adapted its proposal following stakeholder feedback, nor adjusted it to address changes to planning policy, both of which it should have done. Coordination is given great emphasis in the NPS's for the reason that it reduces costs, reduces infrastructure and reduces harm. 1.8. By refusing to coordinate, and by perpetuating the piecemeal/radial model, not only is National Grid behind the times in planning terms, but also guilty of causing enormously significant cumulative harm to East Anglia's landscapes, environment, heritage, communities and businesses. To put it bluntly, the scale of harm caused by National Grid's failure to coordinate infrastructure is off the scale.	The Project has been subject to strategic network exercises such as the Holistic Network Design (HND) and therefore has been subject to strategic network planning. National Grid is also engaged in the Strategic Spatial Energy Plan (SSEP) and Centralised Strategic Network Plan (CSNP) exercises. The **7.17 Strategic Options Backcheck Review [APP-335]** submitted as part of this Development Consent Order (DCO) application sets out the Network Options Assessment (NOA) and HND recommendations as well as confirming National Energy Systems Operator (NESO) is currently transitioning from the NOA to a more comprehensive approach through the Centralised Strategic Network Plan (CSNP). Further to the extensive work carried out we are now at a stage where the Project is identified as critical to delivering a network which supports the 2030 clean power pathways.
Planning Policy	1.10. NPS EN-1 says the following of CNP infrastructure: "*3.3.63 **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*	The Applicant has produced a DCO application that is compliant with relevant statutory requirements and its duties under the Electricity Act 1989 and the Planning Act 2008. Section 2 of the **Planning Statement [APP-085**] sets out the legislative and policy framework relevant to the Project in more detail. The Applicant has set out in paragraphs 3.1.24 to 3.1.30 of the Planning Statement **Planning Statement [APP-085]** how CNP policy applies to the Project, including paragraph 3.3.63.

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	hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible." 1.11. Key to this paragraph is 'subject to any legal requirements', and our various submissions address the legal issues of the N2T DCO.	
Planning Policy	1.12. We support the delivery of the right CNP infrastructure at a pace. When it comes to speed of delivery, however, if National Grid was really interested in rapid delivery, it would be seeking to install underground HVDC cables. For this, there is no legal requirement under the Planning Act 2008 for a DCO at all. National Grid has access to over one-third of the world's HVDC cables, more than it requires for specified projects, and its supplier is ramping up production. It is not the case, as National Grid told then ESO, that it could not build N2T using HVDC until 2034 due to supply chain issues with HVDC cables. 1.13. Moreover, 3.*3.64 Other novel technologies or processes may emerge during the life of this NPS, which are nationally significant and can help deliver our energy objectives. Where these deliver on our objectives, then such technologies or processes can be regarded as needed, and as such should be given substantial weight*. 1.14. Since 2022 there have been two key changes, which National Grid has not factored in to project planning: • The UK approval of TS Conductor, a lightweight and ultra-strong conductor that can carry three times as much power than traditional cables. The use of these conductors should have been considered as follows: to upgrade existing towers and/or to reduce the number of and height of new towers. • HVDC undergrounding has been demonstrated by NESO1 to be a credible solution to meet need between Norwich and Tilbury.	The Applicant has set out why it has not progressed an entirely HVDC proposal in response to paragraphs 2.1, 2.2 and 2.7 of the RR above. The Applicant has responded in relation to the suggestion to consider TS Conductors in response to paragraph 2.3.2 of the RR above. The Applicant reiterates the strong starting presumption for the use of overhead line for new electricity connections under NPS EN-5 (2024). The Applicant is required to seek development consent for the Project under s14(1)(b) and s16 of the Planning Act 2008.
Planning Policy	2. The CNP presumption 2.1. *"4.1.7. 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**."* 2.2. ESNP submits evidence of: • - flood risk • - risk to human health • - very substantial harm to and loss of significance to heritage assets that are wholly exceptional;	The Applicant provides a detailed appraisal of Paragraph 4.1.7 of NPS EN-1 (2024) in section 7.2 of the **Planning Statement [APP-085]** (see paragraphs 7.2.2 to 7.2.29). This evidences the Project will not present an unacceptable risk to or unacceptable interference with those receptors or factors identified in paragraphs 4.1.7, including flood risk or risk to human health. In relation to heritage assets, the Applicant notes that this relates to paragraphs 4.2.16 - 4.2.17 of NPS EN-1 (2024) and not paragraph 4.1.7. The policy tests relating to paragraphs 4.2.16-17 of NPS EN-1 (2024) are appraised in paragraphs 7.2.52 to 7.2.57 of the **Planning Statement [APP-085].** Paragraphs 7.2.56 – 57 conclude, in relation to heritage assets specifically: *"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 (DESNZ, 2024) which treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances."* Paragraphs 7.2.54 to 7.2.55 of the **Planning Statement [APP-085]** specifically consider the impacts to Dedham Vale National Landscape. It demonstrates that exceptional circumstances therefore exist to justify the Project in the Dedham Vale National Landscape and setting, in accordance with paragraph 4.2.16 of the NPS.

Topic	Comment	National Grid's response
	2.3. We support the Dedham Vale Society in its argument that the Norwich to Tilbury project causes substantial harm to the Dedham Vale National Landscape. 2.4. The examination must consider these in detail.	Therefore, the areas highlighted by Pylons East Anglia Ltd as being non-policy compliant have clearly been addressed in the **Planning Statement [APP-085]** as part of its overall appraisal of compliance with relevant policy, including that relating to CNP infrastructure and the specific policy tests applied. As set out in the **Planning Statement [APP-085]** and summarised above, the Applicant concludes that the residual environmental effects of the Project 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.
Planning Policy	Section 3: The Need Case	The Applicant notes that the comments made in Section 3 of the Appendix reflect those of the main RR, and therefore are responded to in paragraphs 1.3.2 to 2.7 above.
Planning Policy	4.1. Hiorns concluded, in his report that, "delaying the decision to commit to a further network expansion of the East Anglia network whilst additional sensitivity studies are undertaken would not delay development of the offshore Wind generation projects and it would ensure risk of stranded investment in Transmission Assets are reduced. If this review concludes that there is a reduced need for additional transmission capacity out of the EC5 group, then the economics of the alternative HVDC solution compared to the OHL becomes more economical attractive." 4.2. Given the reduced generation/interconnector capacity since 2022 (and since the Hiorns report) it is even more essential that National Grid carries out up to date analysis of the need case for Norwich to Tilbury. 4.3. It is highly likely that need can be met with a lower capacity, and less harmful or costly solution, delivered with less haste to allow proper consideration of alternatives. 4.4. The Critical National Priority infrastructure label does not provide a 'get out of jail free' card, as demonstrated above.	The Applicant has responded to points regarding the Hiorns report and alternatives at paragraphs 1.3.2 to 2.5 of the RR. The Applicant has set out above that it does not consider CNP status to be a 'get out of jail free' card, and that careful appraisal of the Project against relevant CNP policy has been carried out and is evidenced in **5.6 Planning Statement [APP-085].** The Applicant concludes that the residual environmental effects of the Project 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.
Socio-economics Recreation and Tourism	**Appendix 21 – Norwich to Tilbury: The human impact** *[A 2024 report presenting resident testimonials and survey data stating that N2T would cause severe and widespread harm to mental health, property values, local businesses, wildlife habitats, livelihoods, and historic landscapes across Essex, Suffolk and Norfolk.]*	Socio-economic impacts (which include impacts on employment, the local economy, local businesses, community and tourism assets and on recreational activity) are assessed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. Where significant impacts relating to private assets have been identified, these are the subject of separate and ongoing discussions with the landowner regarding potential compensation and this matter falls outside the scope of the Environmental Impact Assessment (EIA). Impacts on property prices are discussed in paragraphs 15.3.4 to 15.3.16 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. The conclusion presented in paragraph 15.3.15 states that there is no evidence of any significant environmental effects on house prices as a result of the Project and that any effects of the Project on residential properties are potentially capable of being dealt with through statutory nuisance or compulsory purchase compensation regimes (subject to the requisite criteria being met), although it is noted that these fall outside of the EIA process. Impacts on mental health during both the construction and operational phases are assessed in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including historic landscapes. A comprehensive desk-based assessment and walkover have been undertaken (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**), along with archaeological evaluation (**6.11.A4 Environmental Statement Appendix 11.4: Geophysical Survey Results Report [APP-212], 6.11.A5: Environmental Statement Appendix 11.5 – Trial Trenching Results Report [APP-213], 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**). The impacts of the Project on the historic environment are assessed in **6.11 Environmental Statement Chapter 11 – Historic Environment [APP-208]**. The assessment considers the potential impact on historic landscapes. The proposals

Topic	Comment	National Grid's response
		in **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]** set out appropriate mitigation for historic landscapes. The Project has engaged with Historic England and relevant Local Planning Authorities on aspects relating to heritage, including methodology for assessment and appropriate mitigation measures and to take their views into account during Project development, which are detailed in **6.11 Environmental Statement Chapter 11 – Historic Environment [APP-208]** and in the relevant Statements of Common Ground (**5.9 Draft Statement of Common Ground [APP-089 to APP-100 and APP-102]**). All ecological impacts on habitats and protected species have been assessed in full within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on key ecological features such as designated sites, irreplaceable habitats, protected species, ecological connectivity and habitats/species of principal importance. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken over the 2022-2025 period. The findings of which informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats and species.
Ecology and Biodiversity	**Appendix 22 - Bird Collisions into Overhead Lines** *[Raises concern that N2T poses a significant risk to birds and criticises the exclusion of key habitats and species from surveys, suggesting that alternatives would cause significantly less environmental harm.]*	Industry good practice guidance was followed in determining Target and Secondary species for collision risk analysis, including NatureScot guidance on assessing impacts of power lines on birds (NatureScot, 2016), which recommends the same selection criteria as the guidance on bird survey methods to inform impact assessment of onshore wind farms (NatureScot, 2017 (updated in 2025)[139]). This guidance states passerine species are not generally considered to be significantly impacted by windfarms and overhead cables. A desk study was used to determine survey areas. This included a review of designated sites, a habitat review, and a review of bird records within 2 km of the Order Limits. Habitats of highest potential for birds of collision concern, and areas with hotspots of bird data (over 26,000 records obtained from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centre) were selected for survey. The survey scope was agreed with Natural England and other stakeholders as identified within **5.9.13 Draft Statement of Common Ground - Natural England [APP-101]** and the various Local Planning Authorities, as submitted at Deadline 1. Although passerines were not included in the collision risk assessment, all other species were assessed. These were included in the following groups: • Divers and grebes • Raptors and owls • Wildfowl • Waders • Bittern, heron, storks, spoonbills and egrets • Seabirds • Gulls and terns. As detailed in **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]**, the desk study was completed in September 2023 and updated in January 2024, using data from the British Trust for Ornithology, Royal Society for the Protection of Birds, and local record centres across Essex (Essex Field Club), Norfolk (Norfolk Biodiversity Information Centre) and Suffolk (Suffolk Biodiversity Information Service). Records were obtained covering the previous 10 years. It is stated iNaturalist data feed into the local records centre, and therefore the data referenced are included in the desk study.

[139] NatureScot (2025) Recommended bird survey methods to inform impact assessment of onshore wind farms.

Topic	Comment	National Grid's response
		The referenced extract is from the background section of **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]** and has been commented on in isolation. Operational effects including fragmentation and disturbance for the Project (including overhead and underground cable sections) are discussed in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. In addition, operational habitat loss, degradation, fragmentation and disturbance are assessed in **5.3 Habitats Regulations Assessment Report [APP-082]**. This includes overhead line sections in the vicinity of the Stour and Orwell Estuaries SPA / Ramsar Site and the Thames Estuary and Marshes SPA / Ramsar Site. With regard to suggested alternatives, please refer to the Applicant's response to paragraphs 2.1 to 2.9 of this RR, above which discusses how the Applicant considered alternatives, including offshore and underground connections.
Agriculture and Soils	**Appendix 23 – Soils** *[A 2025 report raising concern that N2T risks severe and long-lasting environmental harm through inadequate assessment of soil and farmland and outdated and imprecise soil classification methods. It concludes that there is a need for a more rigorous site-specific investigation and mitigation to prevent ecological damage, water contamination, and loss of agricultural productivity].*	As stated in **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139]**, the detailed Agricultural Land Classification (ALC) surveys were undertaken in line with the revised ALC guidelines[140] by competent soil scientists with the competencies as set out by the British Society of Soil Science[141]. The detailed ALC surveys did not identify the presence of jarosite in the soil, and in locations where desk-based information suggested a potential for acid sulphate soils, some of the soils were found to be moderately calcareous. There is no evidence to indicate the presence of actual or potential acid sulphate soils within the surveyed areas. Should any evidence of acid sulphate soils arise during construction, appropriate investigation and mitigation measures would be implemented in accordance with best practice. Organic-rich peaty soils were identified in the Waveney Valley during the ALC survey and a further, more detailed, survey was undertaken in the area to identify more information on these soils. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [AP-303]** details measures handling organic-rich soils during construction to prevent for any disturbance leading to its degradation with consequential environmental effects. These surveys (both ALC surveys and detailed peat surveys) have been undertaken in accordance with published guidelines and were designed to provide sufficient coverage of the soil characteristics as required to inform the impact assessment.
Historic Environment	**Additional Appendix 1 – Heritage survey results** *[This document compiles hundreds of resident submitted heritage survey responses describing how the proposed N2T infrastructure could impact historic buildings, landscapes, biodiversity, tranquillity, farmland, public enjoyment, and local communities.]*	The Applicant notes the content of Additional Appendix 1 – Heritage Survey Results. The approach to the assessment of heritage assets and the historic environment is set out in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** and associated appendices. The assessment is supported by walkover, setting and geophysical surveys as documented in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11.A4 Environmental Statement Appendix 11.4: Geophysical Survey Results Report [APP-212]**. Archaeological trial trench evaluation has also been undertaken for sections of the Project and is reported in **6.11.A5 Environmental Statement Appendix 11.5 – Trial Trenching Results Report [APP-213]** along with geoarchaeological and archaeological monitoring of GI works (**6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**). The 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]**). The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information **[AS-068 to AS-083]**. The Local Planning Authority Archaeological Advisors and Historic England are aware of and approved this approach to providing supplementary environmental information. At this stage approximately 3,000 trial trenches and 1,440 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

[140] Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification of England and Wales

[141] British Society of Soil Science (2018) Agricultural Land Classification (England and Wales) - Working with Soil – Professional Competency in Soil Science

Topic	Comment	National Grid's response
		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 results of the trial trenching undertaken for the Project have largely provided further detail and characterisation of areas of archaeology that were previously known through desk-based research and geophysical survey. 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. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** assesses impacts relating to visual amenity and also physical activity (for example use of recreational routes and areas of public open space). Assessment of impacts on community and recreational infrastructure is set out in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. Further detail of how impacts on PRoWs will be managed and mitigated is set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**. 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 up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Effects on landscape character are set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. This includes an assessment of the perceptual characteristics of the landscape, including tranquillity. Visual effects on local communities within 'Visual Receptor Areas' are set out in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment [APP-229]**.
Landscape and Visual	**Additional Appendix 2 – Viewpoints Resident Submitted** *[The document compiles hundreds of resident submitted viewpoints including the location and a description of the location e.g. footpath, heritage site, wildlife area, rural landscape etc. Also details how the proposed N2T route could cause adverse visual, environmental, heritage, recreational and economic impacts.]*	The approach to the selection of viewpoints for the Landscape and Visual Impact Assessment (LVIA) is set out in paragraph 13.4.11 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]**. Potential assessment viewpoints were selected, as advocated by GLVIA3[142] to represent a range of different receptors and views, in consultation with stakeholders including Local Planning Authorities as set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Viewpoint locations are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]**.
Needs Case	**Additional Appendix 3 - Green Book Analysis Calcs** [*An analysis comparing the mostly overhead HVAC N2T transmission proposal with a fully underground HVDC alternative. Quantifies lifetime power transfer costs, community and government benefits, natural capital and property value impacts, construction requirements, and business disruption to show the relative economic, social and environmental impacts of each option*.]	The Applicant has responded with regard to consideration of HM Treasury Green Book[143] in response 9-2.267 in the Consultation Report (**5.1 Consultation Report [APP-066]**): National Grid is confident that the process we follow to identify and then assess potential strategic options is robust and the most appropriate. This has been tried and tested through numerous previous projects, the formal examination process and ultimately decided by the relevant Secretary of State. The Treasury Green Book provides guidance on the interpretation by public servants of public spending, assets and resources for projects, policies and spend from the public purse. That is not relevant for National Grid Electricity Transmission (NGET). There is no requirement in the Planning Act 2008 for developers to have to submit a Treasury Green Book assessment as part of a Development Consent Order (DCO) application. NGET is an Ofgem regulated business, with obligations to consider customer, environmental and other considerations as outlined in the Electricity Act 1989 and in its licence commitments. Consideration of the costs of a project and the funding it should receive via the regulatory settlement is the subject of a separate regulatory process, and it is not appropriate for the Planning Inspectorate, Examining Authority or the Secretary of State in their remit under the Planning Act 2008 to seek to duplicate other regimes.

[142] Landscape Institute (2013) Guidelines for Landscape and Visual Impact Assessment (GLVIA3)

[143] HM Treasury (2026) The Green Book – UK Government Guidance on Appraisal

Appendix AA.
South Norfolk District Council

nationalgrid

Appendix AA
South Norfolk District Council

South Norfolk District Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the Relevant Representation (RR) **[RR-3417]** provided by South Norfolk District Council.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 **(5.9.5 Draft Statement of Common Ground - South Norfolk District Council [Revision B]),** which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table AA1.1 Summary of comments and National Grid's response

Topic	Comments	National Grid's response
Landscape and visual	3.1.3 Key concerns include 3.1.3.1. Significant visual intrusion from tall pylons in open Countryside.	Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].** The Applicant's response on the application of the National Policy Statement (NPS) framework to residual effects is set out in more detail in response to paragraph 5.1 below.
Historic environment	3.1.3.2. Significant adverse impacts on multiple listed buildings and historic farmsteads.	**6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** provides an assessment of the Projects likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets. **Paragraph 7.2.57 of 5.6 Planning Statement [APP-85]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. 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. Para 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. The Applicant has responded in greater detail to the Council's specific points on heritage as relevant in paragraphs below.

Topic	Comments	National Grid's response
Ecology and biodiversity	3.1.3.3. Loss of, and significant implications for, hedgerows and trees (including veterans), with implications for ecology and local Amenity.	Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, sought seeking to reduce, as far as practicable, potential impacts on hedgerows and trees. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken over the 2022-2025 period. The findings of which have informed the design and approach to mitigation. The **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and the **7.2 Outline Code of Construction Practice [APP-300]** contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats and species and mitigation measures as appropriate. The Environment Act 2021 introduces a mandatory requirement for 10 % Biodiversity Net Gain (BNG) for new Development Consent Order (DCO) developments (which is not yet in force and expected May 2026). The Applicant has committed to deliver 10 % BNG with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. Further detail on BNG is available in the **7.1 Biodiversity Net Gain Report [APP-299].**
General	5.1. Before considering detailed drafting, it is essential to emphasise that the applicant's planning documents identify substantial and significant harms associated with this project. These harms are by virtue of the nature of the development and its location and must be given very significant weight in the planning balance. Key harms include: 5.2.1. Landscape and Visual Effects: Introduction of large-scale pylons and overhead lines into sensitive rural landscapes, causing permanent change to character and views. 5.2.2. Heritage Impact: Adverse effects on the setting of multiple designated heritage assets, including Grade I and Grade II* listed buildings, with harm assessed as "less than substantial" but at the mid to high end of that scale. 5.2.3. Ecological Impact: Loss and fragmentation of habitats, with potential impacts on protected species and biodiversity. 5.2.4. Agricultural Land Loss: Permanent and temporary loss of productive farmland including BMVL, affecting rural economy. 5.2.5. Residential Amenity: Noise, visual intrusion and disruption during construction and operation. 5.3. These harms are not minor or incidental. They represent a degree of harm that arises from the fundamental nature of the project and its route selection. They must be accorded very significant weight in the overall planning balance. For the most part the assessment of harms in the application documents is accepted and adopted. The reason for highlighting the harms is to ensure that the very significant harms of the project are properly acknowledged and weighed in the balance.	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 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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-145]** and **5.6 Planning Statement [APP-085].** EN-1 paragraph 4.1.7 provides *'… 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'*. 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 South Norfolk District 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. All mitigation relied upon within the assessments in the Environmental Statement (ES) is summarised in each environmental topic chapter [**APP-138; APP-147; APP-158; APP-181; APP-192; APP-208; APP-221; APP-226; APP-256; APP-265 and APP-271].** The Applicant considers it is the ES and relevant National Policy Statements (NPSs (EN1 and EN-5 (2024)) that set out the level of detail and consideration required for drafting this part of the Development Consent Order. As a point of clarification regarding paragraph 5.2.2, the assessment presented in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** identified less than substantial harm at the lower and mid part of the range, rather than mid – upper part of the range.
Draft DCO	5.5.1. Management plans currently provided only in outline form; full details should be secured through separate requirements with adequate parameters to ensure that which is proposed is delivered with only scope for minor inconsequential variations	Requirement 4 of **3.1 Draft Development Consent Order [APP-056]** requires detailed plans to be substantially in accordance with the outline plans, which limits the scope for the Applicant to make anything more than minor variations.

Topic	Comments	National Grid's response
		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 [APP-300]** 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.
Draft DCO	5.5.2. Proposed period for Council to discharge requirements of 28 days is wholly inadequate, is unjustified when judged against statutory norms in this and other contexts (8–16 weeks) and is particularly inadequate given the need for consultation with prescribed bodies	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 Net Zero Target of 2030, is not unnecessarily delayed by means outside the Applicant's control. A decision period of 8-16 weeks would be wholly disproportionate for the nature of the applications in question. 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. In each instance, **3.1 Draft Development Consent Order [APP-056]** allows for the relevant decision-making authority and the undertaker to agree '*such other period*' as may be appropriate in the circumstances. Likewise, 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 Applicant is committed to continued meaningful and proactive engagement with host Local Authorities and statutory consultees to support the efficient and timely determination of post consent submissions. The discharge of DCO Requirements will build directly on the extensive pre-application engagement and the Examination process, through which the principle, scope and controls for the Project will have been thoroughly considered. By the point of consent, the intention is that the Requirements, the parameters of the authorised development, and the mitigation framework secured through the DCO and Environmental Statement will be well understood and familiar to the relevant authorities. Post consent submissions will therefore focus on the detailed implementation of agreed measures, rather than introducing new concepts or untested mitigation. The Applicant will continue to engage with authorities to agree DCO Requirement pre-application ways of working, with an emphasis on draft document review to clarify expectations and reduce the likelihood of iterative amendments.
Draft DCO	5.5.3. Excessively, prescriptive deadlines (e.g., five days for consultees to identify further information) are impractical and risk poor decision-making.	The Applicant understands this comment to relate to Schedule 4 (Discharge of Requirements) of **3.1 Draft Development Consent Order [APP-056].** Given the Project's status as a project of critical national importance, the Applicant considers 5 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 1(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. 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. Please refer to our response

Topic	Comments	National Grid's response
		to paragraph 5.5.2 above for further detail as to how engagement with the relevant authorities will aid the discharge process.
Draft DCO	5.6. The harms identified in the application documents are substantial and significant. They must be given very significant weight in the planning balance. The DCO must include robust controls to ensure these harms are not compounded by inadequate drafting or procedural weaknesses.	Please refer to our response to paragraphs 5.1 to 5.3 of the SNDC RR above, in relation to residual effects and the planning balance, within the context of CNP policy. All mitigation relied upon within the assessments in the Environmental Statement (ES) is summarised in each environmental topic chapter **[APP-138; APP-147; APP-158; APP-181; APP-192; APP-208; APP-221; APP-226; APP-256; APP-265 and APP-271]**. The Applicant considers it is the ES and relevant National Policy Statements (NPSs (EN1 and EN-5 (2024)) that set out the level of detail and consideration required for drafting this part of the Development Consent Order. The Applicant has sought to robustly secure mitigation in the outline management plans which, in turn, is controlled by Requirement 4 of the **3.1 Draft Development Consent Order [APP056]**.
Historic environment	6.2. Under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, decision-makers must give special regard to preserving listed buildings and their settings. The Council agrees that proposed development would result in less than substantial harm to the significance of the heritage assets affected.	Noted.The assessment presented in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** identified less than substantial harm at the lower and mid part of the range. No substantial harm was identified in the Project assessment and in the Council's historic environment specific comments this is agreed.
Historic environment	6.3. Paragraph 212 of the National Planning Policy Framework (NPPF) requires that great weight be given to the asset's conservation, irrespective of the level of harm. Paragraph 213 NPPF further requires that this harm must be weighed against the public benefits of the proposal. In addition, paragraph 215 provides that this harm must be weighed against the public benefits of the proposal, including securing its optimum viable use. While the harm identified is less than substantial, it nevertheless should carry great weight in the decision-making process, as required by Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.	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. Nevertheless, both NPS EN-1 (2024) and NPPF indicate that where development would result in substantial harm, it is necessary to achieve substantial public benefits that outweigh that harm. Where less than substantial harm is identified, the degree of harm should be considered alongside any public benefits that can be delivered by development. Environmental appraisal has been an integral part of the Project design from the outset, which has meant that the Project has been able to avoid environmentally sensitive features, including heritage assets, as far as reasonably practicable. National Grid has also embedded measures into the design of the Project to avoid or reduce significant effects that may otherwise be experienced during construction and operation (and maintenance) of the Project. Both NPS EN-1 (2024) and NPPF require an assessment of harm to heritage significance. EN-1 and the NPPF further categorise that harm into 'substantial' and 'less than substantial'. The PPG which supports the NPPF heritage policies expects potential harm to designated heritage assets to be categorised as either less than substantial harm or substantial harm (which includes total loss) and that within each category of harm identified, the extent of the harm should be clearly articulated. **ES Appendix 11.7 [APP-215]** concludes that none of the harm is of so considerable a scale as to be classified as substantial harm. Paragraphs 5.9.28 to 5.9.30 of NPS EN-1 (2024) provide the loss of significance to designated heritage assets of highest significance should be 'wholly exceptional' and for Grade II listed buildings and registered park and gardens should be 'exceptional'. In considering the loss of significance, it is necessary for applicants to comply with the tests in Paragraph 5.9.31 to demonstrate to the SoS that the '….*loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss….'* The substantial public benefits and need for the Project, including contribution towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the medium and lower end of the spectrum, to the designated heritage assets. The potential for harm or loss of significance upon non-designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project providing the judgement required under paragraph 5.9.33 of NPS EN-1 (2024). Furthermore, the Project constitutes CNP Infrastructure under the NPS. The Applicant has set out the position of residual heritage impacts under CNP policy in response to paragraph 3.1.3.2 above.

Topic	Comments	National Grid's response
Historic environment	6.7. Five assets are considered by National Grid to experience moderate adverse significance of impact during operation, which should also be treated as significant: 6.7.1. Church of All Saints, Tibbenham (Grade I); 6.7.2. Church of Remigius (Grade I); 6.7.3. Kenningham Hall, Elm Farmhouse and Manor House (Grade II) 6.8 During the operational phase, the following assets are assessed as experiencing a mid-level of less than substantial harm: Flordon Hall, Heywood Manor, Elm Farmhouse and Manor Farmhouse. In addition, numerous other designated heritage assets are identified as experiencing a low level of less than substantial harm. 6.9. It is considered that Flordon Hall should be assessed as incurring a higher level of less than substantial harm than National Grid indicate. Furthermore, the following assets are assessed by the Council as experiencing a mid-level of less than substantial harm: Church of All Saints, Tibbenham; Church of St Remigius; Kenningham Hall; and Manor House.	Responses for each heritage asset provided in the responses that follow. The assessment has concluded that these assets would experience minor adverse significance of effects during operation as detailed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]**. Further responses to the individual assets are provided in the points that follow.
Historic environment	*Church of All Saints, Tibbenham (1049992) – Grade I (Sections 3.2.369 & 3.2.370)* 6.10.1 The baseline report states that the church's setting is informed by its roadside location within Tibbenham and nearby village assets. However, this underplays its prominence: the church's substantial tower is highly visible across the parish to the west, including from Manor House and Diss Road. Approaching from Mill Road, views of the tower reinforce the important status of the building within the parish. The front elevation of Manor House (1179387) appears deliberately designed with bay windows to capture views of the church across open fields. 6.10.2 While the report acknowledges that the setting extends to the order limits with views to the northwest, it fails to recognise the church's role as a landmark within the wider parish setting and the intervisibility between heritage assets, which will be significantly compromised by pylons and wires. Given the church's high grade and value, the impact should be assessed as moderate adverse significant of effect, equating to mid less than substantial harm, not "lower less than substantial" as currently stated	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 [APP-208]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[144]. As described in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]**, views to and from the asset from designated assets within its vicinity have been considered. Therefore, the conclusions of assessment for the Church of All Saints are considered to be appropriate.
Historic environment	*Church of Remigius (1050237) Grade I (3.2.403 & 3.2.404)* 6.11.1 The setting is informed by "its location on the northern edge of the Waveney Valley with views over the valley to the south." For much of its history the church was set within a rural location, and although there is urban development, the aspect to the south remains rural and well preserved. The pylons and wires	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 [APP-208]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[145]. **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

[144] Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition).

[145] Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition).

Topic	Comments	National Grid's response
	will have a significant and intrusive detrimental impact on the relationship of the church with its rural hinterland to the south that is well preserved, including views of the church from the Angles Way footpath. Although the assessment states that the setting makes a moderate contribution, this has taken into account the change to the rural setting to the north as part of the setting, however the setting to the south remains preserved and therefore continues to make a considerable contribution to the significance of the asset as the remaining well preserved element of the setting. There is moderate adverse significant of effect and therefore significant, and the level of harm should be mid less than substantial harm.	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 [APP-210]**) 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.
Historic environment	*Kenningham Hall (1373056) – Grade II (Section 3.2.472)* 6.12.1. During the operational phase, the proximity of industrial pylons will cause a significant visual intrusion into the hall's setting, which currently makes a considerable contribution to its value. Despite some vegetation, the scale and closeness of pylons and wires will remain highly visible from all directions. The impact should not be considered moderate adverse harm and significant and thus should equate to mid less than substantial harm and not low substantial harm.	The Applicant assumes that the comment should read *'The impact should ~~not~~ be considered moderate adverse harm...'*. 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 [APP-208]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[146]. The Applicant disagrees with the council and considers the current assessment to be appropriate.
Historic environment	*Elm Farmhouse (1373558) – Grade II (Sections 3.2.574 & 3.2.575)* 6.13.1. The farmhouse's setting is defined by its agricultural and rural context, which contributes considerably to its significance. The proximity of pylons and wires will substantially alter this setting, resulting in moderate adverse significant of effect and significant , not "minor adverse" as stated. The conclusion of mid less than substantial harm is appropriate. Note: Elm Farmhouse is located west of Hapton, not East.	The discrepancy between the Environmental Impact Assessment, as presented in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]** and the assessment of harm, as presented in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** and the incorrect compass direction have been addressed in **8.1 Errata List.** The assessment of harm now reads as follows: 'The Grade II Listed 'Elm Farmhouse' is located west of Hapton. During the operation phase, the Project would be partially within the setting of the medium value asset. The operation phase of the Project would impact the asset's setting through the introduction of pylons RG27-29, the closest of which (RG28) would be located c. 190 m north-north-west of the asset. The setting of the asset is informed by the surrounding agricultural landscape, with which the asset has a historical relationship and possibly ongoing functional relationship. The setting is further informed by the asset's surviving non-designated outbuildings to the east and west and which are recorded on the first edition OS map of 1884. The Project would impact the views of the agricultural landscape to the north-north-west (RG28) as the pylon would be visible above the hedgerow which defines the asset's garden, and to the south-west where pylon RG29 is located c. 220 m away. The Project would result in a small change to the setting of the asset resulting in a minor impact on its value. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm.' The Applicant considers the assessment of Elm Farmhouse to be appropriate.
Historic environment	*Manor House (1179387) – Grade II* 6.14.1. Currently assessed as "minor adverse" significant of effect and therefore not significant underestimates the importance of intervisibility with Tibbenham Church. The House's front elevation, including bay windows, appears deliberately oriented to capture views of the church tower across open fields. This design intention amplifies the significance of the relationship. The impact	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 [APP-208]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[147]. The assessment of Manor House (1179387) has been reviewed and the Applicant is confident in its Lower Less Than Substantial Harm assessment for Manor House (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**) and minor adverse (not significant) effect (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]**).

[146] Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition).

[147] Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition).

Topic	Comments	National Grid's response
	should be moderate adverse significance of effect, equating to mid less than substantial harm.	While the view from the asset back towards the bell tower of Church of All Saints (1049992) would include overhead wires should the Project go ahead the church is c. 1.3 km to the east of the asset and therefore a comparatively distant feature in views.
Historic environment	*Flordon Hall (1050698) – Grade II** 6.15.1. Flordon Hall's setting is informed by its agricultural landscape and historic farmyard. Built c.1600 by the Kemp family, its E-shaped plan facing East was a conscious design statement intended to be viewed across open farmland, particularly from Long Lane. The Tithe Map of c1840 shows the fields between Long Lane and Hall marked with K which can be taken as being owned by the Kemps and associated with the Hall. Pylons and wires, while not blocking views, will introduce a dominant presence, undermining this design intention. Given the asset's high grade and significance, the harm should be considered high less than substantial harm.	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 [APP-208]** and in accordance with professional heritage sector guidance The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)[148]. Should the Project go ahead, it would result in the addition of five pylons (RG19-RG23) within 1 km of the asset. The pylons would run on a north-east/south-west alignment from the north of the asset (RG19) to the south-west of the asset (RG23). At its nearest point (RG21) the Project would be c. 270 m to the north-west of the asset. It is acknowledged that the Project would traverse farmland still likely associated with the Hall and associated farmstead. As described in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** the intervening landscape between the asset and Project includes buildings, copses, and mature tree-lined hedgerows that would interrupt and break up the views from the asset towards the Project. The principal elevation of the asset faces east, and views eastwards would not include or be impacted by the Project. Nor would the Project impact the asset's relationship and intervisibility with the Farmstead and its two Grade II listed elements (Piggery 60 Yards South of Flordon Hall (1172231) and Barn to Flordon Hall (1373055)). The asset can be viewed from Long Lane c. 480 m to the south-east, and this view would potentially include the top of pylons RG21 and RG22 cresting above mature tree-lined hedgerows and copses to the north-west of the asset. The Applicant is, therefore, confident in its assessment that the Project would cause a low adverse magnitude of impact prior to mitigation resulting in a direct, permanent moderate adverse significance of effect (significant). The Applicant is also confident in its conclusion that the asset would experience Mid Less Than Substantial Harm. This is because the Upper Less Than Substantial Harm category requires: '...*changes within the setting of the designated asset (or elements of its setting) that contribute to its value would significantly alter a large proportion of the setting of the asset that contributes to its value*.', as set out in the methodology which was informed by PPG paragraph 18 (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). The Applicant is confident the level of harm to the asset does not meet this threshold.
Historic environment	*Planning Balance* 6.17.1. Moderate adverse impacts are significant and must be given substantial weight in the planning balance. Even where the magnitude of impact is categorised as low, noticeable changes to the setting justify classification as moderate adverse harm. These effects represent a meaningful level of harm to heritage assets and require robust mitigation and precise DCO requirements to ensure impacts are not worsened during detailed design.	The Applicant has provided a response in relation to the overall planning balance and residual heritage impacts at paragraph 3.1.3.2. of the RR, as above in this table. All mitigation relied upon within the assessments in the Environmental Statement (ES) is summarised in each environmental topic chapter **[APP-138; APP-147; APP-158; APP-181; APP-192; APP-208; APP-221; APP-226; APP-256; APP-265 and APP-271]**. The Applicant considers it is the ES and relevant National Policy Statements (NPSs (EN1 and EN-5 (2024)) that set out the level of detail and consideration required for drafting this part of the Development Consent Order.
Landscape and visual	7.1. Chapter 13 of the Environmental Statement provides a comprehensive assessment of potential landscape and visual effects. Given the scale and nature of the project, it is unsurprising that the assessment concludes there will be residual significant adverse effects on landscape character and visual amenity. The Council acknowledges that, within South Norfolk, there are no routing options that would avoid such effects.	The Applicant notes this comment.

[148] Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition).

Topic	Comments	National Grid's response
Landscape and visual	7.2. Paragraph 13.6.6 – LV02 proposes: "Pre-construction condition surveys will be undertaken during the construction period…" This appears contradictory and requires clarification.	Paragraph 13.6.6 in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** erroneously states that pre-condition surveys will be undertaken during construction. Commitment LV02 in Table 6.1 of **7.2 Outline Code of Construction Practice [APP-300]** contains the correct wording: '*Pre-construction condition surveys will be undertaken prior to the construction period to ensure appropriate reinstatement is undertaken. These will identify and record the condition of features such as trees, woodland, hedgerows, walls and fences that are to be reinstated. The surveys will comprise photographic, descriptive, and locational baseline evidence*.' Paragraph 13.6.6 in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] has been corrected in 8.1 Errata List.**
Landscape and visual	7.3. Paragraph 13.8.1 – Reinstated habitats are proposed to be monitored for only five years. The Council requests this period be extended to 10 years, consistent with other DCOs and local planning permissions, with management continuing for the lifetime of the scheme.	Monitoring of reinstated habitats will be undertaken over a five-year period as set out in the Outline Landscape and Ecological Management Plan (LEMP) **(7.4 Outline Landscape and Ecological Management Plan [AS-046])**. This period is considered sufficient to ensure successful establishment. Further specific details on monitoring (including who will undertake the monitoring) would be agreed with the relevant Local Planning Authority as part of the discharge of the final LEMP under Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**.
Ecology and biodiversity	7.4. Document 6.13.A6 (Arboricultural Impact Assessment) confirms the loss of irreplaceable habitat, including four veteran trees, even after mitigation. This is assessed as major adverse and significant. The Council has the following concerns: 7.4.1. No list of abbreviations is provided, making interpretation difficult;	7.4. Comment is noted 7.4.1. A list of abbreviations is provided on Page 22 of **6.13.A6 Env Statement Appendix 13.6 Arboricultural Impact Assessment [APP-236]**
Ecology and biodiversity	7.4.2. the Arboriculture Impacts Plan (Figure A13.6.1) does not reference all trees, thus preventing accurate cross-checking;	The figures in Annex D of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** references the high and moderate value trees matching those in the tree schedule of Annex C. Trees have been surveyed in line with the Scoping Report (**6.19 Scoping Report - including appendices B to K [APP-296]**). Low value trees (C grade) have been reported as canopy area and do not have individual tree reference numbers.
Ecology and biodiversity	7.4.3. Veteran trees affected are not clearly identified in the Outline Landscape and Ecological Management Plan (OLEMP) - Document Reference 7.4;	Veteran trees are included within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**.
Ecology and biodiversity	7.4.4. There appears to have been no consideration of canopy spread or overhead constraints when designing temporary access routes with the consequent potential for more loss than currently stated;	Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** 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 will take further account of tree canopies and overall tree size. This is recorded as commitment GG14 in **7.2 Outline Code of Construction Practice [APP-300]**.
Ecology and biodiversity	7.4.5. Lack of explanation for need for tree removal (e.g., pylon footprint or clearance requirements);	The figures in Annex D of **Environmental Statement Appendix 6.13.A6 Arboricultural Impact Assessment [APP-236]** show the current design information for which the arboricultural impacts assessment was made. The explanation of the arboricultural assessment can be found in Section 13 of **6.13.A6 Arboricultural Impact Assessment [APP-236]**
Ecology and biodiversity	7.4.6. No schedule explaining removal rationale or category for "removed but replanted," particularly for hedgerows and there should be a category setting this out in the AIA;	The rationale and detail for replanting is contained within **7.4 Outline Landscape and Management Plan [AS-046]**
Ecology and biodiversity	7.4.7. No evidence that arboricultural data informed scheme design or that adjustments were made to avoid harm. For example, it is unclear why the proposed route alignment cannot be modified to provide full protection for the TPO-designated veteran tree (TPO reference SN0697);	The Project has continually considered the impact of trees and hedgerows through the development of the Project design. Application document **5.15 Design Development Report [APP-122]** (and **7.20 2023 - Design Development Report for the Project [APP358]** and **7.21 2024 - Design Development Report for the Project (APP-359]** refer to changes made to the Project design in response to consultation feedback and design changes in response to engineering and environmental surveys and assessment, including in respect to arboriculture. The TPO SN0697 veteran tree located in overhead line span RG22-RG23 is located on the edge of the limits of deviation and has therefore been identified as potentially affected. It has not been completely avoided as to do so

Topic	Comments	National Grid's response
		would move the overhead line south east potentially changing the impact on two other veteran trees in spans RG20 to RG21 and TG22 to RG23. At detailed design the Contractors will seek to deliver the overhead line as per its proposed alignment whereby all three veteran trees remain unaffected as per commitment B08 in **7.2 Outline Code of Construction Practice [APP-300]**
Ecology and biodiversity	7.4.8. Temporary works areas appear excessive in places, risking unnecessary removal of trees e.g. in the vicinity of proposed pylon RG82 on page 45 of document reference 6.13.A6.F1;	7.4.8. The assumed worst-case vegetation removal/management is detailed within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130].**
Ecology and biodiversity	7.4.9. Existing Tree Preservation Order (Stoke Holy Cross TPO 1967 No. 4) is not shown on the plans;	7.4.9. Information on TPOs is included in **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**.
Ecology and biodiversity	7.4.10. Veteran trees marked as "potentially affected" – no indication of measures to avoid impact are provided;	7.4.10. Veteran trees are included within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** Measures to avoid/mitigate impacts to all trees (including veterans) is a Project commitment LV05 in **7.2 Outline Code of Construction Practice [APP-300]**.
Ecology and biodiversity	7.4.11. Criteria for tree retention versus removal in the final plans to be approved under requirements are unclear.	During detailed design vegetation removal/retention will be further assessed with measures to avoid/mitigate impacts to trees detailed within an Arboricultural Method Statement (AMS) to be approved by relevant Local Planning Authorities prior to constrcution commencement. **7.2 Outline Code of Construction Practice [APP-300]** includes various references to an AMS.
Ecology and biodiversity	7.5. Document 6.8.A3 states that hedgerow surveys were limited to those meeting certain criteria (species-rich, bluebell presence, protected lane, parish boundary). This approach may exclude hedgerows important for historic reasons (e.g. pre-enclosure field systems).	**6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]** assesses the ecological aspect of The Hedgerows Regulations 1997. The heritage aspect of The Hedgerows Regulations 1997 is assessed separately within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]**. All important hedgerows affected by the Project for ecological and historic reasons are shown on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**.
Ecology and biodiversity	7.6. The term "protected lane" is undefined and appears to be sometimes inconsistently referred to as "Old Lane" in the summary tables.	The term 'Old Lane' is not used in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** or associated appendices. 'Protected Lanes' are referred to in the heritage documents where these have been defined by the Local Planning Authority.
Ecology and biodiversity	7.7. Plans only show "potentially important hedgerows not chosen for survey" which is inadequate for Examination purposes. It is not clear why National Grid have been selective about the surveys undertaken and no justification has been provided. The Council is concerned that the full implications for important hedgerows have therefore not been assessed and that this information is essential to inform the Examination.	A Hedgerows Regulations Assessment was undertaken at hedgerows across the Project that met the criteria outlined within **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**. Potentially important hedgerows are considered important on a precautionary basis. However, whether or not a hedgerow is 'important' under The Hedgerows Regulations 1997 does not materially affect the impact assessment as all hedgerows are considered to be Habitats of Principal Importance for the conservation of biodiversity, and therefore all are considered ecological receptors of high value. Any loss of hedgerow (including any important hedgerows) would be mitigated with replacement planting on completion of construction. All hedgerows have been surveyed to inform the Biodiversity Net Gain assessment and replanting approach.
Ecology and biodiversity	7.8. Outline Landscape and Ecology Management Plan (Document Reference 7.4): 7.8.1. Section 7.1.2 – it is not explained how the Arboricultural Method Statement (AMS) will be agreed. This should this be secured through a specific requirement;	Paragraph 7.1.2 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** confirms that the AMS is to be agreed with the relevant Local Planning Authorities. Under Requirement 4 of the DCO, the Applicant is required to comply with the Outline LEMP, and any subsequent LEMP developed in accordance with the Outline LEMP.
Ecology and biodiversity	7.8.2. Section 7.3 – Tree canopies may require inclusion within fenced protection areas but this is not addressed in the OLEMP or Arboricultural Impact Assessment;	Tree canopies would form part of an Arboricultural Method Statement following detailed design. Paragraph 13.4.14 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** confirms that an Arboricultural Method Statement (with Tree Protection Plan) would be provided prior to construction activities commencing and agreed with the Local Planning Authorities. The commitment is also confirmed within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Commitment LV05 of **7.2 Outline Code of Construction Practice [APP-300]** confirms that relevant tree protective principles would be detailed within an Arboricultural Method Statement.

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Ecology and biodiversity	7.8.3. Section 7.5.14 – Heading suggests uncertainty regarding removal of four veteran trees. Clarification is required;	**6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** provides a worst-case assessment of tree impacts. During and following detailed design, impacts would be confirmed. The heading reference to 'Potentially Removed' is therefore appropriate at this stage. Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable. This is also recorded as commitment GG14 in **7.2 Outline Code of Construction Practice [APP-300]**.
Ecology and biodiversity	7.8.4. Section 7.6.1 – Confirmation is required as to whether all "important" hedgerows have been identified – it appears to the Council that there may be systemic omissions of particular categories (see above) and failure to identify or survey potentially important hedgerows;	A Hedgerows Regulations Assessment was undertaken at hedgerows across the Project that met the criteria outlined within **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**. Potentially important hedgerows are considered important on a precautionary basis, ensuring all important hedgerows have been identified. However, whether or not a hedgerow is 'important' under The Hedgerows Regulations 1997 does not materially affect the impact assessment as all hedgerows are considered to be Habitats of Principal Importance for the conservation of biodiversity, and therefore all are considered ecological receptors of high value. Any loss of hedgerow (including any important hedgerows) would be mitigated with replacement planting on completion of construction. All hedgerows have been surveyed to inform the Biodiversity Net Gain assessment and replanting approach. All important hedgerows affected by the Project for ecological and historic reasons are shown on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**.
Ecology and biodiversity	7.8.5. Section 8.1.1 – General authorisation to remove vegetation identified as "potentially affected" is inappropriate because it is ambiguous, too general and leaves the interpretation for National Grid's decision resulting in a lack of clarity for enforcement purposes;	As stated within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** the 'potentially affected' category includes allowances for changes to vegetation loss due to design flexibility within the Limits of Deviation. It is not expected that the overall amount of vegetation to be removed would be significantly different, but the location of impact may change slightly (within the Limits of Deviation) to account for detailed design. This approach to vegetation loss was accepted on the Applicant's Hinkley Point C Connection Project and Yorkshire Green Energy Enablement Project. There are numerous commitments set out in **7.2 Outline Code of Construction Practice [APP-300]** that seek to minimise impacts to vegetation, for example commitment B13 states *'There will be a refinement post-consent, that within the provisions of the* [**7.4 Outline Landscape and Ecological Management Plan [AS-046]**] *aims to further reduce vegetation losses prior to pre-commencement*'.'
Ecology and biodiversity	7.8.6. Section 8.2.2 – Micro-siting haul roads to avoid mature trees depends on DCO boundary flexibility; RPAs and canopies must be considered now to ensure that the haul roads and other construction infrastructure can be accommodated within the DCO limits without unnecessarily impacting RPAs and canopies and in such a way as to provide root and canopy protection;	Tree canopies will form part of an Arboricultural Method Statement following detailed design. Paragraph 13.4.14 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** confirms that an Arboricultural Method Statement (with Tree Protection Plan) will be provided prior to construction activities commencing and agreed with the Local Planning Authorities. This commitment is confirmed within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Annex D of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** shows the extent of tree canopies and root protection areas which would inform detailed design.
Ecology and biodiversity	7.8.7. Section 9.3.1 – The Council has been discussing long-term replacement of trees that cannot be replaced like for like. If reinstatement tree planting upon decommissioning is accepted, this should be included in section 9.3 of the OLEMP;	The Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]** which is secured by Requirement 4 within the **3.1 Draft Development Consent Order [APP-056].** Details of on-site tree planting will be provided in accordance with the final Landscape Ecological Management Plan (if provided within Environmental Areas) or the Reinstatement Planting Plan secured under a separate requirement of the **3.1 Draft Development Consent Order [APP-056].** The Project will prioritise the replanting for individual trees within the Order Limits, however off-site provision may be required. Any off-site tree planting required as a result of this commitment will be secured via a legal agreement. There are currently no specific plans to decommission the Project. It is expected that the transmission of electricity would continue for as long as there is a business case for doing so and that any decommissioning activity would occur decades into the future. To date, relatively few transmission projects have been decommissioned since the main expansion of such infrastructure in the 1950s and 1960s.

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Ecology and biodiversity	7.8.8. Section 9.4 – Any existing hedgerows, currently in poor condition, that may have been removed should be reinstated to a high standard. The replacement hedgerow should fully address and fill all gaps resulting from its previous deterioration;	Hedgerow gap planting where appropriate within the Order Limits will be added to the next iteration of the **7.4 Outline Landscape and Ecological Management Plan [AS-046**] at Deadline 2..
Ecology and biodiversity	7.8.9. Section 10 – Impose a ten-year replacement period for failed planting, consistent with other DCOs (e.g. Hornsea Three Offshore Wind Farm Order 2020 – see requirement 9).	The Outline Landscape and Ecological Management Plan (LEMP) **(7.4 Outline Landscape and Ecological Management Plan [AS-046])** outlines clear roles and responsibilities to ensure compliance with the DCO documents submitted. 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 the Outline LEMP, which includes like-for-like replacement or consideration of alternative species based on site-by-site conditions and the reasons for failure.
Ecology and biodiversity	7.8.10. Section 10.2.2 – Regenerating coppice may require protection, such as fencing against deer.	The Outline Landscape and Ecological Management Plan (LEMP) **(7.4 Outline Landscape and Ecological Management Plan [AS-046])** outlines clear roles and responsibilities to ensure compliance with the DCO documents submitted. 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 the Outline LEMP, which includes like-for-like replacement or consideration of alternative species based on site-by-site conditions and the reasons for failure.
Ecology and biodiversity	7.8.11. Appendix C – Planting Schedules – Species mix appears rigid; replacement planting should reflect original species or site-specific conditions	Paragraph 9.2.5 of **7.4 Outline Landscape and Ecological Management Plan [AS- 046]** provides flexibility in the use of the species mixes provided and allows for differences on a site-specific level.
Ecology and biodiversity	7.9. Although the locations of ancient woodland are listed by Project Section, there is no corresponding identification for the veteran tree specimens. This information is essential to enable the Council to properly review and provide informed comments.	Veteran trees are illustrated in Annex D of **6.13.A6 Arboricultural Impact Assessment [APP-236]** by a star. This is also the case on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**.
Noise and vibration	8.1. The Council considers that the Environmental Statement provides insufficient detail to assess potential noise and vibration impacts during both construction and operation. Although the "ABC" method is broadly acceptable, the absence of background noise monitoring means the true level of impact, particularly in rural areas with very low ambient noise, cannot be determined. This omission undermines confidence in the assessment.	The Applicant does not agree with this statement. The noise and vibration assessment presented in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** directly acknowledges and takes account of the low ambient noise levels which are expected along the majority of the route. The assessment of construction noise used the lowest threshold for potential significant effects; namely the Category 'A' thresholds from the 'ABC' method described in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise[149]. The need for baseline noise surveys would therefore only be to justify increasing this threshold (i.e. to use a Category 'B' and 'C' threshold, which may be applicable in some locations, for example close to main roads). The use of the Category 'A' thresholds is therefore worst-case and appropriate for quiet locations. Additionally, there is a requirement for the assessment to be proportionate. Given that the results of the surveys would not affect the outcome of the assessments, there is no justification for undertaking extensive baseline surveys.
Noise and vibration	8.4. The project appears to rely entirely on percussive piling, which is a major source of noise and vibration nuisance. No justification for this approach has been provided and critically, no geo-environmental or geotechnical investigations have been undertaken to confirm whether percussive piles are appropriate for site conditions. Without this information, the suitability of pile types cannot be established. 8.5. Once pile types are confirmed, the noise and vibration assessment must be revised to reflect actual construction methods. The vibration assessment should also include impacts from construction traffic, consistent with approaches adopted in	The Applicant does not agree with this statement. The assessments of construction noise and vibration presented in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** assume percussive piling may be required as a worst-case assumption only, in order to identify potential noise and vibration 'hot-spots' where there are potential significant adverse effects, without mitigation. It would not be appropriate to assume quieter plant at this stage prior to the geotechnical investigations. Specific construction methodologies, including the potential use of other, quieter methods, would be determined by the Main Works Contractor(s) following their detailed assessments. The contractor is committed to employing best practicable means (BPM) by commitment NV01 within **7.2 Outline Code of Construction Practice [APP-300]**. This would include selection of an appropriate pylon foundation construction methodology with regards to noise and vibration. With regards to construction traffic vibration, vibration from construction traffic has been scoped out of the ES as detailed in the Scoping Report and agreed in the Scoping Opinion **6.20 Scoping Opinion [APP-297]**, on the

[149] British Standards Institution (2014). *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise*.

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	other DCOs such as Hornsea 3 Offshore Wind Farm. That assessment is currently missing.	basis that vibration is generated by irregularities in the road surface (e.g. pot-holes) and it is reasonable to assume that the public highway's road surface would be well maintained. As such, significant effects from traffic vibration alone are unlikely to occur and are unlikely to be significant when combined with vibration from piling given the specific construction methodologies and mitigations proposed (see below).
Noise and vibration	8.6. If alternative pile designs are adopted, the proposed requirement for immunity from prosecution under the Environmental Protection Act 1990 (EPA) and the Control of Pollution Act 1974 (COPA) is unnecessary. The Environmental Statement indicates that the principal contractor will undertake a repeat noise assessment following monitoring. However, this commitment is not secured within the DCO requirements, which is considered unacceptable. 8.7. 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. 8.8. The Council's position is 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). Furthermore, where works are undertaken pursuant to a Section 61 consent, noise levels and durations can be conditioned and any breach of those conditions remains enforceable. In such cases, BPM again constitutes a valid defence against prosecution. 8.9. Accordingly, provided that the National Grid or its principal contractor can evidence compliance with BPM, there is no justification for an immunity clause within the DCO. It is noted that certain DCO and Nationally Significant Infrastructure Projects (NSIPs) have elected to undertake all works under Section 61 consents, which offers an appropriate and established mechanism for managing noise impacts without undermining enforcement provisions.	The Main Works Contractor(s) are committed to undertaking detailed construction noise and vibration assessments by commitment NV05 within **7.2 Outline Code of Construction Practice [APP-300]**. These assessments will be based on the specific proposed construction methodologies for each works activity and location. Specific mitigation measures will be determined by the Main Works Contractor(s) based on the outcome of these assessments. The mitigation measures identified will be detailed in the Noise and Vibration Management (NVMP), which will be updated from the outline NVMP **(7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306])**. The Main Works Contractor(s) is committed to employing best practicable means (BPM) by commitment NV01 within **7.2 Outline Code of Construction Practice [APP-300]** (Outline CoCP). The Outline CoCP and outline NVMP (or subsequent CoCP and NVMP) do not themselves grant immunity; rather, they secure the requirement that BPM must be applied and documented, which is the legal basis for any immunity. Additionally, some aspects of construction noise and vibration may be managed through applications for prior consent under Section 61 of the Control of Pollution Act 1974, through consultation between the Main Works Contractor(s) and the Local Planning Authority, as detailed in the Noise and Vibration Management Plan **(7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306])**. This same principle has been proposed on other recent National Grid projects, including Bramford to Twinstead and Sea Link.
Biodiversity Net Gain (BNG)	9.1. The Council expects all developments to take every reasonable opportunity to enhance biodiversity and deliver a measurable net gain for nature. This requires strict adherence to the mitigation hierarchy i.e. avoidance, minimisation and compensation and should be supported by robust biodiversity net gain measures.	The Biodiversity Net Gain (BNG) Report **(7.1 Biodiversity Net Gain Report [APP-299])** has been prepared in support of the Project. The report represents the initial BNG calculation undertaken for the Project to demonstrate how BNG could be achieved for the Project. This has included strict adherence to the mitigation hierarchy.
Biodiversity Net Gain (BNG)	9.2. The applicant has committed to delivering BNG, supported by an Initial BNG Report (Document 7.1). Current projections indicate: 8.25% net loss in habitats; 10% net gain in hedgerow units; and 10.65% net gain in watercourse units. As habitat losses cannot be offset against hedgerow gains, additional measures will be required to achieve net habitat gains and comply with national policy. The Council strongly encourages alignment with the Local Nature Recovery Strategy (adopted October 2025) and best practice guidance to ensure BNG delivery post-construction.	The Applicant can confirm that the Local Nature Recovery Strategies will be part of the Applicant's off-site BNG selection process. In accordance with national policy requirements, the Project has been designed following the mitigation hierarchy. The environmental mitigation hierarchy, as set out in **ES Chapter 5: EIA Approach and Method [APP-135]** and in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 14(2)(c)), has been applied throughout the iterative design process. The BNG assessment considers the Project as a whole, committing to deliver at least 10% BNG with wider environmental and societal benefits across the Project. While every effort has been made to deliver BNG through replacement planting and on-site mitigation in the form of habitat creation and enhancement, given the scale and

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		nature of the Project, 10 % BNG is not fully achievable on-site. Off-site BNG is therefore proposed to make up any deficit. Biodiversity is not physically bound by Local Planning Authority boundaries and therefore a holistic approach is proposed for any off-site BNG, with the aim to deliver a biodiversity legacy ideally in each of the three counties crossed by the Project (Norfolk, Suffolk and Essex). Consultations with third-party stakeholders are on-going to secure off-site habitat creation and enhancement measures to offset the impacts of the Project. A range of off-site options are currently being considered, including the Waveney and Little Outse Recovery (WaLOR) project. Further detail on BNG is available in the **7.1 Biodiversity Net Gain Report [APP-299].**
Ecology and Biodiversity	9.3. The Environmental Statement does not provide a complete ecological assessment. In particular, hedgerows within the Development Consent Order (DCO) limits have not been fully surveyed, despite the Hedgerow Regulations Report (Document 6.8.A3) identifying potentially significant hedgerows. Only one important hedgerow has been identified i.e. H1 due to its species richness in Roydon affected by the siting of Pylon RG87; while mostly retained, parts will be affected and a minor section removed for the haul road. 9.4. The survey identifies an additional 53 hedgerows classified as 'potentially important' that were not included in the assessment, 10 of which coincide with proposed pylon locations within South Norfolk. While a distinction is drawn between these and hedgerows deemed 'unimportant,' the basis for the exclusion of those 53 from the survey is not clearly explained. If these hedgerows did not satisfy any of the criteria outlined in Paragraph 3.2.1 of Document 6.8.A3, they should have been categorised as 'unimportant.' The absence of a clear rationale raises concerns regarding the completeness and transparency of the assessment process. Those hedgerows should be surveyed to assess their importance.	A Hedgerows Regulations Assessment was undertaken at hedgerows across the Project that met the criteria outlined within **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**. However, whether or not a hedgerow is 'important' under The Hedgerows Regulations 1997 does not materially affect the impact assessment as all hedgerows are considered to be Habitats of Principal Importance for the conservation of biodiversity, and therefore all are considered ecological receptors of high value. Any loss of hedgerow (including any important hedgerows) would be mitigated with replacement planting on completion of construction. All hedgerows have been surveyed to inform the BNG assessment and surveys would be undertaken to inform replanting. All important hedgerows affected by the Project for ecological and historic reasons are shown on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**.
Ecology and Biodiversity	9.5. Although the pylon route has been broadly designed to avoid sensitive features, with slight amendments made to the route following the non-statutory targeted consultation response in July 2025, further opportunities to minimise impacts on County Wildlife Sites, Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs), trees and hedgerows should be explored. The Council is particularly concerned about potential impacts on Norfolk Valley Fens SAC, Roydon Fen and Flordon Common.	For Norfolk Valley Fens SAC, Roydon Fen LNR/CWS and Flordon Common SSSI, the assessment identified hydrological connections as the only potential impact pathway. These effects would be mitigated through the water-quality protection measures set out in commitments W01 to W16, as presented in Table 6.1 of **7.2 Outline Code of Construction Practice [APP-300]**. With these measures in place, no significant residual ecological effects are anticipated on these designated sites. Natural England is in agreement with this conclusion with regard to Norfolk Valley Fens SAC and Flordon Common SSSI.
Ecology and Biodiversity	9.6. The Habitat Regulations Assessment (Document 5.3) confirms that a Likely Significant Effect (LSE) on Norfolk Valley Fens SAC cannot be ruled out. During construction, the haul road and base of Pylon RG24 will be located within 50 metres of a watercourse flowing into Flordon Common, with trenching works within 30 metres. This proximity creates a real risk of watercourse degradation and harm to SAC habitats. While the Outline Code of Construction Practice (CoCP) includes mitigation measures (Table 6.1), the Council remains concerned that damage could occur before mitigation is implemented, given the sensitivity of these designated sites	The Habitats Regulations Assessment **(5.3 Habitats Regulations Assessment Report [APP-082])** identifies that a Likely Significant Effect on the Norfolk Valley Fens Special Area of Conservation (SAC) cannot be ruled out due to the proximity of certain construction activities to connected watercourses. These risks have been assessed, and the mitigation measures in Table 6.1 of **7.2 Outline Code of Construction Practice [APP-300]**, including commitments W01 to W16, are designed to prevent water-quality deterioration before and during works. With these measures secured and implemented in advance of activity near sensitive watercourses, the potential for adverse effects on the SAC is considered to be effectively controlled. This assessment and conclusions have been agreed with Natural England.

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Ecology and Biodiversity	9.7. The Council acknowledges that the route has largely been designed to avoid direct impacts on statutory designated sites, including Flordon Common SSSI, Forncett Meadows SSSI, Aslacton Parish Land SSSI and Shelfanger Meadows SSSI. However, their close proximity to the works raises concerns about potential indirect impacts during construction. Roydon Fen, a County Wildlife Site, is likely to experience direct impacts. While a compensation strategy via the Waveney and Little Ouse Recovery (WaOL) Project is proposed, no justification has been provided for why avoidance or mitigation measures were not considered. This lack of explanation is unacceptable. Compensation can only be acceptable if there are no alternative means of delivering the project without the harms or routes to harm	Potential indirect effects have been carefully considered as outlined within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** on all designated sites. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** sets out specific mitigation required to ensure no significant residual impacts on any nationally designated site occurs. The commitment to pollution prevention and other construction restrictions, are detailed within **7.2 Outline Code of Construction Practice [APP-300]**. No direct or indirect impacts on Roydon Fen County Wildlife Site (CWS) have been identified following careful design and routeing. The mitigation hierarchy has been followed throughout the design process and changes to design have been made to remove potential impacts on Roydon Fen CWS, therefore no compensation is required.
Ecology and Biodiversity	9.8. The Outline CoCP and OLEMP propose appropriate mitigation for badgers, with 10 setts identified in South Norfolk and 5 unavoidable across the full route. Subject to implementation, impacts on badgers under the Protection of Badgers Act 1992 are not considered significant. District Level Licensing will mitigate impacts on Great Crested Newts and no other licences are anticipated at this stage. However, further ecological surveys will be required at detailed design. If reptile translocation is necessary, the receptor site must be identified, secured and maintained for the lifetime of the scheme.	A draft licence application for badgers has been submitted to Natural England for review. The Applicant is working with Natural England towards obtaining a Letter of No Impediment (LONI) for badgers and expecting receipt during the examination phase. Results of pre-commencement surveys would be included as part of the final Landscape and Ecological Management Plan.
Ecology and Biodiversity	Construction Working Hours – OLEMP (Document Reference 7.4) 9.9. Section 2.3.4 – Justification for activities outside core hours is unclear. Sensitive works (e.g., trenchless crossings in woodlands) should occur during standard daylight hours.	The proposed construction core working hours, activities which can take place outside of the core working hours and the provision for start-up and close down activities are available in full in Schedule 3 of **3.1 Draft Development Consent Order [APP-056]** (draft DCO). The working hours are secured through Requirement 7 of Schedule 3 of **3.1 draft DCO [APP-056]**. **3.1 draft DCO [APP-056]** permits a limited range of activities to take place outside the core working hours where this is necessary to ensure public safety, engineering integrity, network reliability, or compliance with third-party requirements, and to minimise overall disruption. 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 nights or weekends to maintain safety and reduce disruption. Provision is also made for the continuation of works to a safe stopping point, the completion of works delayed by severe weather, emergency activities, security monitoring, and necessary survey works. Mechanical and electrical installation works undertaken within completed and enclosed buildings are expected to result in minimal external effects and can proceed outside core hours without significant effects on nearby receptors. The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters that include the core working hours for the construction phase of the Project. **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 [APP-300]**, significant effects from during the construction phase are not anticipated. The measures set out therein will

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		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. The Applicant therefore considers the provision for start up and close down activities and activities that can commence outside of 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 [APP-300]**.
Ecology and Biodiversity	9.10. Following mitigation secured through DCO requirements, impacts on ecological receptors are predicted to be negligible or minor adverse. While these effects may influence individual receptors, they are not expected to compromise overall integrity or conservation status.	The Applicant notes this comment.
Cumulative effects	The Council notes a concentration of large-scale energy infrastructure proposals and consents within South Norfolk and the wider Norwich area, including: Tasway Energy Park – 700MW Solar and Battery Energy Storage System (BESS) NSIP (Phase One consultation ongoing). East Pye – 500MW Solar and BESS NSIP (formal submission anticipated in the New Year). Consented and proposed TCPA renewable energy schemes around Norwich Main and along the proposed pylon route.	East Pye Solar Farm was not taken to the Stage 3 assessment within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** as it is located outside of the largest Zone of Influence. The Tasway Energy Park was not included within the cumulative assessment for the Project as a cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. However, since the 1 April the Applicant been undertaking monthly reviews of planning registers and web searches (and is aware of the Tasway Energy Park) 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 ES then these would be published into Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). In addition, the Tasway Energy Park project will be required to undertake its own the cumulative assessment with other developments as part of their respective planning application.
Cumulative effects	Offshore wind projects and associated infrastructure: Orsted Hornsea Project Three Offshore Windfarm NSIP cable routes and converter station northwest of Norwich Main; Equinor Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects (SEP and DEP) cable routes and converter station south of Norwich Main;	Cumulative effects of the Project have been assessed and are presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The assessment includes the Orsted Hornsea Project Three Offshore Wind Farm and Equinor Sheringham Shoal and Dudgeon Extension Projects.
Cumulative effects	Three consented National Highways schemes for works around Norwich.	The Applicant would need further information to determine if these schemes are already assessed within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**.
Cumulative effects	10.2. The existing network of pylons running from Norwich into Suffolk already imposes a significant visual presence. The proposed Project will introduce an additional line of pylons in close proximity to the existing network, resulting in two parallel lines dominating the rural landscape. This raises serious concerns regarding: 10.2.1. Harm to rural character and visual amenity; 10.2.2. Adverse effects on the setting of heritage assets.	The cumulative effects of the Project have been assessed within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** which includes cumulative effects on landscape and visual receptors and heritage assets. Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240].** There are also a high number of nationally designated landscapes, valued for their natural beauty, which have historically been designated despite the presence of transmission infrastructure. The rural landscape will remain in place beneath and around the proposed overhead line, albeit there will be some significant effects on landscape character and visual amenity as reported in the LVIA **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].** The Applicant has set out how residual effects, including on landscape and heritage, are considered within the overall planning balance, in response to paragraph 5.1 of the SNDC RR, in this table.
Cumulative effects	10.3. The Council is concerned that the cumulative effect of these Projects [large-scale energy infrastructure proposals and	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 considers landscape and visual cumulative effects, cumulative ecological

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	consents within South Norfolk and the wider Norwich area], together with existing infrastructure, will result in: 10.3.1. Landscape and Heritage Harm as a result of industrial-scale infrastructure incompatible with rural character; 10.3.2. Ecological Impact as a result of potential loss of habitats and biodiversity. 10.3.3. Community Disruption due to noise, disturbance and disruption during construction and operation phases; 10.3.4. Economic Consequences due to negative impacts on local businesses and tourism e.g. South Norfolk with its Market Towns of Diss, Harleston, Loddon and Wymondham; numerous Heritage assets including medieval churches; the Waveney Valley; Boudicca Way; museums; walking and cycling routes which provide a rich tourism/visitor offer. Any reduction in visitor numbers due to disruption or diminished attractiveness of the area will negatively affect hospitality, retail and cultural sectors. 10.4. The overlapping construction periods, likely spanning years rather than months, will exacerbate these impacts.	effects, community disruption during construction and operation (considered as part of a number of environmental topic chapters), economic consequences and overlapping construction periods. With regard to walking and cycling routes, the Applicant notes that 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 South Norfolk that would be subject to closure without diversion and there would be no severance of the overall network as a result of the Project. The Applicant can also confirm that the Boudicca Way is not affected by the Project.
Traffic and transport	10.5. Additional anticipated impacts include: 10.5.1. Movement of abnormal loads requiring road closures; 10.5.2. Potential road widening and associated loss of hedgerows and trees	**7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** details the movements of Abnormal Indivisible Loads (AILs), and describes how these will be managed to minimise impacts. **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Guide to the Plans and Master Key Plan [APP-312]** provides details of highway mitigation measures including potential road widening. **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Section A [APP-313]** is area-specific to South Norfolk District Council, and **2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section A [APP-048]** presents details of associated loss of hedgerows and trees within the South Norfolk District Council region. There may be opportunities for the Main Works Contractor to reduce loss of hedgerows and trees associated with road widening during detailed design, when additional survey information will be available.
Mitigation measures	10.6. South Norfolk Council urges the Examining Authority to: 10.6.1. Require comprehensive mitigation measures to address landscape, heritage, ecological and community impacts;	The Environmental Impact Assessment was undertaken in accordance with **19 Scoping Report [APP-288 – 297]** and **6.20 Scoping Opinion [APP-298]**. The assessments undertaken for each environmental topic (including landscape, heritage, ecological and community) identified a number of embedded, standard and additional mitigation measures to avoid, prevent, reduce and offset (where relevant and appropriate) environmental effects. All mitigation relied upon within the assessments in the Environmental Statement (ES) is summarised in each environmental topic chapter [**APP-138; APP-147; APP-158; APP-181; APP-192; APP-208; APP-221; APP-226; APP-256; APP-265 and APP-271]**. These mitigation measures are also outlined within management plans including **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]** which are secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056].**
Traffic and transport	10.6.2. Ensure that construction phasing and traffic management plans minimise disruption to residents and businesses.	**7.3 Outline Construction Traffic Management Plan [APP-309]** details that traffic management will be coordinated with other developments/events (within the framework of the Permit Schemes of each Local Highway Authority) and is aimed to be phased to reduce overlapping construction closures and minimise disruption where possible.
Need case	10.7. The Council acknowledge that there are national benefits in delivering the projects, however those national benefits are secured at the cost of very substantial local harm local level. There is however harm identified at a local level, in particular by	EN-5 requires the Applicant to operate in an efficient, coordinated and economical way[150]. 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.

[150] Electricity Act 1989, Section 9

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	the erection of the 50 metre pylons, 88 of which would be situated within the South Norfolk District. The Council considers that significant weight should be had to the heritage, visual, ecological and local amenity harms in the planning balance.	In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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. The Applicant has set out how residual effects, including on landscape and heritage, are considered within the overall planning balance, in response to paragraph 5.1 of the SNDC RR, in this table.
Ecology and biodiversity	10.8. The Council wishes to continue to work pro-actively with the applicants as the application is progressed through to Examination to try to resolve the outstanding issues particularly in relation to hedgerows and trees and the specific wording of some of the requirements.	Noted, and the Applicant welcomes this approach.
Draft DCO	The key issues: 11.4.1. Future Governance Changes: Norfolk (and Suffolk and Essex) is part of the accelerated Local Government Review, meaning the current two-tier system will likely be replaced by unitary authorities before requirements are discharged. Wording must be future-proofed;	Noted. The Applicant will consider the inclusion of reference to unitary authorities to future proof the drafting in the next revision of **3.1 Draft Development Consent Order [APP-056]**.
Draft DCO	11.4.2. Discharge Authority: The Council recommends that the Local Planning Authority be designated as the discharge authority for all planning-related matters.	The Applicant acknowledges the authority's position.
Draft DCO	11.5. Inconsistent use of 'days' and 'business days' for timescales creates confusion; suggest that terminology is standardised.	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.
Draft DCO	11.6. To assist developers, the DCO should include a clear definition of what constitutes a "very minor amendment" (e.g., a simple wording change to a management plan) that can be agreed without triggering a full discharge process. Under the current National Grid drafting, even minor changes require formal resubmission, which is unnecessarily burdensome.	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. The Applicant agrees that care needs to be taken that the burden on authorities does not become disproportionate or unnecessary.
Draft DCO	*Missing Requirements* 11.7.1. The present Requirements do not seem to cover the following matters, despite the fact that the Council considers these necessary:-	Like planning conditions, Development Consent Order (DCO) Requirements must meet certain criteria, including being necessary, relevant, enforceable, precise and reasonable. Where controls are found elsewhere in the application materials, it is not necessary or reasonable to also add Requirements.

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Draft DCO	11.7.1.1. Implementation and Maintenance of Landscaping;	Landscaping must be carried out in accordance with the Landscape and Ecological Management Plan, as approved under Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**, which deals with implementation and maintenance. The final Landscape and Ecological Management Plan will provide the preliminary framework for the principles and procedures that the Main Works Contractor(s) must implement to minimise, manage and mitigate the potential environmental impacts of construction works associated with the Project.
Draft DCO	11.7.1.2. Drainage Strategy in particularly surface water and foul drainage if necessary;	Paragraph 6.2.3 of **7.2 Outline Code of Construction Practice [APP-300]** requires the Main Works Contractor to prepare a Surface Water Management Plan prior to construction, as part of the suite of Environmental Control Plans (ECPs) that will be appended to the final Code of Construction Practice. This is secured as part of compliance with Requirement 4.
Draft DCO	11.7.1.3. Skills and Employment Plan;	Due to the nature of the Project, the potential maximum peak day construction workforce for local workers is anticipated to be approximately 172 Full Time Equivalents (FTEs) and the total job demand throughout the four-year construction period is anticipated to be approximately 480 jobs locally. This is considered to not be a significant number of construction employment when compared with other sectors. Given these considerations, a DCO requirement for a Skills and Employment Strategy would not be proportionate or necessary for the Project. However, the Applicant is committed to working with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. The Applicant is also committed to providing a coordinated regional approach to jobs and skills opportunities. This commitment is broader than the individual Project and separate to any commitments under the proposed DCO for this Project. Post-construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure we leave a lasting positive legacy in the communities where we operate. With regards to a delivery mechanism, the above measures will be delivered as part of our community benefit package, which will look at both local and regional initiatives. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance[151].
Draft DCO	11.7.1.4. Fencing and Means of Enclosure (permanent and temporary e.g. construction lay down areas and satellite construction compound in the Council's administrative area);	Commitment GG29 in **7.2 Outline Code of Construction Practice [APP-300]** 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. 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. **7.16 Design Approach for Site Specific Infrastructure [APP-354]** secures permanent fencing as hot-dipped galvanized steel palisade fencing, up to 4 meters high, with strict specifications for durability, security, and maintenance. There is no scope for variation in material or finish, and gates match the fencing. Requirement 12 of the Draft Development Consent Order ensures the Applicant must comply with the **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 planning authority.
Draft DCO	11.7.1.5. Traffic and Highway Access (permanent and temporary);	Please refer to Parts 4 and 5 of Schedule 16 (Protective Provisions) of **3.1 Draft Development Consent Order [APP-056]**.

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

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Draft DCO	11.7.1.6. Contaminated Land and Groundwater Management;	Commitments GH01 to GH14 in **7.2 Outline Code of Construction Practice [APP-300]** relate to Contaminated Land, Geology and Hydrogeology and therefore there is no need for a specific Requirement.
Draft DCO	11.7.1.7. Noise Control Measures;	Noise Control Management is covered within **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** therefore there is no need for a specific Requirement.
Draft DCO	11.7.1.8. Control of Critical Light Emissions.	**7.2 Outline Code of Construction Practice [APP-300]** contains detailed, project-wide commitments on lighting, including: • Use of the lowest safe luminosity • Directional and shielded lighting to minimise light spill • Switching off or using motion sensors when not in use • Specific measures to protect ecological receptors (e.g., bats) and minimise visual intrusion • Compliance with best practice guidance (e.g., that provided by Institution of Lighting Professionals and Bat Conservation Trust). The commitments above are set out in Table 6.1 (GG26, B06, LV03) of **7.2 Outline Code of Construction Practice [APP-300]**. Requirement 4 of **3.1 Draft Development Consent Order [APP-056]** mandates that all construction works must be carried out in accordance with the approved Code of Construction Practice (and its appendices and sub-plans) which must be 'substantially in accordance with' **7.2 Outline Code of Construction Practice [APP-300]**. This means the lighting measures in **7.2 Outline Code of Construction Practice [APP-300]** are legally binding and enforceable, with compliance monitored by the relevant authority. As such, the Applicant does not consider a separate lighting Requirement to be necessary.
Draft DCO	12.1. South Norfolk Council wishes to raise concerns regarding the proposed Limits of Deviation under Article 5 of the DCO. These concerns relate to ecological and landscape impacts arising from changes incorporated into the DCO submission following the targeted consultation in March 2025.	Noted. Limits of Deviation have been assessed within **6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026]** and **6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226]**.
Draft DCO	12.2. While some deviations pose minimal ecological risk, others present significant issues, particularly in relation to irreplaceable habitats, veteran trees and areas of cultural and conservation importance. The flexibility afforded by Article 5 must not enable works that result in unacceptable ecological harm.	While the Limits of Deviation provide some flexibility in design for the detailed design stage, the Project commitments to avoid key features apply (including ancient woodland and veteran trees) and will act as constraints to the detailed design phase, commitments are outlined within **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Draft DCO	12.3. In particular: 12.3.1. Norfolk 2 (Pylons 30–33 and relocation of Pylon 39): There is potential direct impact on a veteran oak tree of approximately 522cm circumference next to Pylon 33;	**7.4 Outline Landscape and Ecological Management Plan [AS-046]** 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 secured by commitment GG14 in **7.2 Outline Code of Construction Practice [APP-300]**. This relates to all trees and includes the veteran tree in proximity to Pylon 33. In addition, **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** contains information on individual veteran trees.
Draft DCO	12.3.2. Norfolk 3 (Pylons 48 & 49 moved 60m west): 12.3.2.1 Direct impact on a large area of veteran trees, considered irreplaceable habitat and potentially ancient woodland; 12.3.2.2 A veteran bee tree lies within the DCO limits; Requirements must include explicit wording to protect veteran trees and ancient woodland. 12.3.2.3 Repositioning of the haul road into a previously cleared woodland is highly concerning and unacceptable. This area has re-matured and exhibits ex-ancient woodland characteristics. It	**7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** includes information on individual veteran trees. Currently the area of woodland within the Tas Valley is not classified as ancient woodland on the Natural England Ancient Woodland Inventory (AWI). Habitat surveys of this woodland did not identify the woodland ground flora as indicating the presence of ancient woodland and therefore is not considered irreplaceable habitat in line with guidance. Given the controls noted above, the Applicant does not consider it necessary to amend the drafting of Article 5 of **3.1 Draft Development Consent Order [APP-056]**.

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	was previously avoided in the 2024 consultation due to its classification as A3 Woodland, denoting significant cultural, conservation and heritage value. This option would result in the loss of irreplaceable habitat; 12.3.3. The limits of deviation (LOD) should be drafted to avoid the impacts set out above and must avoid the area.	
Draft DCO	12.4. The Council requests that the Examining Authority: 12.4.1. Restrict the Limits of Deviation to avoid areas of irreplaceable habitat, including veteran trees and ancient woodland; 12.4.2. Amend the Requirements to include: 12.4.2.1 Explicit protection for veteran trees and ancient woodland. 12.4.2.2 A prohibition on works within A3 Woodland or areas exhibiting ex-ancient woodland characteristics.	While the Limits of Deviation provide some flexibility in design for the detailed design stage, the Project commitments to avoid key features apply (including ancient woodland and veteran trees) and will act as constraints to the detailed design phase, commitments are outlined within **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** also includes information on individual veteran trees, groups of veteran trees and Ancient Woodland.
Draft DCO	12.4.3. Secure a Habitat Protection Plan by Requirement to ensure compliance with biodiversity policy and mitigation commitments.	The Applicant does not consider a Requirement to secure a Habitat Protection Plan to be necessary. Mitigation measures specific to ecology (including habitats) are outlined within **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** which are secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]** and the Applicant will use a legal agreement to secure Biodiversity Net Gain.
Draft DCO	12.5. The Council has concerns about the current scope of Article 5 where it enables deviations that would result in the loss of irreplaceable habitats. These impacts are contrary to national policy and cannot be adequately mitigated. Robust restrictions and requirements must be included in the DCO to protect these sensitive ecological assets.	The limits of deviation in Article 5 of the draft DCO **(3.1 Draft Development Consent Order [APP-056])** are subject to the commitments contained in **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Code of Construction Practice [APP-300]**. The Applicant does not consider it necessary to amend the wording of Article 5 of the draft DCO.
Draft DCO	*Requirement 3 – Stages of authorised development* 13.2.1. It is unclear why a phasing plan cannot be required prior to commencement. This would provide clarity and certainty for stakeholders. As currently drafted, Requirement 3(1) and (2) appear potentially contradictory, as activities defined as 'pre-commencement' may themselves constitute development. To avoid ambiguity, the sequence should be revised so that (1) precedes (2), ensuring the phasing plan is agreed before any works begin.	Given the programme to which the Project has to be delivered, a requirement of a phasing programme for the entire scheme before the carrying out of any pre-commencement operations would be disproportionate and could frustrate the delivery. It is agreed that phasing should be confirmed prior to commencement of construction.
Draft DCO	*Requirement 4 – Construction Management Plans* 13.3.1. There is a need for additional consultees. For example, only Natural England is listed in Requirement 4(1) as a consultee for landscape and ecology. Additional consultees should include: 13.3.1.1. Environment Agency; 13.3.1.2. Local Highway Authority; 13.3.1.3. National Highways (where strategic networks are affected). 13.3.2. Construction Traffic Management Plans, for example, must be agreed with the Highway Authority and National Highways.	The Applicant has developed an Outline Construction Traffic Management Plan (CTMP) **(7.3 Outline Construction Traffic Management Plan [APP-309])** which details the engagement with Local Highway Authorities and other stakeholders for any changes within the Outline CTMP. The Local Highway Authority then has 28 days to confirm its consent to the change, to provide reasons why the change is not accepted. As part of our ongoing engagement with other parties, we will review if others wish to be listed as consultees.

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Draft DCO	*Requirement 5 – Archaeology* 13.4.1. For Norfolk this Requirement falls under the remit of the Historic Environment Service currently the responsibility of the County and which has engaged with National Grid.	Noted. 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.
Draft DCO	*Requirement 6 – Design and layout plans (elevations)* 13.5.1. The phrase 'general accordance' is unacceptable. In the absence of anything more than illustrative or approximate details, any details submitted as part of the discharge of Requirements must either be in accordance with specific proposals or subject to further approval. The council have asked to be provided with the details of the construction laydown areas and satellite construction compounds. If those details were to be provided, the Council would accept 'in general' accordance with to allow for de minimis variations.	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]** (draft DCO).
Draft DCO	13.5.2. The Council considers Schedule 3, paragraph 1(3), which allows for amendments approved in writing by the relevant discharging authority, should be more tightly drafted. While the requirement for the authorised development to be carried out "in general accordance with" approved plans or documents provides some flexibility, this cannot be construed as permitting material changes. The phrase "in general accordance with" should be restricted to de minimis variations only i.e. those that do not alter the substance or intent of the approved scheme. The current wording would undermine the certainty and integrity of the consent process, effectively enabling significant departures without proper scrutiny or procedural safeguards.	The intention of paragraph 1(3) of Schedule 3 to the **3.1 Draft Development Consent Order [APP-056]** is to clarify that the Applicant will be in 'accordance' or 'general accordance' with an approved plan if it is in 'accordance' or 'general accordance' with any details that are approved by the relevant discharging authority following a re-submission of a Requirement for discharge. It is not intended to authorise the relevant authority to discharge Requirements that facilitate a material change. Indeed, the management plans to be approved under Requirement 4, for example, must be in substantial accordance with the outline management plans. Likewise, any amendments authorised by the discharging authority under an 'unless otherwise agreed' tailpiece are limited by the need to demonstrate to the relevant authority that the proposed amendment would not result in any materially new or materially different environmental effects to those reported on in the Environmental Statement.
Draft DCO	13.5.3. This narrow reading is reinforced by Requirement 6, which governs design and layout plans (elevations). Requirement 6(1) mandates that the authorised development must be carried out "in general accordance" with the approved design and layout plans, while Requirement 6(2) appears to clarify that any departure resulting in materially new or materially different environmental effects would fall outside this flexibility. Accordingly, the interpretation provision should not be used to justify changes that go beyond minor, non-material adjustments, as doing so would conflict with the express limitation in Requirement 6(2).	The Applicant notes the authority's comment relating to the clarificatory wording in Requirement 6 of the **3.1 Draft Development Consent Order [APP-056],** but does not agree that its inclusion authorises reliance on paragraph 1 to go beyond minor, non-material adjustments.
Draft DCO	*Requirement 7 – Construction hours* 13.6.1. Current wording allows work on Bank Holidays and Sundays, which is inconsistent with other DCOs. Standard practice is: 13.6.1.1 Monday–Friday: 07:00–19:00 13.6.1.2 Saturday: 07:00–13:00 13.6.1.3 No working on Sundays or Bank Holidays	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday – Friday: 0700 to 1900 • Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700 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]** (draft DCO).

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	13.7. Other NSIPs with similar urgency (e.g. Hornsea, Equinor and RWE) have managed delivery without resorting to routine Sunday and Bank Holiday working. If work needs to be carried out outside approved hours, National Grid can apply for prior consent for construction works under section 61 Environmental Protection Act 1990. It allows National Grid to apply to the local authority for prior consent to carry out works that might otherwise cause a statutory nuisance under Part III of the Act. This has been an effective way of managing works needed on Sundays and Bank Holidays in the DCO projects referred to above whilst managing amenity impacts. The requirement should be worded so as to limit the hours but to allow of exceptions where EPA consent is granted. 13.8. National urgency does not override the principle of reasonable mitigation for local impacts. The National Policy Statement and standard DCO practice require minimising adverse impacts on local amenity. Continuous working would go beyond that which was assessed in the Environmental Statement, introducing unassessed harm as set out in paragraphs 8.4 and 10.3.3 of this representation.	The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the project. The construction works are largely linear and would not occur along the entire length of the project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. **7.2 Outline Code of Construction Practice [APP-300]** (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 draft DCO [APP-056]** within the final CoCP. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in **Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300]**, including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30).
Draft DCO	*Requirement 8 - Retention and removal of trees, woodland and hedgerows* 13.9.1. Plans showing trees for retention or removal are already submitted for approval as part of requirement 4. It is unclear why this Requirement is needed against that background and context.	Requirement 4 in Schedule 3 to the **3.1 Draft Development Consent Order [APP-056]** covers **7.4 Outline Landscape and Ecological Management Plan [AS-046]** which does not show all the trees and hedgerows that will be removed by the Project. **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]** shows outline landscape proposals for non-linear permanent infrastructure. Conversely, Requirement 8 requires the Applicant to advise which trees and hedgerows will be affected along the entire route alignment.
Draft DCO	*Requirement 9 - Reinstatement planting plan* 13.10.1. The Heading to, and the text of Requirement itself should not contain the word "reinstatement" because it should encompass planting plans that may or may not include reinstatement. 13.10.2. Requirement 9(4) – term "earliest opportunity" creates ambiguity about in whose opinion the earliest opportunity may be. It should be defined as the "next planting season" for clarity.	The reference to 'reinstatement' is to the reinstatement of the land prior to that part of the authorised development being brought into operational use. 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.

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Draft DCO	*Requirement 9 - Reinstatement planting plan* 13.10.3. Requirement 9(7) - A 10-year replacement period is required to allow establishment, consistent with other DCOs and planning consents. This was agreed under Hornsea following evidence on Norfolk's climate and planting challenges, as a result of the uniquely dry and sandy ground conditions in Norfolk.	The Applicant has proposed a five-year replacement period that is consistent with recent National Grid Development Consent Orders (DCOs) including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. Section 10 (Aftercare) of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** addresses the aftercare procedures. The Applicant notes that a 10-year replacement period is not standard practice for 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.
Draft DCO	*Requirement 10 - Reinstatement schemes* 13.11.1. The Council doesn't understand why a period of 21 months is provided for. It could be a typo and National Grid meant to refer to 12 months, so this should be clarified.	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.
Draft DCO	*Deemed discharge provisions* 14.1.1. The Council objects to the inclusion of Schedule 4, Requirement 1(2) within the draft DCO, which introduces a mechanism to allow certain requirements to be treated as approved if the relevant authority does not respond within a specified timeframe. 14.1.2. The principle of deemed discharge is addressed in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO). While deemed discharge is permitted for some planning conditions, Article 30(2) of the DMPO expressly excludes conditions relating to matters of significant complexity and risk, including: 14.1.2.1. Environmental Impact Assessment (EIA) development; 14.1.2.2. Highway safety; 14.1.2.3. Contaminated land; 14.1.2.4. Environmental protection measures, such as biodiversity, heritage assets and flood risk. 14.1.3. The rationale for these exemptions is clear i.e. that such conditions require detailed technical assessment and cannot be left to automatic approval without scrutiny. 14.1.4. Many requirements within the DCO i.e. particularly those relating to ecology, heritage, landscape and construction impacts are analogous to the exempted conditions under the DMPO. These requirements involve: 14.1.4.1. Protection of irreplaceable habitats (e.g. ancient woodland and veteran trees); 14.1.4.2. Safeguarding heritage assets and cultural landscapes; 14.1.4.3. Managing complex environmental mitigation measures. 14.1.5. Allowing deemed discharge for these requirements would undermine the precautionary approach embedded in National Policy Statement EN-5, as well as statutory duties under the Planning Act 2008 and Environmental Impact Assessment Regulations. 14.1.6. The Council requests that the Examining Authority amends the provision to exclude all requirements relating to	The principle of deemed discharge provisions in relation to the discharge of Requirements is not unique to this Project. The principle has precedent in The National Grid (Bramford to Twinstead Reinforcement) Order 2024. It is essential that a project of this scale and critical national importance incorporates these deemed approval provisions to ensure that matters outside of the Applicant's control do not unnecessarily frustrate the delivery of the Project. The deemed discharge provision in Schedule 4 paragraph 1(2) of **3.1 Draft Development Consent Order [APP-056]** (draft DCO) is subject to the caveat in sub-paragraph (3), which ensures that if the application is accompanied by a report that considers it likely that the subject matter of the application is to give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement, then the application is deemed to have been refused by the relevant authority at the end of that period. The draft DCO does not include any Requirements directly relating to highway safety. Instead, highways matters are to be governed by the protective provisions in Part 4 and Part 5 of Schedule 16 to the draft DCO. The Requirements referred to in paragraph 14.1.4 of the authority's relevant representation are all matters for which there are already outline management plans. Requirements 4 and 5 in Schedule 3 of the draft DCO require the detailed plans or written schemes of investigation submitted to discharge these Requirements to be in substantial accordance with the relevant outline plan or scheme of investigation as the case may be. As such, the relevant discharging authorities will have had sight of the key principles and will have an opportunity to raise any specific concerns during Examination.

Topic	Comments	National Grid's response
	environmental, ecological, heritage and other high-risk matters, consistent with the DMPO 2015 exemptions. 14.1.7. By analogy with the DMPO 2015, deemed discharge is inappropriate for requirements involving complex and sensitive issues. Active approval by the relevant authority is essential to ensure compliance with national policy and to prevent significant harm to the environment and communities.	
Draft DCO	*Importance of Precise Wording* 14.2.1. It is critical to recognise that the National Grid team responsible for pre- application and examination will not manage post-consent implementation. Instead, a separate team will rely entirely on the wording of the DCO consent. Contractors appointed post-consent often seek changes to agreed management plans (e.g. working hours) due to unforeseen issues or programme constraints. This underscores the need for clear, robust and practical drafting at the outset.	The Applicant agrees with the authority that it is important for **3.1 Draft Development Consent Order [APP-056]** to be clear, robust and practical to enable the efficient delivery of the Project. The Project will be delivered by the Great Grid Partnership (GGP) – a new delivery mechanism for National Grid's Accelerated Strategic Transmission Investment (ASTI) projects, established to support the timely and coordinated delivery of nationally important electricity transmission infrastructure. Under this model, the team responsible for taking the Project through detailed design and construction, including the principal works contractors, has already been appointed. This team has had the opportunity to review the Development Consent Order (DCO) application and associated environmental and technical documentation in full prior to submission, ensuring that the Project is well understood by those who will be responsible for its delivery. This approach reflects the scale, urgency and strategic importance of ASTI projects and is intended to ensure that the Project can move efficiently into construction as soon as development consent is granted, without the delay that can arise from post-consent procurement or contractor familiarisation. The GGP model also supports a consistent approach to delivery, drawing on shared experience, common standards and best practice across the ASTI portfolio. This consistency helps to: • Drive quality in design, construction and environmental management • Ensure alignment with the assumptions and commitments set out in the DCO and Environmental Statement • Reduce delivery risk through early contractor involvement and integrated team working. Overall, the GGP approach provides a robust framework for delivering ASTI projects at pace, while maintaining high standards of safety, quality and environmental performance, and reflects the urgent national need to strengthen the electricity transmission network.
Draft DCO	*Timeframes for Discharge* 14.3.1. The proposed 28-day period for discharge is, in the Council's view, unrealistic and unworkable. This is a major issue for the council. Faced with that unrealistic timeframe, the Council may be put in a position where it has no option but to refuse an application for discharge. The Council requires a minimum of 8 weeks/56 days to discharge requirements. 14.3.2. It is unclear in places whether this means calendar days or working days and whether bank holidays are excluded. This must be explicit. 14.3.3. The Council's requirement to allow 8 weeks to discharge a requirement is reasonable when compared to the current statutory timeframes for discharge of conditions under the Town and Country Planning Act (TCPA) are: 14.3.3.1. 8 weeks for most applications; 14.3.3.2. 16 weeks for EIA developments.	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 Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. 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) of **3.1 Draft Development Consent Order [APP-056]** (draft DCO) to extend the 28-day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority, and within Paragraph 2 for the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question. The Applicant is committed to continued meaningful and proactive engagement with host Local Authorities and statutory consultees to support the efficient and timely determination of post-consent submissions. The discharge of DCO Requirements will build directly on the extensive pre-application engagement and the Examination process, through which the principle, scope and controls for the Project will have been thoroughly considered. By the point of consent, the intention is that the Requirements, the parameters of the authorised development, and the mitigation framework secured through the DCO and Environmental Statement will be well understood and familiar to the relevant authorities.

Topic	Comments	National Grid's response
		Post-consent submissions will therefore focus on the detailed implementation of agreed measures, rather than introducing new concepts or untested mitigation. The Applicant will continue to engage with authorities on draft submissions where appropriate, helping to clarify expectations and reduce the likelihood of iterative amendments. Longer default determination periods risk introducing avoidable delay where matters have already been discussed and agreed in principle through pre-application engagement, and where consultees are familiar with the Project, its impacts, and the mitigation framework. 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.
Draft DCO	*Timeframes for Discharge* 14.3.4. As to the periods of consultation: Prescribed consultees typically require 21 days for initial consultation with further consultation often necessary. Complex applications often necessitate further consultation, particularly where specialist input is required (e.g. environmental health, ecology, heritage). A five-day window in Schedule 4, Requirement 2, paragraphs (2) and (3) does not allow sufficient time for: 14.3.4.1. Reviewing technical documentation. 14.3.4.2. Liaising with internal specialists. 1 4.3.4.3. Identifying gaps or requesting additional information. 14.3.5. The requirement should be amended to allow a minimum of 21 days for initial review, with flexibility for further consultation where necessary. This ensures: 14.3.5.1. Proper scrutiny of proposals; 14.3.5.2. Compliance with statutory consultation norms; 14.3.5.3. Avoidance of rushed or incomplete assessments that could compromise decision.	A standalone consultation or initial review period of 21 days would have a considerable impact on the time it takes relevant authorities along the entire length of the route to discharge Requirements and could frustrate the delivery of the Project. The Applicant considers 5 days to be sufficient time to identify key gaps. 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 5-day period if necessary. The Applicant has been, and continues to be, committed to collaborative working with the relevant authorities.
Draft DCO	14.3.6. The concern of National Grid that longer timeframes will lead to delays is unfounded. The Council's experience demonstrates proactive engagement with developers, enabling projects to remain on track. For example, RWE is ahead of programme due to effective collaboration with the Norfolk Council's.	The Applicant notes the authority's comment, but respectfully disagrees, noting the vastly different scale and nature of the RWE development compared to a 180 km linear project that passes through 13 host local authorities. The discharge of DCO Requirements will build on extensive pre-application engagement and the Examination process, meaning the principle, scope, and mitigation framework will already be well understood by authorities. Post-consent submissions will focus on implementing agreed measures, not introducing new concepts. The Applicant will continue to engage proactively on draft submissions to clarify expectations and minimise amendments. Given this, longer default determination periods risk unnecessary delay where matters have already been discussed and agreed. The Applicant remains committed to collaborative working, but believes streamlined determination periods are important for timely delivery and certainty.
Draft DCO	14.3.7. The Council considers it is necessary to adopt the Vanguard DCO Procedure for discharge of Requirements for this DCO to ensure a proven, workable practical approach is adopted	The principles for the procedure for the discharge of Requirements in Schedule 4 of **3.1 Draft Development Consent Order [APP-056]** is based on precedent, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024, whilst the timings are bespoke to the needs of this Project, which is of critical national priority. The Applicant does not consider it justified to adopt the Vanguard DCO Procedure.
Draft DCO	*Fees* 14.4.1. The proposed fixed fee of £145 is outdated. As of April 2025, the national fee for discharge of conditions is £298. Fees should align with the national fee schedule and refund provisions should reflect national practice.	The Applicant will update this figure in the next revision of **3.1 Draft Development Consent Order [APP-056]**.

Appendix AB. Suffolk County Council

nationalgrid

Appendix AB
Suffolk County Council

Suffolk County Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the Relevant Representation (RR) provided by Suffolk County Council [**RR-3520**].

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (**5.9.2 Draft Statement of Common Ground - Suffolk County Council (SCC) (incl LLFA and Highways) [Revision B]**), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table AB1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Alternatives	4. In conjunction with Essex County Council and Norfolk County Council, the Council commissioned an independent report from Hiorns Smart Energy Networks to review the need for the National Grid Reinforcements in East Anglia being promoted by NGET (Appended). That report was submitted to NGET in November 2023 in response to its non-statutory consultation. The report concluded that, having regard to the realities of when connection of new generation sources to the transmission network was likely to be required, an exceedance of current or committed transmission network capacity (including the Bramford to Twinstead Reinforcement which is currently underway) was not likely before 2035 (as opposed to the date of 2030 suggested by NGET). As a result, the report concluded that there was scope for further analysis of potential options, including a potential offshore HVDC link, and it could not be concluded that the NGET proposal was the best option. NGET responded to that report in April 2024 suggesting that it could not delay its reinforcement of the transmission network beyond 2030 without being in breach of its contractual and licence obligations. Whilst the Council notes that response, it is also the case that the Secretary of State is not a party to any of NGET's connection contracts or licence conditions and, notwithstanding that those matters may be material, they cannot be seen as over-riding when balancing the overall public interest. There is a process of reform of the system of connection arrangements, via Queue Management, currently underway and the Secretary of State is able to take a holistic position looking strategically at how the transmission network can best be improved. 5 While the Council recognises the principal need of grid reinforcement, it considers that it is premature for NGET to submit this DCO application until alternatives have been considered in full, and objects to the application because this work has not been undertaken.	The Project is due to connect various energy developments, many of which are consented and in the process of being built so are unaffected by the Queue Management referred to. The continued validity of the Project Need case is set out in Section 2.3 of **5.15 Design Development Report [APP-122]**. At each key stage of the consultation and submission process the Needs Case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Transmission Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 in as set out in **Strategic Options Backcheck and Review [APP-355].** The timing and urgency for electricity infrastructure is referred to within The Overarching National Policy Statement for Energy (EN-1): *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.* The National Policy Statement for Electricity Networks infrastructure (EN-5) 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.* *2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.* *2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.* **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** Appendix A Page A3 sets out the Applicants Transmission Owner Licence obligations providing detail to the duties referred to within the National Policy Statement for Electricity Networks infrastructure (EN-5):

Topic	Summary of matters raised	National Grid's response
		Condition D2: "Obligation to provide transmission services", which includes "responding to requests for the construction of additional transmission system capacity". *Condition D3 "Transmission system security standard and quality of service" which includes "Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')"* Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS are in place. The factors above show the 2025 updated Needs Case continues to indicate the urgent need for reinforcement for both Contracted and ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report was published in April 2024 and is available on the Project website. In summary we do not accept the Report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register. Furthermore, 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.
Landscape and Visual	6. NGET proposes to underground the cables in the sections under the Dedham Vale National Landscape. The Council supports this as a way of reducing the visual and landscape impact of the Norwich to Tilbury proposed development.	The Applicant notes the Councils support of the proposal to underground the Project through Dedham Vale National Landscape.
Landscape and Visual	7. Whilst the proposed areas of undergrounding are supported, the Council is conscious of the concerns from local communities of the visual impact of the remaining sections of overhead lines.	Please refer to the Applicant's detailed response to paragraph 8 of the RR regarding the use of overhead lines. The Landscape and Visual Impact Assessment (LVIA), included in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** recognises that there will be significant visual effects of the Project during construction and operation (and maintenance). Such residual effects following application of the mitigation hierarchy must be considered as part of the overall planning balance. 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 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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-145]** and **5.6 Planning Statement [APP-085]**. EN-1 paragraph 4.1.7 provides *'… 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'.* 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.

Topic	Summary of matters raised	National Grid's response
Alternatives	8. The Council considers that other alternatives such as offshoring or undergrounding the entire length of the route between Norwich and Tilbury should be given further consideration particularly as the Council believes that the Norwich to Tilbury proposals are not required until the middle of the 2030s.	The Applicant must respond within the remit of its Transmission Licence and contractual obligations rather than on the basis of perceived connection timings. Please see the Applicant's response to paragraphs 4 and 5 of the RR for further detail. EN-5 requires the Applicant to operate in an efficient, coordinated and economical way3. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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.
Cumulative Effects	9. In terms of cumulative impacts these include the 400kV grid reinforcement proposals by NGET between Bramford and Twinstead, which would also connect at Bramford substation. This project (also a NSIP) was consented by the Secretary of State on the 12 September 2024 and is currently under construction. Bramford substation is already a focus for a number of energy related projects consented under the Town & Country Planning Act by Babergh & Mid Suffolk District Councils. Along the route there are also emerging proposals for additional solar farms and associated battery energy storage.	An assessment of Cumulative Effects was undertaken in accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The cumulative long list of developments considered within the cumulative assessment applied a cutoff date of 1 April 2025 to give sufficient time for the assessment to be completed given the scale of the Project. However, since 1 April 2025 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).
Cumulative Effects	10. Further afield there are also cumulative impacts with other NSIP proposals including Sizewell C Nuclear Power Station for example with potential skills shortages.	An assessment of Cumulative Effects was 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]**. Peak workforce numbers are estimated to be up to 1,720 workers per day across the route of the approximately 180 km Project. The construction of the Project would be highly technical and require specialised contractors. These contractors would largely be sourced from the Applicant's existing pool of contractors, anticipated to be approximately 90% of the estimated construction employment. Therefore, no cumulative effects are anticipated resulting from skills shortages.
Historic Environment	11. Suffolk County Council Archaeological Service ("SCCAS") does not object in principle to the Proposed Development. However, without a full programme of archaeological, geoarchaeological, and palaeoenvironmental evaluation to inform a robust mitigation strategy, the scheme risks causing avoidable harm to the Historic Environment. 12. Given the linear nature of the Proposed Development, which will traverse diverse archaeological landscapes of East Anglia (river terraces, clay plateaus, and valley floors), there is potential for remains and deposits of local to national significance. Establishing their significance requires evaluation (geophysical survey, trial trenching, coring, and deposit modelling) prior to finalising designs, as required by EN1.	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 1,440 ha of geophysical survey have been completed. The Phase 2 stage of the geophysical survey and trial trenching will continue in 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 Report. 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]**.

Topic	Summary of matters raised	National Grid's response
		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. The update and scope of the document will be informed by the findings of the ongoing fieldwork, and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
Historic Environment	13. Responsibility for heritage matters is divided as follows: a. Built heritage (designated and non-designated buildings, conservation areas): Babergh Mid Suffolk District Council ("BMSDC"). b. Scheduled Monuments: Historic England. c. Archaeology: Suffolk County Council Archaeological Service (SCCAS). 14 Suffolk County Council Archaeological Service (SCCAS) has engaged positively with the Applicant and their consultants during pre-application and will continue constructive engagement throughout the Examination, including via the draft Development Consent Order ("dDCO"), Local Impact Report, Written Representations, and Statements of Common Ground.	The Applicant notes this comment.
Historic Environment	15. Archaeological evaluation (geophysical survey and trial trenching) has not been completed across all areas of development impact. Further work is required to establish archaeological potential and inform appropriate mitigation strategies, in line with HEAN 17 and CIfA standards. This must be secured through robust Requirement wording.	See response to items 11 and 12 above. 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.
Historic Environment	16. Investigations to date have identified multiple previously unrecorded sites of local and regional significance, requiring mitigation should consent be granted. This indicates a high likelihood of further unrecorded assets being identified along the remainder of the route. Any remaining evaluation should therefore be undertaken at the earliest opportunity post-consent to ensure mitigation strategies can be developed and integrated into project programmes. 17. Provision must also be made to address any additional areas of significance identified during evaluation, including preservation in situ where remains of national importance are encountered.	Since the submission of the DCO application, archaeological fieldwork comprising geophysical survey and archaeological trial trenching has been ongoing. As described in the Supplementary Environmental Information submitted to the Planning Inspectorate in January 2026, this fieldwork has resulted in the identification of 54 additional non-designated assets within the bounds of the Order Limits across the Project. In Suffolk these assets comprise: three medium value and five low value assets identified in Section B; and five medium value and 16 low value assets identified in Section C. The assessment considered the physical impact of the Project on the archaeological remains of all the assets and also the impact on the settings of the medium value assets. The assessment concluded that the Project would result in negligible/minor significance of effects (not significant) on the identified assets. As set out above the Phase 2 stage of the geophysical survey and trial trenching will continue in 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]**. 17 – The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
Historic Environment	18. The programme of geoarchaeological sleeved coring, deposit modelling, and palaeoenvironmental assessment to enable detailed stratigraphic analysis (e. g. pollen, diatoms, macrofossils) and scientific dating of buried sequences remains incomplete in areas where Quaternary deposits, alluvium, and peat may be affected (e. g. watercourse crossings). This work must be secured	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 **7.5 Outline Archaeological Mitigation Strategy and Outline Written**

Topic	Summary of matters raised	National Grid's response
	by robust Requirement wording and scheduled early enough to inform design and mitigation.	**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.
Historic Environment	19. No archaeological mitigation has yet been undertaken. Mitigation will be secured through the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation ("AMS-OWSI"). This process document must set out the framework for producing Detailed Written Schemes of Investigation ("DWSI"), to be submitted to and approved by the Local Authority Archaeological Advisors ("LAAA") and the Local Planning Authority ("LPA") before works commence.	The framework for production of Detailed WSIs is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**.
Historic Environment	20. The submitted AMS-OWSI does not currently meet national standards or local guidance, nor does it secure an adequate level of assessment and mitigation as required under EN-1 and EN-5. SCCAS comments on the submitted version must be addressed before it can be considered acceptable.	Comments on the draft version **of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** provided by the Council's archaeological advisors were considered in the updated version submitted with the DCO application. As discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England, comments on the current version will be considered in an updated version to be submitted during examination. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application and which have been considered sufficient by the Planning Inspectorate and the Secretary of State to determine applications.
Historic Environment	21. Although the revised AMS-OWSI now includes methodologies for further assessment and mitigation, the proposed approaches remain inadequate. Additional field evaluation is required to inform appropriate mitigation strategies. The archaeological Requirement should therefore allow for amendment of the AMS-OWSI to reflect new discoveries.	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. Comments will be considered as part of the updates to **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be updated 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.
Historic Environment	22. Where remains are to be preserved in situ, whether due to significance or design constraints, they must be protected from damage during pre-commencement, construction, and operation. A strategy for their long-term protection must be incorporated into the mitigation framework, supported by a Historic Environment Management Plan ("HEMP") agreed with SCCAS to ensure appropriate management in perpetuity.	Any archaeological remains preserved in situ that remain in the Applicant's ownership will have a management plan prepared, which will be included 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]**.
Historic Environment	23. The draft Schedule 3 requirement for archaeology does not provide adequate protection for the Historic Environment. SCCAS will submit detailed comments and proposed wording at the Local Impact Report stage, setting out robust requirements for archaeology, geoarchaeology, and palaeoenvironmental matters to secure evaluation, mitigation, reporting, publication, and archiving in line with national and local guidance.	Regarding archaeology, geoarchaeology, and palaeoenvironmental matters to secure evaluation, mitigation, reporting, publication, and archiving these aspects are set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. While these matters are already covered in this document the Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during examination in response to further comments from the Council, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England. Detailed comments on the current version are understood to be included in the Council's LIR. As **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** is secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** there should be no need to significantly alter Requitement 5.
Historic Environment	24. To assist in resolving outstanding issues, SCCAS requests that the Applicant provide: 25. Route-wide Evaluation Plan and Programme – identifying locations of completed and proposed geophysical survey, trial trenching, geoarchaeological and palaeoenvironmental assessments across all areas of development impact.	The Supplementary Environmental Information includes a Project-wide figure indicating the progress of the priority evaluation areas and Phase 2 geophysical survey (**6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [AS-082]**). The Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination phase in consultation with the Local Planning Authority Archaeological Advisors, which will include figures detailing the completed and planned evaluation.

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Historic Environment	26. An approved Archaeological Management Strategy and Outline Written Scheme of Investigation (AMS-OWSI) – prepared in accordance with CIfA, Historic England, and local guidance, and in line with Local Authority Archaeological Advisor comments.	The Supplementary Environmental Information includes a Project-wide figure indicating the progress of the priority evaluation areas and Phase 2 geophysical survey (**6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [AS-082]**). The Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** during the examination phase in consultation with the Local Planning Authority Archaeological Advisors, which will include figures detailing the completed and planned evaluation.
Historic Environment	27. Geoarchaeological and Palaeoenvironmental Strategy – defining key river valleys and sequences, with detailed sampling, dating and analytical methodologies to inform design and mitigation.	Updates relating to this are proposed to be included in the update to **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.
Historic Environment	28. Draft OREAC/OCEMP – setting out archaeological controls to appropriate standards. 29. SCCAS will provide detailed comments on the submitted documents at the Local Impact Report.	**7.2 Outline Code of Construction Practice [APP-300]** includes commitments for mitigation of impacts to the historic environment. The Applicant is not intending to produce an OREAC or OCEMP as the typical content of these documents is already included within **7.2 Outline Code of Construction Practice [APP-300]**.
Ecology and Biodiversity	30. In terms of Ecology and Biodiversity, the documents have been prepared to a good, professional standard by the Applicant. The scope and extent of the desk study and field surveys is considered to have resulted in a thorough and detailed baseline of data on which assessments can be accurately based. The methodologies used for collection of baseline information and assessment are considered suitable for the specific purpose of this proposal. 31. However, at the time of writing, the information provided within the Environmental Statement ("ES") and its appendices regarding field survey data and subsequent assessments is incomplete due to the outstanding 12. 5% coverage of the land within the Order Limits. These data and assessment updates have been scheduled for publishing in November 2025. All comments within this document on Ecology and Biodiversity are therefore caveated in lieu of scrutiny of this additional information. This gap in information is acknowledged throughout the ES and its appendices and reasons for this delay have been given. Verbal feedback from the Applicant's team has indicated that no significant alterations to the Environmental Impact Assessment ("EIA") receptors for Ecology and Biodiversity are expected based on initial results from these works.	Survey results from 2025 (including habitat, otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.
Ecology and Biodiversity.	32. The proposals within the Order Limits would have no direct impact on any internationally designated sites. The assessment of potential impacts upon the Stour and Orwell Ramsar and Special Protection Area ("SPA") sites and proposed mitigation and precautions as detailed within the ES, Code of Construction Practice ("CoCP") and Landscape and Ecology Management Plan ("LEMP") adequately address any potential issues relating to the qualifying interest of the sites.	The Applicant notes and welcomes this comment.
Ecology and Biodiversity.	33. The proposals within the Order Limits would have no direct impact on any nationally designated sites. The assessment of potential impacts upon Middle Wood Site of Special Scientific Interest ("SSSI") and proposed mitigation and precautions as detailed within the ES, CoCP and LEMP adequately address any	The Applicant notes and welcomes this comment.

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	potential issues relating to significant accidental, incidental or indirect impacts on qualifying interest of the sites.	
Ecology and Biodiversity.	34. The scope and subsequent assessment of impacts on all locally designated wildlife sites and habitats within the assessment area but outside of the Order Limits are considered suitable for the proposed development.	The Applicant notes and welcomes this comment.
Ecology and Biodiversity.	35. The scope and subsequent assessment of impacts on all locally designated wildlife sites and habitats within the Order Limits are considered suitable for the proposed development. The proposed mitigation to mitigate for potential impacts within these areas are well defined and are likely to result in the predicted negligible residual impacts providing the robustness of the CoCP and LEMP and the efficacy of the Ecological clerk of Works (ECoW) are sufficient to enable the appropriate procedures and task to be implemented effectively. We shall expect to be consulted and will make appropriate observations on any CoCP and LEMP.	The Applicant can confirm 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 the **3.1 Draft Development Consent Order [APP-056]**, prior to commencement of works.
Ecology and Biodiversity.	36. Mitigation for permanent habitat loss via Biodiversity Net Gain ("BNG") areas, "Environmental Areas" and additional locations for tree planting etc. appears to be generally sufficient to provide replacement and potential gain. The Council's three for one replacement principle for trees must be followed within this process.	**7.4 Outline Landscape and Ecological Management Plan [AS-046]** outlines the approach to reinstatement planting. The Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. All other tree habitat including scrub and woodland (area habitats) is assessed and mitigated through the BNG metric and captured within **7.1 Biodiversity Net Gain Report [APP-299]**.
Ecology and Biodiversity	37. The mitigation required for replacement of "Important Hedgerows" however must be seen to take into account not only their intrinsic species and structural value but their value as functional corridors for other flora and fauna communities across the wider landscape. Therefore, wherever possible planting and replanting must take place in as close proximity to possible as the lengths lost and in such a way as to provide functional connectivity with remaining hedgerows in these areas.	**7.4 Outline Landscape and Ecological Management Plan [AS-046]** outlines the approach to reinstatement planting for hedgerows, including important hedgerows. Hedgerows will be re-planted in the same location from which they were removed. The only exception to this will be at the permanent substation and Cable Sealing End compound sites, within the Environmental Areas, where an illustrative landscaping plan for each location has been prepared within **7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324]**. All hedgerows temporarily impacted by the Project will be reinstated at the earliest appropriate opportunity within the correct planting season, allowing connectivity to be maintained.
Ecology and Biodiversity.	38. The Council would like to reiterate that irreplaceable habitats (e. g. veteran trees) must always be fully protected and avoided wherever possible and the design of the scheme should go to extraordinary lengths to ensure this is the case.	The only irreplaceable habitats identified across the Order Limits are ancient woodland and veteran trees. While every effort has been made to avoid ancient woodland through careful routeing and siting there are five ancient woodlands where direct/indirect impacts are unavoidable, as the proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or 15 m root protection zone. However these impacts have been minimised and appropriate mitigation set out in detail within **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**. This document sets out clear mitigation measures required at each of the five ancient woodlands to ensure no significant long-term residual effect and to ensure compliance with the Overarching National Policy Statement for Energy (EN-1 (2024)). The Project currently reports the loss of four veteran trees, however this would be reviewed during detailed design with effort made to retain the trees. Commitment GG14 in **7.2 Outline Code of Construction Practice [APP-300]** confirms that relevant surveys for arboriculture would be undertaken to reduce the impact of the Project on trees and hedgerows (this includes the veteran trees).
Ecology and Biodiversity.	39. The approach regarding Invasive Non-Native Species (INNS) within the ES chapter refer to ensuring that no spread is caused by the proposals. It is the Council's view that rather than simple prevention of an offence through mitigation, ecological	Under the Wildlife and Countryside Act 1981 (as amended) it is an offence to plant or otherwise cause to grow in the wild any plant listed under Schedule 9. Measures to ensure invasive species under Scheule 9 are not spread as a result of the Project are outlined within **7.4 Outline Landscape and Ecological Management Plan [AS-046]** which would ensure compliance with this legislation.

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	enhancement would be achievable by a commitment to eradicate INNS within the Order Limits when encountered, rather than just preventing spread.	
Ecology and Biodiversity	40. The protected and notable fauna species surveys and assessments appear suitable to ascertain the baseline conditions for the site. Where protected species have been identified as receptors, the proposed mitigation, use of licenses and proposed implementation of the ECoW appears well designed to meet all legal, conservation and ecological requirements.	The Applicant notes and welcomes this comment.
Ecology and Biodiversity	41. In regard to breeding and wintering birds, the Council requires clarification regarding the mitigation and compensation for permanent habitat loss. Whilst it is agreed that on the most part populations occurring within the Order Limits are of local value and displacement into surrounding habitat would be unlikely to result in significant impacts, if mitigation is considered necessary with regard to habitat replacement for breeding and/or wintering birds, this area should be a separate mitigation area and not considered to be covered by BNG areas. BNG is not designed or expected to provide mitigation for faunal species by purpose but rather to provide a gain to the habitat units of an area and therefore it's incidental benefits to faunal groups should not be considered when providing mitigation for habitat loss on these groups. I. e. areas for replacement habitat should not also be used for BNG. If it is the case that no habitat placement is required to result in negligible impacts, this should be clear in the ES rather than suggesting BNG land will act as mitigation.	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. 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 [AS-046]**. 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 and is not required to achieve the residual impact conclusions for these bird receptors. The assessment of effects on breeding and wintering/passage birds does not depend on BNG to demonstrate that no significant residual effects remain. Accordingly, no separate mitigation 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.
Ecology and Biodiversity	42. The Council welcomes the appointment of an Ecological Clerk of Works and considers this a critical role to deliver biodiversity mitigation, compensation, and enhancement, including Biodiversity Net Gain. The Council looks forward to supporting their work through liaison at the Ecology Working Group. Given the size and complexity of the site, the Council would like to ensure that sufficient resources are available for the ECoW role to be effectively carried out through all stages of the proposals. The hierarchy of responsibilities outlined within the LEMP indicates this will be the case but lacks specifics at this stage regarding the manpower and locations of ECoWs during the works and operation as required. Once these details are known, the Council would like to be able scrutinise this detail within the Ecology Working Group.	The Applicant's commitment to ensure compliance with all ecological mitigation measures is detailed within **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The final Code of Construction Practice and final Landscape and Ecological Management Plan would be completed post consent by the relevant Main Works Contractor(s) and would include additional details on the Ecological Clerk of Works. No Ecology Working Group is proposed for this Project.
Ecology and Biodiversity	43. The Council welcomes the consideration of future potential impacts, specifically potential changes to habitat and faunal groups associated with the WaLOR project.	The Applicant notes this comment.
Biodiversity Net Gain.	44. The long-term success of the BNG habitat will need to be guaranteed through a detailed HMMP or similar, not only stipulating the required creation and management to provide the 10%+ gain but also including contingency planning and monitoring to be able to identify any failures and facilitate	The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for development (subject to certain exemptions); however this requirement is not yet in force for development consented pursuant to a Development Consent Order (DCO). Despite submitting the development consent application before it is mandatory, the Applicant has committed to deliver 10% BNG with wider environmental and societal benefits for the Project. The 10% BNG target for the Project is currently voluntary and aligned with the Applicant's corporate sustainability commitment. In the absence of any guidelines for Nationally Significant

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	replacements and or adaptations to management to ensure long term gain.	Infrastructure Projects, the BNG assessment methodology was set out and agreed with Natural England and Local Planning Authorities. The details of the BNG methodology are presented within **7.1 Biodiversity Net Gain Report [APP-299]**. The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas in line with the commitments made within **7.1 Biodiversity Net Gain Report [APP-299]**. The monitoring and maintenance measures for the Environmental Areas would be included in the final Landscape and Ecological Management Plan, which would be subject to review by the relevant Local Planning Authority ahead of works. For any required off-site BNG, the Applicant is committed to the delivery of units through third-party providers, with sites registered on the Natural England register to ensure reliable delivery. Long-term management of these off-site BNG habitats will fall to the third-party providers in line with the habitat management plan for the specific site.
Ecology and Biodiversity.	45. The Council would urge the Applicant to provide Biodiversity Awareness Training for construction workers, delivered by the Ecological Clerk of Works. This would help to ensure that workers are kept informed regarding what they may encounter, and how to deal with these situations appropriately.	As secured through **7.2 Outline Code of Construction Practice [APP-300]** and **7.4 Outline Landscape and Ecological Management Plan [AS-046]** all staff and operatives working on the Project would undergo a site-specific induction, which would include relevant environmental topics. Environmental toolbox talks would be provided by the Main Works Contractor(s). These would give targeted information about site-specific issues or activities taking place at that time.
Ecology and Biodiversity.	46. The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring.	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 [AS-046]** 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
Ecology and Biodiversity.	47. Further, more detailed comments may be provided in the Local Impact Report in lieu of outstanding survey data, results and assessment.	The Applicant notes this comment. Survey results from 2025 (including habitat, otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.
Socio-economics Recreation and Tourism	48. The ES recognises construction workforce needs but does not provide the granular modelling by project phase (civils, mechanical and electrical, commissioning) that SCC's Supplementary Guidance requires. This omission prevents accurate alignment with local training pipelines.	The ES assessment on employment impacts is in line with the Overarching National Policy Statement for Energy (EN-1). The Applicant is committed to sharing relevant detailed labour market demand data once it is available.
Socio-economics Recreation and Tourism.	49. The Applicant assumes that only 10% of the construction workforce will be drawn from the Wider Study Area. This risks underestimating local labour capacity and opportunity, while also failing to model displacement effects from other NSIPs (Sizewell C, Sea Link, North Falls, Five Estuaries).	As detailed in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**, 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. From experience of other National Grid projects, it is likely that a minimum of 10% of the construction workforce would be sourced from the local labour market.
Socio-economics Recreation and Tourism.	50. Without agreed, scenario-based modelling (low/medium/high local engagement), there is no robust basis to forecast impacts on transport, housing, or public services.	The assessment methodology adopted for the Project is consistent with methodologies used for other projects of a similar scale and nature. Transport assessments are set out in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. Housing assessment is scoped out of the ES as agreed in **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**. Assessments on public services, including access to community facilities, are set out 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) and public transport delay are set out in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**.

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Socio-economics Recreation and Tourism.	51. SCC requires the Applicant to work with the Regional Skills Coordination Function ("RSCF") to co-produce an evidence-based, phase-by-phase workforce model, consistent with SCC's Supplementary Guidance.	The Applicant acknowledge SCC's request to work closely with the RSCF to co-produce an evidence-based, phase-by-phase workforce model that aligns with SCC's Supplementary Guidance. We are committed to working with SCC on electricity industry skills and workforce planning, but this commitment is broader than the individual project and separate to any commitments under the proposed development consent order for this Project.
Socio-economics Recreation and Tourism.	52. The ES does not sufficiently address cumulative competition for labour across Suffolk and the wider region.	Cumulative effects on local employment are set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The anticipated construction employment would be minimal, of approximately 4,800 throughout the four-year construction period, with an estimated peak of up to 1,720 workers per day across the 180 km route of the Project (including approximately 90% non-local workers). Therefore, the potential cumulative effect is anticipated to be not significant.
Socio-economics Recreation and Tourism	53. Norwich to Tilbury will overlap temporally with Sizewell C, Sea Link, and multiple offshore wind projects. These projects will compete for scarce skills in project management, civils, and M&E trades.	The Applicant notes this comment. The Applicant is committed to working with other major DCO projects to manage resources on scarce skills.
Socio-economics Recreation and Tourism	54. SCC is concerned about displacement effects: diversion of skilled staff from local construction, education, health, and SME sectors, leading to delivery risks for essential services and local projects.	A relatively modest number of local construction workers is anticipated during construction, with an estimated peak of up to 1,720 workers per day across the 180 km route of the Project. Therefore, the potential effect is anticipated to be not significant.
Socio-economics Recreation and Tourism	55. The Applicant must demonstrate how cumulative workforce demands have been considered and commit to coordinated regional workforce planning with SCC and other promoters.	Cumulative workforce demand assessment is detailed in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** which has been undertaken in accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**. The Applicant is committed to working with SCC and other promoters on workforce planning.
Socio-economics Recreation and Tourism	56. The ES notes potential for supply chain benefits but lacks a scenario-based assessment of local procurement opportunities. 57. SCC's guidance requires promoters to distinguish hyper-local (district), local (county), and regional (East of England) supply chain opportunities, and to assess them under low/medium/high engagement scenarios. This has not been undertaken. 58. Without such modelling, there is no robust estimate of indirect or induced employment or Gross Value Added ("GVA"). 59. There is also insufficient recognition of potential negative effects, including wage inflation, diversion of capacity from SMEs, and supply chain saturation due to overlapping NSIPs.	Material supply and demand would vary significantly, and it is not possible to specify sources at the time of submission of the DCO application. The Applicant is committed to sharing relevant data once it is available. The Applicant acknowledges these are important factors that can influence local and regional economic dynamics. However, they were not scoped into the Environmental Statement, and the approach taken on the Project is in accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** and aligned with other projects of a similar scale and nature. National Grid is committed to working with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning.
Socio-economics Recreation and Tourism	60. SCC expects all major infrastructure promoters to agree governance arrangements for skills and supply chain delivery through the RSCF. 61. Norwich to Tilbury has not yet committed to such governance. Without this, there is no assurance that workforce and supply chain benefits will be realised or that adverse impacts will be mitigated. 62. SCC requires a formal commitment to: a. Participate in the RSCF skills governance framework. b. Participate in the Major Infrastructure Forum c. Co-fund or support targeted skills interventions linked to project phases. d. Work with SCC to design monitoring frameworks to evidence outcomes.	The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four-year construction period. Employment is modest in scale and is not considered significant when compared with employment demand in other sectors or large-scale regeneration schemes. Notwithstanding this, the Applicant is committed to supporting skills development and workforce planning at both local and regional levels, beyond the scope of this individual Project. This includes: • Working with local suppliers and supporting forums, such as Chambers of Commerce • Contributing to a coordinated regional approach to electricity industry jobs and skills planning • Engaging with Local Authorities to understand local priorities and opportunities around skills and employment. These commitments form part of the Applicant's wider approach to community benefits and legacy and are broader than, and separate from, the DCO process. The delivery of these initiatives will be taken forward through non-statutory community benefit and engagement mechanisms, rather than through the development consent process, consistent with established guidance.

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Hydrology Land Drainage and Flood Risk	63. Suffolk County Council, as the Lead Local Flood Authority ("LLFA") has several matters that need to be agreed prior to agreeing the statement of common grounds. These include, but are not limited to: - a. FRA to be updated to included latest publish national flood maps. b. ES includes all the current legislation & guidance. c. Ensure that Chapter 12 (Hydrology, Land Drainage and Flood Risk) of the ES has been updated with desktop studies, assumptions etc d. LLFA will require surface water drainage to be in accordance with the National standards for Sustainable Drainage Systems ("SuDs") and the SCC LLFA local guidance. e. The LLFA considers that temporary drainage for construction shall be provided for approval in the form of a construction surface water management plan. f. LLFA reserves its position regarding the Protective Provisions for Section 23 of the Land Drainage Act and are in communication with the other Local Flood Authorities and Internal Drainage Boards to ensure consistency and consensus amongst all parties.	63a - The Applicant confirms that **7.9 Flood Risk Assessment [APP-331]** presents and assesses data from the National Flood Risk Assessment 2[152] national dataset and also reflects the updates to the Flood Map for Planning[153] published March 2025. 63b - The Applicant confirms that the legislation referred to in **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]** is current. With regards to guidance, there are more recent publications linked to SuDS, which have been acknowledged and taken into account in preparing **8.2 Drainage Strategy Report [Revision A]**. This has been submitted into the examination at Deadline 1. 63c - The Applicant has reviewed more recently available information regarding past flood events, which has been collected from each of the LLFAs, and has summarised this into a technical note that shall be shared and submitted to the examination at Deadline 2. 63d - Building on the information provided in Appendix C of **7.9 Flood Risk Assessment [APP-331]**, further details regarding proposals for surface water management (including calculated attenuation volumes, specified discharge rates/limits) will be shared with Suffolk and submitted to the examination in the form of a Drainage Strategy Report (**8.2 Drainage Strategy Report [Revision A]**). This has been submitted into the examination at Deadline 1. The Strategy has been drafted in accordance with both the National Standards for SuDS and SCC LLFA local guidance, which will be evidenced. 63e - Commitment GG22 within **7.2 Outline Code of Construction Practice [APP-300]** secures that the Main Works Contractor(s) will prepare a Surface Water Management Plan to inform the discharge of Requirement 4 in **3.1 Draft Development Consent Order [APP-056]**. The Plan will define construction drainage measures which will be developed liaising with the LLFAs, with ongoing dialogue during implementation of the measures. 63f - The Applicant welcomes ongoing discussions between the LLFAs and Internal Drainage Board to agree a consistent and agreeable set of Protective Provisions.
Traffic and Transport	65. As a Local Highway Authority ("LHA"), the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on road users and local communities and propose typical working hours of Monday-Friday 0700-1900 and Saturday 0800-1300. This may be exacerbated in areas subject to significant seasonal fluctuation such as agriculture or tourism.	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday – Friday: 0700 to 1900 • Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700 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] (draft DCO).** The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the project. The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews mean that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provide essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the

[152] Environment Agency (2025b) Long term flood risk map. [online] Available at: https://www.gov.uk/check-long-term-flood-risk (accessed February 2025)

[153] Environment Agency (2025a) Flood Map for Planning. [online] Available at: https://flood-mapfor-planning.service.gov.uk/ (accessed March 2025).

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		programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. **7.2 Outline Code of Construction Practice [APP-300]** (Outline CoCP) sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 draft DCO [APP-056]** within the final CoCP. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in **Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300]**, including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30).
Traffic and Transport	66. However, the DCO and supporting management plans should be sufficiently flexible to allow for approval of highway works outside the stated working hours where for example deemed necessary due to restrictions on the highway network to avoid excessive delays for roadworks.	**7.3 Outline Construction Traffic Management Plan [APP-309]** details the working hours, and that '*deliveries by HGVs are limited to Mondays to Fridays 07:00-19:00 and Saturdays 07:00-17:00, unless otherwise agreed with the highway authorities*'. The latter wording should provide the additional flexibilities needed to allow for approval of highway works outside of the stated hours, where said highway networks are to use HGVs. The traffic management works associated with the Project are to be managed through the Local Highway Authority Permit Schemes, as detailed in **7.3 Outline Construction Traffic Management Plan [APP-309]** and secured via Requirement 4(1)(b) (Construction Management Plans) of **3.1 Draft DCO [APP-056]** within the final Construction Traffic Management Plan.
Traffic and Transport.	67. Whilst SCC accepts that most transport impacts for the operational phase are scoped out it considers that the AIL operational movements should be included with assessment. This is due to concerns about the resilience of the routes, for example being compromised by weight or other limits being placed on the network, together with the impacts of any temporary measures to overcome these. SCC accepts that inclusion of improvements to the Lorraine Way / Bullen Lane junction is a move towards this.	National Grid Electricity Transmission (NGET) substations are designed to operate unmanned under normal conditions, resulting in very low operational vehicle movements. The number of vehicle trips generated by the operation and maintenance of the Project are unlikely to result in significant effects and it was therefore considered acceptable to scope this matter out. This was agreed by the Planning Inspectorate as stated within the **6.20 Scoping Opinion [APP-297]**. As noted in Section 2.3.28 of the **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. The Applicant assessed access requirements to existing and proposed substations to be used as part of the Project and identified permanent highway modifications to facilitate future access, including, for Bramford Substation, the permanent widening of the carriageway on Bullen Lane and at the junction of Bullen Lane and Lorraine Way. Whilst the Applicant considers that these proposed improvements are sufficient and proportionate, it welcomes further dialogue with SCC to understand the specifics of SCC's concerns about the resilience of routes.
Traffic and Transport.	68. It is understood the DCO includes construction of the temporary accesses within the definition of pre-commencement whilst the OCTMP states it will be inclusive of these works. This places a tension between the OCTMP commitment to use of agreed site access and haul roads and that construction of the haul road will be post commencement.	Whilst the measures for using agreed construction site access and haul roads within **7.3 Outline Construction Traffic Management Plan [APP-309]** are applicable to the pre-commencement activities, **7.3 Outline Construction Traffic Management Plan [APP-309]** also details that the construction of the access points does not require the haul roads to be built and that they can be built from the local highway network. While **3.1 Draft Development Consent Order [APP-056]** includes the construction of temporary accesses within the definition of pre-commencement operations, this does not extend to haul roads. Haul roads are not considered temporary accesses and are therefore not permitted as part of pre-commencement works.

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Traffic and Transport.	69. Careful programming of any road closures is required so that they do not coincide and cause unnecessary delays or confusion to road users. SCC has yet to be provided with details to review.	**7.3 Outline Construction Traffic Management Plan [APP-309]** details that traffic management will be subject to the Permit Schemes of the Local Highway Authorities. The Applicant is proposing that the Permit Scheme currently operated by Suffolk County Council will be used to coordinate street works required by the Project. As the Main Works Contractor develops 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 (CLO) through letter drops and emails, alongside any advance notices and signage used to communicate the works to road users. These notifications of works are anticipated to include the works, scale of impact, dates and hours of the works.
Traffic and Transport.	70. Disapplication of parts of the New Roads & Street Works Act 1991 (the 1991 act) should not fetter LHA in managing highway network (co-ordination), recovering reasonable costs and avoidance of long-term maintenance costs.	National Grid would welcome further engagement with SCC Highways in order to better understand their concerns on this point. Notwithstanding those future discussions, National Grid considers that the provisions are appropriate in the context of this Project. The disapplication in Articles 13(3) and (4) of **3.1 Draft Development Consent Order [APP-056]** has been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. Regarding the LHA's coordination role, Article 12(1) of **3.1 Draft Development Consent Order [APP-056]** confirms that the Permit Schemes operated by LHAs apply and will be used by National Grid (or, where appropriate, UK Power Networks) in connection with the construction and maintenance of the authorised development. The Applicant considers that this provides adequate safeguards to ensure that the LHA will continue to be able to coordinate works on its highway network.
Traffic and Transport.	71. The undertaker should maintain temporary works for duration (not 12 months)	Article 18(2) of **3.1 Draft Development Consent Order [APP-056]** sets out that where a street is altered or diverted under the Order, the Applicant will maintain it for a period of 12 months from its completion. Paragraph 19 of Part 4 of Schedule 16 to **3.1 Draft Development Consent Order [APP-056]** sets out that the Applicant will maintain any temporary highway works for the duration of their use.
Draft DCO	72. SCC will seek protective provisions or similar agreements to protect the safety of those using the public highway and local rate payers incurring costs resulting from this project and its long-term impacts.	**3.1 Draft Development Consent Order [APP-056]** contains in Schedule 16 protective provisions for the protection of the highway authorities. The Applicant considers that Schedule 16 provides sufficient protective provisions for the protection of the highway and the highway authorities.
Traffic and Transport	73. As the Outline Construction Traffic Management Plan will be applicable to the pre commencement works (as described in section 1. 8. 1) the document will need to be robust enough to cover these.	**7.3 Outline Construction Traffic Management Plan [APP-309]** has been developed to be primarily applicable to construction operations within the main construction process. The pre-commencement activities are detailed within Article 2(1) of **3.1 Draft Development Consent Order [APP-056]** and listed within **7.3 Outline Construction Traffic Management Plan [APP-309]**. There are a number of activities listed within the pre-commencement activities that will be required to use the Local Road Network, before the haul roads are constructed. As set out in **Requirement 4(3) in 3.1 Draft Development Consent Order [APP-056],** 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. The Applicant would require infrequent access to the temporary accesses to complete the pre-commencement works. Infrequent Heavy Goods Vehicles would be needed. Additional information on the pre-commencement operations assumed are listed within **3.1 Draft Development Consent Order [APP-056]**.
Traffic and Transport.	74. The applicant will need to retain overall control of the Construction Traffic Management Plan ("CTMP") particularly if multiple contractors are responsible for the roles as occurs in other similar projects.	As detailed within **7.3 Outline Construction Traffic Management Plan [APP-309]**, the Applicant will put in place robust procedures to inform and supervise all personnel on the Project, with contractual requirements placed on the Main Works Contractors. The Applicant is to be held responsible for any breach of compliance as detailed within **7.3 Outline Construction Traffic Management Plan [APP-309]**. **7.3 Outline Construction Traffic Management Plan [APP-309]** is secured within Requirement 4 of **3.1 Draft Development Consent Order**

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		[APP-056], with the Applicant responsible for the overall compliance. The Applicant will therefore work with the multiple (if required) Main Works Contractors to ensure consistency of application.
Traffic and Transport.	75. SCC considers it would be appropriate for the Secretary of State to control numbers and routes of Heavy Goods Vehicles ("HGV") during the construction period as recommended in 5. 14. 14 of EN-1 Overarching National Policy Statement for Energy.	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 daily assessment, to be transparent in the expected trips along each construction route. This exercise allowed the traffic and environmental impact assessment to be completed on robust and credible trip generations across the whole construction programme and the results of these assessments are presented within **7.11 Transport Assessment [APP-333]** and **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. The Applicant has sought to provide the most up-to-date assessments, based on the design and construction programmes available at the time the assessments were completed, and they have had due regard to feedback from stakeholders, including the Local Highway Authorities, through the Traffic and Transport Working Groups. The Applicant has stated within **7.3 Outline Construction Traffic Management Plan [APP-309]**: '*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 **7.3 Outline Construction Traffic Management Plan [APP-309]** additionally states, '*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 Network/Major Road Network*'. This monitoring of the construction routes throughout the construction phase will ensure that any change in traffic volumes which can cause material effect can be identified and discussed with the relevant Local Highway Authority when appropriate.
Traffic and Transport	76. As an LHA, the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays, as per section 2. 3) on roads used for recreational purposes and the uninterrupted impacts on local communities.	Please refer to the Applicant's response to paragraph 65 of the RR above regarding the proposed working hours. In relation to this specific concern, the Applicant highlights that **7.3 Outline Construction Traffic Management Plan [APP-309]** has been developed and includes appropriate mitigation measures for construction related traffic, including Heavy Goods Vehicle (HGV) and Light Goods Vehicle (LGV) drivers. One of the key measures is the provision of a driver information pack. This driver information pack will include details of 'hot spots' where roads are used for recreational purposes and will include measures intended to mitigate potential impacts. **7.11 Transport Assessment [APP-333]** has also noted areas where there are recreational facilities, as detailed in the severance and amenity elements of the Institute of Environmental Management and Assessment guidance[154], and these areas will also be detailed within the driver information pack. It is anticipated that the pack will be circulated to all HGV drivers on the Project. This is to help mitigate any impacts on the local communities.
Traffic and Transport.	77. This project appears to be largely proposing a road only freight strategy with the exception of Abnormal Indivisible Loads ("AIL") arriving by sea. SCC would welcome efforts to explore the practicality of aggregate deliveries through local ports and railheads. 78. SCC will require more than 72 hours' notice of AIL movements taking place outside of the core hours as otherwise delays may occur if loads cannot safely pass over weaker structure. Early engagement on all AIL movements is essential and lack of engagement may result in movements being delayed.	A Multi-Modal Assessment was undertaken (detailed within **7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340]**). The Multi-Modal Assessment identified potential facilities for the delivery of materials for the Project, either by rail or water-borne transportation. Several key elements of the Project remain to be finalised, including the detailed design, construction programme, and commercial agreements for the procurement of material quantities. The outcome of this process will be to confirm sources of material supply and associated transport logistics, and to identify whether alternative transport modes are feasible, commercially viable and operationally reasonable. In the event that development consent is granted for the Project, National Grid, in collaboration with the appointed Main Works Contractor(s), will pursue the exploration and implementation (where feasible, commercially viable and operationally reasonable) of alternative transport modes to deliver materials and large and/or heavy items. **7.3 Outline Construction Traffic Management Plan Appendix A - Abnormal Indivisible Load (AIL) Access Strategy [APP-310]** details the processes and proposed routes for AIL movements. The schedule of AIL movements is anticipated to be further developed and shared with the Local Highway Authorities when appropriate, following confirmation of the construction programme by the Main Works Contractor(s). The formal

[154] IEMA Guidelines: Environmental Assessment of Traffic and Movement (2023)

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		notification of AIL movements will follow the Electronic Service Delivery for Abnormal Loads (ESDAL) system and will follow all formal processes. The Applicant is engaging with the police force to help inform the police's planning to support AIL movements. This includes provision of indicative volumes of AIL movements, and indicative programme dates.
Traffic and Transport.	79. The estimate numbers of HGVs are similar to other energy projects (EA1(N), Bramford to Twinstead). This volume of movements will have negative impact for the highway network in the construction period, most noticeable, but not exclusively, on minor roads where existing HGV use is low. 80. With the number of NSIPs and other large infrastructure projects in East Anglia significant pressure is being put on the available facilities for HGV drivers and this matter should be considered by the applicant. 81. The authority recognises there is balance between a haul road dominated access plan as in this application and the alternative of many local accesses. The former requires significant volumes of material for haul roads but avoids use of unsuitable local roads and in the case of Norwich to Tilbury the impacts in highway terms are lessened by the projects approach. Note that this may not be the best solution for other disciplines.	The construction vehicle volumes have been determined through a comprehensive trip generation exercise, which was activity specific, rather than basing the numbers off similar schemes. The construction vehicles are reflected through the anticipated peak day vehicle numbers for each construction activity. The Applicant completed an exercise following the presentation of the trip numbers in **7.11 Transport Assessment [APP-333]** to ensure the suitability of the proposed Primary Access Routes (PARs) with the anticipated vehicle numbers. **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the likely impact along those roads forming the PARs, where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors. National Grid developed **7.3 Outline Construction Traffic Management Plan [APP-309]**, the purpose of which is to monitor, mitigate and manage the impacts around construction traffic. The Applicant notes SCC's comments regarding the Project's haul road based access plan (strategy). The principles for siting and designing access routes are set out in CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by Commitment GG33, with ecological constraints covered by Commitment B02. The Applicant notes SCC's comment about facilities for HGV drivers. Construction traffic to be generated by the Project and its routeing 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 Essex 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 Essex. 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 Essex 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.
Traffic and Transport.	82. In highway terms, SCC supports the inclusion of a temporary haul road to bypass the village of Holton St Mary to reduce impacts through the village and avoid the tight bends and narrow roads on the B1070. Note that this may not be the best solution for other disciplines.	The Applicant welcomes the support for this change which it made following consideration of consultation feedback.
Traffic and Transport.	83. Terminology used in the application must be consistent. For example, on plans made available to SCC the term bellmouth is used throughout but elsewhere there is a discrimination between a site access (i. e. where construction traffic gains access to the site) and crossing point (where no access is permitted).	The Applicant acknowledges the importance of consistent terminology across the application documents and plans. For clarity, a bellmouth refers to the physical layout of a junction designed to accommodate large vehicles. In contrast, terms such as site access or crossover points describe functional aspects of the works, for example where construction vehicles enter the site or cross a public highway. The bellmouth is therefore the physical junction arrangement, while the other terms relate to operational use, and the appropriate term depends on the context.

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		To avoid ambiguity, the Applicant will review the glossaries in relevant documents to ensure definitions are clearly set out, with any updates reflected in future revisions.
Traffic and Transport.	84. The council is concerned that some of the access routes proposed for construction traffic are not appropriate for the significant volumes of construction traffic and that the transport impacts have been underestimated. Specific locations are: a. bends south of Rickinghall. b. manoeuvrability under the railway bridge at Gislingham. c. manoeuvrability at the crossroads at Finningham. d. manoeuvrability under the railway bridge at Finningham. e. A1120 / Saxham Street junction (NW of Stowupland). f. Mill Lane, Stowmarket (sharp bends, tight)	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. With regard to the specific locations noted, the Applicant is in the process of developing plans in coordination with the Local Highway Authority, with proposals being subject to reviews and processes such as Road Safety Audits at appropriate points in the design process. All locations referenced within this representation have been subject to this assessment process, with highway mitigation proposed for locations (a) and (b). The assessment of all other locations has not identified the need for physical mitigation at this stage.
Traffic and Transport.	85. SCC have yet to review the details of the assessment. However, based on the information available SCCs specific concerns are: a. safety, particularly at evolved junctions where delays joining the main carriageway may result in driver frustration. b. that the impacts on the Major Road Network ("MRN") are not considered, in the case of Suffolk specifically the road safety at the A140/A143, Stoke Ash junctions. c. there is a reliance on others providing mitigation at the A1071/B1113 e. g. Beagle Roundabout.	Junction modelling was undertaken to assess the likely impact the increase in traffic as a result of the Project would have in combination with committed developments at key junctions on or connecting to the Primary Access Routes (PARs). Where required, suitable mitigation measures have been proposed or are under discussion with Suffolk County Council and National Highways to reduce driver delays through junctions as presented within **7.11 Transport Assessment [APP-333]**. The A140 is part of the Major Road Network (MRN) and may be used by construction vehicles travelling to and from the PARs to the Project. Within **7.11 Transport Assessment [APP-333]**, junctions located on the Strategic Road Network (SRN) and MRN that connect to the PARs were modelled where potential capacity issues as a result of increased traffic from the Project and other committed developments would likely be expected. The exception to this was where Local Highway Authorities and National Highways identified additional junctions that should be included. The A140/A143 junction does not connect to a PAR, and was therefore not initially included within the modelling assessments. However, at the request of Suffolk County Council the junction was modelled to understand the impact to the side roads at this junction due to increased traffic on the A140 as a result of the Project in light of existing safety issues. As the source of construction materials was unknown prior to DCO submission, **7.11 Transport Assessment [APP-333]** assumed a likely trip generation for vehicles using the A140 based on an assumed directional split from PAR 8, PAR 10, PAR 12. During peak hours this equated to 22 movements in both directions along the A140 during peak construction activity, that is expected to be of one week. The junction modelling found that the junction would operate within capacity, but with a slight increase to delay to traffic turning from the side roads on to the A140. The Applicant acknowledges the existing road safety concerns at the A140/A143 Stoke Ash junction and concern for driver frustration. However, the level of mitigation required at the junction to resolve the existing safety issues is considered to go beyond what is reasonable and proportionate 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 would welcome further discussions with Suffolk County Council. The Applicant has been engaging with Suffolk County Council to understand the impact of the Project in combination with committed developments, where mitigation is proposed by others. This includes Site 32: A1071/B113/Swan Hill junction and Site 30: A1214 London Road / Scrivener Drive roundabout. The Applicant modelled the peak hours at both junctions using the existing highway layouts and reported the results within **7.11 Transport Assessment [APP-333]**. The temporary nature of the impact and the small increase in RFC values due to the construction traffic were considered and no mitigation was proposed. Through further engagement and at the request of Suffolk County Council, further junction modelling has been undertaken at these junctions using the junction highway changes proposed by the other developments. For Site 32: A1071/B113/Swan Hill junction it was found that the junction would operate within capacity with the Project construction flows and other developments. No further mitigation would therefore be required.

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		At Site 30: A1214 London Road / Scrivener Drive roundabout, the junction would also operate within capacity but would require minor mitigation in the form of signal optimisation. The Applicant is committed to working with Suffolk County Council to agree the inclusion of this mitigation at the junction. **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the likely impact along those roads forming the PARs, where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to reduce significant environmental effects on sensitive receptors, e.g. in Link PAR 12 - B1113 Finningham Rd/B1113 Walsham Road and Link PAR 16 - A1120 Church Road/A1120 Bell's Lane. National Grid developed **7.3 Outline Construction Traffic Management Plan [APP-309]**, the purpose of which is to monitor, mitigate and manage the impacts around construction traffic.
Traffic and Transport.	86. Potential improvements for passage of AILs has not been considered such as the A1120 Cedars Link and A140 Brockford Street Bridge which have restrictions on AIL use.	**7.3 Outline Construction Traffic Management Plan Appendix A - Abnormal Indivisible Load (AIL) Access Strategy [APP-310]** outlines the process for checking the structural capacity of structures along the proposed AIL routes, stating that a case-by-case approach is necessary. The document further states that, in the case of Local Highway Authority structures, structural assessments will be undertaken as necessary to confirm suitability, with the provision of structural information by the Local Highway Authorities. Potential improvements for the passage of AILs will be informed by the findings of said structural assessment once sufficient record information has been provided by the asset owner. This allows for the Applicant to assess each structure against the specific Project vehicle specifications and to investigate potential mitigation measures. Should this process conclude that no mitigation measures are suitable, the Applicant would seek alternative access for the AIL. 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. They will follow all formal processes required, which encompasses verification of structures along the access routes prior to movements taking place. The restrictions noted are subject to further review and the Applicant is working with the Local Highway Authority to progress this appropriately.
Traffic and Transport.	87. SCC would welcome discussion on whether certain areas of mitigation can be left in place rather than removed at the end of the project.	**7.3 Outline Construction Traffic Management Plan [APP-309]** explains that the potential for the site access points to be made permanent as a legacy to the Project has been considered within their design. The permanent retention of access points will be discussed on a case-by-case basis with the Local Highway Authority. There are a number of requirements needed to retain the site access points, including if the access point can be operational following the removal of any temporary traffic management associated with it. The Applicant and its Main Works Contractor(s) will therefore discuss with each Local Highway Authority, where appropriate, the retention of any temporary traffic management associated with site access points that could be made permanent.
Cumulative Effects.	88. SCC considers that in the case of cumulative impact there is a particular need for there to be direct consideration of an important aspect of inter-project effects, which is not at present adequately captured by the ES or the TA. SCC considers there is a third type of cumulative impact other than Intra-project and Inter-project effects. This is the repeated impact of multiple NSIPs or other major projects in a geographical location over a length of time, specifically repeated impacts on a community by repeated delivery of these schemes. An example would be a series of repeated closure of PRoW which would have a cumulative impact on amenity, severance and public health.	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 assesses inter-project cumulative effects from clusters of other development.
Air Quality	89. It is understood that the applicant has agreed within the standard mitigation that the applicant will ensure all on-road vehicles comply with the requirements of the London Low Emission Zone standards where applicable. This appears to be discretionary. SCC would expect a commitment for HGVs to	Commitment AQ01 of the **Outline CoCP (7.2 Outline Code of Construction Practice [APP-300]**) does set a requirement to ensure all on-road vehicles comply with the requirements of the London Low Emissions Zone (LEZ) standards where applicable. This is because it is included in the IAQM construction dust guidance mitigation, it is not discretionary. The LEZ standard for diesel HGVs over 3.5 tonnes is Euro VI.

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	comply with relevant emission standards e. g. EURO VI with appropriate monitoring and enforcement.	Commitment reference GG19 in **7.2 Outline Code of Construction Practice [APP-300]** states how the appropriate standards for lorries, buses, coaches and Heavy Goods Vehicles (HGVs) may include Euro VI (NOx and PM). This commitment has been updated to remove the word 'may' and include the following wording: *'Where specialist vehicles or availability provide a constraint to meeting the above standards an exemption register will be kept.'* This updated version of **7.2 Outline Code of Construction Practice [APP-300]** will be submitted into the examination at Deadline 2.
Traffic and Transport	90. The assessment of driver and public transport delay should include the impacts of any significant diversions for roads closed during construction.	**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the likely impact of temporary road closures on driver and public transport delay along those roads forming the Primary Access Routes. Only short-term road closures are expected in Suffolk, with less than 4 weeks if full closure of between 6-8 weeks if managed closure. Therefore, no significant effects are expected. National Grid developed **7.3 Outline Construction Traffic Management Plan [APP-309]**, the purpose of which is to monitor, mitigate and manage the impacts around construction traffic. Planned temporary road closures have been identified, and the management of impacts arising from temporary road closures that are required for various stages of the Project, including the provision of diversion routes where appropriate, will be identified. Engagement will be carried out with Suffolk County Council on planned diversion routes with the Main Works Contractor.
Traffic and Transport	91. In terms of severance, fear and anxiety for pedestrians, cyclists and horse riders SCC remains concerned about the impacts, practically where PRoW are diverted onto adjacent roads, especially if these are also used by the project's construction traffic or workers.	With regard to safety, where Public Rights of Way (PRoWs) are diverted onto adjacent roads, **7.6 Outline PRoW Management Plan [APP-329]** notes that any PRoWs subject to temporary diversion onto roads, or subject to temporary connection onto roads at locations that differ from their existing connection points, will be subject to discussion with the relevant Local Highway Authority PRoW Officers. Such arrangements will also be subject to suitable Road Safety Audits. The document also confirms that suitable temporary traffic management will be put in place and that visibility splays for all users will be provided in accordance with the relevant highway design guidance (Local Highway Authority Guidance or National Highways' Design Manual for Roads and Bridges). Where diversions involve roads that also accommodate construction traffic, the safety arrangements will be developed to account for the presence of construction vehicles, with appropriate measures applied as required. **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.6 Outline PRoW Management Plan [APP-329]** detail the approach to managing any interactions between construction activities and PRoWs intended to ensure that any temporary road based diversions operate safely for pedestrians, cyclists and equestrians.
Landscape and Visual	92. SCC considers that the key issues for landscape and visual matters that will need to be addressed by the Applicant during examination are around mitigation and compensation, including consideration of change requests put forward by SCC and BMSDC in August 2024:	The Applicant has set out in response to paragraph 7 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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. Consideration to the specific points raised is provided below.
Landscape and Visual	92a. Proportionate, landscape scale compensation in the Waveney Valley and south of Diss following the decision not to provide undergrounding of the high voltage electricity line through the Waveney Valley	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].** Whilst compensation is part of the mitigation hierarchy, EN-1 or EN-5 do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. 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'. 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.

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		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 CNP 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. The above aligns with the Bramford to Twinstead (BTNO) 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.
Landscape and Visual	92b. Exploration of further options to mitigate the adverse impacts of the scheme around Mellis and Gislingham	The Landscape and Visual Impact Assessment set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and accompanying **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** sets out a robust and consistent methodology, with clear, transparent criteria and assessment grades, in line with the Guidelines for Landscape and Visual Impact Assessment and the Clarification Notes. The approach and methodology were presented to and discussed with statutory consultees as recorded in relevant Statements of Common Ground **(5.9.1 – 5.9.12 [APP-089 to APP-100])**. The judgements were informed by detailed desk and field studies, and the findings are supported by explanations. Sequential assessments have been undertaken for long distance paths such as the Angles Way as advocated in GLVIA3 paragraph 6.22. Although it is recognised that people move freely around and across common land, as access is unlimited, GLVIA3 does not advocate sequential assessment in such instances. In considering the nature of the receptor and the likely effect on the view, the way that receptors experience views, in this case when moving around Mellis Common, perhaps as part of a walk, is considered in making the judgement. As noted, the LVIA recognises that there will be significant effects on visual receptors at Mellis Common. Views from Mellis Common are represented by Viewpoint 2.05 Mellis Road, Mellis Green the location of which can be found on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]**. The viewpoint assessment is presented on pdf page 500 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Annex A Viewpoint Assessment [APP-229]**. This viewpoint is typical of a reasonable worst-case location in terms of proximity to the settlement and open nature of the view to the north. The open access land at Mellis Common was taken into consideration in determining the susceptibility of recreational receptors as high. The viewpoint was identified as being of regional/local value and overall sensitivity was judged to be medium. The significance of effects at this viewpoint are reported to be moderate-major adverse and significant. A review of this judgement has been made and no need for amendments have been identified. Heritage viewpoint HE33 is also located on the western edge of Mellis Common, and the visualisation can be found within **7.12 Visualisations - Part 9 of 9 [APP-351],** pdf page 61. This photomontage demonstrates the filtering and screening effects of intervening vegetation from another part of Mellis Common.
Landscape and Visual	92c. Opportunity for restoration of the historic landscape and for Biodiversity Net Gain at the poplar plantation west of Wickham Skeith.	The Applicant has set out the proposed Biodiversity Net Gain (BNG) approach within **7.1 Biodiversity Net Gain Report [APP-299]**. Off-site BNG sites would be selected based on a range of factors including proximity to the Project, geographical location, local nature recovery strategies, habitat type, habitat condition, cost and timings amongst others. All off-site BNG sites would need to be formally registered sites on the Natural England BNG site register, to ensure long-term deliverability.
Landscape and Visual	92d. Exploration of further options to mitigate the adverse impacts of the scheme in the Gipping Valley, through potential changes in alignment or undergrounding of the 400kV line, as well as further rationalisation of the existing 132kV and 33kV networks, south-east of Stowmarket in particular, as part of this project	The Applicant has set out in response to paragraph 8 of this RR how it has considered the use of undergrounding within the context of its statutory duties and national policy. In relation to the existing electricity transmission network, this provides power, via the local distribution network, into the local area where it is used in homes and businesses. The need case and funding for the Project is to deliver the new network reinforcement needed, rather than to remove existing overhead lines by undergrounding them. We have identified a number of locations where we have proposed placing existing overhead lines underground. These locations are where existing 132 kV and lower voltage lattice pylon lines are crossed by the proposed 400 kV overhead line and / or mitigation of effects are considered necessary. This includes locations

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		such as at Mellis, between Offton and Bramford Substation, to the south of Bramford Substation and near Fuller Street. Unless required for mitigation, undergrounding existing overhead lines on the transmission network would not be in accordance with NPS EN-5 (2024) and would result in substantial cost to bill payers. There may also be significant environmental impacts due to the removal works on sensitive ecological and archaeological receptors as well as constraints from either existing built form or unsuitable ground conditions.
Landscape and Visual	92e. Positive strategic placemaking around Bramford substation	At Bramford Substation the Project includes a relatively small extension to the south-west corner together with overhead lines connecting into the north and the south. The Applicant is required to assess the potential environmental impacts of the Project only and set out proposed mitigation, in an Environmental Statement (ES) in accordance with the EIA Regulations. The EIA started early in the process, and in that respect, a considerable amount of assessment work was undertaken to allow preliminary judgements to be made about the design and routeing of the Project. This is set out in a number of documents including **5.1 Consultation Report [APP-066]** and **5.15 Design Development Report [APP-122]**, with feedback helping shape the Project. Embedded landscape and visual mitigation measures in the vicinity of Bramford Substation include proposals for rationalisation and undergrounding of several sections of existing 132 kV overhead line together with careful consideration of the routeing of the proposed 132 kV underground cables and 400 kV overhead line into and out of the substation. The Applicant recognises people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. An assessment of Cumulative Effects has been undertaken in accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. This includes an assessment of cumulative landscape and visual effects around Bramford Substation including the Bramford to Twinstead Project. Significant cumulative landscape and visual effects are recognised.
Landscape and Visual	92f. Effects of undergrounding on the Dedham Vale National Landscape	Section 5 of **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** sets out the approach for assessing effects of the Project on Dedham Vale National Landscape. **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** presents the assessment of effects of the Project on Dedham Vale National Landscape. The findings of the assessment of effects on the special qualities (natural beauty) of Dedham Vale National Landscape are reported as significant during construction but would reduce to not significant during operation.
Landscape and Visual	92g. Consideration of additional sections of Horizontal Directional Drilling ("HDD")	Trenchless underground cable installation techniques are part of a mitigation hierarchy that presents different effects at additional cost and require substantive excavations for drive and reception pits and a wider working area and residual cable swathe. They have been adopted where appropriate space is available and where the effects of standard open cut methods are not considered to be acceptable or practical. They are proposed for crossing major infrastructure (A12 and Railway) and for the River Stour and in response to heritage interests. The Applicant does not consider the benefits justify the effects elsewhere.
Landscape and Visual	92h. Comprehensive mitigation and screen planting around Cable Sealing End ("CSE") compounds	The Applicant confirms that the Cable Sealing End (CSE) compounds have been carefully sited and mitigated. Projects of this nature are required to assess the potential environmental impacts of the proposals, report on those, and set out proposed mitigation, in an Environmental Statement (ES) in accordance with the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017. The EIA started early in the process, and, in that respect, a considerable amount of assessment work was undertaken to allow preliminary judgements to be made about the design and routeing of the Project, including the siting of the CSE compounds. This is set out in various publications including **5.1 Consultation Report [APP-066]**, **7.15 Design and Access Statement [APP-353]** and **5.15 Design Development Report [APP-122]**, with feedback helping shape the Project proposals. Embedded landscape and visual mitigation measures are proposed the vicinity of the proposed CSE compounds within Environmental Areas. Details of the Environmental Area proposals are presented within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. **7.16 Design Approach for Site Specific Infrastructure [APP-354]** discusses design principles for landscape and visual mitigation of the CSE compounds together with any scope for variation at detail design stage. Commitment GG14 of **7.2 Outline Code of Construction Practice [APP-300]** makes the following commitment: '*Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be*

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		undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable'.
Landscape and Visual	94. SCC considers the Waveney Valley to be a highly valued and highly sensitive landscape and has provided evidence to support this. The Waveney Valley west of Diss is a shallow, intimate landscape consisting of a distinct valley floor and gentle valley sides. It is within an area that was previously designated as a Special Landscape Area in Mid Suffolk. In the South Norfolk Local Plan, it is recognised as a valued landscape.	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]**. There are no current local landscape designations such as Special Landscape Areas within the Study Area. The value of the landscape has been considered and the approach to making judgements on the value of landscape receptors is set out on pages 12-18 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 (TGN) 02/21 Assessing landscape value outside national designations. This defines landscape value as '*the relative value or importance attached to different landscapes by society on account of their landscape qualities*' (page 3)[155]. The Waveney Valley is underlain by three Landscape Character Types (LCTs) or Landscape Character Areas (LCAs) and the relative value and sensitivity of each is listed below, as reported in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**: • Waveney Rural River Valley LCA (medium value, high sensitivity overall) • Wooded Valley Meadowlands and Fens LCT (medium value, high sensitivity overall) • Rolling Valley Farmlands and Furze LCT (medium value, medium sensitivity overall).
Landscape and Visual	95. While SCC acknowledges that the new proposed alignment of an overhead line, east of Wortham Ling SSSI and west of Roydon Fen Local Nature Reserve, would reduce adverse effects of the scheme to the west of Wortham Ling SSSI, on Listed Buildings and Bressingham Steam and Gardens, the proposed alignment is now crossing the Waveney Valley in a more remote, yet publicly accessible area, previously recognised as a Special Landscape Area.	The Applicant notes this comment but considers that the decision making set out in section 4.6 of **5.15 Design Development Report [APP-122]** remains preferred and provides a balanced decision founded in policy in NPS EN1 and EN5.
Landscape and Visual	96. The Angles Way is a 93-mile long-distance walking trail from Great Yarmouth to Thetford, following the river Waveney and the powerline would be expected to dominate the valley floor in this area. Additionally, the alignment proposed in the submission documents is, in landscape and visual terms, worse than that from the last consultation. Towers RG85 – RG87, would no longer run parallel to the Angles Way but cross it at a very shallow angle, exacerbating the PRoW users' experience of walking underneath the powerline. SCC considers that the alignment in this area should be reconsidered.	Decision making on route alignment in the Waveney Valley is set out in section 4.6 of **5.15 Design Development Report [APP-122].** 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]**, page number 314 onwards. The Landscape and Visual Impact Assessment (LVIA) recognises that there will be significant adverse landscape and visual effects resulting from the Project during construction and operation. The Applicant has routed and sited the alignment in accordance with the Holford Rules as well as results of survey information and consultation feedback. We believe the alignment in this area is the preferred alignment to be taken forward whilst taking account of all these factors.
Landscape and Visual	97. SCC considers that the significant adverse effects on landscape character and visual amenity in this area resulting from the proposal as currently presented, would be incapable of mitigation and severe in their level of harm.	The Applicant notes this comment. This point is also reflected in National Policy Statement EN-5 (2024) which recognises that it is not possible to fully mitigate the landscape and visual effects of electricity transmission infrastructure. The Applicant has set out in response to paragraph 7 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Alternatives	98. SCC welcomes the extension to the proposed undergrounding of the existing 132kV powerline north to tower PKF35 (from PKF	The Applicant considered this as set out in **5.15 Design Development Report [APP-122]** at paragraph 5.1.6, but does not consider the effects justify the additional cost and effects of further undergrounding The Applicant has

[155] Landscape Institute (2021 *Technical Guidance Note (TGN) 02/21: Assessing landscape value outside national designations*.

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	28). However, SCC considers that this does not effectively rationalise the various powerlines to the west of Palgrave and that the undergrounding should have been extended further, to partially offset the impacts of the scheme. 99. SCC considers that the further rationalisation (undergrounding) of the existing 132kV powerline all the way to Diss substation or as near as possible to it (around PKF40, near Elm Vale Farm), would compensate to some degree for the adverse impacts of the proposals in this area by reducing the extent of the cumulative wire scape to the south of Diss and in the Waveney Valley. This would also benefit several Listed properties in the area and PRoWs, which the 132kV line currently crosses.	set out in response to paragraph 8 of this RR how it has considered the use of undergrounding within the context of its statutory duties and national policy.
Airfields	100. SCC welcomes the change in alignment of the proposed 400kV line in order to protect the function and flight path of Brook Farm airstrip.	The Applicant notes and welcomes this comment. The Applicant's approach to the assessment of Project's 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]**. **5.15 Design Development Report [APP-122]** and **7.21 2024 – Design Development Report [APP-359]** describe the consideration of feedback to inform evolution of the Project design, including from the Brook Farm airfield operator, resulting in realignment and reorientation of the proposed Project alignment in the vicinity of the aerodrome. **5.9.32 Draft Statement of Common Ground – Brook Farm aerodrome – Letter [APP-119]** provides further detail regarding the chronology of the Applicant's engagement with the operator and the agreement of assessment conclusions that the implemented design changes effectively minimise potential adverse aviation impacts to enable continued safe aviation operations from the aerodrome.
	101. SCC notes that the route is aligned to avoid crossing Mellis Common. However, the adverse visual effects on views from this Conservation Area remain moderate major, therefore significant, according to the Applicant's own assessment (Doc Ref 7. 12, Figure 7. 12 F26_VP2. 05c and e, Viewpoint 2. 05: Mellis Road, Mellis Green). SCC considers that adverse effects might in fact be major and that the viewpoint assessment does not sufficiently address the perceptual qualities within the views from the common and its cultural heritage aspect. The sequential nature of the effects, when walking around the common, also do not appear to have not been addressed. SCC considers that changes to the design of the powerline should be considered to reduce the adverse effects on this area.	The change in alignment leading to the positioning of the Project to the west of Burgate Road was made following feedback on the 2023 preferred draft alignment which was to the east of the road. Paragraph 5.4.67 of **7.21 2024 - Design Development Report [APP-359]** responded to feedback and highlighted potentially significant adverse effects to a double moat. The moated site is a double moat which is more significant than single moats despite it not being designated. The 2023 preferred draft alignment (RG112 in particular) was too close to the moated site and Historic England had concerns regarding physical impacts and impacts through change to setting. Other routeing considerations regarded the impact to the open western end of Mellis conservation area so routes further west were also preferred on this basis. There are also other possible moated sites in this section, therefore alternatives to the east of Burgate Road were less preferred.
	102. Currently there are four directional changes (at towers RG108, RG110, RG112, and RG117) to the north-east of Gislingham. SCC acknowledges that this alignment was probably chosen to avoid impacts on the setting of the moated site at Moatyard Plantation. However, this includes crossing Burgate Road twice, which is likely to result in significant adverse effects and disbenefits for the visual amenity along this route, which is used for recreation	Burgate Road is located within Visual Receptor Area (VRA) B3 Mellis. As reported in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**, effects on VRA B3 have been assessed as significant during construction and operation up to approximately 1.5 km from the Project, including from Burgate Road. Viewpoint 2.49 Burgate Road, south of Little Green, is representative of people living in and moving around the community of Burgate and using the local Public Right of Way and road network. Effects were assessed as significant during construction and operation, as described in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]**.
Landscape and Visual.	103. SCC considers, without prejudice, that there is potential to avoid the double crossing of Burgate Road by locating the powerline between Burgate Road to the west and the Moatyard Plantation to the east, while still respecting the setting of the	The basis of decision-making regarding overhead lines and undergrounding is set out in response to paragraph 8 of the RR, above. These locations are where existing 132 kV and lower voltage lattice pylon lines are crossed by the proposed 400 kV overhead line and/or where mitigation of effects is considered necessary. This includes a section of the PKF overhead line at Mellis. Unless required to mitigate the effects arising as a result of the Project

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	moated site, (by starting the route change at RG 108). This would also largely avoid cutting through the Green Lane connecting Burgate Road and Mellis Road. In landscape and visual amenity terms this would be a significant improvement to the alignment. This would also help to reduce cumulative effects with other energy proposals (solar) in this area. 104. SCC further considers, without prejudice, that the concentration of energy infrastructure at Burgate Road could be further reduced by continuing the undergrounding of the UKPN line to PKF 14 and providing robust screen planting around the CSE compound.	(which could occur in combination with the existing lines) which fall to be considered in the context of NPS EN-5 (2024) various paragraphs of section 2.9), the Applicant has no remit to reduce the effects from existing overhead lines. There may also be significant environmental impacts due to the removal works on sensitive ecological and archaeological receptors as well as constraints from either existing built form or unsuitable ground conditions. We therefore do not believe there is a driver in policy terms (in the context of NPS EN-5 (2024) various paragraphs of section 2.9) for continuing the undergrounding of the 132 kV overhead line at Mellis. Once the Project has been constructed and commissioned, the temporary construction working areas relating to the UKPN works would be removed and the site reinstated where practicable, including the reinstatement of planting as set out in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Ecology and Biodiversity.	105. SCC welcomes that the proposed access to the construction corridor between Thornham Road/Major Lane and Coldham Lane has been removed from the scheme, avoiding thereby considerable adverse effects for ecology and cultural heritage. According to the Arboricultural Impacts Plan (AIP) mature trees on either side, including one veteran tree, will now not be affected by the scheme. It is still now proposed to use a track south of Coldham Lane, but according to the AIP this would not affect any trees west of railway line. SCC further welcomes that the promoter now proposes to use the existing field path, just east of the railway embankment, along a route which minimises impacts on trees.	The Applicant notes this comment and wishes to clarify that the Project still includes temporary accesses from Thornham Road/Major Lane to the construction corridor, albeit these have been modified to allow a change in the overhead line alignment. The Applicant has however removed from the Project a proposed permanent access easement between Thornham Road and Coldham Lane. This is the access that the **7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan [APP-322]** refers to.
Alternatives	106. It is notable that the current alignment north of a visually prominent poplar plantation has been modified in comparison to earlier consultations. A tower that was previously placed in the middle of a probable roman site to the north of the plantation (https://heritage. suffolk. gov. uk/Monument/MSF7298) has been moved further west. The line still crosses the poplar plantation, but further west than the original crossing point.	The Applicant notes the observations made by Suffolk County Council.
Ecology and Biodiversity	107. The poplar plantation itself is in a small field, with the River Dove flowing through it. The field is bounded to the north and south by hedgerows with prominent and locally characteristic pollard oak trees, some of which show veteran characteristics, historically there were also Elm pollards present. During the 1960s the entire area underwent a comprehensive and extensive programme of field amalgamation. However, this small stream side enclosure remained intact, because the river was too large to be piped. The field could not be incorporated into the adjacent land to the north and was bounded to the south by Wickham Road. However, the landowner did take the opportunity to plant commercial hybrid poplars (Populus × canescens) onto the site, certainly with a view to selling these, possibly for match production. See Ordnance Survey mapping from 19039 and 195310. 108. Cutting through this relatively short-lived commercial plantation to make way for the overhead line is likely to increase the risk of wind-throw for the remaining trees, which are now comfortably middle-aged. This could create a serious risk for	107 -109 The Project currently assess part removal of the poplar tree plantation confirmed within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]**. The extent of tree removal for the Project would be confirmed following detailed design and confirmed in commitment GG14 of **7.2 Outline Code of Construction Practice [APP-300]**. 108-109. The comment relating to tree health and safety and the risk of windthrow is noted. Future potential to manage the plantation is noted. Following detailed design, the Applicant would agree the future management of the poplar tree plantation with the landowner 110 & 111 – The Applicant notes SCC's comments on this matter and will continue to engage on this topic. 112 - Trees both to the north and south of Wickham Road are currently impacted (either removed, affected managed or potentially affected). Detailed design will seek to retain vegetation and develop an Arboricultural Method Statement; see commitments GG14 and LV05 in **7.2 Outline Code of Construction Practice [APP-300]** to limit impacts to retained trees.

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	users of Wickham Road and the PRoW in and adjacent to the plantation. 109. Therefore, it is essential that these trees are carefully inspected to understand their current health and disease profile, and how they might react to the significant change in their environment by the removal and disturbance of part of the plantation. Depending on the findings of these inspections, and notwithstanding the visual prominence of this plantation, the most responsible approach to forestall the anticipated public safety / access and highway risks associated with the ageing and deterioration of this plantation may be to remove the entire plantation. 110. Should this be the case, SCC considers that this would present a unique opportunity for the Norwich Tilbury project to deliver significant historic landscape and biodiversity gains at this site. 111. The extensive work necessary to accommodate the new pylons would provide the opportunity for the site to be cleared, de-stumped, and for the previous historic landscape of the riverside meadow to be revealed. 112. SCC considers that throughout this process, it is essential for the final alignment to avoid impacts on the historic pollard trees in the site boundary, and those on the southern side of Wickham Road.	
Traffic and Transport	113. The currently proposed alignment crosses Wickham Road at a point where two PRoW meet. 114. One PRoW leads westwards through the plantation to Eastlands Lane. This PRoW would be part of the restoration proposals, with the potential for additional voluntary open access, subject to landowner agreement. 115. The PRoW leading south-east from Wickham Road would, under the current proposals meet the power line again where it ends at a single-track lane to the south. Previous hedgerow restoration adjacent to the west of this PRoW, which would provide some screening from the close-range views of the power line along this route, and which would further improve over time, is put at risk by the current proposals. The adverse visual and amenity effect on the PRoW users will be increased by the current alignment. SCC considers that the alignment should be adjusted as it will be essential for public amenity to appropriately protect this hedge and its young hedgerow trees during the construction and operation phase of the scheme.	113 & 114 - The Applicant notes the comments. 115 - The landscape and visual assessment set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** is based on vegetation clearance assumptions set out in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and presented on page 77 of 352 and page 79 of 352 of Annex D within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]**. These figures illustrate that the section of hedgerow in question would either be unaffected or managed; no hedgerow loss is reported. Hedgerow trees within this particular hedgerow would either be removed or managed. Habitat removed during the construction would be reinstated with the exception of planting restrictions associated with operation (and maintenance) requirements within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Alternatives	117. SCC welcomes the proposed rationalisation and incorporation into the project of the existing 132kV line in this area but considers that there is a wider opportunity for a comprehensive scheme of undergrounding to include 132kV and 33kV infrastructure that would, subject to archaeological constraints, compensate for, through offsetting, the harm of the 400kv line, providing significant landscape and heritage benefits.	The Applicant notes that the various lower voltage assets referred to are owned and operated by a third party. In considering the routeing and potential mitigation where other overhead lines are present, the Applicant has considered whether sufficient mitigation (such as undergrounding) is proposed to ensure any crossings provide safe clearances and also to consider whether cumulative effects are to be addressed. Whilst acknowledging the landscape and visual benefit from further rationalisation, the Applicant considers that necessary safety clearances are met and does not consider that the additional effects from the 400 kV works justify the additional

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		costs and the effects of further undergrounding. This was set out from paragraph 5.4.3 of **5.15 Design Development Report [APP-122]**.
Alternatives	118. SCC is disappointed that the Promotor has not taken on board the request to realign the 400kV line through the Gipping Valley from its current alignment further to the west and continues to have concerns about the proposed alignment through the wider Gipping Valley, and considers that the currently proposed alignment through the Gipping Valley requires re-configuration. 119. While the Gipping Valley has in many parts lost its remote, tranquil and undeveloped character, there are still pockets where field patterns and the spatial relationship between the valley sides and the valley floor are legible. In these areas, which were formerly identified as a Special Landscape Area, any development can have a profound visual impact, in particular new vertical elements within the valley side landscape, such as pylons. 120. The current alignment passes closely to the east of Creeting Hall, through one such area, crossing two small tributary valleys, that were formerly a Special Landscape Area and still exhibit the key characteristics and features such as small fields bordered by hedgerows and visually prominent trees and pockets of grasslands. Whereas, to the west of Creeting Hall, the land rises to an open plateau landscape which has been subject to a comprehensive programme of agricultural improvement and rationalisation of boundary features. 121. Therefore, SCC requests that the alignment is moved to the west of Creeting Hall by changing the alignment between RG161 and RG168. This would also result in reducing the adverse effects to the setting for the Grade II*Listed Creeting Hall. 122. SCC considers that the potential additional adverse effects on St Peter's Church (Grade I Listed), the war memorial (Grade II Listed) and Glebe House (Grade II Listed) and their settings that may result from this change request would need to be assessed.	For 118 to 122, the Applicant has considered this change as set out from paragraph 5.4.3 of **5.15 Design Development Report [APP-122]**. Alternative routes are possible but lead to different effects to different receptors and on balance are considered less preferred.
Landscape and Visual	123. The southern valley sides of the Gipping River retain a more intact landscape pattern and provide an important setting for the valley as well as for Stowmarket and Needham Market. Located on these southern slopes south of Stowmarket is the significant cultural heritage site of Badley Hall Farm and St Mary's Church cluster. 124. As the visual assessment (Doc ref 7. 12, Figure: 7. 12. F37_VP2. 16a-e, Viewpoint 2. 16: PRoW near Badley Hall Farm (Badley 21)) shows, the setting of this cluster is already impacted by two existing 132kV powerlines, passing the site to the east in close proximity. A further powerline crosses the approach from the B1113. With the addition of the proposed 400kV powerline the setting of this cluster would be further significantly eroded. SCC considers that it would be appropriate and reasonable to compensate for the impacts of the new 400kV powerline through a comprehensive scheme of undergrounding of the 132kV and other lower voltage lines in this 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.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**, the effect on visual receptors at Viewpoint 2.16: PRoW near Badley Hall Farm (Badley 21) would be minor-moderate and not significant (adverse) during operation. As set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** embedded landscape and visual mitigation measures in the vicinity of the Gipping Valley include careful consideration of the routeing of the proposed 400 kV overhead line and undergrounding of sections of existing 132 kV overhead line south of the Gipping Valley where these interact with the Project.

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Landscape and Visual	125. Holyoak Farm and the settlement of Combs, which are currently sandwiched between two powerlines would be additional areas, where undergrounding or rationalisation of 132kV and 33kV powerlines would provide compensation for the adverse effects of the proposed 400kV powerline in form of wider landscape restoration.	Holyoak Farm and the settlement of Combs are located over 2 km from the Project. As shown on page 4 of **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]** they are located within Visual Receptor Area (VRA) B10 Great Bricett. As set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]** effects on visual receptors beyond 1.5 km would be minor and not significant (adverse).
Cumulative Effects	126. SCC is concerned that the cumulative effects around Bramford substation will result in a landscape dominated by pylons and electricity infrastructure, with a wide-ranging visual envelope. The Council considers it essential that the Applicant should focus on strategic positive placemaking around Bramford substation, to address the significant adverse effects on landscape character and visual amenity in this area, resulting from high voltage electricity transmission infrastructure converging. This should include rationalisation and/or undergrounding of power lines, as well as strategic planting and placemaking at a landscape scale. The cumulative effects of the proposed reinforcement of the Bramford to Twinstead line must also be addressed in this context and acknowledged on the Norwich to Tilbury plans and drawings as well as in the assessments.	At Bramford Substation the Project includes a relatively small extension to the south-west corner together with overhead lines connecting into the north and the south. The Applicant is required to assess the potential environmental impacts of the Project only and set out proposed mitigation, in an Environmental Statement (ES) in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The EIA started early in the process, and in that respect, a considerable amount of assessment work was undertaken to allow preliminary judgements to be made about the design and routeing of the Project. This is set out in a number of documents including **5.1 Consultation Report [APP-066]** and **5.15 Design Development Report [APP-122]**, with feedback helping shape the Project. Embedded landscape and visual mitigation measures in the vicinity of Bramford Substation include proposals for rationalisation and undergrounding of several sections of existing 132 kV overhead line together with careful consideration of the routeing of the proposed 132 kV underground cables and 400 kV overhead line into and out of the substation. The Applicant recognises stakeholders may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. An assessment of Cumulative Effects has been undertaken in accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]** and is presented in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. This includes an assessment of cumulative landscape and visual effects around Bramford Substation including the Bramford to Twinstead Project. Significant cumulative landscape and visual effects are recognised. The residual landscape and visual effects that remain following the application of the mitigation hierarchy 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.
Alternatives	127. SCC welcomes the proposed funding of a feasibility study for the removal/rationalisation of existing 132kV overhead lines east of Bramford Substation.	The Applicant notes the comment from Suffolk County Council.
Ecology and Biodiversity.	128. SCC welcomes, in principle, the proposals for undergrounding the proposed 400kV line within the Dedham Vale NL, and the efforts made by the applicant to avoid significant adverse effects on honeypot locations, such as Flatford. 129. However, the undergrounding may in itself result in significant adverse impacts and effects on the NL. These are likely to result from the requirement to navigate the complex and wooded valley slopes which define the vale, the need to cross the river Stour west of Stratford St Mary and navigate various waterbodies on the valley floor, to cross the Black Brook in a further, parallel, tributary valley to the south, as well as the A12 near Langham. 130. The landscape within the NL is intrinsically sensitive and change can result in significant adverse effects on the immediate environment, as well as on longer distant views across the valley. The new proposed alignment is likely to result in significant adverse effects on longstanding and traditional landuse patterns and in the loss of mature trees, which form an integral part of the landscape.	An assessment of effects on the Dedham Vale National Landscape is set out in **6.13.A5 Environmental Statement Appendix 13.5 – National Landscape Assessment Study [APP-235]**. Significant adverse effects are reported on a number of special qualities (natural beauty) of the National Landscape during construction. During operation these effects would reduce and not be significant. The Applicant recognises that stakeholders may have concerns about tree and hedgerow loss. Efforts have been made to minimise impacts on trees and hedgerows through an iterative design and assessment process and careful routeing and siting. The mitigation hierarchy has also been followed regarding tree and hedgerows affected by the Project which will continue as part of detailed design. Commitments to minimising vegetation loss is outlined in **7.2 Outline Code of Construction Practice [APP-300]**. In addition, the Applicant is committed to 3:1 replacement tree planting for individual and small groups of trees which would be undertaken on-site as a priority and off-site if required. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** also outlines the commitment to on-site replacement planting within Section 9.3.1. The loss of trees within scrub and woodlands (area habitats) as identified by **7.4 Outline Landscape and Ecological Management Plan [AS-046]** is assessed and mitigated through the BNG metric and within **7.1 Biodiversity Net Gain Report [APP-299]**. **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** details the compensation and mitigation strategies for veteran trees and ancient woodland affected. Detail on impacts to trees and hedgerows at the track heading east from West Lodge, north-west of Langham Hall can be found on pages 169 of 352 and 170 of 352 of Annex D within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**.

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	131. SCC considers that the Promoter has a duty to minimise adverse effects on trees and hedge, and is concerned about some of the proposed access routes for example at the track heading east from West Lodge, northwest of Langham Hall (Project Design Section C, Page 31 of 63).	The Applicant has set out in response to paragraph 7 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Landscape and Visual	132. The Council welcomes the siting of the Cable End Sealing compounds so that they avoid significant harm to the Dedham Vale National Landscape and Raydon Airfield. Although in order to ensure that a conflict with Raydon Airfield is avoided, moving the Cable End Sealing Compounds further north to Lattice Tower JC026 in the vicinity of Wenham Thicks would be beneficial. It would also lessen the impacts upon and the Grade II Listed Buildings at Wenham Grange and Vauxhall. The Council is concerned that this request is not reflected in the current proposals. 133. As the location of the CSE compound remains unchanged under the current proposals, SCC welcomes that the cable corridor now is proposed to head east rather than west at the very beginning of the undergrounding from the CSE compound. This is likely to result in the loss of fewer field trees in this area. It would still need to be clarified, whether or not the CSE compound and the current arrangement are interfering with the landing strip of Raydon Airfield and any archaeological constraints.	The Applicant has considered the alternative positioning of the Cable Sealing End (CSE) compound but does not consider this preferred for the reasons set out in paragraph 6.1.6 of **5.15 Design Development Report [APP-122]**. Aviation advisers to the Applicant have evaluated the CSE compound positioning, which has an area of existing woodland between it and the airfield, and do not consider it to interfere with operation of the nearby airstrip. The Applicant notes the comments regarding the changed cable corridor alignment. Paragraphs 15.4.12 to 15.4.18 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** provide detail of the Applicant's assessment of Project impacts on Raydon Wings aerodrome. The key conclusions include that, whilst the proposed overhead line alignment (including the CSE compound positioning) will represent a new obstacle in the vicinity of the aerodrome, overflight as part of existing operational circuits will be from a safe height. Likely disruption to the aerodrome during construction of the underground cable route is recognised 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. The Applicant has sought engagement with the operator to discuss mitigation measures to minimise impacts further, where possible.
Landscape and Visual.	134. SCC welcomes the proposal to continue the undergrounding to the EACN Substation, as this would reduce the adverse effects outside the NL, especially around Ardleigh, and on views from the NL.	This change was made after the 2022 consultation in response to feedback, environmental assessment and consideration of potential effects. Suffolk County Council's support is welcomed and noted.
Landscape and Visual	135. SCC re-iterates that additional HDD (in addition to further HDD requests elsewhere) should be considered by the Applicant to minimise the adverse effects on landscape features that are integral to the NL and its setting.	Trenchless underground cable installation techniques are part of a mitigation hierarchy that presents different effects at additional cost and require substantive excavations for drive and reception pits and a wider working area and residual cable swathe. They have been adopted where appropriate space is available and where the effects of standard open cut methods are not considered to be acceptable or practical. They are proposed for crossing major infrastructure (A12 and Railway) and for the River Stour and in response to heritage interests. The Applicant does not consider the benefits justify the effects elsewhere.
Landscape and Visual.	136. Without prejudice to comments from Essex County Council and Colchester City Council, SCC notes the changes in alignment that have been made around Langham Hall and Glebe Farm, Langham (a Grade II listed Farmhouse and Barn). SCC welcomes that the cable corridor now avoids the approach to the farm and the young avenues leading up to it. However, SCC queries what the reasons are behind the placement of construction compound JC-CC03 (Doc Ref: 6. 4. F1, Figure 4. 1 – Project Description - Proposed Project Design Section C, Page 31 of 63), and whether this could be re-considered. It appears that the compound and attenuation basin, are isolated form the cable corridor and necessitating a temporary haul road of considerable length, which would still cut through the avenue of trees leading up to Glebe Farm and one other tree line resulting in the loss of at least five trees and a considerable length of hedgerow along Rectory Road (Doc Ref: 6. 13. A6. F1, Figure A13. 6. 1 - Landscape and Visual Arboriculture Impact Plan, page 173 of 352). SCC considers that	The Applicant notes the respondent's preference for the compound location and did consider whether vehicles should continue further along Dedham Road to enable a compound location between Rectory Road and Dedham Road. To allow for this, Dedham Road would have needed to be widened over a considerable distance leading to disruption to residents using the road and effects on roadside vegetation. It was preferable to modify the haul road location to utilise some pre-existing gaps and field access locations. There remains potential to consider single vehicle width crossings to reduce effects where possible. The Applicant agrees that Glebe Farm is within the setting of Dedham Vale National Landscape. The setting of the National Landscape to its south is shown on Figure A13.5.5 in Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**.

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	this may be avoided, if the compound was located to the between Rectory Road and Dedham Road and accessed from Dedham Road. It is acknowledged that this would result in additional adverse effects on the residential receptors along Dedham Road and would have to be weighed up carefully. However, these additional adverse effects would be limited to the construction period and would preserve the fabric of the landscape and the setting of Glebe Farm. While Glebe Hall is not situated within the National Landscape (NL), it is within 500m of the NL to the west, north and east, and arguably part of the setting of the NL.	
Ecology and Biodiversity	137. SCC welcomes that the woodland block near Springfield Farm is now to be avoided (Figure 4. 1, Page 32). 138. From here, corridor leads on, east of Priory Cottage to the cross the Black Brook. Here a large, wooded area, including a veteran tree (T566), and large parts of an avenue of trees is earmarked for removal (Doc Ref: 6. 13. A6. F1, Figure A13. 6. 1, Page 175 of 352. SCC considers that this area should be assessed in detail and that vegetation losses should be reduced/minimised through micro-siting and that HDD drilling should be considered to cross the Black Brook. In particular, every effort should be made to avoid harm to the veteran tree.	137 – The Applicant notes and welcomes the comment. 138 - Table 7.1 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** references design refinement and the requirement for protective measures set out in the **7.2 Outline Code of Construction Practice [APP-300]**. There are a number of commitments in **7.4 Outline Landscape and Ecological Management Plan [AS-046]** that seek to minimise impacts to vegetation, for example commitment B13 states, '*There will be a refinement post-consent that within the provisions of the Outline LEMP [AS-046] aims to further reduce vegetation losses prior to pre-commencement*.' We would note that the veteran tree is located to the edge of the corridor and assuming careful methodology is developed would be avoided though the potential for it to be affected cannot be removed. The potential to cross Black Brook using trenchless techniques has been considered but it was concluded that with around 80m spacings between residential property and the veteran tree there is insufficient space to accommodate Horizontal Directional Drilling which needs cables (of which there are 18) to be separated by 10m to allow for directional variability. This requires an overall cable swathe of around 170m width compared with approximately 55m cable swathe for open cut installation.
Landscape and Visual	139. SCC considers that the required Cable Sealing End compounds will need to be carefully sited and mitigated. As a design principle, Cable Sealing End compounds should be sited away from the more sensitive valley sides, on the plateaux, where the potential for successful effective screening through strategic landscape scale planting may be achieved. Site selection for Cable Sealing End Compounds should further be guided by existing landscape features as well as built structures, which should be utilised to help embed the compounds into their surroundings.	The Applicant agrees with the need for Cable Sealing End (CSE) compounds to be carefully sited and mitigated and considers it has adhered to this for the siting of the various CSE compounds on the Project tin accordance with the EN-1 and EN-5 and its duties under the Electricity Act 1989.
Landscape and Visual	142. SCC considers that there is the opportunity to achieve a coherent landscape design approach for all Cable sealing End Compound sites and substations along the route, which should be explored by the Applicant. 143. This should be based on the Mitigation Hierarchy, as defined in the Glossary of Overarching National Policy Statement for Energy (EN-1), November 2023: The 'avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity. ' 144. SCC therefore expects the Applicant to provide measures of compensation, where residual harm persists beyond measures to avoid, reduce and mitigate.	142 - Projects of this nature are required to assess the potential environmental impacts of the proposals, report on those, and set out proposed mitigation, in an Environmental Statement (ES) in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The EIA started early in the process, and in that respect, a considerable amount of assessment work was undertaken to allow preliminary judgements to be made about the design and routeing of the Project, including the siting of the Cable Sealing End (CSE) compounds. This is set out in various publications including **5.1 Consultation Report [APP-066]**, **7.15 Design and Access Statement [APP-353]** and **5.15 Design Development Report [APP-122]**, with feedback helping shape the Project proposals. 143. The Applicant confirms that the CSE compounds and substations have been carefully sited and mitigated. Landscape and visual mitigation is proposed within 'Environmental Areas' at Norwich Main, EACN and Tilbury North Substations and the seven CSE compounds. An indicative landscape design has been developed for these Environmental Areas as detailed within **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]**. **7.4 Outline Landscape and Ecological Management Plan [AS-**

Topic	Summary of matters raised	National Grid's response
		046] provides the site context for each of the Permanent Features and identifies the individual landscape mitigation proposals for the Environmental Areas. **7.16 Design Approach for Site Specific Infrastructure [APP-354]** discusses design principles for landscape and visual mitigation of the CSE compounds together with any scope for variation at the detailed design stage. 144. With regard to the request for compensation, please refer to the Applicant's response to paragraph 92a of the RR above.
Key Legislation and Planning Policy Context	145. SCC would support the principle of a Design Champion (para 4. 7. 5, Overarching National Policy Statement for Energy (EN-1), November 2023) being engaged sufficiently early in the development of the project to oversee the design process, primarily within highly sensitive landscapes and around substation and Cable Sealing End Compounds, where positive placemaking will be essential. Further, there would be opportunities for the Design Champion to contribute to back checking of various alignment alternatives and to the integration of the proposals into the landscape at the detailed design, construction, and operational stages of the project, including micro-siting of pylons. As this this work will need to straddle both engineering and landscape disciplines, two key leads may be required to work in close collaboration. 146. The skillset required of a Design Champion has not been clearly defined within the National Infrastructure Strategy. The Institution of Civil Engineers (ICE) and the National Infrastructure Commission Design Group (NICDG) have produced a useful working paper 'Defining and developing the design champion role', (August 2022), in this respect.	The Applicant notes the support of the Design Champion. The Applicant will appoint a Design Champion, who will be a technical expert with the relevant experience and qualifications, for the implementation and construction phase to provide independent oversight and advocacy for ongoing good design in finalising the design and delivery of the Project. The Design Champion will act as a critical friend ensuring that the design principles secured through the DCO are upheld during detailed design development and implementation.
Landscape and Visual	147. SCC welcomes the application of the Rochdale Envelope but considers that this needs to be remembered both at the DCO decision making stage and throughout the detailed design stage and in all control documents. The Rochdale Envelope, presenting a reasonable worst-case scenario, requires that micro-siting and rationalisation of construction options are integral in further reducing harm to landscape features, landscape character and visual amenity post-consent.	The application of the Rochdale envelope has been described in Section 4.6 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The **7.2 Outline Code of Construction Practice (CoCP) [APP-300]** provides the preliminary framework for the principles and procedures that the Main Works Contactor(s) must implement to minimise, manage and mitigate the potential environment impacts of the construction works associated with the Project. The final version of the CoCP will be submitted for approval in accordance with Requirement 4 of the **Draft Development Consent Order [APP-056]** prior to commencement.
DCO Application	148. As the rationalisation and/or undergrounding of 132kV powerlines and of low voltage infrastructure along the reinforcement route from Norwich to Tilbury is expected to form an essential part of the mitigation and compensation for the scheme, SCC considers that further technical clarity and certainty are required, in particular, regarding how this work would be managed contractually, and how it would be controlled.	The Applicant has engaged UK Power Networks to undertake detailed design and delivery for works to UK Power Networks assets, both existing and proposed within the **3.1 Draft Development Consent Order [APP-056].** The DCO contains details of the finalised Front End Engineering Design conducted in collaboration with UK Power Networks. Further technical clarity on the solution will be progressed throughout the detailed design stage. The powers to deliver UK Power Networks' works are provided for within **3.1 Draft Development Consent Order [APP-056]** and any DCO listed constraints or prerequisites will be adhered to during delivery.
Historic Environment.	149. While the single trenches and working corridors are reduced in scale in comparison with the proposal's 400kV infrastructure SCC considers that a full assessment of impacts and effects, including vegetation loss and impact on archaeology will be required.	The 132 kV underground cable works are included in the Order Limits and assessed in the Environmental Statement (Volume 6 of the DCO application) including **6.11 Environmental Statement Chapter 11- Historic Environment [AS-069]** and its appendices. This element of the construction works is included in Phase 2 of the archaeological evaluation which is underway. Any vegetation removal would be managed and reinstated in accordance with the measures set out in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.

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DCO Application	150. SCC further requests detailed information with regards to the Decommissioning Strategy for the 132kV power lines, for example, whether foundations will be removed to plough depth. 151. As it is proposed that this work is undertaken by third party statutory undertakers, and the works have to be implemented prior to commencement of construction of the Norwich to Tilbury Line (ES, Chapter 4 – Project Description, paragraph 4.8.88), SCC would welcome some information on the Applicant's cooperation and coordination with the third parties to achieve this, on programming and envisaged timelines for separate applications, and clarification as to whether these would TCPA applications.	Paragraph 4.8.94 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** stated for the removal of existing 132 kV infrastructure that '*The reinforced concrete foundation would then be removed (for the purposes of the assessment within the ES (Volume 6 of the DCO application), this is assumed to be a depth approximately 1.2 m below ground level), the excavation backfilled, ground reinstated and any waste removed from site to a suitable licensed waste management facility*'. In all instances where reasonably feasible and appropriate to do so, foundations will be removed to plough depth. UK Power Networks' and the Applicant's construction works have the ability to be conducted concurrently, however some activities, such as stringing of the 400 kV conductor, would be unable to take place until UK Power Networks overhead line has been dismantled within interfacing sections of overhead line. The Applicant has engaged UK Power Networks to undertake detailed design and delivery for works to UK Power Networks' assets and are coordinating to produce a holistic programme of works taking into account both parties' delivery responsibilities. No further consenting powers are currently required as the powers to undertake all UK Power Networks' works as currently detailed are allowed for within the development consent application.
Ecology and Biodiversity	152. SCC assumes that the Applicant is aware of tree and hedge data from Suffolk Biodiversity Information Service (SBIS) for mapping and data and the Joint Babergh and Mid Suffolk District Council Landscape Guidance Joint Babergh and Mid Suffolk District Council Landscape Guidance, 2015.	The Applicant is aware of the Suffolk Biodiversity Information Service (SBIS) data set and has used this data within its ecology and landscape assessments. The tree and hedgerow data set available from Suffolk Biodiversity Information Service was initially used as part of the Stage 1 habitat survey, alongside high-definition aerial imagery and other desk-based resources. Detailed on-the-ground Stage 2 habitat surveys were then undertaken across the Project over 2023–2025; this included a combination of UKHAB, Biodiversity Net Gain condition assessment and Hedgerows Regulations 1997 assessment. Hedgerow survey results can be found within **6.8.A1 ES Appendix 8.1 - Habitat Report [AS-028]** and **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**. The landscape baseline set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]** was informed by desk study data which drew on a number of information sources including the Joint Babergh and Mid Suffolk District Council Landscape Guidance[156].
EIA Approach and Method	153. SCC considers that the proposals regarding the Bramford to Twinstead reinforcement should be included in plans, drawings and assessments as a likely part of the baseline.	The cumulative effects of the Project with the Bramford to Twinstead Project are considered in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**.
Landscape and Visual	154. SCC considers that proposed temporary access points and routes, as well as compound areas, need to be carefully considered, fully assessed and ground-truthed with regards to existing vegetation (trees, hedges and woodland) that may be affected. Visibility splays need to be fully considered in this context. SCC considers it essential that temporary works, in particular, are rationalised and co ordinated with the purpose to avoid and minimise impacts on vegetation. Temporary haul roads should not lead along narrow, tree-lined or wooded tracks. The default vegetation management for visibility splays should be hedge coppicing, not hedge removal.	The proposed access points and associated visibility splays have been carefully considered and impacts to vegetation have been reduced where in line with road traffic safety requirements. The default impact on hedgerows in visibility splays is already hedgerow coppicing/pruning, rather than removal. The allowance for hedgerow removal has only been included in the assessment at locations where traffic lights are proposed as an alternative option to long visibility splays, allowing room for temporary car stacking locations. Commitments are included within **7.2 Outline Code of Construction Practice [APP-300]** that seek to minimise impacts to vegetation, such as commitment B13, at the detailed design stage.
Landscape and Visual	155. No compounds or laydown areas shall be located within the National Landscape, except HDD compounds.	The Applicant welcomes SCC's support for the efforts it has made to reduce effects within the National Landscape.
Landscape and Visual.	156. Where conflicts with mature vegetation of landscape, amenity or screening value are identified, alternatives should be actively sought by the Applicant. SCC welcomes that one particularly concerning example at Gislingham (Coldham Lane), has been removed from the scheme, but there may be others (for	There are numerous commitments set out in **7.2 Outline Code of Construction Practice [APP-300]** that seek to minimise impacts to vegetation, for example commitment B13 states, '*There will be a refinement post-consent, that within the provisions of the Outline LEMP* [**7.4 Outline Landscape and Ecological Management Plan [AS-046]**] *aims to further reduce vegetation losses prior to pre-commencement*.'

[156] Babergh and Mid Suffolk District Council (2015) *Joint Babergh and Mid Suffolk District Council Landscape Guidance*

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	example the proposed access from High Road, Diss, Norfolk, leading to the Grade II Listed Farmhouse at Grove Farm, although the AIA predicts that no trees would be affected by the proposals).	A permanent access route is proposed along the track between the A1066 High Road, Diss and RG87, via Grove Farm. As set out in paragraph 4.1.8 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** there would be no physical works associated with these permanent access routes to pylons or underground cables. They are proposed rights of access only to allow for any maintenance or refurbishment required. As shown on page 47 of 6.13.A6.F1 in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]**, no trees or hedgerows along the track would be affected by the Project.
Ecology and Biodiversity	157. It appears that the hedgerow surveys are currently incomplete. SCC would welcome clarification, why some potentially important hedgerows were not chosen for survey (Doc Ref: 6. 8. A3 Figure A8. 3. 1 - Ecology and Biodiversity Hedgerows Regulations Assessment, Page 1 of 24) and if/when the Applicant intends to complete the surveys.	157 - A Hedgerows Regulations Assessment was undertaken at hedgerows across the Project that met the criteria outlined within **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**. This hedgerow assessment included a combination of survey effort, through either UKHAB data or targeted hedgerow surveys, and desk-based information. No further hedgerow surveys are to be undertaken to inform the impact assessment. Potentially important hedgerows are considered important on a precautionary basis where field data was collected slightly out of the ideal hedgerow season of April/May. The assessment assesses the impact on both important and potentially important hedgerows as a combined receptor. However, whether or not a hedgerow is 'important' under the Hedgerows Regulations does not materially affect the impact assessment as all native species hedgerows are considered to be Habitats of Principal Importance for the conservation of biodiversity and therefore all are considered to be ecological receptors of high value. Any loss of hedgerow (including any important hedgerows) would be mitigated with replacement planting on completion of construction. All hedgerows have been surveyed to inform the BNG assessment and surveys would be undertaken to inform replanting. All important and potentially important hedgerows affected by the Project for ecological and historic reasons are shown on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**.
Ecology and Biodiversity	158. There should be a clear listing of how many metres/ kilometres of hedge are permanently or temporarily lost, how many kilometres will be coppiced and how many kilometres of hedgerow will be retained through HDD. This should be done for each section of the scheme to inform the mitigation requirements in different areas and needs to include all enabling works, such as haul roads, site compounds, access points and all works associated with the removal and undergrounding of section of 132kV power lines and other required associated works that need to be undertaken by Third Parties the enable the Scheme.	**6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** already identifies how many kilometres of hedgerow would be removed by the Project, and whether this loss would be temporary loss or permanent loss. All construction elements that form part of the Project, including enabling works and third-party works, have been included as part of this hedgerow impact calculation. The design has sought to minimise impacts to hedgerows through careful routeing and siting. Further commitments have been made within the **7.2 Outline Code of Construction Practice [APP-300]** to minimise impacts on hedgerows through the detailed design process post-consent.
Ecology and Biodiversity	159. Please note for Appendix 8. 1 Habitat Report, Chapter 4 Results, paragraphs 4. 2. 13 ff: a. Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 lists Hedgerows as habitats of principal importance in England, as boundary and linear features. b. Any important hedgerows that are to be removed should be listed in a Schedule (Removal of Important Hedgerows) and identified on an appropriate plan. c. No work should be allowed to commence until full and complete hedgerow surveys have been carried out. This is necessary to inform the baseline against which Biodiversity Net Gain and the success of the LEMP need to be assessed and to agree replacements as part of the landscaping scheme.	159a - All native species hedgerows are considered to be Habitats of Principal Importance for the conservation of biodiversity and therefore all are considered to be ecological receptors of high value within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. 159b - All important hedgerows affected by the Project for ecological and historic reasons are shown on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**. 159c - Full on the ground habitat surveys have been completed across 97% of the land within the Order Limits; this includes detailed hedgerow surveys. The remaining 3% of land within the Order Limits has been mapped using aerial imagery. This survey information has been used to inform the baseline assessment within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and **7.1 Biodiversity Net Gain Report [APP-299]**. This baseline information will also be used to inform the replacement planting requirement, as outlined within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Ecology and Biodiversity	160. SCC considers that important hedgerows for the purposes of this scheme should include: a. Those meeting the Hedgerow Regulations (1997), including the criteria for Archaeology, History, Wildlife and Landscape as listed in Schedule 1 of the Regulations. If bat surveys identify 20 or	160a - **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]** assesses the ecological aspect of the Hedgerows Regulations 1997. The heritage Hedgerows Regulations are assessed separately within the Historic Environment Assessment Tables in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. All important hedgerows affected by the Project for

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	more passes by bats the hedgerow should be considered important as a bat corridor. b. All the hedgerows where one or more passes of a barbastelle have been recorded - due to the rarity of the species and margin for error in recording. The Regulations do not appear to set out a basis for a threshold of 5 passes. c. Those that perform an important visual function.	ecological and historic reasons are shown on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**. While the presence of a bat roost in a hedgerow could be used to identify 'important hedgerow', this approach has not been taken by the Project as bat tree roosts are often transient features. The commuting routes and foraging corridors are not covered by the Hedgerows Regulations 1997. The approach to bat mitigation has been agreed with Natural England. Bat activity has been assessed within **6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036]**. In certain locations where temporary vegetation removal is more than 15 m in width, and the bat species assemblage and a high bat usage feature has been identified, temporary artificial bat flyways would be installed during construction to maintain bat commuting routes. The location of bat flyways is presented in **7.4 Outline Landscape and Ecological Management Plan Appendix E - Bat Flyway Locations [AS-048]**. 160b - The bat commuting routes and foraging corridors are not protected by the Hedgerows Regulations 1997. However, bat activity has been assessed separately within the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and specifically within **6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036]**. This bat activity assessment considers all bat species, including but not exclusive to barbastelle bats. 160c - The visual function of a hedgerow is not covered in the Hedgerows Regulations (1997) and therefore not captured in our assessment of important hedgerows.
Ecology and Biodiversity	161. To enable full understanding and assessment of locations of important hedges, and areas, where either Horizontal Directional Drilling (HDD) needs to be undertaken, or off-setting of residual impacts needs to be agreed, SCC would ask the Applicant to: a. Append a column which identifies, by reference to the Hedgerow Regulations (1997), why hedgerows are considered important.	**6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]** identifies the criteria that each hedgerow passes to be identified as important under the wildlife and landscape criteria, and the criteria for selection as potentially important. All important hedgerows affected by the Project for ecological and historic reasons are shown on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**. The heritage Hedgerows Regulations are described in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and assessed separately within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. It is not proposed to use HDD for the Project simply to avoid impacts to 'important' hedgerows.
Ecology and Biodiversity	b. Display the above hedges on a colour – coded map of an appropriate scale, distinguishing between the different criteria. This should also include the additional hedgerows covered by points 2 (bat passes) and 3 (visual importance) above.	All important hedgerows affected by the Project for ecological and historic reasons are shown on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**. There is no requirement to distinguish between important hedgerow criteria on the Volume 2 plans and would unnecessarily visually complicate the plans. Important features for bats have been considered separately within **6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036]**. The location of bat flyways is presented in **7.4 Outline Landscape and Ecological Management Plan Appendix E - Bat Flyway Locations [AS-048]**. Neither bat commuting routes/foraging corridors nor visual function of a hedgerow are covered under the Hedgerows Regulations 1997 and therefore not captured in our assessment of important hedgerows.
Ecology and Biodiversity	c. Confirm that the hedgerows in the DCO limits have been assessed against all the criteria in the hedgerow regulations, regarding, for example the presence of other protected species (Part II 6 (3)) and proximity to rights of way (Part II 8).	The criteria that were used for the wildlife and landscape criteria are set out in **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**. The proximity to Public Rights of Ways was considered but the presence of protected species was not used as a criterion as use can be transient and difficult to prove. Impacts to habitats for protected species including hedgerows has been assessed separately for each species within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**.
Ecology and Biodiversity	d. Provide photos of each of the hedgerows which fall within the definition of 1, 2 and 3 above as and in accordance with point C. This will provide a reference for the baseline	Annex D of **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161**] contains photographs of each of the hedgerows that were subject to a targeted hedgerow survey under the wildlife and landscape criteria. Photographs of hedgerows have also been undertaken as part of the UKHAB surveys. Owing to the large volume of data collected, this information was not presented in the ES
Ecology and Biodiversity	e. Confirm which hedgerows the Applicant is proposing to HDD.	The Ecological Impact Assessment assumes a worst case scenario for hedgerow loss, whereby an open cut solution for the crossings has been assessed (unless otherwise identified). The locations of trenchless locations have been identified within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130].** The Project Description allows for flexibility in design, with the option for trenchless techniques associated with third-party works to be determined following detailed design. Where trenchless techniques are proposed (which may

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		include HDD) for sections of underground cabling, there would be no impact on the hedgerow above. While the presence of important hedgerows alone has not determined the need for a trenchless solution, it has been part of the consideration in key areas. All important and potentially important hedgerows affected or retained by the Project for ecological and historic reasons are shown on **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**.
Ecology and Biodiversity	162. SCC welcomes the Arboricultural Impact Assessment (AIA) and Tree Survey in accordance with BS 5837:2012 Trees in relation to design, demolition and construction. This data should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees.	162 - The tree data within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** will be used to inform detailed design. The Project has committed, in commitment GG14 in **7.2 Outline Code of Construction Practice [APP-300]**, to undertake relevant tree surveys with the aim to reduce removal of trees and hedgerows.
Ecology and Biodiversity	163. For the detailed design stage, there should be a clear, revised record and audit of how many trees are permanently or temporarily lost, how many need to be pruned or coppiced (please define these terms) and how many would be retained. This needs to be done for each section/stage of the scheme to inform the mitigation requirements in different areas and needs to include all enabling works, such as haul roads, site compounds, access points and all works associated with the removal and undergrounding of section of 132kV power lines and other required associated works that need to be undertaken by Third Parties the enable the Scheme.	Paragraph 13.4.14 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** states that following detailed design an Arboricultural Method Statement (AMS) will be produced together with a Tree Protection Plan. It is envisaged that bespoke AMSs and associated plans will be produced and agreed with Local Planning Authorities as confirmed in Section 7 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** for the different phases of construction. The AMS will detail tree works and include removals and management operations. BS 3998:2010 Tree Work - Recommendations[157] contains details on tree pruning/management and is referenced within paragraph 13.5.5 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**.
Ecology and Biodiversity	164. No works should be allowed to commence until a full Arboricultural Impact Assessment (including Tree Survey and Tree Protection Plan) and an Arboricultural Method Statement, (including location specific special construction method statements, where works are to be carried out within rootzones of trees that are to be retained) in accordance with BS 5837:2012 are submitted to and agreed with the relevant LPA in writing. SCC considers that it is essential that this is secured in the DCO and welcomes that this is addressed in the Outline LEMP.	Section 7 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** requires an Arboricultural Method Statement (AMS) to be prepared following detailed design and to be agreed with the relevant Local Planning Authorities prior to construction activity commencing. This is also referenced in paragraph 13.4.14 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**.
Ecology and Biodiversity	165. No article in the DCO should authorise any works to any tree subject to a tree preservation order. Such works, if demonstrated to be unavoidable, should be agreed with the relevant LPA on a case-to-case basis so that appropriate compensation can be agreed and secured.	Article 51 (Trees subject to tree preservation orders) of **3.1 Draft Development Consent Order [APP-056]** is adapted from the general model provisions. Article 51(3) obliges the Applicant to do no unnecessary damage and to pay compensation for any damage. This article is substantially the same as article 48 of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 and is necessary to ensure that the Applicant can comply with its obligations under the Electricity Safety, Quality and Continuity Regulations 2002.
Ecology and Biodiversity	166. The trees that are being lost should be appropriately evaluated by using an appropriate asset-based tree valuation system which calculates the replacement value of each tree and the benefits it provides in terms of carbon sequestration, carbon storage, air pollution removal and rainwater retention. This is to ensure that compensation measures are met for any replacement planting for the loss of those ecosystem services. SCC usually considers that any tree lost to the scheme needs to be replaced with three replacement trees.	Tree surveys and the reporting of baseline data and arboricultural assessment are detailed in Appendix J of **6.19 Scoping Report – including appendices B to K [APP-296]**. As referenced in Section 9.3.3 of **7.4 Outline Landscape and Environmental Management Plan [AS-046]** the Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups.
Landscape and Visual	167. SCC welcomes that through desk top study, site work and stakeholder engagement the number of viewpoints was increased	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

[157] British Standards Institution (2010). *BS 3998:2010 Tree Work – Recommendations*.

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	from the original 89 to 206, which does appear to be a more appropriate ratio when applied over the 184km of the project, although this still only translates to just over one viewpoint per km, and inevitably leaves considerable gaps. (In comparison, National Grid's Bramford to Twinstead project had an average of 5. 3 viewpoints per km.)	discussed and agreed with relevant Local Planning Authorities, as set out in the relevant Statements of Common Ground (**5.9.1 – 5.9.12 Statement of Common Ground [APP-089 to APP-100]**). The number of viewpoints assessed in the Landscape and Visual Impact Assessment (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. These are presented in **7.12 Visualisations [APP-343 – 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.
Landscape and Visual	168. SCC notes that there appears to be only one viewpoint outside the 3km study area (VP3. 20) and that none were considered at a greater distance of up to 5 km from the scheme. SCC considers that there is potential for significant visual effects beyond the 3 km study area, for example where there are particularly sensitive visual receptors and where topography allows more far-reaching views, and that there may also be additional viewpoints closer to the scheme that should have been assessed.	The following viewpoints are located beyond 3 km from the nearest above ground structure within Suffolk (approximate distance provided in brackets): Viewpoint 3.20 Fenbridge Lane (4.2 km); Viewpoint 3.24 Higham Hill, south of Lower Raydon (4.2 km); Viewpoint 3.26 Essex Way, near Langham Hall (3.7 km); and Viewpoint 3.27 B1066 Park Road, near Thorington Street (4.8 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]**. 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 Landscape and Visual Impact Assessment (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 viewpoints were discussed and agreed with relevant Local Planning Authorities, as set out in **5.9.1 – 5.9.12 Statement of Common Ground [APP-089 to APP-100]**. A number of viewpoints suggested by Local Planning Authorities were 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 reasons for not taking forward some of the viewpoints suggested by the Local Planning Authorities were provided to the Local Planning Authorities prior to submission.
Landscape and Visual	169. I t would have been helpful if Figure 13. 7 - Landscape and Visual -Visual Receptors and Viewpoints, (Doc Ref 6. 13. F7) could have been presented using Figure 4. 1 – Project Description - Proposed Project Design (Doc Ref: 6. 4. F1) as a base and indicate the viewing direction with a cone. The location maps on the viewpoints assessment pages alleviate the coarseness of the viewpoint map to some extent; however, the scale of the viewpoint map suggests a density in viewpoints that is not matched in the field.	**6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** is based on mapping at 1:10,000 scale, hence there would need to be substantially more plans to fit all the viewpoints onto the sheets. This scale of mapping would lose context of the viewpoints in relation to the Project. **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]** is intended as an overview map of viewpoint locations and the scale of the mapping is proportionate for this purpose. Viewpoint location maps, which are at a larger scale and include a viewing cone, are shown on the individual viewpoint sheets within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**, **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]**, **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]** and **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232]**.
Landscape and Visual	170. SCC welcomes the revised layout of the viewpoint assessment pages with clear location maps with recognizable reference points, and bigger and clearer viewpoint numbers, title and viewing directions. 171. However, the sequence of the viewpoint assessment pages remains confusing, as there is no consistent sequence from north to south along the alignment. It appears that viewpoints that were added later are presented later in the document, and therefore fall outside the geographical sequence, which makes reviewing more difficult.	170 – The Applicant notes and welcomes this comment. 171 - 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]**. Additional viewpoints, suggested by Local Planning Authorities, were added at various points. Due to the large number of additional viewpoints, they were numbered following on from the original sequence. This was to avoid confusion when referring to existing viewpoint numbers, which had already been shared with stakeholders. The locations of the viewpoints are shown on **6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [APP-243]**.
Biodiversity Net Gain	172. SCC welcomes the Applicant's commitment to a 10% minimum BNG, recognising that this is in fulfilment of the obligations with their regulator Ofgem.	The Applicant notes the respondent's comment.
	173. The pre-requisite to achieving BNG is successful reinstatement planting.	The Applicant has committed to a five-year monitoring period for tree and hedgerow replacement planting. Where new habitats are being created or habitat enhanced within Environmental Areas, the Applicant has committed to

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	174. With the current, justified focus on BNG and reinstatement, the third element of successful mitigation is in danger of being overlooked and ignored: planting for mitigating the landscape and visual effects of the development.	a 30-year monitoring and maintenance period. This commitment is detailed within the **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. Mitigation measures of relevance to landscape and visual effects are outlined in section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. These measures include but are not limited to the following examples: - Embedded measures, such as sensitive routeing and siting, undergrounding, rationalisation of 132 kV overhead lines and landscape and visual mitigation planting around substation and Cable Sealing End (CSE) compounds; and -Standard mitigation measures related to construction such as protection of vegetation to be retained and reinstatement planting. As set out in paragraph 13.6.4 (bullet 5) of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, landscape planting within Environmental Areas around CSE compounds, the proposed new EACN Substation, south of the proposed new Tilbury North Substation and the existing Norwich Main Substation and its extension is considered to be embedded landscape and visual mitigation, designed to screen and filter views of this infrastructure and help to integrate it as far as possible into the landscape. Details of the Environmental Area proposals are presented within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. **7.16 Design Approach for Site Specific Infrastructure [APP-354]** discusses design principles for landscape and visual mitigation of the CSE compounds together with any scope for variation at the detailed design stage. Regarding the request for compensation, please refer to the Applicant's response to paragraph 92a of the RR above.
Biodiversity Net Gain	175. While reinstatement planting would form the basis for landscape and visual mitigation planting, and BNG measures could also achieve landscape and visual mitigation, the rationale and aims for this third element are distinct from the two others: Landscape mitigation seeks to conserve and enhance landscape features and the landscape character impacted by the development, while Biodiversity Net Gain is linked to the habitats impacted. Visual mitigation is required so that the visual effects of development are minimised, by helping to embed the development into the surrounding landscape with effective screen planting, where possible. 176. While the three types of planting are interlinked, the Council does not consider that landscape and visual mitigation requirements are by default satisfied, once reinstatement planting and BNG goals are achieved. The Council expects that full consideration is given to landscape and visual mitigation and, if required, to compensation measures. The Council considers that landscape and visual mitigation planting is offers additional opportunities to the overall BNG being achieved.	As set out in paragraph 13.6.4 (bullet 5) of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, landscape planting within Environmental Areas around CSE compounds, the proposed new EACN Substation, south of the proposed new Tilbury North Substation and the existing Norwich Main Substation and its extension is considered to be embedded landscape and visual mitigation, designed to screen and filter views of this infrastructure and help to integrate it as far as possible into the landscape. Details of the Environmental Area proposals are presented within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. **7.16 Design Approach for Site Specific Infrastructure [APP-354]** discusses design principles for landscape and visual mitigation of the CSE compounds together with any scope for variation at the detailed design stage. Regarding the request for compensation, please refer to the Applicant's response to paragraph 92a of the RR above.
Landscape and Visual	177. SCC welcomes the indicative landscape design around the new/ extended National Grid permanent assets (i. e. CSE compounds and substations) (OLEMP Appendix D: Outline Landscape Proposals), designed to provide landscape and visual mitigation while also offering ecological value. SCC will provide further comments on these designs in the Local Impact Report. 178. SCC considers that the planting around these new assets should be managed and maintained for 30 years or for the life-span of the assets, whichever is longer.	As stated in **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.1 Biodiversity Net Gain Report [APP-299]**, where new habitats are being created or habitat enhanced within Environmental Areas, the Applicant has committed to a 30-year monitoring and maintenance period in line with Biodiversity Net Gain requirements.

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Ecology and Biodiversity	179. SCC has concerns with regards to the terminology regarding different types of mitigation. While SCC agrees with the definition given of embedded mitigation (paragraph 13. 6. 2), the council considers that the definition for standard mitigation (paragraph 13. 6. 5) is insufficient, and that for additional mitigation (paragraph 13. 6. 8) unhelpful and inappropriate.	**6.5 Environmental Statement Chapter 5 - Environmental Impact Assessment Approach and Method [APP-135]** defines the mitigation terms used in the Environmental Statement including **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Although Suffolk County Council may have defined the mitigation terms used differently, ultimately a change to definitions would not change the mitigation measures proposed for the Project.
Landscape and Visual	180. Any planting for Landscape and Visual Mitigation (i. e. which is proposed in addition to reinstatement planting for vegetation that was removed to enable the scheme) with the purpose of screening or filtering views of CSE compounds and/or other elements of the scheme, is considered by SCC to be required and necessary to mitigate impacts and to minimise effects on visual receptors (application of the mitigation hierarchy), and to make the scheme acceptable in landscape terms. It stands side by side with reinstatement planting and planting for Biodiversity Net Gain and cannot be considered 'additional' or 'above and beyond' (paragraph 13. 6. 8).	As set out in paragraph 13.6.4 (bullet 5) of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, landscape planting within Environmental Areas around CSE compounds, the proposed new EACN Substation, south of the proposed new Tilbury North Substation and the existing Norwich Main Substation and its extension is considered to be embedded mitigation. No additional landscape mitigation is proposed. The Applicant has set out in response to paragraph 7 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Landscape and Visual	181. Paragraphs 13. 6. 8 and 13. 6. 9 appear to contradict each other, the former stating the LVIA has identified a requirement for further mitigation, while the latter negates this. SCC disagrees with paragraph 13. 6. 9 and considers that further mitigation in form of tree and hedge planting is required for this project.	Embedded and standard mitigation measures of relevance to landscape and visual effects are outlined in section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Additional mitigation refers to measures implemented beyond the initial Project design to further reduce or manage environmental impacts identified during the planning or construction phases. No additional landscape mitigation is proposed.
Landscape and Visual.	182. Despite the assessment of long-term significant adverse impacts and effects on landscape character and long-term significant adverse effects on visual receptor groups including residents, road users and recreational receptors are likely, the Applicant does not sufficiently explore the fourth column of the Mitigation Hierarchy, Compensation, in the landscape chapter. 183. SCC considers that residual adverse impacts, that cannot be mitigated, will need to be compensated, by means of wider landscape restoration and a coordinated Landscape, Ecology, Archaeology, and Rights of Way Masterplan, in particular, but not exclusively, in areas which are disproportionately affected by energy infrastructure, such as Bramford, Burstall, and the Gipping Valley.	Please refer to the Applicant's response to paragraph 92a of the RR above.
Landscape and Visual.	184. In Table 13. 1 Engagement undertaken relevant to Landscape and Visual, the Applicant considers offsite tree planting to be compensation. SCC welcomes offsite tree planting as it would contribute to the enhancement of the landscape character and visual amenity. It will be essential to agree an effective mechanism to mitigate/compensate for tree loss, both under the line and in the wider corridor, and a comprehensive programme of planting on a 3:1 ratio should form the starting point. The Council acknowledges that it would be difficult to plant such quantities of trees within the DCO boundary. 185. The Council considers that it will need to be clarified and quantified, to which extent offsite tree planting will be counted towards replacement planting, necessary as a foundation to	184 – The Applicant notes this comment. 185 and 186 – Off-site tree planting will be undertaken as part of the Applicant's 3:1 tree compensation commitment. The precise breakdown of numbers of trees delivered on-site and off-site as part of this commitment will not be known until after detailed design. Details of the on-site tree planting will be provided in accordance with the final Landscape and Ecological Management Plan secured under Requirement 4 (if provided within the Environmental Areas) or the Reinstatement Planting Plan secured under Requirement 9 (as appropriate) of **3.1 Draft Development Consent Order [APP-056]**. Off-site tree planting will be secured via a legal agreement. The off-site provision (on-site deficit) can only be finalised once final details of the on-site provision have been approved under the final Landscape and Ecological Management Plan. An Off-site Planting Delivery Scheme will be provided to the relevant Local Planning Authorities for their information which provides details of the off-site provision. Compensation for individual trees is considered separately from Biodiversity Net Gain commitments as set out within **7.1 Biodiversity Net Gain Report [APP-299]**.

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	achieve BNG targets, and how much will be further compensation for the adverse effects of the scheme that cannot be mitigated. 186. The offsite tree planting and wider landscape enhancement is expected to be secured outside the DCO boundary via a Section106 agreement.	
Landscape and Visual.	187. The Council notes the measures that have been taken to minimise the impacts of the project on the NL, but notes that NGET accepts that there will still be residual adverse impacts on the natural beauty and special qualities of the NL. In terms of the statutory duty to seek to enhance the natural beauty of the NL, the Council welcomes the positive approach that NGET has taken to proposing a financial contribution to support appropriate enhancement measures within or benefiting the NL, and expects to engage further with NGET, together with other partners, on the details of those measures and how they are best to be secured.	**6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** presents the assessment of effects of the Project on Dedham Vale National Landscape. The findings of the assessment of effects on the special qualities (natural beauty) of Dedham Vale National Landscape are reported as significant during construction but would reduce to not significant during operation. The Applicant notes the Council's positive response to the NGET's consideration of its duty in relation to the Project to seek to further the purpose of the National Landscape, as 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]**. The Applicant will continue to engage with the council on this matter.
Ecology and Biodiversity.	188. SCC broadly welcomes the Outline LEMP and will provide detailed comments on it and on other control documents in the Local Impact Report.	The Applicant notes this comment.
Ecology and Biodiversity	189. SCC welcomes that the working swathe, will be reduced to 12m, when a hedgerow is being crossed (paragraph 8. 3. 2, Outline LEMP Doc Ref 7. 4). It should also be anchored in the OLEMP, as well as the CoCP and REAC that the default for vegetation management for temporary visibility splays will be coppicing rather than removal of the hedgerows.	The approach to hedgerow management within visibility spays is detailed within Paragraph 8.3.8 within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The amount of hedgerow removal required within the visibility splays will be reduced as much as possible, and instead the hedgerows will be cut to stump to allow them to grow back on completion of works.
Ecology and Biodiversity	190. SCC welcomes that an Arboricultural Impact Assessment and Plan has been provided at submission, which greatly aids the understanding of the effects of the proposals oh high category trees. It is further welcome that an Arboricultural Method Statement (AMS) (including Tree Protection Plan) will be produced following detailed design and agreed with the relevant LPAs prior to construction activity commencing.	The Applicant notes this comment.
Ecology and Biodiversity	191. SCC will comment in more detail on Tree Protection in the LIR.	The Applicant notes this comment.
Ecology and Biodiversity	192. SCC welcomes that the Applicant has agreed to a five-year adaptive aftercare period for sites with reinstated woodland, trees and hedgerows. This means, planting will need to reach agreed growth and survival rates in order to be moved forward into the next year of agreed aftercare. This may result in different duration of aftercare periods for different types of planting (hedge/scrub/trees/ woodland) or different areas within the scheme. 193. The rationale behind this is as follows: If the reinstatement planting cannot achieve a return to the baseline conditions which existed prior to the development, whether this is because certain elements of habitats cannot be reinstated (such as trees) or because implemented reinstatement planting has failed during the aftercare period, this will impact on, and reduce the percentage of BNG that is achieved elsewhere on site. In other words, more	The 5-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 approach to reinstatement with regard to Biodiversity Net Gain (BNG) and the justification for timings is clearly set out within the **7.1 Biodiversity Net Gain Report [APP-299]** as broadly agreed with Natural England in the absence of NSIP guidelines. The Applicant has committed to an adaptive monitoring period, as stated within **7.4 Outline Landscape and Ecological Management Plan [AS-046]**, which includes like-for-like replacement or consideration of alternative species based on site conditions and the reasons for failure. The commitment to adaptive monitoring does not alter the 5-year monitoring and management period committed to. 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. An extended aftercare period of 30 years would apply to new areas of habitat creation within Environmental Areas.

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	biodiversity measures need then to be implemented to achieve 10% BNG. 194. The Council therefore considers that the aftercare for reinstatement planting needs to be linked to considerations about BNG. This may result in extended aftercares periods, if successful establishment of the reinstatement planting is not achieved within five years. The success, or lack thereof, of the reinstatement planting needs to be considered, when the success of the biodiversity enhancement measures is evaluated, and management measures are reconsidered.	
Ecology and Biodiversity	195. Any tree or shrub that is removed, dies, or becomes seriously damaged or diseased during the aftercare period, must be replaced with suitable replacement plants or trees to the specification agreed in writing with the relevant LPA during the next available planting season (ideally the following November/December).	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. Aftercare is outlined in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Ecology and Biodiversity	196. The proposals should allow for the costs of annual post monitoring inspections by and reports to the LPAs for the life span of the project or at least for the first 15 years, and longer if mitigation goals are not being achieved (dynamic aftercare). 197. The baseline to monitor against is the pre-construction baseline data.	196 - 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. Aftercare is outlined in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**. The council's comment on monitoring costs is noted and will be considered. 197 – The Applicant notes this comment. Detailed habitat surveys have been undertaken which will act as the baseline value.
Draft DCO	198. **Article 2(1) (interpretation)** – the definition of "maintain" includes the replacement of any part of the authorised development and the replacement of the whole of it. SCC would like to know to what extent "replacement" has been assessed and where this is considered in the Environmental Statement. SCC would like to know to what extent the definition of "maintain" duplicates the applicant's PD rights.	The definition of 'maintain' included within Article 2(1) of **3.1 Draft Development Consent Order [APP-056]** reads as follows (emphasis added): '*"maintain" includes inspect, repair, adjust, alter, dismantle, remove, clear, refurbish, paint, surface treat, decommission, improve, reconstruct or replace any part* ***but not remove, reconstruct or replace the whole****, of the authorised development including through the use of robots, helicopters, drones, gadgets or similar devices either remotely controlled or autonomous, provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement, and any derivative of "maintain" must be construed accordingly;*' The current drafting, which is consistent with The National Grid (Bramford to Twinstead Reinforcement) Order 2024, reflects National Grid's view that there would be no scenario where the whole of the authorised development would or could be reconstructed or replaced using powers of maintenance under Article 4 of **3.1 Draft Development Consent Order [APP-056]**. In respect of the second part of its representation on this point, SCC is directed to Section 4.10 (Operation (and Maintenance)) of **6.4 Environmental Statement Chapter 4 – Project Description [APP-130]**. The Environmental Statement does not consider any scenarios where large sections of the Project would need to be replaced because such scenarios are considered to be very unlikely, whereas the purpose of Environmental Impact Assessment is to identify likely significant effects. The environmental effects of maintenance work would be no greater, and likely much lower, than the effects resulting during construction of the Project and so are not reported separately. Noting the well-established precedent which underpins the current definition of 'maintain', National Grid would welcome clarification from SCC as to the relevance of the third and final part of its representation on this point (concerning National Grid's permitted development rights as a statutory undertaker).
Draft DCO	199. **Article 2(1) (interpretation)** – the definition of "permit scheme" means a permit scheme in force on the date on which the Order is made. SCC consider the definition should allow for	National Grid notes the point made by SCC. However, with reference to Article 2(9) of **3.1 Draft Development Consent Order [APP-056]** (draft DCO) (copied below), National Grid does not consider that an amendment to the definition of 'permit scheme' is

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	the situation where a permit scheme is updated after the date on which the Order is made. It would be strange for an extant permit scheme to control certain works in Suffolk and for a historic permit scheme to control others.	necessary. By virtue of Article 2(9), any updates to the permit schemes referenced in the draft DCO would have automatic effect in the context of the application of Article 12 (Application of the permit schemes). Article 2(9) reads as follows: '*References in this Order to any statute, order, regulation or similar instrument are to be construed as a reference to the statute, order, regulation or instrument as amended by any subsequent statute, order, regulation or instrument or as contained in any subsequent re-enactment*'.
Draft DCO.	200. **Article 2(1) (interpretation)** – the definition of "pre-commencement operations" is wide-ranging and goes well beyond the Explanatory Memorandum's ("EM") description of these works as "de minimis or [having] minimal potential for adverse impacts" (paragraph 3. 6. 6) [APP-057]. SCC would like to know – . a. how each operation will be controlled (especially the "set up works associated with the establishment of construction compounds and temporary laydown areas" and "temporary accesses"). b. which buildings are proposed to be demolished as part of the "pre commencement operations". c. whether land used for temporary works will be reinstated to a condition suitable for its former use and, if not, why not. d. the relevant paragraphs of the ES which deal with the assessment of these works. (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 works and operations from the definition is appropriate") [APP-057].	a. Reference is made to Requirements 4(3) and 5(4) in Schedule 3 to **3.1 Draft Development Consent Order [APP-056]** (draft DCO), each of which require all 'pre-commencement operations' to be carried out in accordance with the outline construction management plans, as well as the outline archaeological mitigation strategy and outline written scheme of investigation. National Grid considers that the outline management plans provide effective control over these excluded works and operations, noting that the approach mirrors that adopted on other recent projects, including the Bramford to Twinstead project. b. National Grid has not currently identified any buildings that would need to be demolished. If demolition was to be required, it would be due to unforeseen circumstances. c. Reference is made to Articles 27 and 28 of the **3.1 Draft Development Consent Order [APP-056]**. Both articles require that any land which is possessed temporarily (and in respect of which an interest is not acquired by either National Grid or UK Power Networks) must be restored to the reasonable satisfaction of the landowner, unless otherwise agreed. Compensation is payable for any loss or damage arising from the exercise of those temporary possession powers. d. Reference is made to Section 4.7 (Construction - General)) of **6.4 Environmental Statement Chapter 4 – Project Description [APP-130]**. Paragraph 4.7.2 of Chapter 4 notes the potential for certain 'pre-commencement operations' to take place following the grant of development consent. Those operations have been assessed as part of the Project, rather than individually.
Draft DCO.	201. **Article 3(6) (development consent etc. granted by the Order)** – this provision states that the development consent granted by the Order allows works (including demolition of buildings or other structures) within the Order limits to the extent they "relate to, are required by or are incidental to the carrying out of the authorised development". This is a broad power which does not appear to have been included in the precedents cited by the applicant in paragraph 1. 2. 5 of the EM [APP-057]. It will be remembered that paragraph 1. 2 of Advice Note Fifteen: drafting Development Consent Orders states: "A thorough justification should be provided in the Explanatory Memorandum for every Article and Requirement, explaining why the inclusion of the power is appropriate in the specific case. The extent of justification should be proportionate to the degree of novelty and/ or controversy in relation to the inclusion of that 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.	BCLP – Zoe Burke / Helen Hetherton National Grid acknowledges SCC's position and will consider whether this drafting point can be included in the next updated version of the **3.1 Draft Development Consent Order [APP-056]**.
Draft DCO.	202. **Article 7 (consent to transfer benefit of Order)** – this article allows any or all of the benefits of the provision of the Order to be transferred, with the consent of the Secretary of	National Grid considers that Article 7(5) of **3.1 Draft Development Consent Order [APP-056]** already addresses the point raised by SCC.

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	State, to others. In the event of such a transfer, owing to its role in determining consents under the dDCO, SCC requests that it is notified as soon as reasonably practicable.	However, to the extent that SCC has any further concerns, National Grid would be pleased to consider those. For the avoidance of doubt, Article 7(5) states: '*Where a transfer or grant has been made in accordance with paragraph (1), the undertaker must notify the relevant planning authority of the same.*' 'Relevant planning authority' has the meaning given to it in Article 2(1).
Draft DCO.	203. **Article 10(2) (planning permission)** – this provides that any planning permissions or DCO which conflict with the authorised development can proceed without the risk of enforcement action being taken notwithstanding any incompatibility between the Project and the development authorised under that planning permission or DCO. It would be helpful if the applicant would confirm whether it has any specific planning permission or DCO in mind.	National Grid does not have currently have a specific planning permission or DCO in mind. However, and with reference to Paragraph 3.14.2 of **3.2 Explanatory Memorandum [APP-057]**, National Grid is cognisant of the fact that a number of other Nationally Significant Infrastructure Projects are situated, or proposed to be situated, in proximity to the Project. Article 10(2) has therefore been included on a precautionary basis and seeks to address any risks, both in relation to the Project and also in relation to third-party developments, which could arise from the decision in *Hillside Parks Ltd v Snowdonia National Park Authority* 2022 UKSC [30].
Draft DCO.	204. **Article 11(1) (street works)** – absent a suitable highways side agreement or protective provisions to protect SCC's highways interests, SCC considers art. 11(1) should be subject to the street authority's consent. . 205. The same point applies in respect of the following articles:14(1) (power to alter layout, etc. of streets), 15(1) (permanent stopping up of streets and public rights of way), and 16(1)(a) (temporary closure of streets and public rights of way).	As a fundamental point of principle, National Grid does not agree that a secondary tier of consents is appropriate or necessary in relation to the exercise of street works powers under Articles 11(1), 14(1), 15(1) and 16(1)(a) of **3.1 Draft Development Consent Order [APP-056]**. The nature and extent of those powers is already suitably constrained and will, in any event, be subject to detailed scrutiny as part of the Examination process. It would be wholly inappropriate, taking account of Parliamentary intentions underpinning the Planning Act 2008 regime, for SCC (or indeed any other highway authority) to be afforded a further opportunity to limit the practical application and exercise of any statutory powers which the Secretary of State has determined are necessary to enable the timely delivery of the Project in response to a critical national need. National Grid is, however, content for the *conduct* of the works permitted by the abovementioned articles to be subject to appropriate and proportionate pre-commencement controls, in accordance with the Protective Provisions included for the benefit of SCC and other Local Highways Authorities at Part 4 of Schedule 16 to **3.1 Draft Development Consent Order [APP-056]**the draft DCO.
Draft DCO.	206. **Article 11(2) (street works)** – Under several of the draft DCO's articles (including article 11(2)), SCC is required to grant approval for certain street works, and provision is made to say that approval must not be "unreasonably withheld or delayed" and there is also a provision that it is deemed to be given after 28 days. In several cases this appears to be unprecedented in DCOs or not well precedented. . 207. SCC will be receiving considerable numbers of requests for approval and will ensure that they are dealt with as quickly as possible. With the deeming provisions included there is no need to also say that the approvals must not be "unreasonably withheld or delayed". . 208. SCC request that the same amendment is made to the following articles: 14(4) (power to alter layout, etc. of streets), 15(2)(a) and (b) (permanent stopping up of streets and public rights of way), 16(2), 16(5)(b) (temporary closure of streets and public rights of way), 17(1)(b) (access to works), 20(3), 20(4)(a) (discharge of water), 49(2) (traffic regulation), 55(1) (procedure regarding certain approvals etc.).	National Grid notes that the principle of including deemed discharge provisions in **3.1 Draft Development Consent Order [APP-056]** (draft DCO) is not unique to this Project. The principle has very recent and relevant precedent in the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The inclusion of such provisions is considered justified on the basis that it is essential that the delivery of a project of this scale and critical national importance is not unnecessarily frustrated by matters outside of National Grid's control. Further, National Grid does not agree with SCC's position that the inclusion of deeming provisions in the draft DCO negates the need for the draft DCO to also state that approvals must not be unreasonably withheld or delayed. Taking account of the critical national need for the Project, National Grid envisages that there may well be situations where a more straightforward or routine approval is sought from the relevant authority and where it would therefore be reasonable to expect a decision to be proactively taken without delay by the authority at the earliest opportunity – notwithstanding the ultimate fall-back position of a deemed consent mechanism. National Grid would, in practical terms, anticipate working closely with SCC and other relevant authorities to provide advance notice, where practicable, of any requests for approval to which a deeming provision would apply under the draft DCO. National Grid remains in ongoing dialogue with SCC to ensure that the impacts of the Project are appropriately managed and mitigated.
Draft DCO.	209. **Article 11(3) (street works)** – provides that if a street authority fails to respond to an application for consent within 28	Whilst SCC's commitment to determine all applications for consent or approval as expeditiously as possible is welcomed, National Grid does not consider that a decision period of 56 days would be conducive to the timely delivery of the Project.

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	days of the application being made, that street authority is deemed to have given its consent. 210. While SCC will ensure that any application for consent 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 which have already been consented (For example: East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432), East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433), Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853), Sunnica Energy Farm Order 2024 (SI 2024/802), and National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024 / 958). Forthcoming DCO applications for which SCC will be a host authority include National Grid Electricity Transmission's Sea Link application and National Grid Interconnector Holdings Limited's LionLink Interconnector application). A 28-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications. 211. Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 28 days is too short and requests that it is replaced with 56 days. SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision. 212. SCC requests that 28 days is also replaced with 56 days in the following provisions: 14(5) (power to alter layout, etc. of streets); 16(8) (temporary closure of streets and public rights of way); 17(2) (access to works); 20(9) (discharge of water); 22(8) (authority to survey and investigate land), 49(10) (traffic regulation) and 50(5) (felling or lopping). . 213. A similar point applies in respect of paragraph 1(1) (applications made under requirements) of Schedule 4 (discharge of requirements), which is mentioned below.	National Grid's position is that a 28-day decision making timeframe is both proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Clean Power Target of 2030, is not unnecessarily delayed by circumstances outside the control of National Grid. Furthermore, 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. In each instance, **3.1 Draft Development Consent Order [APP-056]** allows for the relevant decision-making authority and the undertaker to agree 'such other period' as may be appropriate in the circumstances. In addition to the precedent cited at Paragraph 3.3.3 of **3.2 Explanatory Memorandum [APP-057]**, National Grid notes that there is extensive precedent for a 28-day period in a number of existing DCOs, including: The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 (see, for example, Articles 18(9) and 19(8)), the A57 Link Roads Development Consent Order 2022 (see, for example, Articles 14(6) and 18(11)), and the Awel y Môr Offshore Wind Farm Order 2023 (see, for example, Articles 12(6) and 15(6)).
Draft DCO.	214. **Article 12(2)(d) (application of the permit schemes)** – this provision prohibits "the relevant street authority" from permitting certain works at a certain time but then says "local highway authority" may grant a permit for immediate works. Should those references be to the same body? If not, why not? Also, the term "local highway authority" is not used elsewhere in the dDCO (save in a single definition) and is not a defined term itself. In articles 12(3), (4) and (5) "the relevant highway authority" referred to and SCC wonders whether that term should also be used (whether once or twice) in article 12(2)(d). SCC would welcome the applicant's explanation on this drafting point.	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 DCO) in order to refer in both instances to 'the relevant highway authority'. The amendment will be incorporated in the next updated version of the draft DCO.
Draft DCO.	215. **Article 13(3) and (4) (application of the 1991 Act)** – SCC is concerned by the extent of disapplication proposed by article 13(3) and (4).	National Grid would welcome further engagement with SCC Highways in order to better understand their concerns on this point. Notwithstanding those future discussions, National Grid considers that the provisions are appropriate in the context of this Project. The disapplication in Articles 13(3) and (4) of **3.1 Draft Development Consent Order [APP-056]** has been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the

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		National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.
Draft DCO.	216. **Article 16 (temporary closure of streets and public rights of way)** – by article 16(1), the undertaker may, "for any reasonable time" divert traffic from the street or public right of way; and prevent all persons from passing along the street or PROW. SCC would welcome more information as to what "a reasonable time" might be. 217. In addition, SCC considers that article 16 should provide that any temporary diversion specified in column (4) of Part 1 or Part 3 of Schedule 8 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.	National Grid notes that Article 16(1) is well-precedented, with the overall power constrained to such temporary diversions or prevention of access as are required for the purposes of carrying out the authorised development. More specifically, reference is made to **7.6 Outline Public Rights of Way Management Plan [APP-329]** (the Outline PRoWMP) which explains, in detail, the management regimes to be adopted in the context of the Project, as well as stating National Grid's clear ambition to minimise disruption to Public Right of Way (PRoW) users wherever reasonably practicable. In that context, and with reference to the detailed information included in Table 8.3 of the Outline PRoWMP, it is noted that the duration of each temporary closure will vary, but the key principle of only restricting access for as long as necessary to complete the required construction works would be applied at all times. Turning to the second of SCC's comments on this point, National Grid notes that Article 16(4) already states that if a street or public right of way specified in Parts 1 and 3 of Schedule 8 is to be temporarily closed, altered or diverted, the undertaker must provide the temporary diversion as specified in column (4) of that Part. If a street or public right of way is 'provided', the implication is that it must therefore be open for use. National Grid does not consider that any amendment to the drafting is necessary. Article 16(5) states that the street authority must be consulted before the undertaker temporarily closes, alters or diverts any street or public right of way specified as mentioned in paragraph (4). Given the temporary nature of the diversions, National Grid does not consider that it is feasible for a temporary diversion to be completed to the reasonable satisfaction of the street authority, taking into account its duties to act economically and efficiently. Therefore, and noting the effect of section 161(1)(b) (breach of terms of order granting development consent) of the Planning Act 2008, National Grid cannot agree to include the additional wording in Article 16.
Draft DCO	218. **Article 16(5)(b) (temporary closure of streets and public rights of way)** – this provision refers to the street authority's ability to attach reasonable conditions to a certain consent. Other provisions which state conditions may be added to a consent include articles 20(3) (discharge of water) and 42(3)(a) (crown rights); however, other provisions which provide for consent are silent as to whether conditions can be added. Since there is no restriction on the imposition of conditions, SCC considers that can be added; however, for consistency and the avoidance of doubt, SCC considers each provision which provides for the grant of consent or approval should state explicitly that conditions may be attached to such consent or approval e. g. the following articles: 11(2) (street works), 14(4) (power to alter layout, etc. of streets), 16(2) (temporary closure of streets and public rights of way), 17(1)(b) (access to works), 22(5) (authority to survey and investigate the land), 49(2) (traffic regulation), and 50(4) (felling or lopping).	National Grid does not consider that it is necessary to add any additional wording to clarify that a discharging authority has the discretion for reasonable conditions to be attached to an approval or consent. Article 55(3) (Procedure regarding certain approvals etc) of **3.1 Draft Development Consent Order [APP-056]** is clear that where such consent, agreement or approval is granted under the DCO, it will be subject to the same appeal procedure as the requirements including where a condition to which the undertaker objects is included.
Draft DCO.	219. **Article 34(1) (time limit for exercise of authority to acquire land and rights compulsorily)** – SCC considers allowing the applicant seven years to issue 'notices to treat' or a 'general vesting declaration' to acquire the land or rights that is subject to the power of compulsory purchase is excessive. Five years is the usual position and SCC considers the usual position should be adopted here, especially since (per article 34(4)) that period will not be eaten into by any legal challenge to the decision to grant development consent for the project.	National Grid refers to the justification already provided in Paragraph 3.38.1 of **3.2 Explanatory Memorandum [APP-057]**: '*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 precedented 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.*'

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Draft DCO	220. **Article 49(5) (traffic regulation)** – this provision refers to the "instrument" made under paragraph (1), (2) or (3) of article 49. SCC considers it would be helpful if a copy of the made instrument were made available by the undertaker and sent to SCC. In the light of this, SCC would suggest a new article 49(13) to provide as follows – . "(13) A copy of the instrument referred to in paragraph (5) must be held at the registered office address of the undertaker for inspection during normal working hours and, as soon as reasonably practicable after being made, a copy must be served on the highway authority".	National Grid acknowledges the rationale for this additional wording and will consider whether this drafting point can be included in the next updated version of the **3.1 Draft Development Consent Order [APP-056]**.
Draft DCO.	221. **Article 50 (felling or lopping)** – SCC is concerned that important hedgerows under the Hedgerow Regulations 1997 are included in this Article without any provision for special consideration to minimise impacts, for example by using HDD or coppicing and temporary storage prior to replanting, instead of removal. In any event, SCC notes the following from Advice Note Fifteen: drafting Development Consent Orders: "…the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if they cannot be specifically identified) but this must be subject to the later consent of the local authority" (paragraph 22. 1). 222. Regarding "a plan to specifically identify the hedgerows to be removed", while the applicant has prepared "trees and hedgerows to be removed and/or managed plans" it is not clear those plans apply to all hedgerows or important hedgerows to be removed and SCC would welcome clarification on this point. 223. Regarding consent, only trees "within or overhanging the extent of the public highway" (and not included in the "trees and hedgerows to be removed and/or managed plans") are subject to consent. Depending on the confirmation received in respect of the point mentioned above, SCC might seek the amendment of this article to include a more general consent provision.	221. The Applicant refers to **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**, the conclusions of which directly informed the baseline for the assessment of effects on hedgerows, including important hedgerows, as reported in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Table 8.23 in ES Chapter 8 records the conclusions of the assessment undertaken as follows: '*Following the application of mitigation, it is concluded that there would be an overall negligible magnitude of impact with no significant residual effect on 'Important' hedgerows.*' **7.2 Outline Code of Construction Practice [APP-300]** includes a commitment that following detailed design and prior to construction (of relevant parts of the Project), relevant surveys would be undertaken of arboricultural features that may be impacted or need to be removed to ensure any hedgerow removal is reduced as far as practicable. 222. **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]** identify the *potential* effect of the Project on all relevant trees and hedgerows, including important hedgerows, situated in proximity to the Order Limits. It is noted that the impact upon individual hedgerows (i.e. those shown on the Plans as 'potentially affected', 'affected managed' or 'removed') could change depending on the final location of the Project within the Limits of Deviation which National Grid is seeking consent for. 223. The Applicant notes that SCC intends to give further consideration to the drafting in Article 50(4) of **3.1 Draft Development Consent Order [APP-056]**.
Draft DCO	224. **Schedule 3 (requirements) (paragraph 1 (interpretation))** – paragraph 1(1) defines "discharging authority" as "the body responsible for giving any consent, agreement or approval required by a requirement included in this Order …". Requirement 4 (construction management plans) provides for the involvement of the "other discharging authority" in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions (Section 120(2)(a) Planning Act 2008) and one of the six tests for conditions is precision (Circular 11/95: Use of conditions in planning permission (paragraph 14). SCC consider the inclusion of "discharging authority" in requirement 4 creates imprecision and requests that the applicant recasts requirement 4 so that the body they want to be involved in requirement 4 is named.	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.

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Draft DCO.	225. **Schedule 3 (requirements) (paragraph 1 (interpretation))** – paragraph 1(4) needs to be amended as follows – . "Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies "unless otherwise approved" or "unless otherwise agreed" by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given where it has been demonstrated to the satisfaction of the relevant highway authority or the relevant planning authority that the subject matter of the approval or agreement sought will not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement". . 226. This amendment is consistent with the drafting of the equivalent paragraph of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958).	National Grid is unclear as to the precise amendment which SCC is seeking, noting that the wording included in Paragraph 1(4) of Schedule 3 to **3.1 Draft Development Consent Order [APP-056]** currently reads as follows: '*Where an approval or agreement is required under the terms of any requirement or a document referred to in a requirement, or any requirement specifies "unless otherwise approved" or "unless otherwise agreed" by the relevant highway authority or the relevant planning authority, such approval or agreement may only be given where it has been demonstrated to the 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.*'
Draft DCO	227. **Schedule 3 (requirements) (requirement 3(1) (stages of authorised development))** – requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out. This is included in the equivalent requirement of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958). SCC's experience of discharging requirements under that Order has shown the time period to be too short. In the light of this, SCC requests that the 7-day period is increased to 35 days.	National Grid notes that Requirement 3(1) requires written notice to be provided no less than seven days prior to the date on which the first pre-commencement operations are to be undertaken. National Grid notes that the obligation is to provide a notification only and, therefore, there is no requirement for the relevant authority to take any further action or other positive step(s) within those seven days. As a consequence, it is unclear what further utility would be served by increasing that period to 35 days.
Draft DCO	228. **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 5 working days.	National Grid acknowledges SCC's submission on this point and will consider whether revised drafting can be included in the next updated version of the **3.1 Draft Development Consent Order [APP-056]**.
Draft DCO	229. **Schedule 3 (requirements) (requirement 6(2) (archaeology))** – this provision names "the relevant planning authority" as the discharging authority. In Suffolk, SCC should be the discharging authority because archaeology is a county function. This approach is precedented. For instance, requirement 3 (project wide: archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) names SCC as the approving authority for archaeological matters.	National Grid acknowledges SCC's submission on this point and will amend references in Requirement 5 (Archaeology) from 'relevant planning authority' to 'relevant discharging authority', noting that the latter is already separately defined in Paragraph 1(1) of Schedule 3 to **3.1 Draft Development Consent Order [APP-056]**.
Draft DCO	230. **Schedule 3 (requirements) (requirement 7 (construction hours))** – this provision needs significant reworking in order to allow for community respite. For example, SCC considers Saturday hours should be between 08:00 and 13:00 and there should be no working on Sundays and Bank Holidays. The Secretary of State considered a similar approach appropriate in the East Anglia ONE North Offshore Wind Farm Order 2022 (S. I. 2022/432). Requirement 24 of that Order states the core hours	The Applicant has responded in detail to comments on the working hours at Paragraphs 268 to 270 of the RR above. National Grid does not consider it justified to amend the core working hours. There are a number of instances within Requirement 7 that ensure the relevant authority's consent is sought to work outside of the core working hours. Beyond this, National Grid does not consider it to be practical to notify the relevant authorities, especially, for example, those that involve a continuation of works that began during core working hours.

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	are "between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays", subject to certain exceptions listed in sub-paragraph (2). SCC's proposed amendments to requirement 7 include the following. 231. Requirement 7(1) should be amended as follows – . "Subject to sub-paragraphs (2) to (5) work may only take place between the hours of 07. 00 and 19. 00 Monday to Friday and 08. 00 ~~07. 00~~ and 13. 00 ~~17. 00~~ on Saturdays, ~~Sundays, bank holidays and other public holidays (the core working hours~~), unless otherwise approved by the relevant planning authority". 232. 35. Requirement 7(2) should be amended as follows – "No percussive piling works may take place outside of the hours of 0700 to 1900 Monday to Friday and 08. 00 ~~0700~~ to 13. 00 ~~1700~~ on Saturdays, unless otherwise approved by the relevant planning authority". 233. 36. Requirement 7(3) should be amended as follows –. "Subject to sub-paragraphs (4) and (5), no HGV deliveries may be made to site outside of the hours of 0700 to 1900 Monday to Friday and 08. 00 ~~0700~~ to 13. 00 ~~1700~~ on Saturdays, unless otherwise approved by the relevant highway authority". 234. 37. Requirement 7(4)(a) should be omitted. 235. . 38. Requirement 7(4)(g) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, which paragraph 4. 3. 5 of the EM [APP-057] cites as a precedent for the requirements. For example, requirement 7(3)(g) of the Bramford Order states –. "(3) The following operations may take place outside the core working hours referred to in sub-paragraph (1)— . (g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities that the undertaker and its contractor agree forms the critical path for the accepted construction programme. In such cases, the undertaker must, as soon as practicable, notify the relevant planning authority of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1)"; [Words not included in the dDCO shown underlined]. 236. SCC considers the bold and underlined text (which SCC requested should be included in the Bramford DCO) should be included in the dDCO. 237. Requirement 7(5) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024, which paragraph 4. 3. 5 of the EM [APP-057] cites as a precedent for the requirements. For example, requirement 7(4) of the Bramford Order states – . "The core working hours exclude start up and close down activities up to 1 hour either side of the core working	Requirement 7(4) of Schedule 3 of **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. Trenchless crossings may need to proceed without interruption to avoid safety, environmental, or asset integrity risks. Importantly, any activities undertaken outside core construction hours remain subject to the controls and mitigation measures set out in **7.2 Outline Code of Construction Practice [APP-300]** (Outline CoCP). These controls include provisions relating to noise management, lighting, environmental protection and monitoring, ensuring that any out-of-hours activity is appropriately managed and minimised. The measures set out within **7.2 Outline CoCP [APP-300]** will be secured via Requirement 4(1)(a) (Construction Management Plans) of **3.1 Draft Development Consent Order [APP-056]** within the final CoCP. There are no statutory noise limits for construction noise. However, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise[158], and as detailed in Section 4 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**.

[158] British Standards Institution (2014) *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise*.

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	hours. A 50dBA noise limit (LOAEL) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours". 238. SCC considers the underlined text (which SCC requested should be included in the Bramford DCO) should be included in the dDCO.	
Draft DCO.	239. **Schedule 3 (requirements) (requirement 9(3) (reinstatement planting scheme))** – this provision states – . "Any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting (or such other period as is specified in the landscape and ecological management plan approved pursuant to requirement 4), are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority". 240. The reference to "5 years" should be changed to "10 years", which would provide greater ecological improvements.	National Grid has proposed a five-year replacement period, the duration of which is consistent with recent National Grid DCOs including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. Five years is considered appropriate for the types of reinstatement and mitigation planting proposed for the Project. Planting sizes and species have been selected based on those that would naturalise more easily than larger tree stock.
Draft DCO	241. **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 Advice Note Fifteen: drafting Development Consent Orders. 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). 242. This argument is unconvincing. The 28-day decision-making period in paragraph 1(1) of Schedule 4 (compared to the 42-day period in paragraph 1(2) of Appendix 1 to Advice Note Fifteen) is unlikely to affect "the immediate and pressing national need which the project is intended to address". 243. While SCC will ensure that any request for approval will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 42-day decision-making period would be challenging in this context; the reduction of the timeframe to 28 days is unrealistic and potentially detrimental to the effective consideration of requests. Owing to these circumstances, the Councils consider a 56-day decision-making period would be reasonable.	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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	244. Paragraph 4. 4. 3 of the EM [APP-057] says this schedule is "identical to the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024". It is not. The equivalent period in the Bramford Order is 35 days. SCC's experience of determining applications for the discharge of requirements for that Order have shown that 35 days is insufficient. More time, not less, is required here.	
Draft DCO	245. **Schedule 4 (discharge of requirements) (paragraph 3, fees)** – the fees proposed in paragraph 3(1) are unreasonably low and need to be increased. Moreover, paragraph 3(2) – which provides for the refund of fees in certain circumstances – is unreasonable and should be deleted.	National Grid acknowledges SCC's submission and will submit revised drafting which reflects the extant national fee schedule applicable to the discharge of planning conditions. However, it is not clear to National Grid on what basis SCC consider the refund mechanism in Paragraph 3(2) to be unreasonable, given the circumstances in which a refund could fall due would be within SCC's control. It would be helpful if SCC could further clarify its concerns on this point.
Draft DCO	246. **Schedule 17 (public general legislation)** – the disapplication of section 23 of the Land Drainage Act is not agreed, and neither are the protective provisions included at Part 3 (for the protection of drainage and flood authorities) of Schedule 16 (protective provisions) to the dDCO.	National Grid acknowledges SCC's submissions in respect of Part 3 of Schedule 16 and similarly in respect of Schedule 17. National Grid would welcome engagement with SCC on both points in order to better understand SCC's specific concerns.
Draft DCO	247. **Schedule 18 (amendment of local legislation)** – SCC requests copies of the Acts which affect their administrative area.	National Grid notes that the local legislation referenced in Schedule 18 to **3.1 Draft Development Consent Order [APP-056]** is a matter of existing public record and would, therefore, respectfully direct SCC to the relevant legislative databases.
Health and Wellbeing	248. The scope and extent of the baseline data, including ward level analysis and consideration of vulnerable groups, is thorough and indicates alignment with best practice as set out in national guidance (NPS EN-1, EN-5, IEMA, Wales Health Impact Assessment Support Unit (WHIASU) and Public Health England. The methodologies used for assessment are considered suitable by Public Health for the specific purpose of this project.	This is noted.
Health and Wellbeing	250. Chapter 10 references a range of local and national datasets, however the coverage is not fully comprehensive as neither the Suffolk Office of Data & Analytics (SODA), the Suffolk Joint Local Health and Wellbeing Strategy 2022 2027 nor the Suffolk Joint Strategic Needs Assessment (JSNA) appear to have been considered. The Suffolk Health and Wellbeing Strategy is only briefly mentioned as a baseline source elsewhere in the chapter, with the JSNA referred to in the Bibliography only. These omissions suggest that important Suffolk specific data sources may not have been fully incorporated, potentially limiting the depth and relevance of the health and wellbeing evidence base for Suffolk. Notably, the Babergh and Mid Suffolk Health and Wellbeing Strategy is cited, but this is distinct from the Suffolk wide strategy.	Paragraph 10.2.16 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** (ES Chapter 10) states that local health and wellbeing strategies, JSNAs and the health priorities they contain, have been used to inform the health and wellbeing assessment. The Suffolk County Council JSNA and Health and Wellbeing Strategy are both referenced within the bibliography and have been reviewed as part of our methodology. Table 10.1 should have included a row specifically relating to health priorities identified in these documents; this omission is included in **8.1 Errata List [Revision A]** following submission. However, we would like to affirm that the Suffolk Health and Wellbeing Strategy is referenced elsewhere in ES Chapter 10: Health and Wellbeing (for example in paragraph 10.5.16). Other paragraphs in Section 10.5 (Baseline Conditions) make reference to JSNAs more generally where they allude to trends or issues common to a number of local authorities (rather than highlighting every individual instance of an issue being raised); for example paragraph 10.5.22 states that '*mental health and wellbeing is a priority identified in the majority of the JSNAs and Health and Wellbeing Strategies of local planning authorities within the Wider Study Area*'.
Health and Wellbeing	251. The assessment methodology is presented as proportionate and indicates alignment with guidance from the Institute of Environmental Management and Assessment (IEMA) and the WHIASU. Stakeholder engagement with statutory consultees including Suffolk County Council and Norfolk County Council has been documented, and the use of the Mental Wellbeing Impact Assessment (MWIA) toolkit is welcomed. However, the Health and Wellbeing Chapter does not provide clear evidence of direct	As noted, the assessment in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** (ES Chapter 10) is proportionate, and signposts to other documents and assessments where relevant. Findings from stakeholder and community engagement are an important element of health and wellbeing assessments, identifying areas of potential concern and anxiety within the local population; it is noted in paragraph 10.4.16 of ES Chapter 10 that the focus of the Health and Wellbeing assessment has been informed through engagement with stakeholders and consultation responses received. Examples of where information from statutory and non-statutory consultation has fed directly into the Health and Wellbeing assessment include in relation to perceptions of health risk arising from Electric and Magnetic Fields during operation (paragraph 10.7.135).

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	engagement with the wider community, parish councils, or vulnerable groups, nor does it critically evaluate the effectiveness, timing, or inclusivity of consultation activities. Public Health cannot therefore confirm that effective community engagement has been fully achieved through review of the Health and Wellbeing Chapter alone.	**5.1 Consultation Report [APP-066]** presents a summary of all pre-application consultation for the Project, including both statutory and non-statutory consultation for submission and including information relating to engagement with the wider community, parish councils and seldom-heard groups (defined as those being inaccessible to most traditional and conventional methods of consultation for any reason, and including people who may be described as vulnerable (e.g. older people and people with disabilities)). The Applicant undertook research to identify local seldom-heard organisations and worked with Local Planning Authorities and other bodies as needed to identify additional groups. The approach was defined as part of the development of **5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) and supporting evidence [APP-071]**, giving Local Planning Authorities the opportunity to influence this strategy. Public information events were held across the local area and were accessible and inclusive for members of the public. The Applicant has sought to engage thoroughly with affected stakeholders throughout the Project development, with consultation completed at an early stage in the development of proposals to allow consultees to have a real opportunity to influence the Project. **7.14 Equality Impact Assessment [APP-352]**, Paragraph 5.1.4, confirms that the Applicant has undertaken inclusive and accessible consultation throughout the development of the Project, including provision of materials in alternative formats, and the use of accessible venues and digital platforms.
Health and Wellbeing	252. Embedded and standard mitigation measures such as those that would be set out in the Code of Construction Practice (CoCP), Construction Traffic Management Plan (CTMP), and Public Rights of Way (PRoW) Management Plan, are acknowledged within Chapter 10, but they are not described in detail or specifically referenced within the chapter itself. Instead, the text indicates that these measures are defined and discussed in other Environmental Statement chapters and related documents. From a Public Health perspective, it is considered good practice for the Health and Wellbeing chapter to include clear examples of relevant mitigation measures, particularly those that directly address health related impacts. Quoting or summarising key mitigation actions within the chapter would improve transparency and allow stakeholders to better assess the adequacy and appropriateness of the proposed measures in relation to health and wellbeing outcomes.	This is noted. A summary of mitigation measures has been provided in section 10.6 of **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** (ES Chapter 10). A balance has been sought in providing sufficient information within ES Chapter 10 and signposting to other documents elsewhere in the suite of Development Consent Order submission documents. With regard to impacts on physical activity during construction, for example, ES Chapter 10 includes a summary of those PRoWs impacted along the Project in paragraph 10.7.90, together with a summary of overarching mitigation provided in paragraph 10.7.88. **7.6 Outline Public Rights of Way Management Plan [APP-329]** is referenced for further detail as this is an extensive document covering all PRoW along the Project.
Health and Wellbeing	253. In accordance with the principles set out in Suffolk County Council's Community Engagement and Wellbeing Supplementary Guidance Document (SGD), further detail is required on: a. The monitoring of health and wellbeing outcomes, including mental health, physical activity, and access to services, using baseline data such as Suffolk's Emotional Needs Audit and Key Performance Indicators for engagement and wellbeing. b. The process for reviewing and updating mitigation measures in response to community feedback and emerging evidence, with participatory monitoring and adaptive management. c. The role of Public Health and local authorities in ongoing scrutiny and engagement, including the expectation for continuous, honest, and collaborative engagement with communities and parish councils. d. Consideration of appointing an independent relationship manager to act as a consistent, impartial point of contact for communities, building trust and reducing negative impacts on wellbeing.	253a - No significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty whilst the proposals are developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through early and transparent engagement with communities and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. 253b - Information relating to how community feedback received during consultation has helped influence and shape the proposals to date can be found in **5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068]** and **5.1 Consultation Report - Appendix C: 2023 non-statutory consultation [APP-069]** respectively. 253c and d - **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 community relations team to engage with local residents and provide dedicated communications support. The Applicant will continue to engage openly with local authorities along the Project route.

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Health and Wellbeing	254. The proposals involve substantial electrical infrastructure with associated Electric and Magnetic Fields (EMFs). The Chapter explains the project is designed in accordance with National Grid design standards, complies with guidelines and policies related to EMF as stated in NPS EN-5 (DESNZ, 2024b), including the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines (ICNIRP, 1998). The Chapter further clarifies compliance means the project will already have designed out potential effects from EMF to a level appropriate to meet health and safety standards, including precautionary measures. However, it is important to specifically acknowledge that anxieties and perceptions around EMFs can have real and measurable impacts on mental wellbeing. The Chapter recognises that such concerns may link to anxiety (paragraph 10. 7. 136). The Applicant has committed to providing clear, accessible information and ongoing local engagement generally, including a dedicated website, helpline, and specialist support at consultation events, to help address concerns.	This is noted.
Health and Wellbeing	255. Recommendation: To fully address the potential mental health impacts associated with EMF perceptions, further detail should be provided on the delivery of mental health mitigation. This should include local education programmes, targeted community engagement, and the monitoring of mental health outcomes during both construction and operation.	**6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** includes an assessment of the potential impact on mental health and wellbeing arising from perceptions in health risk from Electric and Magnetic Fields (EMFs) during operation. The chapter identifies opportunities for public awareness raising about EMFs, which would form part of measures recommended for affected communities along the Project. As referenced in response to paragraph 253a above, no significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the proposals are developed may cause anxiety and 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. **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.
Health and Wellbeing	256. The Chapter outlines measures for informing residents and businesses about construction impacts, traffic management, and mitigation, including regular updates, contact points, and complaints procedures as set out in the Outline Code of Construction Practice. The Chapter refers to legal compliance and a multi-channel approach, but does not itself evidence compliance. Instead it points to the Consultation Report and Policy Compliance Document for full details.	As noted in the previous response, **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.
Health and Wellbeing.	257. The Environmental Statement acknowledges in Table 10. 4 that "During construction there would be disruption to recreational routes or areas of open space which may affect opportunities for physical activity. During the operation (and maintenance) phase, access to recreational routes would be reinstated and no effects are anticipated in relation to physical activity" (Table 10. 4). Use of the term "no effects are anticipated" should be carefully scrutinised in each case, as even temporary or localised disruptions to PRoWs can have a disproportionate impact on physical activity, social connectedness, and mental wellbeing, particularly for vulnerable groups.	The role of recreational routes and open space in relation to health and wellbeing is identified within **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**, including in relation to physical activity and mental wellbeing. The chapter includes an assessment of Public Rights of Way (PRoWs) impacted by the Project during construction, and highlights that the residual effect may be different for vulnerable groups (a minor adverse level of effect compared to a negligible level of effect for the general population). This reflects the disproportionate impact on certain user groups that can arise from temporary or localised disruption to PRoW. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** states that impacts on recreational routes during operation may relate to routine inspections or maintenance activities and are not considered to impact general usage of the route. This has informed the conclusion set out in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** that no effects are anticipated during the operational phase.

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Traffic and Transport	258. The chapter notes in Paragraph 10. 7. 87 that "The majority of PRoWs would be affected for short durations only and the strategy is aimed at maintaining them as open Rights of Way throughout the construction period, wherever practicable". From a public health perspective, it is essential that all reasonable effort is made to ensure that these "short durations" are minimised as far as possible, and that "wherever practicable" is interpreted robustly, so that the right to access and use PRoWs is preserved for the community.	The overall strategy 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 during construction, either through managed access on their existing alignment or through appropriate temporary diversions. As a result, no PRoW within Suffolk would be subject to closure without a diversion in place, and no severance of the overall network is anticipated from the Project. Any temporary closures will be kept as short as practicable within the constraints of the works. The indicative durations of temporary closures are identified in **7.6 Outline Public Rights of Way Management Plan [APP-329]**.
Health and Wellbeing.	259. A significant adverse effect from construction traffic noise has been identified at Bentley Road (PAR 30), with a predicted increase of 11. 4 dB, exceeding the Significant Observed Adverse Effect Level (SOAEL). The Outline Construction Traffic Management Plan proposes mitigation measures and whilst these measures may help reduce noise, the Environmental Statement acknowledges in 14. 7. 36 that "major significant adverse effects from construction traffic noise would still be expected on Bentley Road" From a Public Health perspective, it is essential to recognise that the proposed mitigation may not be sufficient to prevent significant adverse impacts on residents' health and wellbeing. It is recommended that the applicant explores further site-specific mitigation options, this should include ongoing engagement with affected residents and robust monitoring.	Further detailed construction vibration assessments would be undertaken by the Main Works Contractor(s), as per commitment NV05 of **7.2 Outline Code of Construction Practice [APP-300]** based on their specific methodologies. Based on the findings of these assessments specific mitigation measures will be identified, if required, and incorporated into the Noise and Vibration Management Plan (which will be updated from **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]**). Given the nature of this location, mitigation options are limited and it is conceded that significant adverse effects may not be avoidable at this location. However, mitigation measures would be put in place to mitigate and minimise impacts as far as practicable. Mitigation measures already incorporated are speed restrictions, and a widening of the road which serves to move vehicles further away from the property.
Cumulative Effects	260. The cumulative effects of multiple infrastructure projects in the same locality can result in significant adverse impacts on community wellbeing, including increased anxiety, loss of control, and emotional distress, as identified in the Suffolk County Council's Community Engagement and Wellbeing SGD. The chapter goes some way to recognise this in Paragraph 17. 5. 47: "In a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases. " These impacts may not be fully captured by the EIA process and require mitigation through early, continuous, and collaborative engagement, as well as support for community leaders and volunteers.	As noted, the inter-project cumulative assessment set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** highlights potential adverse effects in relation to mental health and wellbeing for the reasons described. The Applicant will continue to engage with people potentially affected by the Project during the construction phase, using a variety of communication means. The approach to engaging with local communities is set out in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]**.
Cumulative Effects	261. Table 17. 3 acknowledged that for some groups, the cumulative effect of noise, visual, and access impacts is considered significant: "Owing to the significance of visual effects within 500 m of the Order Limits, and as further mitigation is unlikely to be practicable, it is anticipated that the residual cumulative effect of visual and noise amenity effects with access and delay effects would lead to a significant intra-project cumulative effect on pedestrians, cyclists and horse riders. However, the significant effects are no greater than reported in Chapter 13: Landscape and Visual". No additional mitigation measures are proposed within the chapter beyond those already identified in the other topic chapters.	**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. **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** concluded that further mitigation to reduce the significance of effects was considered unlikely to be practicable, therefore no further mitigation other than that proposed within **7.6 Outline Public Rights of Way Management plan [APP-329]** is proposed.

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	262. Recommendation: Given that the chapter concludes further mitigation is "unlikely to be practicable," it is recommended that the Applicant continues to engage proactively with affected communities, particularly those within 500 m of the Order Limits to monitor the real world impacts on pedestrians, cyclists, and horse riders. The Applicant should remain open to implementing targeted, site specific measures or enhancements if significant adverse effects are observed during construction or operation, even if these go beyond standard mitigation.	
Cumulative Effects	263. The assessment concludes that inter-project cumulative effects on health and wellbeing are not significant during both construction and operation phases. This conclusion is based on the assumption that other developments will implement best practicable means (BPM) and standard mitigation measures. 264. Paragraph 17. 4. 22 explains that "No monitoring is proposed during construction or operation (and maintenance)." This appears a notable gap given the potential for significant combined impacts on physical activity, mental wellbeing, and community amenity: 265. Recommendation: Public Health recommend targeted monitoring of health and wellbeing outcomes for affected communities is undertaken, especially where significant cumulative effects are identified. Processes should be put in place and documented to communicate and engage with users of PRoWs, schools, and community facilities to ensure timely information about closures, diversions, and mitigation measures. Additionally The Applicant should proactively distribute mental health resources (e. g. https://simplebooklet.com/wellmindssuffolk#page=1) provide funded Mental Health First Aid training for community members, and support local mental health organisations to mentor volunteers, as recommended in the Suffolk County Council Community Engagement and Wellbeing SGD.	No significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through transparent engagement with residents and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. **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. With regard to communications on Public Right of Way (PRoW) closures, diversions and associated mitigation, **7.6 Outline PRoW Management Plan [APP-329]** sets out the measures that would be put in place to inform the Local Highway Authority and those who may be affected. These measures include advance notification of the timing and duration of any closures or diversions through on-site signage, notices and clear waymarking of diversion routes. Advance signage will include relevant mapping and contact details for further information and will be installed in good time prior to any closures or diversions being implemented.
Cumulative Effects	266. Sensitivity testing as detailed within Paragraph 17. 6. 4 indicates that delays or extensions to the construction programme would not result in new or different significant inter-project cumulative effects. 267. Recommendation: Public Health recommend the applicant maintain flexibility in mitigation and monitoring plans to respond to unforeseen cumulative impacts, especially if construction timelines or project overlaps change.	As reported in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** 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 developments would be constructed prior to the Project, and others would be under construction at the same time as the Project). However, no developments identified within **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short 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.
Project Description	268. It is the view of Public Health that the proposed core working hours of 07:00–19:00 (weekdays) and 07:00–17:00 (weekends and bank holidays) exceed those considered appropriate to safeguard public health and raise material concerns regarding potential impacts on health and residential amenity. The inclusion of weekend and bank holiday working, as well as the potential for night working for trenchless crossings and other exceptions,	**7.3 Construction Traffic Management Plan [APP-309]** is secured by Requirement 4 of **3.1 Draft Development Consent Order [APP-056]**. The Applicant has completed assessments on the impacts of the extended working hours. The extended working hours are in place to ensure works are completed in time for the energisation date, and to provide a robust working hours assessment. It is anticipated that, at ad-hoc intervals within the duration of the Project, all working hours will not be required. The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are:

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	raises concerns about the adequacy of protection for public health and residential amenity. 269. The applicant's reliance on management plans (CoCP, CTMP, etc.) for mitigation is noted, however there is a risk that extended hours, night working, and start up/close-down activities could result in unacceptable levels of noise, disturbance, and stress for local residents, particularly those in rural and semi rural locations close to the works. 270. Recommendation: Core working hours be reduced to more typical levels with no routine working on Sundays or bank holidays, except where essential for safety or agreed with affected residents. Night working be strictly limited to essential activities only, with advance notice, robust justification, and additional mitigation for affected receptors. Start-up and close-down activities be included within the core hours, not permitted outside them. The applicant be required to consult with affected communities and local authorities before agreeing any variations to working hours or mitigation measures.	• Monday – Friday: 07:00 to 19:00 • Saturday, Sunday and Bank Holidays: 07:00 to 17:00. Details relating to the proposed construction working hours and any associated restrictions are contained within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The working hours are secured through Requirement 7 of Schedule 3 of **3.1 Draft Development Consent Order [APP-056]**. The 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 mean that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday. The defined core working hours provide essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and Bank Holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. The assessment within the Environmental Statement (ES) (Volume 6 of the DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the Project. **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 of the core working hours. The assessment concluded that with the embedded mitigation and controls set out in **7.2 Outline Code of Construction Practice [APP-300]**, significant effects from 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. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in Table 6.1 of **7.2 Outline Code of Construction Practice [APP-300]**, including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30). The Applicant also considers that the provision for start-up and close-down activities to be proportionate, justified, and consistent with established practice for Nationally Significant Infrastructure Projects, noting that all such activities remain subject to the application of best practicable means and appropriate mitigation to manage noise and other environmental effects as set out in **7.2 Outline Code of Construction Practice [APP-300]**.
Noise and Vibration.	271. The Chapter identifies in Paragraph 14.7.24 that construction vibration may exceed the Significant Observed Adverse Effect Level (SOAEL) at 74 Noise Sensitive Receptors (NSRs), primarily	The construction vibration assessment presented in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** uses reasonable worst-case assumptions for vibration generating activities and does not include mitigation. As noted, the source of vibration leading to potential exceedances is from vibratory

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	due to compaction activities associated with highway works, haul road construction, and temporary construction compounds. With mitigation in the form of Best Practicable Means (BPM), the magnitude of impact is expected to be negligible to small at residential and low to medium sensitivity non-residential NSRs, and negligible at high-sensitivity NSRs, resulting in a residual effect that is not significant. There does however appear to be any explicit commitment to vibration monitoring or detailed site-specific mitigation for vibration in the Outline Construction Traffic Management Plan or the Environmental Statement. From a Public Health perspective, whilst the use of BPM is welcomed, it is recommended that the applicant provides greater clarity on how vibration impacts will be monitored and mitigated during construction.	compaction. In practice, this can be readily mitigated by use of an alternative method, such as dead rolling (i.e. not using the vibrator when rolling). As such, in practice, the SOAEL is not expected to be exceeded at any location. Further detailed construction vibration assessments will be undertaken by the Main Works Contractor(s) as per commitment NV05 of **7.2 Outline Code of Construction Practice [APP-300]** based on their specific methodologies. Based on the findings of these assessments, specific BPM mitigation measures would be identified, if required, and incorporated into the Noise and Vibration Management Plan (NVMP) (which would be updated from **7.2 Outline Code of Construction Practice Appendix F – Outline Noise and Vibration Management Plan [APP-306]**). The Outline NVMP includes protocols for vibration monitoring in situations where works may induce high levels of vibration, and this would form part of the implementation of BPM. Additionally, commitment NV04 of **7.2 Outline Code of Construction Practice [APP-300]** includes for pre- and post-condition surveys to be conducted in situations where there is a potential for building and structural damage, and includes a commitment to rectify any damage (cosmetic or otherwise) deemed to be caused by the works. However, in practice such high levels of vibration would not be expected, particularly with the implementation of standard BPM.
Traffic and Transport.	272. The proposed new pylon route significantly affects the public rights of way (PROW) network during the construction phase due to this SCC strongly advocates this is dealt with within its own chapter. It is therefore covered in health and well-being chapter; landscape and visual chapter; social economics, recreation and tourism and transport and traffic chapter. As a result, the post methodology's do not recognise the importance of the quality of the experience enjoyed by the public when going for a walk or ride. SCC does welcome the Draft PROW Management Plan but would like all the other aspects to be covered off or repeated in a dedicated PROW chapter, or in a subsection of the Traffic and Transport section. 273. The PRoW Management Plan should be a standalone document.	As per the **6.19 Scoping Report [APP-288 to APP-296]** and the **6.20 Scoping Opinion [APP-297]** a separate PRoW chapter has not been provided. This is because PRoWs are assessed using different methodologies by several different environmental topic chapters within the Environmental Statement, **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**, **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]**, **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** and **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. PRoWs are assessed separately within each relevant environmental topic chapter and cumulative effects on a single PRoW presented within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. In addition, **7.6 Outline PRoW Management Plan [APP-329]** has been prepared to set out the proposed approach to the management of PRoWs during construction of the Project. This has been developed as a standalone document and it is expected that the final PRoW Management Plan, to be developed by the Applicant's appointed Main Works Contractor ahead of the commencement of construction activities, will also be a standalone document.
Traffic and Transport.	274. Section 15 covers receptors and some long-distance trails, some notable circular walks have been omitted and need to be referenced and assessed, using the 'Discover Suffolk website' routes affected are and not limited to: a. Great Bricett Moat & Pub Walk, b. Great Bricett Airfield & Hall Walk, c. Bramford Mills and Meadows Walk.	The Great Bricett Moat and Pub Walk or Bramford Mills and Meadows Walk are located outside the Order Limits (Local Study Area) therefore are not considered within **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. A corner of the Great Bricett Airfield and Hall Walk falls within the Order Limits (Local Study Area) near RG187. However, it is not considered within **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** as effects would not result in a likely significant effect; its omission is in accordance with **6.19 Scoping Report [APP-296] and 6.20 Scoping Opinion [APP-297]** which states '*EIA Scoping is proposed to follow a proportionate approach and focus the assessment on those areas where there is potential for significant effects, rather than assessing all PRoW and tourism and recreation assets within the study area*'.
Traffic and Transport.	275. SCC has concerns about the impact of multiple National Grid projects particularly within the Bramford area and the long-term impact on restrictions on the rights of way network. The combination of projects could see closures for significant lengths of time effectively severing the network and creating long term disruption to PRoW users. Although the closures are not permanent, this will impact on access and thus on the health and well-being of the local community over a lengthy period. SCC considers that appropriate mitigation for these residual impacts is required.	**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 Public Rights of Way (PRoWs), 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 the cumulative effects would be negligible and not significant on recreational routes. In respect of the Project, the overall strategy set out in **7.6 Outline PRoW Management Plan [APP-329]** is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment or through appropriate temporary diversions. As a result, no PRoWs within Suffolk would be subject to closure without a diversion in place, and no severance of the overall network is anticipated from the Project.
Traffic and Transport.	276. Several promoted long-distance routes will be affected by the proposal covering the Stour Valley Path, Gipping Valley	The Outline Public Rights of Way (PRoW) Management Plan was included within the submission documents and is available on the Planning Inspectorate's website (**7.6 Outline PRoW Management Plan [APP-329]**). It

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	Footpath and Mid Suffolk Footpath and connecting promoted circular routes, in addition to local strategic routes close to villages. These routes need to be monitored during construction of the line and usage of haul roads, to identify impacts and where required further mitigate. This should also cover the increase in construction traffic on minor routes close to villages that are also used for non-motorised access to the PRoW network. SCC are happy to provide details of specific areas of known medium to high use that should be included in further surveying. This comment carries over from previous correspondence and should also be addressed in the Public Rights of Way Management Plan (PRoW MP), which has not been attached to the submission documents but referred to as document 7. 6.	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. The **7.6 Outline PRoW Management Plan [APP-329]** also confirms that signage associated with PRoW management will include contact details for the Applicant and the Main Works Contractor, allowing members of the public to raise any issues they encounter. The Applicant welcomes continued engagement with SCC regarding areas of high PRoW usage, which can be considered as part of the ongoing development of management measures by the Main Works Contractor. With regards to monitoring of construction traffic, **7.3 Outline Construction Traffic Management Plan [APP-309]** states that the Main Works Contractor will monitor the number of construction vehicles using the Primary Access Routes between the construction site and the strategic/main road network.
Traffic and Transport.	277. SCC also expects mitigation measures for the impact on the popular sections of the rights of way to offset the disruption to local communities. Consideration needs to be given to whether temporary infrastructure can assist as legacy for PRoW access as a permanent measure once completion of the scheme, including any proposed structures. Further discussion would be welcomed on this. . 278. Further details would be welcomed on treatment of routes and proposals for closures.	The overall strategy, as set out in **7.6 Outline Public Rights of Way (PRoW Management Plan [APP-329]**, is to maintain access along 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. 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. With regard to SCC's request for further detail on the treatment of routes and closures, this information is contained within **7.6 Outline PRoW Management Plan [APP-329]**. The strategy for managing each affected PRoW, including the proposed approach to management, any temporary diversions, and indicative timescales, is set out in Section 8 of that document. On completion of the Project's construction the intention is that all affected PRoWs will be reinstated to the reasonable satisfaction of the Local Highway Authority and the landowner.
Traffic and Transport.	279. A pre and post condition survey must be carried out including identification and assessment of surface condition and with a scope of coverage and methodology to be agreed with SCC as Highway Authority. This should include pre-construction work where PRoW might be used to gain access to the corridor and reinforcement works might be required prior to use by vehicles. Pre and post condition surveys are covered in 2.2.4 and will be required and agreed by SCC PRoW and adequately covered and agreed in the PRoW MP. a. Where impacted by the works, any PROW will be restored to original condition or to a condition agreed with SCC - where there are existing defects, the applicant should agree restoration measures with the SCC, and this should be included within a Code of Construction Practise. This is referred to in 2. 2. 4 of the Draft PROW Management Strategy and adequately covered and agreed in the PRoW MP. b. 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 PRoW MP. c. 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	The comments are noted but there appears to be some confusion within them regarding the documentation that is being referred to, as the paragraph numbers in the comments do not appear to correspond to relevant sections of the documentation referred to. Notwithstanding this, the matters raised are addressed within **7.6 Outline Public Rights of Way (PRoW) Management Plan [APP-329]**, **7.2 Outline Code of Construction Practice [APP-300]** and **7.3 Outline Construction Traffic Management Plan [APP-309]**. In accordance with commitments GG06 and GG15 of **7.2 Outline Code of Construction Practice [APP-300]**, pre- and post-construction condition surveys will be undertaken of any PRoWs affected by the works, in conjunction with a suitable representative from the relevant Highway Authority. a. **7.6 Outline PRoW Management Plan [APP-329]** confirms that, in accordance with commitment GG07 in **7.2 Outline Code of Construction Practice [APP-300]**, any PRoW that is affected by construction works, that has been confirmed as requiring reinstatement, will be reinstated prior to reopening to the reasonable satisfaction of the PRoW Officer. Where existing defects are identified, appropriate reinstatement measures will be agreed with the Highway Authority. b. **7.6 Outline PRoW Management Plan [APP-329]** states that suitable temporary measures will be implemented to maintain safe and usable surfaces, including reinforcement of diversion routes with granular material where necessary. Regular site checks will be undertaken by the Environmental Manager, drawing on specialist input as required, with additional procedures or mitigation measures applied where needed. Signage will also include contact details for the Applicant and the Main Works Contractor to enable users to report any issues. c. **7.6 Outline PRoW Management Plan [APP-329]** requires that any pre-commencement operations affecting PRoWs are undertaken in accordance with that document. Where measures require agreement with the relevant Highway Authority, such agreement must be sought before works commence. Temporary and permanent

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	discussed, and any temporary closures will need to be included in the DCO and adequately covered and agreed in the PRoW MP. d. Public rights of way that are used for any stage of construction access should remain open, safe, and fit for the public to use at all times with management measures put in place with the agreement of SCC. e. 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. f. An alternative route must be provided for any public right of way that is to be temporarily closed prior to closure. The location of alternative routes to be agreed with SCC and adequately covered and agreed in the PRoW MP. The path or way must not be substantially less convenient to the public in consequence of the diversion. g. Any alternative route must be safe and fit for the public to use at all times – suitable surface, gradient and distance with no additional road walking between the natural destination points. Any diversion route surface, width and gradient should be at least commensurate with the existing route. Any routes which divert onto a road, which does not currently emerge onto a road, should have an Road Safety Audit undertaken to ensure that it is safe for all users. h. Any temporary closure and alternative route will be advertised in advance on site and in the local media, and to the local parish councils including a map showing the extent of the closure and alternative route. The closure and alternative should be signed accordingly and SCC PRoW informed prior to closure. Also, the path or way must not be substantially less convenient to the public in consequence of the diversion There should be no new gates or stiles erected on any public rights of way that are impacted by the cable corridor and any other associated site.	closures are detailed within **7.6 Outline PRoW Management Plan [APP-329]** and are also secured through Schedules 7 and 8 of **3.1 Draft Development Consent Order [APP-056]**. d. See the response to item (b.) above. e. **7.6 Outline PRoW Management Plan [APP-329]** sets out a strategy to maintain access along PRoWs throughout construction through managed access or appropriate diversions. Any temporary closures will be kept as short as practicable within the constraints of the works. All temporarily affected PRoWs will be reinstated as soon as practicable. f. As set out in **7.6 Outline PRoW Management Plan [APP-329]**, no PRoWs within Suffolk would be closed without a diversion in place and no severance of the wider network is anticipated. Diversion routes have been developed to minimise inconvenience, including consideration of diversion length and connectivity, and have been discussed with the relevant Highway Authorities. g. See the response to item (b.) above. With regard to PRoW widths, **7.6 Outline PRoW Management Plan [APP-329]** confirms that minimum width requirements in line with Paragraph 1 of Schedule 12A to the Highways Act 1980 will be maintained, and also notes that discussions with Highway Authority PRoW Officers have indicated that all footpaths should be a minimum of 1.5 m wide and that any bridleways that are constrained on both sides should be a minimum of 4 m wide. Diversions that introduce a new highway connection point will be subject to suitable Road Safety Audits. h. **7.6 Outline PRoW Management Plan [APP-329]** includes details of proposed signage and notices that will be used to provide advanced warnings of temporary closures and/or diversions, including mapping and contact details for further information. Diversions will be clearly waymarked prior to implementation, and the precise management arrangements, including closure and diversion proposals, will be discussed with the relevant Highway Authority PRoW Officers.
Socio-economics Recreation and Tourism	280. Recreation and Tourism, Table 15. 24, p88: W-129/025/0 is marked as significant in the construction phase, but still marked as low in sensitivity, what mitigation is proposed to lessen the significant impact?	The significant adverse effect identified for receptor W-129/025/0 arises from the potential increase in journey length by over 500 m for the proposed diversionary route. Following a thorough assessment of available alternatives, the proposed 1.3 km diversion has been determined to be the most suitable mitigation option, taking into account both safety considerations and overall feasibility.
Traffic and Transport	281. 16.4.15 Refers to PRoW surveys and states that PRoW officers agreed the scoping. This is not totally correct, as SCC PRoW did not agree locations, or days, or months prior to the survey being undertaken. When we were approached after the surveys, we advised that it needed to be at least three days and in holiday season as well as school time and we needed locations of where the surveys were to be undertaken and the methodology behind the locations, along with the method of collection, as permissions should be sought on PRoWs.	**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** provides the rationale for selection of those Public Rights of Way (PRoWs) to be surveyed. The list of PRoWs to be surveyed included routes likely to have a high number of users and extensive connectivity and/or social significance. An initial meeting with PRoW officers was held in November 2023 to introduce the Project and present our proposed methodology for route selective and survey scope. The list of sites selected were shared with the local authorities in July 2024 and their feedback taken into account, which included additional sites to be surveyed. Where required, landowner permissions to undertake the PRoW surveys were obtained.
Traffic and Transport	282. 16.4.31 Refers to the dates the surveys were taken and noted that the PRoW users would be higher in spring/summer months when the weather is more favourable and daylight hours	**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** details that user surveys for Public Rights of Way (PRoWs) were undertaken on routes with the potential to have a high number of users and extensive connectivity and/or social significance. The assessment of pedestrian, cyclist and horse-rider delay was assessed and there would be no significant effects to PRoWs within Suffolk.

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	are greater. This is agreed and SCC PRoW would request more accurate surveys to be undertaken.	One footpath (W-121/006/0 and W-129/025/0) would require a temporary diversion of over 500 m. Diversion routes have been developed to minimise inconvenience, including consideration of diversion length and connectivity, and have been discussed with the relevant Highway Authorities. Details can be found within **7.6 Outline Public Rights of Way Management Plan [APP-329]** which contains a list of all PRoWs affected by the Project in Suffolk along with the management approach proposed for each and the timescales involved. The number of users has not been used as a criterion for determining the sensitivity of the PRoWs or the significance of any effects, in line with the assessment methodology outlined for Pedestrian, Cyclist, and Horse-Rider Delay within **6.19 Scoping Report [APP-288 to APP-296]**. Since **7.6 Outline Public Rights of Way Management Plan [APP-329]** already includes suitable mitigation measures, we believe that additional user surveys are not necessary at this stage.
Traffic and Transport	283. SCC recommend altering the following statement: 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 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.	The suggested changes would be unacceptable as they specifically reference SCC, whilst commitment S02 is Project-wide and therefore relates to all affected authorities and Local Highway Authority PRoW teams. As a result, as a minimum, the suggested text would need rewording to reference 'the relevant Highway Authority PRoW Team', or similar.
Planning Policy	284. SCC is the Minerals and Waste Planning Authority in Suffolk. The proposed development does not directly impact existing or proposed minerals and waste development. In terms of minerals safeguarding, the sand and gravel resources within Suffolk are of at most regional importance as opposed to these proposals which are of national significance. 285. SCC also determines planning applications for its own development including new schools and highways improvements. There are no known conflicts at the time of writing.	Noted. The Applicant has sought to avoid direct interactions with existing minerals sites, where possible, as described within **6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure Assessment [APP-183]**. The Order Limits within Suffolk cross through several Mineral Consultation Areas for sand and gravel. **5.6 Planning Statement [APP-085]** provides an assessment of the mineral resources and states that the quantity of mineral sterilised by the Project is insignificant in the context of the extensive occurrence of sand and gravel and the national need/significance of the Project.
Airfields	286. SCC has at the request of Councillors through the course of the evolution of these proposals sought to safeguard aviation interests. This work has included help facilitate discussions between NGET and the Civil Aviation Authority and attending meetings convened by the General Aviation Awareness Council and airfield operators. SCC will continue to support in particular Raydon Airfield which is still considered to be adversely affected.	The Applicant has welcomed SCC support to its engagement with aviation stakeholders including the Civil Aviation Authority Airfields Advisory Team (CAA AAT), the General Aviation Awareness Council (GAAC) and aerodrome operators. **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** further describes the Applicant's consultation approach to inform its assessment of aviation impacts. Paragraphs 15.4.12 to 15.4.18 provide detail on assessments relating to Raydon Wings aerodrome, and design changes implemented in response to stakeholder feedback to minimise impacts, where possible. Furthermore, adverse effects on the 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.
Socio-economics Recreation and Tourism	287. SCC welcomes the Community Benefit funds payable to communities in the vicinity of transmission infrastructure and asks that it is consulted as part of that process.	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.
Draft DCO	288. SCC supports additional financially based side agreements with NGET to offset or compensate for the potential impacts of these proposals including:	The Applicant notes SCC's comments regarding the need for various legal agreements. As SCC will be aware, the Applicant has prepared Heads of Terms in relation to:

Topic	Summary of matters raised	National Grid's response
	a. a legal agreement to supply funding to the Dedham Vale National Landscape Project to enable works identified the current Management Plan in order to further the purposes of the National Landscape in accordance with Section 85 of the Countryside and Rights of Way Act 2000 and to offset the impact of undergrounding through the Dedham Vale National Landscape; b. a legal agreement to facilitate a feasibility study of the potential removal of the existing 132kV overhead line which runs between the existing Bramford and Lawford substations to offset the impact of undergrounding through the Dedham Vale National Landscape; c. a legal agreement to supply funding to the Suffolk Wildlife Trust to enable works in accordance with the Waveney and Little Ouse Landscape Project to offset the impact the proposed pylons which will bisect the Waveney Valley; d. a legal agreement to supply funding to the relevant Councils to support compensatory tree planting in lieu of the loss of existing trees along the route of the proposed development. e. a legal agreement to support the monitoring of Biodiversity Net Gain for a period of 30 years.	• A unilateral undertaking to be given pursuant to s.106 of the Town and Country Planning Act 1990 ("a s.106 agreement") to secure the provision of Biodiversity Net Gain, as set out in the BNG Report • A s.106 agreement to secure the off-site compensation planting of replacement trees • A statutory agreement to be made to secure payment of compensation by the Applicant to further the statutory purposes of conserving and enhancing the natural beauty of the Dedham Vale National Landscape. The Applicant remains open to consider the necessity of any other planning obligations. However, any planning obligation must be in accordance with the legal tests in regulation 122 of the Community Infrastructure Levy Regulations 2010: • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development.

Appendix AC.
Suffolk Wildlife Trust

nationalgrid

Appendix AC
Suffolk Wildlife Trust

Table AC1.1 outlines the Applicant's comments on the RR provided by **Suffolk Wildlife Trust [RR-3522]**. The Applicant has held a number of meetings with Suffolk Wildlife Trust during the development of the Project and has been progressing a SoCG. An updated SoCG is provided to the Examining Authority at Deadline 1 **(5.9.19 Draft Statement of Common Ground - Essex Wildlife Trust [Revision B]),** which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table AC1.1 Summary of comments and National Grid's response

Topic	Comments	National Grid's response
Ecology and biodiversity	Suffolk Wildlife Trust also note that currently ecological survey data has not been provided for c. 12.5% of the project, and while it is not anticipated by the Project Team that this will significantly change the assessment, it may result in additional concerns being raised by Suffolk Wildlife Trust.	Additional survey results from 2025 (including otter, water vole and bat roost inspections) are presented within the updated **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** which was submitted to the Planning Inspectorate in November 2025. The updates did not change the conclusions of the assessments.
Ecology and biodiversity	We support the comments made by Essex Wildlife Trust and Norfolk Wildlife Trust in their Relevant Representations on the potential impacts on designated nature conservation sites, irreplaceable habitats, protected species, ecological connectivity, and habitats and species of principal importance. It is important that impacts to these ecological receptors are comprehensively assessed, minimised, and that reinstatement, compensation where necessary, and enhancement follow best practice.	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on key ecological features such as designated sites, irreplaceable habitats, protected species, ecological connectivity and habitats/species of principal importance. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment (EIA) process for the Project, a suite of ecological surveys has been undertaken over the 2022-2025 period. The findings of which informed the design and approach to mitigation. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]** contain a list of relevant good practice measures to avoid or reduce impacts on valuable habitats and species.
Ecology and biodiversity	8. The Project will directly impact on several County Wildlife Sites (CWS), as Local Wildlife Sites are known in Suffolk. These are sites of at least county level importance for wildlife, with many being of regional and even national importance, and include sites that support irreplaceable habitats such as ancient woodland and fen wetland.	Noted.
Ecology and biodiversity	9. We have concerns regarding the proposals at Sproughton Park CWS and the onsite reptile population which could be directly impacted during both pylon construction and the undergrounding of existing overhead lines. The undergrounding also crosses the entirety of the site, which has the potential to sever the population, potentially isolating individuals from hibernacula or impacting the short-term breeding success.	Sproughton Park County Wildlife Site (CWS) was surveyed for reptiles and subsequently identified as a key reptile site within **6.8.A6 Environmental Statement Appendix 8.6 - Reptile Report [APP-164]**. **7.4 Outline Landscape and Ecological Management Plan [AS-046]** already sets out mitigation measures for reptiles at key reptile sites and this includes Sproughton Park CWS. The impacts associated with the 132 kV undergrounding would be relatively short-term and small scale. All impacts would be temporary and habitats will be returned to baseline conditions on completion and would be available for reptiles in the medium to long term.
Ecology and biodiversity	10. The restoration of the onsite habitats at Sproughton Park CWS, as well as Fore & Bushey Groves CWS and Thrandeston Marsh CWS, is also a concern; an aim should be to improve habitat value and condition, with a restoration to previous condition the minimum required (as it put forward within the Environmental Statement). Regular monitoring should be undertaken to ensure that habitat restoration is on track, with the	**6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** sets on the principle that all habitats temporarily affected**,** including those located within a County Wildlife Site, will be returned to the baseline habitat type and condition on completion of works. Habitat enhancement measures to improve the habitat condition for certain habitat types within the Order Limits, have been identified where achievable as set out within **7.1 Biodiversity Net Gain Report [APP-299]**. Section 11.4 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** prescribes regular monitoring over a five-year period for designated sites which would include Sproughton Park County Wildlife Site (CWS), Fore and Bushey Groves CWS and Thrandeston

Topic	Comments	National Grid's response
	potential for additional intervention or changes to prescribed management on the table if required.	Marsh CWS. This section of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** also includes adaptive measures to ensure habitats are returned to the baseline habitat type and condition.
Ecology and biodiversity	11. Where impacts to CWS are unavoidable, care in 'micro-siting' of cable route to prevent impacts to the most ecologically important habitat is needed together with well-designed and executed habitat restoration works; these should aim to deliver habitats to the same or better condition. To compensate for any loss, be it considered temporary or not, measures should seek to enhance the wider CWS for its designated features and other nature conservation priorities as appropriate.	The Applicant is committed to avoiding and minimising impacts to important ecological features, including County Wildlife Sites, wherever practicable. The detailed design stage would include micro-siting to ensure avoidance of key areas of ecological value where practicable in line with commitments made within **7.2 Outline Code of Construction Practice [APP-300]**. Habitats would be returned to existing baseline value and condition, unless identified within **7.1 Biodiversity Net Gain Report [APP-299]**, with additional enhancement measures proposed. Details will be included within a Final Landscape and Ecological Management Plan.
Ecology and biodiversity	12. Roydon Fen Local Nature Reserve and CWS lies adjacent to the route, and we continue to have concerns about the potential for impacts to the sensitive onsite hydrology from works in the adjacent floodplain, as well as the impacts from vegetation management required for the construction and operation of overhead lines. (see also comments below on River Waveney Crossing)	The Applicant has assessed the potential hydrological impacts of the Project on Roydon Fen Local Nature Reserve and County Wildlife Site in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and **6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221]**, and has secured a range of measures, detailed in **7.2 Outline Code of Construction Practice [APP-300]**, to maintain and safeguard the hydrology and water quality of the River Waveney and associated habitats.
Ecology and biodiversity	13. There is the potential for the Project to impact the Waveney and Little Ouse Landscape Recovery Project (WaLOR)1 and the delivery of its vision for nature recovery in the wider Upper Waveney Valley in which Suffolk Wildlife Trust is the lead partner alongside the Environment Agency and 15 other landowners.	The Applicant is committed to continuing to collaborate with the WaLOR project to ensure both projects can be successfully delivered.
Ecology and biodiversity	13 We hope to continue the constructive engagement we have had with National Grid prior to submission to ensure the Project is compatible with and supports landscape scale habitat restoration in the Waveney.	As above.
Ecology and biodiversity	14. A key component of the WaLOR project is the restoration of the section of the River Waveney and its floodplain crossed by the Project to a more natural course and function. It is imperative that not only pylon location, but any permanent or temporary access required at construction or operational stage, will not impact the habitat restoration and creation proposals of the WaLOR project, including the river restoration, and that the design, construction, and operation of the Norwich to Tilbury project is compatible with the restoration of natural processes in the river valley, which include the natural migration of the river channel.	Noted. The Main Works Contractor(s) would seek to engage with the Waveney and Little Ouse Landscape Recovery (WaLOR) project team during detailed design development, to reduce any potential for conflicts between the two projects. The Applicant is committed to ongoing collaboration with the WaLOR project team.
Ecology and biodiversity	15. The construction of temporary haul roads and provision of permanent access required for the operational lifetime of the Project could impact habitat creation (outside of that proposed for the river channel) undertaken as part of the WaLOR project, including impacts to habitats where biodiversity, carbon, or other environmental credits have been, or would be, created. Such habitats could also be impacted by short- and long-term vegetation cutting required for management around the proposed pylon route.	The Applicant has sought to minimise impacts on the Waveney and Little Ouse Landscape Recovery (WaLOR) project as far as practicable. The construction haul road has been removed between pylons RG87–88. The permanent access is a right of access only for ongoing maintenance, i.e. no physical permanent works are required and impacts on the WaLOR project would be minimal. The Applicant is committed to ongoing collaboration with the WaLOR project team.
Ecology and biodiversity	16. The river valley acts as a natural wildlife corridor and is used by birds moving up and down the valley; with proposed works as part of the WaLOR project to increase biodiversity value in the	The Project has included bird diverters at the Waveney Valley on a precautionary basis, acknowledging that the proposed Waveney and Little Ouse Landscape Recovery proposals would likely increase the area's value for

Topic	Comments	National Grid's response
	upper Waveney Valley, the number of birds is likely to increase. The potential impact of bird strike is therefore likely to increase; this has been acknowledged by the Project and mitigation is proposed in the form of bird diverters to be installed on the earth line for the section that crosses the flood plain.	wintering birds. The inclusion of bird diverters is considered sufficient mitigation for any potential future increase in value and would mitigate any concern over collision risk.
Ecology and biodiversity	16. Should future monitoring indicate that bird diverters are insufficient to prevent significant impacts on local bird populations from collision with pylons and overhead lines, there should be a commitment from National Grid to provide suitable compensation and additional mitigation measures.	As above.
Ecology and biodiversity	17. We understand that the Project is exploring options for mitigating the landscape impacts of pylons and overhead lines in the Waveney Valley, including potential for undergrounding of existing 132kV overhead lines. Where this is being considered, it must avoid impacts to ecologically valuable habitats, peat soils, and the delivery of the WaLOR project, including river and floodplain restoration.	Landscape mitigation is set out in Section 13.6 of **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. There are no proposals to underground existing 132 kV overhead lines in the Waveney Valley. Short sections of existing 11 kV and 33 kV wood pole lines would be removed to accommodate the Project and undergrounded as shown on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** pages 10 and 11. Undergrounding works will be minimal and have limited short term impacts on habitats in the Waveney Valley. Reinstatement of vegetation is set out in **7.4 Outline Landscape and Ecological Management Plan [AS-046]**.
Hydrology	17. We note the potential for groundwater interactions from any undergrounding works, especially where these extend into the water table, which is close to the surface in the floodplain. Any proposals to underground existing 132kV OHLs must also adequately assess and mitigate the risk of groundwater and surface water pollution, and any potentially adverse hydrological effects on the River Waveney and sensitive wetland habitats, including designated wildlife sites such as Roydon Fen.	Following completion of ground investigation to inform the detailed design of the undergrounding works, if dewatering is anticipated for any locations within open cut trenches, a Hydrogeological Risk Assessment would be undertaken, in accordance with commitment GH11 within **7.2 Outline Code of Construction Practice [APP-300]**. The assessment would consider the specific risks to groundwater and water environment receptors at those locations and identify any additional mitigation that may be required, the nature and scope of which will be agreed with the Environment Agency or other stakeholders, as appropriate.
Ecology and biodiversity	*Hazel dormice* We are pleased to see National Grid undertaking surveys for hazel dormice across a wide area, including parts of the Project in Suffolk supporting habitat suitable for hazel dormice but without existing records. This has resulted in reported presence of hazel dormouse in locations where they have not previously been recorded, providing new evidence of their changing range and extent in Suffolk that could be valuable for informing future surveying and conservation effort.	Noted
Ecology and biodiversity	19. Where dormice habitat, notably hedgerow habitat, is removed as part of works (notably for the undergrounded section through Dedham Vale National Landscape), any required mitigation to retain connectivity for dormice should be monitored to assess its effectiveness. We believe this should be strengthened by including monitoring to assess presence/ absence in the wider landscape (offering clarity if monitoring shows a lack of use of mitigation).	A draft dormouse licence has been prepared and issued to Natural England for review. We are working with Natural England to agree upon necessary dormouse mitigation and expect to receive a Letter of No Impediment during the Examination phase. Due to the small scale of impact on any of the dormouse sites, it is not expected that this would include the requirement for any ongoing dormouse monitoring.
Ecology and biodiversity	20. The scale of compensation and enhancement for multiple receptors impacted by the project provides opportunity to deliver significant increases of habitat suitable for dormice, buffering known woodland populations and providing significant new landscape connectivity. Suffolk Wildlife Trust are keen to see important Suffolk species, such as hazel dormice, benefit wherever possible from wider ecological compensation and enhancement measures.	Noted.

Topic	Comments	National Grid's response
Ecology and biodiversity	21. Suffolk Wildlife Trust are interested in the proposed mitigation measures to retain hedgerow connectivity for bats. Previous research on mitigation measures in Suffolk has been undertaken as part of infrastructure works, this has been shared with National Grid by Suffolk Wildlife Trust; this research highlights the need for more data and Norwich to Tilbury provides a highly suitable opportunity to provide this, adding insight into the effectiveness of mitigation measures aiming to provide temporary connectivity across hedgerows during and immediately after proposed works.	Noted.
Biodiversity Net Gain	22. It is essential that best practice for Biodiversity Net Gain (BNG) is followed and that a strong consideration for the Local Nature Recovery Strategy is included wherever post-development Biodiversity Net Gain units are delivered; the biodiversity value of such habitat can be further enhanced by looking to create habitat of a type or in a location to benefit key species, such as hazel dormice. 22. We acknowledge that there is currently no requirement for mandatory net gain for NSIPs, however as this project has committed to providing a 10% net gain it is important that trading rules and best practice principles are followed throughout. 23. Under BNG's additionality rules, habitat measures delivered to mitigate or compensate for impacts to protected sites and species can only count towards, and not beyond, no-net-loss. To ensure additionality of the Project's 10% BNG, habitat created or enhanced to meet statutory mitigation or compensation for impacts to protected sites or species should be clearly identified in the BNG assessment.	**7.1 Biodiversity Net Gain Report [APP-299]** clearly sets out our overall approach to BNG, the assessment methodology used and the mitigation/enhancement proposed in the absence of BNG guidelines for Nationally Significant Infrastructure Projects. This approach was agreed in principle with Natural England. The Applicant can confirm the Local Nature Recovery Strategy for Essex, will be part of the Applicant's off-site BNG selection process, and will be a key consideration in determining the right location for off-site enhancement measures. The BNG principle around 'additionality' has been applied to the Project to ensure no double counting of mitigation. **7.1 Biodiversity Net Gain Report [APP-299]** has not included any specific mitigation measures required for protected species and/or designated sites above and beyond replacement planting.
Biodiversity Net Gain	24. We welcome the confirmation in Table 3.2 of Document 7.1 Biodiversity Net Gain Report that any habitat loss will only be considered temporary if reinstatement to the original habitat type and condition within two years is possible, as per statutory Biodiversity Net Gain guidance. Where this is not possible, habitat loss must be treated as permanent and its replacement required to demonstrate a minimum 10% Biodiversity Net Gain. Where temporary haul roads are made or hedgerows removed this position is essential to ensure the mitigation hierarchy is duly followed.	Noted.
Examination	*Suffolk Wildlife Trust's capacity to engage in the Examination* Due to resource limitations, Suffolk Wildlife Trust regrets that it may not be able to attend all issue-specific hearings or submit written responses for all Examination deadlines. We propose to engage with the Examination primarily via the submission of Written Representations and the agreement of a Statement of Common Ground with National Grid, setting out clearly the initial areas of disagreement and revised near the end of the Examination to show our final position. As part of this, we will continue our discussions with the Applicant to seek to resolve areas of concern where possible. 26. Suffolk Wildlife Trust look forward to continued discussions with National Grid on the above topics and hope to see genuine positives for biodiversity in Suffolk delivered as part of this project.	The Applicant notes this comment and will continue to engage with Suffolk Wildlife Trust.

Appendix AD. Tendring District Council

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Appendix AD
Tendring District Council

Tendring District Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the Relevant Representation (RR) provided by Tendring District Council.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG (**5.9.7 Draft Statement of Common Ground - Tendring District Council [Revision B]**) is provided to the Examining Authority at Deadline 1, which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table AD1.1 Summary of comments and National Grid's response

Topic	Summary of matters raised	National Grid's response
Needs Case	4.1.1 TDC notes the independent report commissioned by Norfolk, Suffolk, and Essex County Councils from Hiorns Smart Energy Networks (November 2023) (from hereon referred to as the Hiorns Report), which reviewed the need for National Grid's proposed East Anglia reinforcements. The report concluded that the Norwich to Tilbury project is based solely on contracted generation capacity, assuming all projects connect at full volume and on time—an outcome considered highly unlikely. It recommended further analysis of alternatives, including an offshore HVDC link, and stated that the current proposal could not be confirmed as the best option. 4.1.2 National Grid responded in April 2024, citing contractual and licence obligations requiring reinforcement by 2030. Whilst we acknowledge the license obligations placed on National Grid, they have failed to provide any new evidence or sensitivity testing to refute the conclusion of the Hiorns report. Given the magnitude of the impact of this project on the Tendring Peninsula, and other serious matters set out in this RR, TDC considers it essential that in determining what future expansion is required, more transparency is required about the assumptions on the status of the contracted connections and what future generation connections are actually likely to be ready to connect to the transmission network by 2030. The Applicant must not restrict the justification on future network expansion solely on the Electricity System Operator (ESO) contracted position.	At each key stage of the consultation and submission process the Needs Case is reviewed and updated. Both the contracted background, as contained in the National Energy System Operator (NESO) Transmission Entry Connection Register and the NESO Electricity Transmission Ten Year Statement is reviewed. The most recent update was completed to capture the latest information as of June 2025 in as set out in **Strategic Options Backcheck and Review [APP-355]**. The timing and urgency for electricity infrastructure is referred to within The Overarching National Policy Statement for Energy (EN-1) *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.* The National Policy Statement for Electricity Networks infrastructure (EN-5) also states the following regarding Transmission Owners. *2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.* *2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.* **7.19 2023 - Strategic Options Backcheck and Review [APP-357] Appendix A Page A3** sets out the Applicants Transmission Owner Licence obligations providing detail to the duties referred to within The National Policy Statement for Electricity Networks infrastructure (EN-5) Condition D2: *"Obligation to provide transmission services",* which includes *"responding to requests for the construction of additional transmission system capacity".* Condition D3 *"Transmission system security standard and quality of service"* which includes "*Transmission owners are required to at all times plan, develop the transmission system in accordance with the National Electricity Transmission System Security and Quality of Supply Standard ('NETS SQSS')"* Both Conditions D2 and D3 oblige National Grid to ensure sufficient capacity for connections and system reinforcements to reach compliance with the NETS SQSS are in place.

Topic	Summary of matters raised	National Grid's response
		The factors above show the 2025 updated Needs Case continues to indicate the urgent need for reinforcement for both Contracted and ETYS requirements aligned with National Policy Statements and Transmission Licence Obligations. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report was published in April 2024 and is available on the Project website. In summary the Applicant does not accept the Report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity (TEC) register. 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
Alternatives	4.1.3 TDC therefore strongly supports ECC's position that credible alternatives—such as offshore solutions or HVDC undergrounding—should be fully explored to minimise onshore impacts in Essex and elsewhere up and down the project route. These alternative suggestions also feature very strongly in the submissions from our affected Parishes and is fully supported by TDC. Surely, given the magnitude of the impacts, greater transparency is required on assumptions about contracted connections and realistic timelines for generation projects.	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 application for development consent. This includes **5.1 Consultation Report [APP-060]**, **5.15 Design Development Report [APP-122]**, **7.17 Strategic Options Backcheck and Review [APP-355]**, **7.18 2022 - Corridor and Preliminary Routeing 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]** and **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]**. Alternatives in the context of the EIA Regulations have been described in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**. The Applicant has also reviewed the need case as set out in **5.15 Design Development Report [APP-122]** Section 2.3, and in further detail in **7.17 Strategic Options Backcheck and Review [APP-355]**. The Applicant is required to meet contracted connection dates regardless of opinions on whether those are likely to be achieved. The Applicant has been consistent in our consideration of the evidence in the context of the relevant policy and made changes to the Project in terms of technology choice, routeing and siting. **5.15 Design Development Report [APP-122]** from paragraph 2.5.12 explains why offshore solutions and HVDC undergrounding are not preferred. These considerations were made on a consistent level of detail but there is no requirement to develop every possible alternative to the same level of detail as that for the Project submitted. To do so would be inefficient and add unnecessarily to consumer bills.
Alternatives	4.1.4 The current proposal for 50m+ lattice pylons, with limited Alternative Current (AC) undergrounding in Dedham Vale and the Tendring Peninsula, as well as the position of the EACN, would impose severe and lasting impacts on communities such as Ardleigh, Little Bromley and Lawford, and indeed other communities further to the west. If the urgency for reinforcement is less acute, as suggested by the Hiorns report, alternative schemes— such as offshore or HVDC undergrounding—should be assessed in detail to determine whether they deliver better environmental outcomes.	**Document 5.15 Design Development Report [APP-122]** sets out the rationale for the preference for this scheme over other alternatives. The Applicant's response to the findings of the Hiorns Smart Energy Report was published in April 2024 and is available on the Project website. The response reflects that the Hiorns Report did not take account of National Policy Statements or Transmission Licence Obligations. Please see The Applicant's response to paragraph 4.1.1 of the Council's RR for more detail.
Needs Case	4.1.5 TDC asks the ExA to scrutinise the need case, timing, and alternatives as a principal issue during the Examination, and the context as set out above.	The Applicant has updated the Project Need Case at each key stage of the Project as set out in **7.17 Strategic Options Backcheck and Review [APP-355]**, which contains the latest Need Case updated from 7**.19 2023 - Strategic Options Backcheck and Review [APP-357].** **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** also contains the evaluation of alternatives for the Examination consideration.

Topic	Summary of matters raised	National Grid's response
Substations	4.2.1 National Grid states that its preferred location for the EACN remains unchanged. This is despite reviewing all pre-DCO consultation responses, including extensive feedback from TDC and affected parishes during both non-statutory and statutory consultations. 4.2.2 In the main, National Grid argues that not placing the EACN further west and on the prevailing pylons route, for example in areas near major roads like the A12, is justified because doing so would require longer customer connection cables from their preferred location. 4.2.3 In their Design Development Report (DDR) in para 6.5.9 National Grid argues that feedback received in response to the statutory consultation stating a preference for an alternative EACN Substation location closer, or on the prevailing pylons route (for example on the former RAF Boxted) did not provide any new information or identify additional factors to be considered within decision making. TDC finds this hard to accept, especially having repeatedly asked National Grid to provide additional evidence and information about the decision-making process, as set out in this RR.	From paragraph 6.5.8 of **5.15 Design Development Report [APP-122]**, the Applicant has set out its consideration of alternative locations for the East Anglia Connection Node (EACN) Substation. This makes it clear that the reason the EACN Substation location to the east of Ardleigh is preferred is not because alternatives further to the west would require longer customer connections. The reason for its preference is the effects arising from the different combinations of substation siting and connection corridors; in particular, the increased number of underground cable corridors to achieve the required customer connections compared with the one corridor for the 400 kV requirement. A restated preference for an alternative arrangement does not constitute new evidence that overcomes these additional effects.
Substations	4.2.4 Another key factor in National Grid's argument is the requirement for 'multiple corridors' to accommodate the connections for the three confirmed customer connections (Five Estuaries, North Falls and Tarchon). National Grid states that the additional 'effects' of the multiple corridors were a major factor in the selection of the EACN Substation site. They offer further details on these 'effects', mainly in the context of why a site such as the RAF Boxted site was discounted. These reasons, at times very convoluted and confusing, are primarily set out in pages 76-80 of their DDR. To assist the ExA we will summarise these reasons below, as well as TDCs updated position or response to these points, to follow in Italic directly below each summarised reason offered by National Grid: • **National Grid says shorter cable routes to Bramford and Tilbury from RAF Boxted are offset by longer customer connection routes inland.** *4.2.4 We respectfully urge the ExA to scrutinise this argument closely. National Grid appears unwilling to consider extending customer connection routes westwards, treating the matter as closed and allowing contractual and licence obligations to override all other considerations. This rigid stance appears to outweigh all other potential benefits — including those offered by alternative sites that are better located in terms of existing transport infrastructure (the A12) and proximity to existing renewable energy assets, such as a solar farm, and indeed better alignment with the overall project route's prevailing north-east/south-west corridor. We believe this imbalance in priorities warrants closer examination and scrutiny of all the evidence, especially when a more strategically favourable positioned site*	From paragraph 6.5.8 of **5.15 Design Development Report [APP-122]**, the Applicant has set out its consideration of alternative locations for the East Anglia Connection Node (EACN) Substation. This makes it clear that the reason the EACN Substation location to the east of Ardleigh is preferred is not a reluctance to consider the routeing of customer cables further to the west, nor longer customer connections per se, but the effects arising from the different combinations of substation siting and connection corridors; in particular, the increased number of underground cable corridors to provide the customer connections compared with the one corridor for the 400 kV requirement. An additional contributory factor is also noted in paragraph 6.5.21 of **5.15 Design Development Report [APP-122]** to be programme (related to contractual and licence obligations) which is a legitimate consideration in the context of a Critical National Priority infrastructure Project where both the capacity and timing of delivery are key aspects of the need case (Overarching National Policy Statement for Energy (EN-1, 2024))

Topic	Summary of matters raised	National Grid's response
	could deliver broader and longer-term advantages for the environment, food security (National Grid's preferred location for the EACN is on BMV land), the network and its customers.	
Substations	• **Multiple corridors would still be needed to accommodate connections for North Falls, Five Estuaries, and Tarchon.** *4.2.5 TDC acknowledges that multiple corridors will be required to accommodate connections for North Falls, Five Estuaries, and Tarchon — but this is the case regardless of whether the EACN is relocated westwards, which is of course closer to existing trunk road infrastructure and the prevailing north-east/south-west project route. Crucially, this requirement applies equally to the current EACN site, where it is certain that a significant project corridor will be needed from the Langham/Boxted area into the site, along with outbound pylons, should the proposal proceed as currently designed. Furthermore, the route of the Tarchon corridor remains undefined at this stage, irrespective of the final EACN location. For these reasons, we consider this argument to be neutral at best in planning terms, and believe it should carry no comparative weight in favour of one site over another.*	The Applicant disagrees with this assertion and is clear that a single corridor from west of the A12 to the East Anglia Connection Node (EACN) Substation, which forms the basis of the application for development consent, is all that is required for the 400 kV connections. In contrast, and as acknowledged by the respondent, multiple corridors leading to increased effects would be required to route the customer connections in the opposite direction.
Substations	• **National Grid says that if the EACN Substation were relocated further westwards, for example on the former RAF Boxted airfield, space constraints caused by 'nearby development' and infrastructure around the A12/Wick Lane would limit the ability to route customer connections through the existing corridor. They say while suitable for overhead lines, the corridor is unlikely to support underground cables, meaning additional corridors would be needed to serve the three signed customers.** *4.2.6 TDC acknowledges that the area to the east of Old Ipswich Road is developed, however it is predominantly industrial and commercial in nature and dominated by the A12 and its audible and visual presence.* *4.2.7 The areas immediately around National Grid's preferred EACN site is less developed and clearly rural in nature. It is surrounded by quiet country lanes and there are three established, distinct rural settlements in very close proximity (Ardleigh, Lawford and Little Bromley). The existence of nearby industrial development should not diminish the strategic advantages of locating the EACN substation at a site such further to the west and closer to existing strategic road infrastructure, because the Horlock Rules explicitly favour sites that reduce the need for new infrastructure — including haulage routes — and minimise landscape disruption. Sites such as RAF Boxted, along with other brownfield sites along the A12 corridor, aligns far more closely with these principles than a greenfield site situated on Best and Most Versatile (BMV) agricultural land.* *4.2.8 Moreover, while National Grid raises concerns about underground cable routing, presumably for the customer connections, it accepts that overhead lines remain viable — and overhead infrastructure is already a key component of the existing*	The relative level of development and character between the A12 and Wick Lane location compared with the East Anglia Connection Node (EACN) Substation is not disputed but is not the relevant factor in this determination. There is simply insufficient space for the installation of underground cables of equivalent capacity (at the crossing of the A12 given the need for a trenchless technique to be utilised to avoid prolonged closure of the A12. The Applicant has made this decision fully aware of the context set by Overarching National Policy Statement for Energy (EN-1 (2024)), paragraph 4.1.21 which notes that, '*In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions.*' The Applicant disagrees with the respondent's assertion and is clear that a single corridor from west of the A12 to the East Anglia Connection Node (EACN) Substation, which forms the basis of the development consent application is all that is required for the 400 kV connection to connect from Bramford to the EACN. In contrast multiple corridors through the National Landscape, leading to increased effects, would be required to route the customer connections in the opposite direction if the EACN were located west of the A12. In summary whilst understanding the respondent's perspective and preference for an alternative, implementation of it is not possible as it is restricted by the practicalities of the more extensive requirements to route multiple customer connections compared with a single 400 kV connection.

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	corridor. As set out elsewhere in this document, the suggestion that additional corridors would be required applies equally to the current proposal, which also necessitates significant new infrastructure and incurs greater landscape and agricultural impact. *4.2.9 We therefore urge the ExA to weigh this rather loose argument carefully and recognise that potential sites further to the west, and next to established trunk road infrastructure offers a more sustainable, policy-aligned alternative that better serves long-term planning and environmental objectives.*	
Alternatives	**Following on from the above, National Grid identifies two likely alternative cable corridors:** • **An 11 km route from Bramford Substation, passing north of Black Brook and south between Langham Moor and Boxted Cross.** • **A 14 km route through the Stour Valley, west of Flatford Mill and Stratford St Mary, combining customer and project cables toward Boxted Cross.** *4.2.10 While these corridors are presented as viable options, the associated issues and constraints have not been articulated in a coherent or transparent manner. TDC understands that the challenges likely centre around a combination of environmental sensitivities, landscape impacts, proximity to heritage assets, and engineering complexity — particularly in relation to undergrounding cables and navigating protected areas.* *4.2.11 Again, TDC believe these factors warrant detailed scrutiny and clearer explanation accompanied by technical drawings, especially given the permanent and irreversible implications for local communities and the wider landscape. Without a full and balanced assessment, it is difficult to understand how National Grid's preferred corridors compare to alternatives in terms of feasibility, cost, and environmental impact. We will delve into these issues below.*	The challenges of these alternative corridors as noted by Tendring District Council are centred around a combination of environmental sensitivities, landscape impacts, proximity to heritage assets, and engineering complexity. Professional judgement has been applied, and the Applicant reasonably considers that the use of additional corridors (which were less preferred for the 400 kV routeing as set out in **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]**) would lead to greater effects including more extensively on the Dedham Vale National Landscape. The production of additional route development design and technical drawings of alternative options are not required or proportionate as part of a development consent application, once those routes have been discounted.
Underground cables	• **National Grid says the corridor width at pinch points like Black Brook is limited to 80m, leaving no flexibility for construction or maintenance.** *4.2.12 TDC acknowledges the presence of pinch points such as the 80m corridor at Black Brook and the associated challenges for construction and maintenance. However, it is important to note that National Grid's preferred route also encounters comparable environmental constraints and spatial limitations. These include similarly narrow corridors and sensitive landscapes that pose their own engineering and ecological challenges. TDC is also aware that the narrowest combined corridor width for the North Falls and Five Estuaries underground cable routes in northern Essex is now proposed to be approximately 85 metres in some areas, but it could even be slightly narrower than this due technical unknowns in a number of specific locations.*	It is a critical requirement when comparing East Anglia Connection Node (EACN) Substation locations to consider the connection requirements of both 400 kV connections and customer connections. The Applicant has set out clearly in **5.15 Design Development Report [APP-122]** paragraphs 6.5.13 to 6.5.16, why additional corridors are required for the customer connections compared with the 400 kV connection which includes consideration of the co-ordination by North Falls, Five Estuaries and the Tarchon interconnector project. This leads to an increase in effects arising from the connections required to be made and becomes a key factor in decision making. The Applicant is clear that emphasis on such a crucial differentiator is essential and not selective.

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	4.2.13 The emphasis placed on this specific constraint in the DDR appears selective and lacks a balanced comparison across all proposed routes. TDC therefore urges the ExA to scrutinise this point carefully and ensure that such limitations are assessed consistently across all options. In our view, this issue should not be afforded disproportionate weight in favour of National Grid's preferred alignment.	
Underground cables	• **National Grid says that installing 34 underground cables (16 customer + 18 Grid) would require:** – **Precise coordination between all customers.** – **Simultaneous installation to reduce risks and costs.** – **Trenchless crossings of Black Brook and a high-pressure gas pipeline.** – **Avoidance of mature woodland near Boxted Cross** *4.2.14 TDC acknowledges the technical considerations raised by National Grid regarding the installation of 34 underground cables — comprising 16 customer and 18 National Grid connections — and the associated requirements for precise coordination, simultaneous installation etc.* *4.2.15 However, what remains unclear is where these cables would be routed. Without detailed schematic information or visual illustrations, it is impossible to assess whether the full extent of this infrastructure would be required, and in which corridors. This lack of detail and transparency make it impossible to compare construction complexity stemming from a site further to the west with National Grid's preferred site, and therefore significantly weakens their argument.* *4.2.16 Furthermore, close coordination between customers is a fundamental requirement, regardless of where the EACN or customer substations/project corridors are located. The need for coordination is therefore not unique to sites further to the west or any other alternative site, and is expected on projects of this nature. In fact, it was mostly after sustained pressure from TDC and Essex County Council that the two offshore wind farm developers agreed to coordinate their delivery schedules, and pursue simultaneous installation, using one project corridor — a move specifically intended to make better use of space, limit the impact on the environment and reduce disruption for local communities.* *4.2.17 TDC remains unconvinced that construction complexity, either in isolation or in combination with other cited constraints, constitutes a decisive obstacle that justifies Grid's preferred site over a site further to the west closer to existing strategic road infrastructure and with less landscape harm, or other brownfield alternatives.*	The Applicant has responsibility for achieving the connections and has sought specialist engineering advice on how this may be achieved. This has included considering the implications of alternative East Anglia Connection Node (EACN) Substation locations. **5.15 Design Development Report [APP-122]** paragraph 6.5.15 implicitly acknowledges the theoretical potential for the requirements of multiple customer connections to be accommodated in the same corridor width as a 400 kV connection. However, it also identifies that there are multiple risks that mean this is not an appropriate basis on which to progress the Project.
Substations	• **National Grid argues that the alternative site would eliminate one CSE compound and reduce overhead line length by ~10 km, but says that:**	The Applicant considered the alternative location for the East Anglia Connection Node (EACN) Substation after it was raised in feedback received from non-statutory consultation in 2022. It based its decision that it was not preferred on a comparison of the effects of the combination of EACN Substation site and both the 400 kV and customer connections that would be required. It does acknowledge there are local concerns, as there would be

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	– **no new information was provided during consultation to justify relocation.** *4.2.18 TDC is disappointed to note National Grid's claim that no new information was provided during consultation to justify relocating the EACN. Even at this stage of the DCO process it remains entirely unclear what threshold of concern or evidence National Grid would consider sufficient to trigger a reassessment, or the provision of additional evidence in response genuine local concerns and challenges by statutory consultees. This approach appears to be a subjective and undefined standard — effectively a moveable bar that only National Grid can determine, without transparency or accountability.* *4.2.19 In reality, TDC has consistently raised serious, quantifiable concerns and posed valid, evidence-based questions regarding the site selection process. These concerns include (but are not limited to):* • *the timing of EACN connection offers to customers and backchecking of site selection criteria/evidence,* • *the failure on National Grid's side to provide evidence of timings of EACN connection offers to their customer,* • *significant environmental impacts,* • *land use efficiency concerns,* • *residential amenity concerns,* • *highways safety and highways infrastructure capacity concerns, and* • *various areas of local and national planning policy conflict.* *4.2.20 These concerns remain unaddressed, even at this advanced stage of the process.*	with the alternative. The Applicant's reference to no new evidence being provided goes beyond such stated preferences and refers to new information modifying the level of effect arising. On the specific points raised, the Applicant would note that: • The need case for the Project (capacity and programme) has been confirmed prior to the development consent application as set out in section 2.4 of **5.15 Design Development Report [APP-122]**, and in further detail in **7.17 Strategic Options Backcheck and Review [APP-355]**. Given this the Applicant considers the specific timing of connection offers being made to not be relevant • Other matters are addressed within relevant chapters of Volume 6 Environmental Statement
Substations	*4.2.21 The acknowledgement from National Grid that relocating the EACN could eliminate an entire CSE compound and reduce overhead line length by approximately 10 km is not a minor consideration. These are significant material benefits with clear implications for landscape impact, agriculture, highway safety, residential amenity, cost, and long-term network resilience. Dismissing them without proper engagement or justification would, in TDC's opinion, undermine the integrity of the pre-submission consultation and indeed the DCO process.* *4.2.22 TDC therefore urges the ExA to critically examine this issue with utmost scrutiny and ensure that all alternatives — particularly those offering demonstrable design, landscape, highways safety, costs and risk management advantages — are assessed fairly and transparently.*	The Applicant notes that it carefully considered the benefits of an alternative East Anglia Connection Node (EACN) Substation location but also factored into its decision making the disbenefits associated with alternative locations. In this case this includes the effects from an additional connection corridor through the National Landscape to make the customer connections to the EACN. This overall consideration is set out in paragraphs 6.5.8 to 6.5.21 of **5.15 Design Development Report [APP-122]** and is considered to fairly and transparently consider the alternatives from all perspectives in the context of the relevant planning policy.
Substations	**National Grid argues that uncertainty remains over 'customer agreements', construction risks, and operational impacts.** *4.2.23 As set out elsewhere in this representation, uncertainty around customer agreements, construction risks, and operational impacts appears to be the overriding factor driving National Grid's site selection strategy. However, this emphasis reflects what*	A robust site selection process has been undertaken for the EACN Substation. This was set out in **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** and has been reviewed in response to feedback to the various consultations in subsequent documents **7.20 2023 - Design Development Report for the Project [APP-358]** and **7.21 2024 - Design Development Report for the Project [APP-359]** and most recently in **5.15 Design Development Report [APP-122]**. It is our view that this provides an evidence-based assessment in the context of relevant planning policy (NPS EN1 and EN5 in particular) and takes into account the

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	seems to be an unwritten policy of prioritising customer convenience over community impact — a position that TDC finds unacceptable, unjustified, and inconsistent with sound planning principles. *4.2.24 This approach undermines the integrity of the site selection process, which should be guided by an open book approach from the outset, transparent criteria, robust environmental and social assessments, and alignment with established planning frameworks such as the Horlock Rules, applied in a consistent manner. Instead, the National Grid's strategy appears premature, lacking in objective justification, and structurally flawed.* *4.2.25 TDC has consistently raised legitimate concerns about the planning rationale, community disruption, and landscape impact associated with National Grid's preferred site — concerns that remain unresolved. We therefore urge the ExA to critically assess whether disproportionate weight and importance have been afforded to customer convenience, and whether this happened at the expense of fair and balanced considerations of community and environmental factors.*	site-specific construction constraints that restrict what can be delivered. The Applicant would like to clarify that rather than as stated by the respondent in their point 4.2.23, the factors confirming the decision-making are as set out in paragraph 6.5.21 of **5.15 Design Development Report [APP-122]**, and do not emphasise or favour customer convenience nor undermine the integrity of the site selection process.
Underground cables	• **National Grid says sites to the west of the A12, such as RAF Boxted, offers less flexibility for future connections east of the A12 due to constraints in routing 34 underground cables.** *4.2.26 TDC finds National Grid's statement deeply concerning, as it implies an expectation of even more future connections — and by extension, a further concentration of substations and electricity infrastructure in the area between Ardleigh and Little Bromley. If this flexibility concern means something else then National Grid should clarify its statement as soon as possible. Moreover, National Grid's flexibility concern reinforces our longstanding concerns about cumulative impacts, the premature nature of the site selection process, and the lack of transparency surrounding long-term infrastructure planning.* *4.2.27 The suggestion that a site such as RAF Boxted offers "less flexibility" once again appears to prioritise convenience for National Grid and its current and (speculative) future customers over the very real and lasting impacts on local communities. In addition, National Grid does not have any certainty around speculative future customers, who they are and what they will require in respect of space and 'flexibility'. It therefore reflects an approach that places operational flexibility above environmental considerations, landscape protection, and community wellbeing.* *4.2.28 TDC strongly believes that infrastructure decisions of this scale must be guided by clear, accountable principles that are applied consistently — not by assumptions about future customer needs. We urge the ExA to critically examine whether the pursuit of flexibility is being used to justify a strategy that risks entrenching disproportionate infrastructure burdens in a single, sensitive location known for its food production capabilities.*	The potential for future connections is a consideration in the development of any new substation; however, it is not a driving factor that would outweigh other considerations. Any future connections would be considered in their own right and would be subject to planning scrutiny at the time they were brought forward. The identification of the proposed East Anglian Connection Node (EACN) Substation site as the preferred site for the project, as opposed to an alternative to the west of the A12, was made based on signed connection agreements only, with the outcome of that assessment being unaffected by future connection potential. Reference to effects on future flexibility being restricted, does not change the preference position but reinforces the decision-making outcome in the context of increasing emphasis on the Applicant to seek to retain future flexibility when developing transmission network reinforcements.

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Landscape and Visual	• **National Grid argues that an additional corridor through the National Landscape would be needed (if EACN is relocated to a site further west)** *4.2.29 TDC acknowledges that relocating the EACN Substation to a site further to the west and closer to existing trunk road infrastructure may necessitate one additional underground cable corridor (for a customer such as Tarchon which is well behind in the DCO process), and potentially through the designated National Landscape (even though National Grid haven't, in our opinion, demonstrated that this will absolutely be the case). We therefore respectfully urge the ExA to weigh this impact proportionately and in the context of the substantial and wide-ranging benefits that such a relocation would deliver.* *4.2.30 These benefits include:* • *Significant reductions in overhead pylons (at least 10km by National Grid's own admission) and materials, resulting in a lighter visual and environmental footprint across the region.* • *A shorter overall pylon route and no need for pylons in a jarring arc around the north of Ardleigh. Collectively this will reduce disruption to the wider landscape, its communities and limit long-term infrastructure sprawl.* • *Less underground infrastructure required in the Ardleigh area for the Norwich to Tilbury project, easing pressure on sensitive local environments.* *Meaningful amenity improvements for affected communities, including enhanced quality of life, safeguarding of BMV and food security, preservation of local character, and reduced visual intrusion for generations to come.*	The requirement for an additional corridor and indicative routes has been presented such as in **7.18 Corridor and Preliminary Routeing and Siting Study [APP-122]** in Figure 6.7. These were identified based on constraints to routeing with no alternatives being proposed in feedback. As such the Applicant does not consider the suggestion that it may be possible to avoid the National Landscape to be credible. The Applicant also does not agree that the need for an additional corridor has not been demonstrated. The applicant, unlike the respondent, has responsibility to deliver the scheme and cannot proceed given the risks to delivery without use of an additional corridor. The Applicant has carefully considered the benefits of an alternative location but also factored into its decision-making the disbenefits associated with alternative locations and connection routes. This overall consideration is set out in paragraphs 6.5.8 to 6.5.21 of **5.15 Design Development Report [APP-122]** and is considered to fairly and transparently consider the alternatives from all perspectives in the context of the relevant planning policy including Paragraph 4.3.15 of NPS EN-1 (2024) which sets out the obligation on applicants to consider reasonable alternatives.
Landscape and Visual	*4.2.31 It is important to recognise that the National Landscape designation does not preclude infrastructure development — particularly where undergrounding is proposed and where the broader environmental and social gains are demonstrably greater. In this case, the potential impact of an additional underground corridor must be balanced against the cumulative benefits of a more sustainable, community-sensitive, and strategically advantageous alternative, an alternative which could bring about cost benefits as well.* *4.2.32 TDC therefore urges the ExA to consider the full picture — not just the presence of a corridor, but the overall legacy of the infrastructure choices being made.*	The Applicant has considered the full implications of the connection requirements in terms required by National Policy Statements EN-1 (2024), EN-3 (2024) and EN-5 (2024) and the National Planning Policy Framework[159]. This has taken into account the different elements including proposed new EACN Substation, the 400 kV connections between Bramford and the EACN Substation and the EACN Substation to Tilbury as well as the customer connections to the EACN Substation. The Applicant has considered environmental, socio-economic, technical and cost aspects within the decision-making in line with the National Policy Statements. These considerations are set out in Section 6.5 of **5.15 Design Development Report [APP-122]** which identifies that there are other consequences and effects that arise if there was a change to underground cable for the second connection past Ardleigh. The Applicant remains of the view that the Project is consistent with its various duties.
Planning Policy	4.2.33 National Grid's DCO submission makes repeated reference to the Horlock Rules, particularly the principle of minimising changes in direction in the routing of electricity transmission infrastructure. This is notably cited in relation to the oversailing of the Fishing Lake north of Colchester Road—designated as a Local Green Space within the Ardleigh	The Applicant has correctly applied the Holford Rules in respect of overhead line routeing. In respect of the Ardleigh locality, the justification for the preferred route is set out between sections 5.4.120 and 5.4.127 of **7.20 2023 - Design Development Report for the Project [APP-359]** and sections 6.5.22 and 6.5.47 of **5.15 Design Development Report [APP-122]**. **7.21 2024 - Design Development Report for the Project [APP-359]** sets out that changes have been made to the Project to avoid the fishing lake to the east of Ardleigh but that changes to avoid the fishing lake to the west of

[159] Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework

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	Neighbourhood Plan. In Section 9-5.564 of the Consultation Report, National Grid states: 4.2.34 "National Grid has considered alternative alignments to avoid this site. The alternative alignments considered would necessitate multiple changes in direction which would reduce consistency with the Horlock Rules and cannot be adopted." 4.2.35 Given the reliance on the Horlock Rules to justify route decisions, it is important to revisit the specific rule concerning linearity and understand its rationale: *4.2.36 The Horlock Rule in question advocates for transmission routes to remain **as linear as possible**. This principle is underpinned by several key considerations:* • ***Visual Impact**: Straight or gently curving routes are less visually intrusive, particularly in open or rural landscapes. They help maintain visual coherence and reduce the dominance of pylons.* • ***Environmental Sensitivity**: Linear routes are more likely to avoid sensitive ecological areas and reduce habitat fragmentation.* • ***Engineering Efficiency**: Fewer directional changes simplify construction, reduce costs, and improve long-term maintenance.* • ***Land Use**: Straighter routes typically affect fewer land parcels and are easier to negotiate with landowners.* *Illustrative Examples* • ***Ideal Case**: A transmission line running parallel to an existing transport corridor (e.g., railway or major road such as the A12) across flat terrain.* • ***Acceptable Deviation**: A gentle (emphasis added) curve introduced to avoid a village or designated ecological site, with the route returning to its original alignment promptly.* • ***Poor Practice**: A zig-zagging/jarring route that attempts to avoid multiple minor obstacles, resulting in visual disruption and engineering inefficiency* *4.2.37 While linearity is preferred, deviations may be necessary due to:* • *Topographical constraints (e.g., hills, rivers)* • *Existing development* • *Environmental designations (e.g., SSSIs, heritage assets)* *4.2.38 In such cases, the Horlock Rules require that deviations be minimised, justified, and that the route return to a linear alignment as soon as practicable.*	Ardleigh (north of Colchester Road) would *'reduce consistency with the Holford Rules and increase effects to multiple residential properties close to the alignment in this area'* (section 5.4.126). This section goes on to conclude that based on limited and informal use of this fishing lake as well as the effects of alternative routes, the proposed alignment was preferred. **7.21 2024 - Design Development Report for the Project [APP-359]** provides further analysis on the environmental considerations taken into account when planning the route. This considers alternative routes and balances the implications of all potential alignments. This concludes that the proposed alignment is the most favourable when balancing impacts. The impacts of different route alignments for the Project have been considered in line with the Holford Rules and taking into account the impacts of the Project as set out in the aforementioned documents. Having completed this assessment, the proposed route is found to be the most appropriate.
Agriculture and Soils	*4.2.39 TDC has undertaken an assessment of the proposed pylon route north of Ardleigh, beginning at pylon TB3. Between TB3 and TB21, the average angular deviation between cable spans is **19.4°, with a cumulative misalignment of 349° over a linear distance of just 5km (3 miles)**. This results in a pronounced arc-*	The map referred to, as presented in the Relevant Representation (at 4.2.40), shows the Provisional ALC mapping, at a scale of 1:250 000. This provides an indication of likely grades, but it does not provide the subdivision of Grade 3 into Sub-grades Grade 3a and 3b (and therefore can't be used to fully define BMV land). In addition, the Provisional mapping should not be used to inform site-specific assessments. As such, whilst the Provisional mapping forms part of the baseline of information gathered, the assessment is supported by the

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	*shaped route that passes within **250- 300m of built-up areas** in Ardleigh, in some instances pylons are just 200m away from the north eastern build-up areas of Ardleigh* *.4.2.40 While National Grid may argue that this routing is necessary to avoid the village centre and Conservation Area, TDC do not accept this argument because these constraints are **self-created**. Although National Grid have not disclosed the date the decision to locate the EACN to the east of Ardleigh was made, the Council understands this was some time in 2021/2022. The decision to locate the EACN east of Ardleigh, significantly offset from the prevailing route, introduced a range of avoidable impacts, including:* • ***Routing through Grade 1 Best and Most Versatile (BMV) agricultural land is highly concerning. As illustrated in the map below, such land is extremely scarce within this sub-region. Choosing to construct this type of infrastructure on BMV land— when alternative sites are available— raises significant concerns.** The map below illustrates the extent of BMV land in the north-west of the peninsula (shown in dark blue), alongside the approximate concentration of substation, EACN, and pylons infrastructure indicated by red stars. The prevailing direction of the N2T route indicated via the yellow line, with the jarring dogleg deviation into the Tendring Peninsula indicated via the red line. From this image, not only is it clear that the route deviation is completely illogical, it is also unmistakably clear that the proposed infrastructure would be located at the very heart of BMV land, with potentially profound implications for food production and food security, especially for the local farmer farming these areas. These risks are compounded by the numerous unknowns associated with this location, as well as National Grid's own admission that flexibility is required for potential future connection options in such an area (see relevant sections elsewhere in this submission). TDC firmly believes that locating critical infrastructure in the heart of the most productive agricultural land—particularly when less harmful alternatives exist—is wholly inappropriate and unacceptable.* *4.2.41 Other avoidable impacts include* • *Proximity to scheduled monuments and other high-value heritage assets.* • *Oversailing of Local Green Spaces, which enjoy protection equivalent to Green Belt land.* • *Potential ecological harm to Ardleigh Reservoir, a known bird hotspot.* • *Increased proximity to residential and commercial properties.*	output from detailed ALC surveys. The mapping is presented in **6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]**; this shows that there is limited overlap between the Project and Grade 1 land, with just a small area of Grade 1 land mapped to the north of Ardleigh. The EACN is not located on Grade 1 land. Whilst noting the opinion of Tendring District Council, the Applicant has set out from paragraph 6.5.8 of **5.15 Design Development Report [APP-122]** the consideration of an alternative location which would avoid the routeing noted. Technical constraints require an additional corridor to achieve the customer connections which leads to greater effects as set out in particular from paragraphs 6.5.11 to 6.5.21. On this basis, the Applicant concludes that there is no alternative location available. **5.15 Design Development Report [APP-122]** also considered alternative overhead line routes as set out from paragraph 6.5.43 to 6.5.47. In light of these considerations, the Applicant considers that the points raised are not avoidable in the manner described. Overall, as set out in **5.6 Planning Statement [APP-085]**, the Project has sought to minimise impacts on BMV agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource and on agricultural activities (as set out in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**). Given the predominance of BMV agricultural land within East Anglia, it has not been possible to avoid both temporary and permanent effects on this resource. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. The Applicant has set out in response to paragraphs 4.15.7-9 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Landscape and Visual	*4.2.42 The original scheme also proposed entry into the EACN from the north, which would have exacerbated these impacts.*	The Applicant has considered the full implications of the connection requirements in terms required by National Policy Statements EN-1 (2024), EN-3 (2024) and EN-5 (2024), and the National Planning Policy Framework[160].

[160] Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework

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	*One direct consequence of increased directional changes is the need for **angle towers**, which are significantly more visually intrusive than standard pylons.* *4.2.43 The routing of pylons around the north of Ardleigh represents a significant departure from the Horlock Rule on linearity and introduces wide-ranging and permanent harm to the villages of Ardleigh and Little Bromley and the surrounding rural areas. TDC will set out these wide ranging concerns and impacts in detail within its LIR, highlighting the cumulative environmental, visual, and heritage impacts of the proposed alignment, but wanted to bring these very serious concerns to the attention of the ExA at relevant representation stage.*	This has taken into account the different elements including the proposed new EACN, the 400 kV connections between Bramford and the EACN Substation and the EACN Substation to Tilbury as well as the customer connections to the EACN Substation. In this assessment the Applicant has considered environmental, socio-economic, technical and cost aspects within the decision making in line with the National Policy Statements. These considerations are set out in Section 6.5 of the **5.15 Design Development Report [APP-122]**. EN-5 requires the Applicant to operate in an efficient, coordinated and economical way[161]. 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. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it's not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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.
Alternatives	• **National Grid argues that the Boxted site is constrained by existing solar development and may require a dispersed layout for customer substations, complicating design and coordination.** *4.2.44 The assertion that the Boxted site is constrained by existing solar development and would necessitate a dispersed substation layout lacks substantiating evidence. National Grid has not provided any detailed plans, technical illustrations, or spatial analysis to demonstrate what is meant by a dispersed layout, nor have they quantified the alleged design and coordination challenges. In the absence of such material, we urge the ExA to rigorously interrogate these claims.*	The Applicant does not consider it necessary, to develop detailed plans for a theoretical alternative arrangement in order to make informed judgements. The restrictions on the locations of corridors for connections (underground cable and overhead line) do not allow for simple one-directional flow across the site. As such, this necessitates a layout (if the customer substation infrastructure were moved) which the Applicant judge would likely be more dispersed. Regardless of this the Applicant would reiterate the point made across paragraphs 6.5.8 to 6.5.21 of **5.15 Design Development Report [APP-122]**, about the main basis for decision making. In summary, the Applicant carefully considered the benefits of an alternative location but also factored into its decision-making the disbenefits associated with alternative locations. This overall consideration is set out in paragraphs 6.5.8 to 6.5.21 of **5.15 Design Development Report [APP-122]** and is considered to fairly and transparently consider the alternatives from all perspectives in the context of the relevant planning policy.
Alternatives	*4.2.45 Furthermore, the presence of solar infrastructure should not be viewed as a limiting factor, but rather as a potential asset. There appears to be no consideration given to the possibility of temporarily removing and storing the existing solar panels during construction, with a view to reusing them—either on substation buildings or elsewhere within the site or other renewable assets owned by National Grid or a subsidiary company. This would not only preserve renewable energy assets but also demonstrate a more sustainable and integrated approach to site development and renewable infrastructure delivery. On the contrary, National Grid's preferred location consists of undeveloped Best and Most Versatile agricultural land*	The Applicant notes that it carefully considered the benefits of an alternative location but also factored into its decision-making the disbenefits associated with alternative locations. This overall consideration is set out in paragraphs 6.5.8 to 6.5.21 of **5.15 Design Development Report [APP-122]** and is considered to fairly and transparently consider the alternatives from all perspectives in the context of the relevant planning policy. In this context the presence of the solar farm is not a main differentiator, noting also that it is an asset owned and operated by a third party and the implications on the Project of any change should not be underestimated.
Alternatives	*4.2.46 It is also important to note that site further to the west, such as the RAF Boxted site is comparable in scale to the land take required for the EACN and associated windfarm substations,*	The Applicant does not agree that it has suggested that the RAF Boxted site is an unsuitable location for the East Anglia Connection Node (EACN) Substation. Instead, the Applicant notes that, as part of the holistic siting considerations, each of the sites and routes bring different benefits and disbenefits. Inevitably, some of these have more prominence in the decision making than others.

[161] Electricity Act 1989, Section 9

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	including space allocated for landscaping. This undermines the suggestion that the site is unsuitable due to spatial constraints.	
Alternatives	*4.2.47 Crucially, the burden of proof does not lie with TDC to demonstrate the adequacy of sites further to the west and closer to existing strategic road infrastructure. Given the scale and long-term consequences of placing nationally significant infrastructure on undeveloped BMV agricultural land—situated in a disconnected and poorly serviced highly rural location—it is incumbent upon National Grid to provide robust, transparent, and verifiable evidence, including site-specific plans and imagery, to justify why a site such as RAF Boxted cannot accommodate the proposed infrastructure.*	The Applicant considers that within **5.15 Design Development Report [APP-122]**, it has demonstrated that it has followed an evidence-led decision-making process founded within the relevant planning policy and regulatory context within which the Applicant must operate. The document, along with other material such as **5.1 Consultation Report [APP-066]**, also shows a broad consideration of alternatives and feedback and the basis for decision making.
Substations	• **National Grid argues that locating the Tarchon converter at Ardleigh would increase the number of cables needed to reach Boxted, adding complexity.** *4.2.48 The claim that locating the Tarchon converter 'at or near Ardleigh' would increase cable complexity to a site such as RAF Boxted is premature, unsubstantiated and confusing. At the time of preparing this Relevant Representation, TDC has not been provided with any definitive information regarding the proposed location of the Tarchon Interconnector. The only indication received is that the promoters are considering a broad area to the north and north-west of Horsley Cross. Geographically this is east of Ardleigh and most people familiar with the area will judge the above broad location as 'near Ardleigh'. The Tarchon project has not yet reached statutory consultation, and at the time of writing, it is experiencing delays in its Environmental Impact Assessment (EIA) Scoping Report, which is not expected to be submitted to PINS until Q1 2026. Statutory consultation is scheduled for November 2026, with a DCO submission not anticipated until September 2027. In short, the project is still at a formative stage, with no confirmed site or cable routing strategy.* *4.2.49 Given this early stage of development, National Grid cannot credibly assert that a converter station at a yet to be determined location 'near Ardleigh' would necessarily result in greater cable complexity than currently anticipated. No evidence has been provided to demonstrate that a connection from this yet-to-be-determined Tarchon location—potentially situated between Little Bromley and Horsley Cross—could not feasibly link to an EACN located further inland. Alternative inland brownfield sites benefit from proximity to existing trunk road infrastructure and aligns with the prevailing east– west corridor of the Norwich to Tilbury project.* *4.2.50 In the absence of detailed routing studies or spatial constraints, it is speculative at best to suggest that additional cabling would pose prohibitive or overriding challenges. On the contrary, early-stage flexibility in the Tarchon project presents an opportunity to coordinate infrastructure planning in a way that minimises land take, avoids BMV agricultural land, and makes efficient use of previously developed sites.*	In considering alternatives, the Applicant has had to respond to signed customer agreements. There are three of these in place of which Tarchon is one. The Applicant does not disagree that there is very little information available as yet about Tarchon, however the Applicant has made a reasonable assumption, informed by high level consideration of constraints, available published information and professional judgement. Given the connection point at the East Anglia Connection Node (EACN) Substation, it is reasonable to assume that Tarchon cable routeing to a site west of the A12 will be continuing from the general vicinity of the EACN Substation. On that basis the connection for it and the other customers can reasonably be assumed to be seeking to continue in the same general corridors to an alternative site.

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	4.2.51 Ultimately, it is incumbent upon National Grid to demonstrate—through technical evidence and route modelling—why such an integrated and sustainable approach is not achievable. Until such evidence is provided, the assertion of increased complexity remains unconvincing and should be treated with caution by the Examining Authority.	
Landscape and Visual	• **National Grid admits that on its own, Boxted performs slightly better on screening and visual impact, but the Ardleigh site can be landscaped over time to meet similar standards.** *4.2.52 The LPA considers National Grid's admission that alternative sites further to the west perform better on screening and visual impact to be a decisive factor in favour of a site such as RAF Boxted given the very severe landscape, environmental and amenity harm that will ensue from its chosen location. This is not a marginal advantage—it directly reinforces our position that sites further to the west are demonstrably more suitable from a spatial planning, environmental, and cost-efficiency perspective.* *4.2.53 Unlike the Ardleigh/Little Bromley location, which would require extensive landscaping over time to mitigate visual impacts, as site such as RAF Boxted benefits from a position directly next to a noisy strategic road opposite an evolving, predominantly industrial area. It benefits from existing natural screening and a significantly lower landscape profile. Its position directly adjacent to the A12 reinforces its compatibility with the surrounding environment. These inherent characteristics reduce the need for costly new road infrastructure such a new haul routes passing established rural settlements, and minimise the scale and duration of mitigation measures required.*	A better performance of an alternative site on one of many characteristics cannot be cherry-picked to serve as a justification for over-riding all other considerations. Section 4.3 of NPS EN-1 (2024) (Environmental Impact Assessment) requires the identification of likely significant effects. EN-1 is clear that the role of EIA is to identify likely significant effects and to apply the mitigation hierarchy, rather than to operate as a pass/fail test for individual environmental topics. EN-1 requires environmental effects to be assessed comprehensively and weighed in the planning balance. The existence of a significant or adverse effect in one topic area does not, in itself, justify refusal. Paragraph 4.3.23 of EN-1 states that '*The Secretary of State should not refuse an application…simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site.'* EN-1 does not require all significant effects to be eliminated, nor does it indicate that an adverse outcome in a single topic area should, in isolation, preclude development. Instead, the policy requires residual impacts to be weighed in the planning balance against the urgent need for new energy infrastructure. The Applicant has carefully considered the benefits of an alternative location but also factored into its decision-making the disbenefits associated with alternative locations as well as the effects (beneficial or not) of the 400 kV and customer connections that form an integral part of the design solution. This overall consideration is set out in paragraphs 6.5.8 to 6.5.21 of **5.15 Design Development Report [APP-122]** and is considered to fairly and transparently consider the alternatives from all perspectives in the context of the relevant planning policy. On this basis other factors led the Applicant to a decision that the site to the west of the A12 is less preferred.
Landscape and Visual	*4.2.54 Moreover, the suggestion that the Ardleigh site "can be landscaped over time" introduces uncertainty and delay, relying on speculative future outcomes rather than present-day site suitability. In contrast, sites further to the west offers a ready-made solution that aligns with the prevailing project corridor and sustainable development principles, avoids unnecessary intrusion into sensitive landscapes, and supports a more efficient delivery of infrastructure.*	The Applicant notes that it carefully considered the benefits of an alternative location but also factored into its decision-making the disbenefits associated with alternative locations. This overall consideration is set out in paragraphs 6.5.8 to 6.5.21 of **5.15 Design Development Report [APP-122]**, and is considered to fairly and transparently consider the alternatives from all perspectives in the context of the relevant National Policy Statements EN-1 (2024), EN-3 (2024) and EN-5 (2024), along with the National Planning Policy Framework[162]. The Applicant remains of the view that the Project as proposed, and site of the proposed new EACN Substation is suitable. It is well established practice to factor in the beneficial change arising from mitigation measures and accepted practice to specify certain controls to ensure delivery. The Applicant does not consider it reasonable to consider such mitigation to be speculative. The Project allows for landscape planting around the proposed new EACN Substation west of Ardleigh, including proposed woodland, hedgerows, spoil bunds, scrub and grassland. These are shown as 'Environmental Areas' 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]**. As stated in VRAs C12 and C13 and LCA 7a within **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment [APP-229]** and **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**, at year 15 proposed planting would be semi-mature, although growth rates would vary depending upon local conditions. This planting would help to integrate the proposed new EACN

[162] Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework

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		Substation within the surrounding landscape and would reduce the scale of change for some receptors within a localised area around the substation by screening and filtering views. As stated in **7.4 Outline Landscape and Ecological Management Plan [APP-321]**, a specific landscape planting schedule would be created by the relevant Main Works Contractor(s) for each Environmental Area, which would identify where advanced planting/habitat enhancement works ahead of or during construction can take place and where planting will be undertaken on completion of construction works (before operational use).
Landscape and Visual	*4.2.55 In light of this, the LPA urges the Examining Authority to give significant weight to the superior visual and environmental performance of a site such as RAF Boxted, which validates our issue-specific representations and underscores the strategic merit of selecting this site.*	A better performance of an alternative site cannot justify overriding all other considerations. The Applicant has carefully considered the benefits of an alternative location but also factored into its decision-making the disbenefits associated with alternative locations as well as the effects (beneficial or not) of the 400 kV and customer connections that form an integral part of the design solution. This overall consideration is set out in paragraphs 6.5.8 to 6.5.21 of **5.15 Design Development Report [APP-122]** and is considered to fairly and transparently consider the alternatives from all perspectives in the context of the relevant planning policy. On this basis, other factors lead to a decision that the site to the west of the A12 is less preferred.
Underground cables	• **National Grid says both sites require cable routes through the National Landscape, but Boxted introduces greater impacts and risks to programme delivery.** *4.2.56 While National Grid asserts that RAF Boxted presents greater impacts and risks to programme delivery due to cable routing through the National Landscape, TDC contests the validity of this claim and the weight that should be given to it.* *4.2.57 When viewed in the context of the full body of evidence submitted by National Grid, this conclusion is not definitive but rather an "on balance" judgment shaped by a complex interplay of assumptions and variables.* *4.2.58 In fact, National Grid's analysis lacks sufficient granularity and fails to account for mitigation opportunities, route flexibility, and the broader spatial and environmental advantages of the Boxted site.* *4.2.59 Moreover, the suggestion that a site such as RAF Boxted introduces overriding risks to programme delivery is speculative and not backed by robust, site-specific technical assessments. The LPA urges the ExA to scrutinise these claims rigorously and weigh them against the wider planning, environmental, and land-use implications—particularly the irreversible loss of BMV agricultural land and the proximity of Ardleigh to established settlements.*	The Applicant has responsibility for achieving the connections and has sought specialist engineering advice on how this may be achieved. This has included considering the implications of alternative East Anglia Connection Node (EACN) Substation locations. **5.15 Design Development Report [APP-122]** paragraph 6.5.15 implicitly acknowledges the theoretical potential for the requirements of multiple customer connections to be accommodated in the same corridor width as a 400 kV connection. However, it also identifies that there are multiple risks that mean this is not an appropriate basis on which to progress the Project. Whilst noting others may have a different opinion and be sceptical it is also notable that they do not bear any responsibility or liability for what the Applicant considers to be a certain need for multiple corridors and the consequences associated with that. The Applicant considers that within **5.15 Design Development Report [APP-122]** it has demonstrated that it has followed an evidence-led decision-making process founded within the relevant planning policy and regulatory context within which the Applicant must operate. This has considered a wide range of factors including those mentioned in this representation. The document, along with other material such as **5.1 Consultation Report [APP-066]**, also shows a broad consideration of alternatives and feedback and the basis for decision making.
Alternatives	• **National Grid says using Boxted could allow for removal of more pylons, benefiting some residents east of the A12. However, this would shift impacts to residents near Boxted and involve more extensive underground works, with associated disruption.** *4.2.59 TDC accepts that moving the EACN further to the west will no doubt have an impact on other communities, however these impacts have not been quantified. National Grid acknowledge that using as site such as RAF Boxted, for example, could enable the removal of additional pylons—potentially benefiting some residents east of the A12. They then swiftly return to potential negative effects such as more undergrounding. Again, no comprehensive or comparative assessment has been undertaken*	There is no requirement in the EIA Regulations (Infrastructure Planning (Environmental Impact Assessment) Regulations 2017) to investigate and assess alternatives to the same level of detail as that completed for the Project. This approach is reflected in Paragraph 4.3.15 of NPS EN-1 (2024) which sets out that '*Applicants are obliged to include in their ES, information about the **reasonable alternatives** they have studied. This should include an **indication of the main reasons** for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility*.' For the Secretary of State's decision making Paragraph 4.3.22 is clear that they should be guided by the following principles when deciding what weight should be given to alternatives: • the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and • only alternatives that can meet the objectives of the proposed development need to be considered

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	to evaluate the full spectrum of residential amenity impacts between the Little Bromley/Ardleigh area and alternative sites. Without such analysis, National Grid is not in a position to determine, through clear evidence capable of scrutiny, which option would result in greater overall benefit or harm to local communities. *4.2.60 Furthermore, the engineering technique of transitioning underground cables to overhead lines via sealed compounds—commonly used at infrastructure pinch points such as major road crossings—has not been transparently assessed or demonstrated in this context. This raises questions about whether all feasible mitigation strategies have been properly considered.* *4.2.61 In the absence of quantified data or detailed modelling, any claims about "shifting" impacts to Boxted residents remain speculative. It is therefore premature to suggest that a site such as RAF Boxted offers a net improvement in residential amenity without a rigorous, evidence-led comparison of both options.*	To investigate all potential alternatives to the same level of detail would be inefficient and uneconomic given the level of survey effort required across multiple topics. A consistent level of data combined with professional judgement has been utilised and reasonably considers that the use of additional corridors (which were less preferred for the 400 kV routeing as set out in **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]** would lead to greater effects. The Applicant notes in particular the greater effects on the National Landscape because of constrained width at certain pinch points requiring the use of multiple corridors.
Alternatives	• **National Grid argues that a site such as RAF Boxted introduces greater construction risk, uncertainty, and programme delays. They say that these risks, combined with reduced future flexibility, outweigh the potential benefits of relocating the EACN to Boxted.** *4.2.62 National Grid's assertion that a site such as RAF Boxted introduces greater construction risk, uncertainty and programme delays is undermined by their own actions earlier in the project timeline. TDC would argue that it is National Grid who introduced uncertainty by prematurely offering connection points to customers as early as 2021—well before the completion of the DDR and other critical evidence-gathering processes. This pre-emptive commitment appears to have effectively locked in the EACN location without the benefit of a fully informed and transparent assessment.*	The connection point was initially offered by the then ESO (now NESO) in general regional terms and only proposed as the site to the east of Ardleigh at the publication of the **Corridor and Preliminary Routeing and Siting Study [APP-356]** in April 2022. At this stage this was a provisional location only becoming confirmed upon the submission of the development consent application in August 2025. In **7.17 Strategic Options Backcheck and Review [APP-355]** and in subsequent Design Development Reports (most recently **5.15 Design Development Report [APP-122]**) other locations have been reviewed but are less preferred. The reasons set out both in **Corridor and Preliminary Routeing and Siting Study [APP-356]** regarding sites around Felixstowe or in **5.15 Design Development Report [APP-122]** would still be present and determinative regardless of timing of decision.
Alternatives	*4.2.63 Moreover, the recent and significant change in the project corridor north of Black Brook— now veering in a more south-westerly direction towards RAF Boxted—raises serious questions about the integrity of the site selection process. National Grid has yet to provide a clear answer to a fundamental question: had this preferred route near Black Brook been known three to four years ago, would it have altered their preference for Ardleigh/Little Bromley as the EACN location?* *4.2.64 This lack of clarity and retrospective justification suggests that the risks and delays National Grid attributes to a site such as RAF Boxted are not inherent to the site itself, but rather a consequence of their own premature decisions and inflexible planning. It is therefore disingenuous to present a site such as RAF Boxted as a source of greater risk when the evidence points to a flawed and rushed process that failed to account for evolving project realities.* *4.2.65 In light of this, the potential benefits of relocating the EACN to a site such as RAF Boxted— including reduced visual and*	As set out in **5.15 Design Development Report [APP-122]** (paragraphs 6.5.8 to 6.5.21) the reasons for not preferring the former RAF Boxted site relate to the additional risks and effects arising from the connections that need to be made by the three customer projects. These risks and effects arise due to the location of corridor pinch points (including at Black Brook) regardless of the 400 kV route to the north of Black Brook. The change to the route raised therefore has no bearing on East Anglia Connection Node (EACN) Substation siting.

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	residential impact, and alignment with the updated corridor—we would argue, deserve a fair and evidence-based reassessment, free from the constraints of earlier missteps	
Agriculture and Soils	4.3.1 TDC is concerned about the significant disruption to agricultural land and soil quality within the affected communities, particularly around Ardleigh, Little Bromley, and Lawford. The proposed haul routes and construction compounds will fragment productive farmland, impacting local food production and rural livelihoods. We will provide further evidence on the scale and permanence of these impacts at the future Written Representation, and Local Impact Report stages.	**6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** assumed that farming operations would not continue within construction areas. However, disruption to surrounding farming operations would be mitigated by implementing good practice measures. These include maintaining or providing alternative access to affected land parcels in communication with landowners and occupiers to allow for the continuation of surrounding farming operations, maintaining or providing alternative water supplies for livestock, and reinstating any land drains affected by the Project within the Order Limits. These measures form commitments AS03, AS04, and AS05 within **7.4 Outline Code of Construction Practice [APP-300]**. In addition, effects on farming operations during the construction phase would be managed through compensation agreements to allow landowners to claim for loss of income as a result of the Project (which lie outside of the EIA process). **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** notes that all land required temporarily would be reinstated to its pre-construction condition, including land grade with all works undertaken in accordance with good practice as set out in **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]**. As such, once land has been returned, pre-construction land use will be able to continue, including local food production.
Air Quality	4.4.1 TDC notes what will undoubtedly be a deterioration in air quality arising from construction traffic, dust emissions, and soil disturbance along the proposed routes. These impacts will be felt most acutely in rural settlements such as Little Bromley and Ardleigh, where baseline air quality is currently good. We will submit further commentary on this in our LIR and during subsequent examination stages.	**6.7 Environmental Statement Chapter 7 – Air Quality [APP-148]** concludes that following implementation of the proposed standard mitigation measures set out within **7.4 Outline Code of Construction Practice [APP-300]**, the effects of construction on dust soiling, human health and ecological effects, are anticipated to be not significant, in line with IAQM guidance[163].
Cumulative Effects	4.5.1 TDC is greatly concerned about the cumulative impact of this project alongside other NSIPs, including North Falls, Five Estuaries, and the Tarchon Interconnector. The convergence of multiple large-scale energy projects in the same locality will create unprecedented environmental, social, and economic pressures. We have repeatedly raised this matter as a major issue and our concerns remains, for the most part, completely unaddressed. TDC will provide a comprehensive cumulative impact assessment in our Local Impact Report.	A cumulative impact assessment for the Project is provided as **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The assessment has been undertaken in accordance with **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]**. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as a cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025, however, since 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, these would be published during Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). Cumulative Effects documents would not be updated just because there is new information available about a development, where this information has been assessed as having no change to the assessment or conclusions presented in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**. In addition, the Tarchon Interconnector project will be required to undertake its own the cumulative assessment with other developments as part of their respective development consent application.
Contaminated Land Geology and Hydrogeology	4.6.1 ECC will be providing detailed representations about these topics on behalf of the county. However, TDC remains concerned about the potential for contamination and geological disturbance during trenching and pylon installation. These risks could have long-term consequences for structures including historic buildings, land stability and groundwater quality. We will revisit this matter as part of our ongoing engagement.	The Applicant notes this comment. A contaminated land risk assessment has been undertaken for the Project in accordance with Environment Agency guidance and is presented in **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**. **6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]** concluded that with the mitigation measures proposed within **7.4 Outline Code of Construction Practice [APP-300]** the impacts from contamination would be not significant. Impacts relating to geohazards and ground instability were scoped out of the ES. Notwithstanding this, the embedded mitigation (section 9.6.4 of **APP-181**) includes for incorporating suitable consideration of the ground conditions in the design, in accordance with good

[163] Institute of Air Quality Monitoring (2024) Guidance on the assessment of dust from demolition and construction

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		practice. In addition, Commitment GH01 secures the requirement for appropriate geotechnical design in relation to the site/structure specific ground conditions including ground instability/adverse ground condition – informed by intrusive ground investigation.
Cumulative Effects	4.7.1 TDC remains very concerned by the apparent lack of meaningful coordination between the Norwich to Tilbury project and other NSIPs currently proposed within the region, including North Falls, Five Estuaries, and the Tarchon Interconnector. Each of these projects carries significant construction and operational impacts for local communities, TDC will argue that there is insufficient evidence of a strategic approach to minimise cumulative disruption.	National Grid has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both of these wind farms are proposed to connect into the proposed East Anglia Connection Node (EACN) Substation. Both projects involve the construction of new substations, which are proposed to be located adjacent to the EACN Substation. The Applicant worked with North Falls and Five Estuaries project teams up to the submission of the development consent application and assessments was are considered to be accurate and reflective of the current numbers included within each of the wind farm projects application/DCO (North Falls and Five Estuaries). It is noted and accepted that the Norwich to Tilbury numbers included within the wind farms assessments are reflective of an earlier stage of assessment for the Project. The Applicant is continuing to work with the wind farms to establish if any programme adjustments can be made: • To reduce the likelihood of both projects' peak construction activities coinciding • To ensure the proposed connection to the East Anglia Connection Node (EACN) Substation for the wind farm takes place at the correct stage of the Project. **7.3 Outline Construction Traffic Management Plan [APP-309]** provides details on how the Project aims to deliver collaboration across a number of projects within the locality of the Norwich to Tilbury construction programme.
Cumulative Effects	4.7.2 Failure to coordinate these projects risks creating overlapping construction periods, compounded traffic movements, and prolonged disturbance to residents, businesses, and agricultural operations. This fragmented approach not only undermines community resilience but also erodes public confidence in the planning process. It is imperative that National Grid and the Norwich to Tilbury promoters take proactive steps to align timelines, share infrastructure corridors where feasible, and develop joint mitigation strategies – TDC remains unconvinced that this is actively taking place.	A cumulative impact assessment for the Project is provided as **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The assessment, which includes North Falls and Five Estuaries has been undertaken in accordance with **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]**. Traffic numbers from the North Falls and Five Estuaries Projects are also built into the construction traffic numbers used in the assessments in the Environmental Statement.
Cumulative Effects	4.7.3 Moreover, the absence of coordination will lead to unnecessary duplication of works, increased land take, and avoidable environmental harm. A collaborative framework between NSIP promoters is essential to reduce the overall footprint of infrastructure, optimise resource use, and safeguard sensitive landscapes. Without such measures, the cumulative impacts of these projects will be severe and disproportionate, contrary to the principles of sustainable development and good planning practice. 4.7.4 TDC therefore urges the Examining Authority to require clear evidence of inter-project coordination as part of the Development Consent Order process. This should include a comprehensive cumulative impact assessment and a binding commitment from all promoters to minimise disruption through integrated planning and delivery.	National Grid has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both wind farms are proposed to connect into the proposed East Anglia Connection Node (EACN) Substation. Both projects involve the construction of new substations, which are proposed to be located adjacent to the EACN Substation. Project teams have worked collaboratively to reduce potential cumulative traffic effects should they be undertaken in parallel. Examples of this include use of a shared haul road for construction traffic, a common noise monitoring protocol, and coordination over landscape and ecological mitigation. A cumulative impact assessment for the Project is provided as **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. The assessment, which includes North Falls and Five Estuaries has been undertaken in accordance with **6.19 Scoping Report [APP-288 - APP-296]** and **6.20 Scoping Opinion [APP-297]**.
Noise and Vibration	4.8.1 TDC is deeply concerned about the scale and duration of construction activity associated with the EACN, cable corridor,	An assessment of construction noise is presented in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** which was undertaken in accordance with **6.19 Scoping Report [APP-288 - APP-296]** and

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	and pylon installation. The proximity of works to residential areas in Ardleigh and Little Bromley raises serious issues around noise, vibration, and disruption, particularly during extended working hours. These effects will be particularly disruptive during prolonged construction phases. We will submit further evidence on predicted noise levels and mitigation measures at later stages. In particular, TDC will be requesting necessary, reasonable and enforceable controls on working times, robust noise and vibration mitigation measures, and continuous monitoring to protect residents' quality of life and the communities of TDC that will be so disproportionately affected by not only this NSIP, but also the cumulative impacts of a number of NSIPs in this area and the high concertation of electricity infrastructure in the location between Ardleigh, Little Bromley and Lawford.	**6.20 Scoping Opinion [APP-297]**. The assessment provided indicates that no significant effects are expected in relation to noise and vibration from the construction of the East Anglia Connection Node (EACN) Substation, cable corridor, or pylon construction with appropriate mitigation measures. Additionally, the Main Works Contractor(s) would undertake detailed construction noise and vibration assessments based on their specific methodologies (including working hours), as per Commitment NV05 in **7.2 Outline Code of Construction Practice [APP-300]**. Based on the outcome of these assessments, specific mitigation measures (including temporal restrictions, where appropriate) would be identified and implemented such that significant adverse effects are avoided. These measures would be documented in the Noise and Vibration Management Plan (NVMP) (which would be updated from **7.4 Outline Code of Construction Practice Appendix F – Outline and Vibration Management Plan [APP-306]**, and this is secured via Requirement 4 in **3.1 Draft Development Consent Order [APP-056]**. Significant cumulative noise effects are also not predicted within **6.17 Environmental Statement - Cumulative Effects [APP-281]**.
Health and Wellbeing	4.9.1 The Council is deeply concerned about the adverse effects on community health and wellbeing, including stress, noise exposure, and disruption to daily life. The concentration of multiple NSIPs in the same area compounds these impacts, creating prolonged uncertainty for residents. We will provide detailed evidence on these social and psychological effects in later submissions. 4.9.2 The cumulative impact of construction noise, traffic, visual intrusion, and loss of open green spaces poses a significant risk to the physical and mental wellbeing of local communities. The disruption to what is currently rural environments, increased stress from HGV movements, and reduced access to recreational areas will disproportionately affect vulnerable groups, including children and the elderly. TDC urges the Examining Authority to give full weight to these human impacts and we will further outline the true extent of these impacts in our Local Impact Report.	The Applicant recognises people may have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area. **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** includes a specific assessment of the impacts of the Project on mental health and wellbeing during both construction and operation. A cumulative assessment is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. Paragraph 17.5.47 identifies that, in a number of instances, 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 Applicant recognises that uncertainty while the Project is developed may cause anxiety. The Applicant has sought to reduce potential effects on communities and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the Project through engaging with the people and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This will enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns. **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** includes an assessment of impacts on both physical and mental wellbeing during both the construction and operation (and maintenance) phases of the Project. The assessment has been informed by the findings from other Environmental Statement chapters, for example **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**, **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]**, **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The scope of environmental assessments has been undertaken in line with the approach set out in **6.19 Scoping Report [APP-228 – APP-296]** and agreed in **6.20 Scoping Opinion [APP-297].** The scope of the health and wellbeing assessment was discussed with stakeholders prior to DCO submission at two Health and Wellbeing Thematic Group meetings. **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** includes an assessment of the potential impacts of the Project in relation to the four protective factors for mental health and wellbeing set out in the Mental Wellbeing Assessment toolkit[164]. **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** also considers the potential impact of the Project on physical activity, which includes the potential for disruption to recreational routes or areas of open space and how that may affect opportunities for physical activity. Impacts on both the general population and on vulnerable groups (including children and the elderly) have been considered throughout the health and wellbeing assessment.

[164] 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

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Historic Environment	4.10.1 While ECC is leading on preparing representations about heritage matters, TDC notes the potential harm to historic landscapes and assets in Ardleigh, Little Bromley and Lawford. The scale of infrastructure proposed risks eroding the historic character of these rural communities. We will continue to engage and may provide supplementary comments at later stages.	The assessment provided in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** and its appendices identifies less than substantial harm to heritage assets in Tendring. No substantial harm has been identified for any heritage assets in Ardleigh, Little Bromley and Lawford in the assessment presented in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215].** **Paragraph 7.2.57 of 5.6 Planning Statement [APP-85]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the SoS, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-214]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. 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. Para 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.
Hydrology Land Drainage and Flood Risk	4.11.1 ECC leads on this topic but TDC shares the concerns raised by affected parishes and rural communities regarding flood risk and drainage disruption from extensive groundworks and haul routes. These risks could significantly impact agricultural productivity and property resilience. TDC will continue to monitor this issue and provide further input as necessary.	The Applicant acknowledges TDC's concerns and will be sharing further information regarding how surface water runoff, flood risk and drainage from the Project will be managed during its construction and operation within a Drainage Strategy Report to be submitted at Deadline 1. **7.9 Flood Risk Assessment [APP-331]** has been shared with the Environment Agency, which is content with the assessment methodology that has been adopted, the flood risk management and control measures that are secured, and with the conclusions of the assessment.
Hydrology Land Drainage and Flood Risk	4.11.2 Many properties in Little Bromley rely on well water and private sewerage systems. While TDC officers have attempted to review National Grid's position on surface water drainage and flooding, relevant information has been difficult to locate. From what has been found, National Grid appears to consider the risk of contamination to properties in Little Bromley and indeed further away as negligible. 4.11.3 However, we have been unable to find clear information on flood risk associated with surface water runoff from the EACN site, the permanent haul road, or road widening works— particularly where rainwater is involved rather than watercourses – we know this is an existing issue and we cannot find any meaningful information on mitigation.	Regarding water supplies from private wells, **7.2 Outline Code of Construction Practice [APP-300]**, through commitments W4 and W5, secure suitable safeguards to their integrity, including ultimately, the provision of alternative water supplies should Project installation be shown to have had a detrimental effect. As also noted above, further details are forthcoming, with a Drainage Strategy report that is to be submitted to the Planning Inspectorate. Mitigation for operational Project infrastructure, (including the East Anglia Connection Node (EACN) Substation) to manage flood risk, surface water runoff and land drainage is detailed in measures W08 and W14 within **7.2 Outline Code of Construction Practice [APP-300]**. Examples of measures include provision of replacement drainage schemes, installed in line with advice from specialised drainage contractors, reinstatement of stripped topsoil and adoption of sustainable drainage techniques that will be designed to allow for climate change resilience and with consideration of exceedance flow routes.
Mitigation measures	4.11.4 [The image below] shows Ardleigh Road near Jennies Farm after heavy rainfall in early 2024, illustrating how water struggles to drain away, as is common in the area, leaving narrow country lanes flooded for extended periods. TDC will provide further evidence in its Local Impact Report to highlight what we consider a lack of adequate mitigation measures or convincing evidence that these known issues will not be worsened.	The Project has secured, through inclusion of several commitments within **7.2 Outline Code of Construction Practice [APP-300]**, measures that will ensure that neither construction activities associated with the Project, nor the operational development, will contribute to or exacerbate any existing flooding issues. However, the Applicant will review any further evidence provided, and use this information to inform the detailed design of drainage systems that will be put in place to serve the Project during its construction and operation.
Socio-economics Recreation and Tourism	4.12.1 TDC notes the absence of a clear and meaningful community benefit strategy. Given the scale of disruption and long-term impacts, affected communities must be offered tangible	The Government has published guidance on community funds for transmission infrastructure (Department for Energy Security and Net Zero (DESNZ, 2025). 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

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	compensation and legacy benefits. This should include investment in local infrastructure, environmental enhancements, and funding for community-led projects. TDC calls for a formalised Community Benefit Fund, proportionate to the level of harm caused.	fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. The Applicant is committed to providing a coordinated local and regional approach to community benefits. This will be delivered outside the development consent process, since this is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance (DESNZ, 2025).
Economic impact	4.13.1 TDC is concerned about negative socio-economic impacts, including disruption to local businesses, reduced amenity value, and harm to tourism in the Tendring area. The cumulative presence of multiple NSIPs will intensify these pressures. We will provide detailed analysis of economic and recreational impacts in subsequent representations. The project risks undermining the socio-economic vitality of the Tendring Peninsula. Construction activity and landscape degradation may deter visitors to nearby attractions, including Dedham Vale National Landscape and Ardleigh Reservoir, impacting local businesses reliant on tourism. TDC is concerned about the loss of amenity value and urges a full assessment of economic displacement and mitigation strategies.	The Applicant acknowledges TDC's concerns regarding the potential negative socio-economic impacts associated with the Project. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** includes an assessment of Socio-economics, Recreation and Tourism, including effects on local businesses (Table 15.22, Table 15.28 and **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]**) and tourism economy (Paragraphs 15.7.15 to 15.7.19 of Chapter 15) in the Tendring area. The assessments were undertaken in accordance with **6.19 Scoping Report - including appendices B to K [APP-296]**, **6.20 Scoping Opinion [APP-297]** together with other similar projects including Yorkshire GREEN and Bramford to Twinstead Reinforcement. The assessments conclude potential effects on local businesses located in Tendring range from negligible to moderate adverse (three businesses are predicted to be moderate adverse) effects during construction, and neutral to moderate adverse (two businesses are predicted to be moderate adverse) effects during operation, as well as a negligible adverse effect on tourism economy during construction. The impact on visual amenity is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Cumulative effects on socio-economics (including effects on local businesses and tourism economy), as well as landscape and visual (including visual amenity) are set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].**
Traffic & Transport	4.14.1 While ECC leads on transport matters, TDC wishes to highlight the severe and disproportionate strain that construction traffic and associated haul routes will impose on the local highway network—particularly within the sparsely populated and highly rural areas between Ardleigh, Little Bromley, and Lawford. The rural lanes serving Ardleigh and Little Bromley are fundamentally unsuited to sustained heavy vehicle movements, creating significant risks to people and property in terms of road safety, congestion, and structural integrity. These lanes were never designed to cope with major construction projects of this nature and even widening them to make them 'suitable' will have far reaching and irreversible consequences as will be demonstrated in the Council's LIR. The proposed construction of permanent and temporary haul routes in this remote location is considered wholly inappropriate, especially where there are more suitable locations available for this infrastructure. TDC will continue to scrutinise ECC's responses and stakeholder feedback and will provide a detailed, quantified assessment of impacts and harm within its forthcoming Local Impact Report (LIR).	The Applicant has undertaken an assessment of the proposed Primary Access Routes to consider the suitability of these routes for the proposed number of construction vehicles anticipated to use each access route. The access routes at East Anglia Connection Node (EACN) Substation were selected based on an additional sifting criterion. An offline permanent access route is proposed off Bentley Road, to reduce the impacts in Little Bromley, to access Ardleigh Road and the EACN site. The Construction Routing Strategy is based on the use of haul roads, in order to minimise the use of public highways. The use of haul roads is considered the appropriate access strategy for the linear nature of the Project. **7.3 Outline Construction Traffic Management Plan [APP-309]** details the proposed management and mitigation measures to ensure the adherence to the Primary Access Routes and use of the haul roads. It is noted within **7.3 Outline Construction Traffic Management Plan [APP-309]** that the crossover points cannot be used to access the highway network for site vehicles and are only to be used in the instance of crossing points. The crossing points are also used as contingency for where a haul road is unusable and also for access by emergency vehicles where required. Temporary traffic management measures will be provided to avoid delays at crossover points as described within **7.3 Outline Construction Traffic Management Plan [APP-309]**. The significance of effects along the Primary Access Routes including congestion and road safety is presented within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. No significant effects on sensitive receptors were found as a result of the increase in traffic from the Project in Little Bromley Road/Ardleigh Road (link PAR 31) and Bentley Road (link PAR 30). A shared pedestrian/cycle route adjacent to Bentley Road has been proposed as part of the embedded mitigation. The impact on Public Rights of Way (PRoWs) as a result of the proposed haul roads was assessed within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** and an **7.6 Outline Public Rights of Way Management Plan [App 329]** has been prepared. The overall strategy is to maintain access along 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

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		be subject to closure without diversion and there would be no severance of the overall network as a result of the Project. No significant effects on walking, cycling and horse riding were found in Tendring.
Ecology and Biodiversity	4.15.1 While ECC is leading on this topic, TDC wishes to register its strong objection around habitat loss and species disturbance within sensitive areas near Ardleigh, Little Bromley and indeed the wider vicinity of north-west Tendring. The cumulative effect of multiple NSIPs in this locality heightens the risk to biodiversity and will cause overriding landscape harm and permanent harm to the nearby National Landscape through the introduction of the EACN, the windfarm substations, the pylons, and in the short to medium term, the undergrounding of cables.	The Applicant has sought to minimise impacts on habitats, species and the surrounding landscape through careful routeing, siting and detailed design, including Dedham Vale National Landscape and in areas around Ardleigh, Little Bromley and north-west Tendring. The design has been informed by an understanding of the landscape context and existing biodiversity and ecological constraints, with avoidance prioritised wherever practicable and mitigation applied where impacts cannot be fully avoided. This iterative approach has helped reduce potential effects on ecological receptors and the landscape. The Applicant is required to consider National Landscapes under planning policy and guidance when routeing, designing and assessing new electricity transmission infrastructure. Further details of the approach taken in relation to National Landscapes can be found in **6.2 Environmental Statement Chapter 2 - Key Legislation and Planning Policy Context [APP-126]**, **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**, **5.7 Policy Compliance Document [APP-086]**, **5.15 Design Development Report [APP-122]** and **7.15 Design and Access Statement [APP-353]**. 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]**. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** sets out the assessment of ecological effects, supported by extensive surveys undertaken between 2022 and 2025. The Landscape and Visual Impact Assessment (LVIA) is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Mitigation and good practice measures are secured through **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]**. These include habitat protection, species-specific measures and the creation of an Environmental Area around the proposed new EACN Substation. Mitigation measures of relevance to landscape and visual effects are also summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Cumulative effects with other nationally significant infrastructure projects in the area have been assessed in accordance with the EIA Regulations as set out in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**. For biodiversity, the assessment concludes that with embedded mitigation and the measures secured through **7.4 Outline Landscape and Ecological Management Plan [AS-046]** and **7.2 Outline Code of Construction Practice [APP-300]**, the Project would not result in significant cumulative residual effects. As stated in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]**, the assessment concludes that there are likely to be significant cumulative landscape and visual effects on LCA 7a Bromley Heath and Visual Receptor Area (VRA) C13 Little Bromley, during construction. There would also be significant cumulative landscape effects on LCA 7a Bromley Heath during operation. Although the mandatory requirement for 10 % Biodiversity Net Gain under the Environment Act 2021 is not yet in force for development consent schemes, the Applicant has voluntarily committed to delivering 10 % BNG with wider environmental and societal benefits for this Project in line with its corporate sustainability commitments. The Applicant has set out the approach to the duty to seek to further the purposes of the National Landscape in accordance with Section 85 of the Countryside and Rights of Way Act 2000 in the National Landscapes - Duty to Seek to Further the Purposes Report **(s85 Countryside and Rights of Way Act 2000) [APP-120]**. The approach follows the Defra guidance.
Landscape and Visual	4.15.2 The introduction of large-scale pylons, haul roads, and substations will cause irreversible harm to the character of the local landscape, particularly in and around Ardleigh/Little Bromley and Dedham Vale. The arc-shaped pylon route and associated	The Applicant has responded to specific points regarding routing and undergrounding at paragraphs 4.1.3 to 4.6.2 of this response. As stated in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment [APP-229]** and **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**,

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	infrastructure will fragment views, degrade rural tranquillity, and erode the identity of the area. TDC strongly opposes the visual intrusion and calls for alternative routing and more undergrounding.	significant adverse effects have been identified within VRA C12 Ardleigh, VRA C13 Little Bromley and LCA 7a Bromley Heaths. This includes effects on the landscape and on visual receptors within the villages of Ardleigh and Little Bromley, within 1.5 km of the Project, as a result of the proposed overhead line and East Anglia Connection Node (EACN) Substation. Effects on the special qualities of Dedham Vale are assessed in **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. Views towards the Project from the National Landscape are represented by Viewpoint 3.19: Essex Way / Mill Hill, west of Lawford in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]** and are assessed as adverse but not significant. As assessed within VRA C13 Little Bromley in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment [APP-229]**, beyond 1.5 km, effects would be not significant adverse, reducing to none in Dedham Vale National Landscape, north of Lawford. The Applicant has set out in response to paragraph paragraphs 4.15.7-9 of this RR how such residual effects are accounted for in the overall planning balance under NPS EN-1 (2024). In summary, the residual environmental effects 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.
Ecology and Biodiversity	4.15.3 The proposed works threaten mature trees, hedgerows, and ecologically sensitive habitats, including areas adjacent to Ardleigh Reservoir and Local Green Spaces. TDC is concerned about the loss of biodiversity, disruption to wildlife corridors, and inadequate ecological mitigation. A full and accurate arboriculturally and ecological impact assessment is required, with enforceable commitments to habitat protection and restoration.	**6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, undertaken in accordance with agreed methodology in **6.19 Scoping Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297]** clearly sets out all potential impacts on ecological features. 7.4 Outline Landscape and Ecological Management Plan [AS-046] sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10 % Biodiversity Net Gain with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with our corporate sustainability commitment. **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** was also submitted as part of the development consent application and was based on the methodology outlined in **6.19 Scoping Report [APP-288 - APP-296]**. An Arboricultural Method Statement will also be produced post-consent as committed to through commitment LV05 of **7.2 Outline Code of Construction Practice [APP-300].**
Ecology and Biodiversity	4.15.4 There are notable concerns regarding the scope, accuracy, and level of detail within the Arboriculturally Impact Assessment (AIA), particularly in relation to trees protected by Tree Preservation Orders (TPOs).	The level of detail within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment Report [APP-236]** is based on the methodology outlined in Appendix J of 6.19 Scoping Report - including appendices B to K **[APP-296]** and is considered appropriate for this stage of the Project. Information on Tree Preservation Orders (TPOs) are included in **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]** which has been developed using information provided by relevant Local Planning Authorities. With no TPO information provided by Tendring District Council (requested on 4 April 2025) the Project digitised TPO records based on the readily available Tendring Map Access Portal[165]. Commitment LV05 in **7.4 Outline Landscape and Ecological Management Plan [AS-046]** states that relevant protective principles would be applied to trees within the Order Limits and detailed within an Arboricultural Method Statement.
Ecology and Biodiversity	4.15.5 For clarity, TDC raises the following initial points (to be expanded upon in our LIR): 1. Consideration of TPO Trees – What specific measures have been taken to protect trees covered by TPOs?	1. No specific measures have been applied to TPO trees, however, measures have been applied to all trees potentially impacted by the Project. Commitment LV05 of **7.4 Outline Landscape and Ecological Management Plan [AS-046]** states that relevant protective principles would be applied to trees within the Order Limits and detailed within an Arboricultural Method Statement which would be prepared by the Main Works Contractor(s) following detailed design and submitted to the Council for approval.
Ecology and Biodiversity	2. Incomplete Annotation – Not all TPO trees appear correctly annotated. For example, trees on the southern side of Wick Lane,	2. Requests for TPO records were made to Local Planning Authorities and the resulting information was used by the Project. With no TPO information provided by Tendring District Council (requested on 4 April 2025) the Project digitised TPO records based on the Tendring Map Access Portal. Information on Tree Preservation

[165] Tendring District Council (n.d.) Tendring Map Access Portal

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	Ardleigh (covered by 20/00001/TPO) are missing from Figure A13.6.1, whereas others under the same order are shown.	Orders (TPOs) is presented in **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048** to **APP-055]**
Ecology and Biodiversity	3. Identification Gaps – Many trees are listed individually or in groups, but not all have identification numbers. A consistent numbering system would aid transparency.	3. Trees that were assessed as being of High or Moderate value (categorised using BS 5837:2012[166]) and in line with the methodology in **6.19 Scoping Report [APP-288 – APP-296]** have been allocated reference numbers.
Ecology and Biodiversity	4. Clarification on 'Potentially Affected' Trees – Further detail is needed for trees marked with orange dots as "potentially affected."	4. The arboricultural assessment is based on the alignment presented within the development consent application. In the event the Limits of Deviation presented in section 4.5 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** alters the alignment during detailed design, the impacts to trees may also alter and are therefore currently reported as being 'potentially affected'. Over all impacts to trees will be assessed and reported following detailed design. This is explained further in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**.
Ecology and Biodiversity	5. New TPOs – Due to public concern and the scale of proposed removals, TDC has made new TPOs in Dead Lane, Wick Lane, Little Bromley Road, and Home Farm Lane, with further designations likely – this needs to be considered and any impact on these trees properly assessed.	5. The limitations and assumptions in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment Report AIA [APP-236]** confirm when the desk study of TPOs was completed (May 2025). Any information on newly served TPOs would not change the mitigation measures proposed but would be considered during detailed design.
Ecology and Biodiversity	6. Hedgerow Regulations – Hedgerows fall under The Hedgerow Regulations 1997 and should be assessed accordingly, with proposals modified to reflect their importance.	6. Hedgerows within the Order Limits have been assessed in accordance with The Hedgerows Regulations 1997, as set out in **6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]**. This assessment identifies hedgerows that qualify as 'important' under The Hedgerows Regulations 1997 based on ecological criteria. The findings have informed the routeing and design process to avoid important hedgerows wherever practicable, with any required removals limited to the minimum necessary working width. **6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026]** further considers the ecological value of hedgerows and secures mitigation through **7.2 Outline Code of Construction Practice [APP-300]**, including reinstatement. This ensures that hedgerow losses are minimised and that reinstated sections contribute positively to local habitat connectivity.
Ecology and Biodiversity	7. Preliminary Nature of Assessment – Section 13.1.8 acknowledges that impacts are "preliminary" due to the absence of detailed design. This makes it difficult to quantify removals and assess true impact.	7. The approach taken is typical of a Project of this scale and nature.
Ecology and Biodiversity	8. Retention and Pollarding – Has retention or pollarding of mature oaks beneath overhead lines been considered?	8. Consideration has been given to the retention and management of vegetation (including veteran trees) below overhead lines where reasonably practicable. Section 13.4.14 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** states that details of tree protection would be provided within an Arboricultural Method Statement. It is envisaged that the Method Statement and Tree Protection Plans will be updated and made relevant for each construction stage and agreed with the Local Planning Authority and referenced in GG31 of **7.2 Outline Code of Construction Practice [APP-300].** This aligns with Schedule 3 Requirement 8 of the **3.1 Draft Development Consent Order [APP-056].**
Cumulative Effects	4.15.6 The cumulative effect of these removals will be severe, and compensatory planting will take decades to restore lost amenity and biodiversity. TDC is gravely concerned that extensive areas of the proposed development in the TDC peninsula—including the project route, haul routes, and maintenance/access corridors—appear to have been informed by supporting evidence that is demonstrably erroneous and inaccurate within the AIA and other associated documents and appendices. These deficiencies raise serious questions about the robustness of the project's	With respect to arboriculture, the tree surveys undertaken in line with the methodology set out in Appendix J of **6.19 Scoping Report [APP-296]** with the baseline data used to inform the design process and will continue to be a consideration during detailed design. The assessments undertaken and presented in the Environmental Statement (Volume 6 of the DCO Application) are based on the design information presented in **6.4 Environmental Statement Chapter 4 – Project Description [APP-131]** and **6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [APP-133]**. The Applicant considers that the information in its DCO application is robust and has been prepared in accordance with relevant statutory requirements, and furthermore it was deemed sufficient to enable it to be accepted for Examination by the Planning Inspectorate. The Applicant welcomes any further clarification from

[166] British Standards Institution (2012) BS 5837:2012 Trees in relation to design, demolition and construction. Recommendations.

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	evidence base. Further detail on these and related matters will be provided in TDC's forthcoming LIR.	TDC on aspects of the documentation it deems deficient and will respond to any specific points raised by TDC in their Local Impact Report at Deadline 2 of Examination.
Landscape and Visual	4.15.7 The Landscape and Visual Impact Assessment (LVIA) submitted with the DCO application sets out baseline landscape characteristics and visual qualities, identifying viewpoints where the proposed infrastructure will be visible. Section 13.7.13 confirms significant adverse effects on the Bromley Heaths and Ardleigh Valley System Landscape Character Areas during construction and throughout operation. 4.15.8 The introduction of 50m+ pylons and the EACN will dominate the landscape, causing irreversible harm with limited scope for effective mitigation. While closer views will experience the greatest impact, distant views will also degrade the perception of the nearby National Landscape, and the countryside for residents and visitors. 4.15.9 Document 7:12 Visualisations illustrate the scale of this intrusion. Site visits confirm that although some overhead lines already influence the area, the proposed pylons will escalate visual harm to an unacceptable level. Additionally, the creation of haul routes— particularly two separate routes joining Bentley Road—will further fragment the landscape and result in additional tree and hedgerow loss.	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. 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 (2024) and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects. Pursuant to 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-145]** and **5.6 Planning Statement [APP-085]**. EN-1 paragraph 4.1.7 provides *'… 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'.* 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 Tendring District 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.
Ecology and Biodiversity	4.15.10 In terms of Loss of Trees and Replacement Planting - National Grid estimates the loss of approximately 10,000 trees; however, TDC questions the accuracy of this figure, given that most surveys were conducted remotely. TDC considers this number likely to be an underestimate. While National Grid proposes a 1:3 replacement ratio—around 30,000 trees—the delivery mechanisms and planting locations remain unclear. Until these details are confirmed, little weight can be given to this commitment.	**6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** gives a total number of individual tree removals and a canopy area for grouped features removed. This is based on the alignment presented on **6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [APP-133]**. Section 13.1.16 of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** states that '*during detailed design the impacts to trees are likely to reduce*'. There are also a number of commitments set out in **7.2 Outline Code of Construction Practice [APP-300]** that seek to minimise impacts to vegetation, for example Commitment B13 states *'There will be a refinement post-consent, that within the provisions of the Outline LEMP* [...] *aims to further reduce vegetation losses prior to pre-commencement.*' The Applicant has made the commitment to a 3:1 replacement planting for individual trees and small groups of individual trees within **7.4 Outline Landscape and Ecological Management Plan [AS-046]** which 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 final Landscape and Ecological Management Plan (if provided within Environmental Areas) or the Reinstatement Planting Plan secured under a separate requirement of **3.1 Draft Development Consent Order [APP-056]**. While the Project would prioritise the replanting for individual trees within the Order Limits, offsite provision may be required. Any offsite tree planting required as a result of this commitment will be secured via a legal agreement. There are ongoing discussions with relevant stakeholders and third parties on an appropriate delivery mechanism for any offsite provision of trees resulting from the 3:1 commitment. To aid this discussion, an approximate figure for the number of trees which could be subject to the 3:1 commitment has been informally discussed. Notwithstanding this, **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]** details the impact on arboricultural features as a result of the Project.
Ecology and Biodiversity	4.15.11 TDC is willing to engage with National Grid to secure meaningful outcomes. The Council has extensive experience	Noted. Replacement planting would be undertaken within the Order Limits where practicable, under the consenting rights obtained through the DCO. To ensure the BNG commitment is met, offsite BNG would also be

Topic	Summary of matters raised	National Grid's response
	through initiatives such as The Big Green Internet Project, which has delivered over 21 miles of hedgerow planting, new woodlands, and community orchards in partnership with local authorities, landowners, and organisations. Leveraging this expertise could enable targeted replanting near construction areas and enhance connectivity across the district, delivering significant benefits for landscape character and biodiversity.	required. In relation to the 3:1 replanting commitment for individual trees and individual trees in small groups, the Applicant notes this comment and will continue to engage with stakeholders regarding the delivery of this commitment.
Socio-economics Recreation and Tourism	4.16.1 While National Grid references potential employment opportunities, TDC remains deeply concerned that these will be short-term, non-local, and lack meaningful benefit for Tendring residents and businesses. Currently, there is no clear or legally binding mechanism to ensure local labour, apprenticeships, or supply chain engagement within the district. TDC therefore calls for a legally binding Skills and Employment Strategy that prioritises these outcomes. Moreover, TDC's clear expectation is that National Grid must adhere to the Council's Social Value Framework. We expect legally binding commitments to ensure that local recruitment and the use of local labour are fully optimised, that local supply chains are prioritised wherever possible, and that the project works closely with TDC's Economic Growth team to maximise opportunities for our district rather than sourcing these entirely from outside. TDC will set out further detail on these requirements in our forthcoming Local Impact Report. 4.16.2 TDC is unconvinced that the project will deliver any lasting skills or employment benefits for Tendring—one of the most deprived districts in the country. This view is informed by recent experience with other NSIPs along the east coast, where promised benefits have largely failed to materialise *[Sizewell C Case Study provided]* 4.16.4 Until binding commitments are secured, TDC urges the ExA to give little or no weight to claims of skills and employment benefits for Tendring. TDC reserves the right to review its position under the above heading if and when new information comes forward.	The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak onsite construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four-year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors or large-scale regeneration schemes. **6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265]** concludes that the Project would not give rise to significant adverse socioeconomic effects in relation to employment or workforce requirements. Given these considerations, a DCO requirement for a Skills and Employment Strategy would not be proportionate or necessary for the Project. However, the Applicant will work with local suppliers, facilitated by supporting forums (such as the local Chambers), on electricity industry skills and workforce planning. Post-construction job opportunities are limited given the nature of the development, however the Applicant will still work with Local Authorities (including facilitating local partners) to understand what is important to them around skills and employment to ensure a lasting positive legacy is left in the communities in which the Applicant operates. This will be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO, as per the Community Funds for Transmission Infrastructure guidance[167].
Draft DCO	5.2 TDC, alongside ECC, was offered an opportunity by the Applicant to review certain elements of the draft DCO prior to submission. Detailed and considered comments were provided in good faith during this process. However, no feedback was received from the Applicant on these comments, and it appears that many of the issues raised have not been addressed in the submitted DCO (APP-056). No explanation has been offered for this lack of engagement, which is disappointing and contrary to the spirit of collaborative resolution encouraged by the NSIP process.	The Applicant is grateful for the authorities' comments on the draft Development Consent Order ahead of submission and had regard to these when preparing **3.1 Draft Development Consent Order [APP-056]** for submission. The Applicant will continue to engage with the authorities on this matter during the Examination process.
Draft DCO	5.3 While TDC notes that the drafting of the DCO broadly follows the structure and content of previously approved Orders, drawing	In preparing **3.1 Draft Development Consent Order [APP-056]**, recent precedents have been followed and guidance in Advice Note 15[168] and Government guidance Planning Act 2008: Content of a Development Consent

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

[168] Planning Inspectorate (2025) Nationally Significant Infrastructure Projects - Advice Note Fifteen: drafting Development Consent Orders

Topic	Summary of matters raised	National Grid's response
	on established precedents and practical experience, it is essential to recognise that local circumstances may require departures from precedent. Where such changes would facilitate effective implementation and address local impacts, they should be considered seriously.	Order required for Nationally Significant Infrastructure Projects[169] has been taken into account and complied with. The Applicant has considered each article and the provisions of each schedule to **3.1 Draft Development Consent Order [APP-056]** on a Project-specific basis and by reference to the issues relevant to the relevant article or schedule. The structure and content of **3.1 Draft Development Consent Order [APP-056]** is referenced extensively through the application documents and any material change to the structure of the document in particular, would require the updating of a very significant amount of the application documentation, and cannot be supported on that basis given the scale of the application that has to be examined in the examination period.

[169] Ministry of Housing, Communities and Local Government (2024) Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects

Appendix AE.
Thurrock Council

nationalgrid

Appendix AE
Thurrock Council

Thurrock Council is a 'host authority' as part of the Project falls within its geographical jurisdiction. The Applicant has provided comments on the Relevant Representation (RR) provided by Thurrock Council.

The Applicant has been engaging with host authorities since the Project started and has been progressing a Statement of Common Ground (SoCG). An updated SoCG is provided to the Examining Authority at Deadline 1 (**5.9.4 Draft Statement of Common Ground - Thurrock Council [Revision B]**), which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table AE1.1 Summary of comments and National Grid's response

Topic	Comment	National Grid's response
General	2.1 Thurrock Council opposes development consent being granted for this DCO application, unless the technical issues raised in the following relevant representation are resolved (further detail is set out below). Whilst Thurrock Council recognises the need for the Project and considers several areas of the DCO application to be acceptable, the Project (as proposed) raises some major concerns. In some instances, these concerns may be resolved through the provision of further supporting information from NG.	Noted
Property acquisition	*Compulsory purchase: Household Waste and Recycling Centre* 3.1 During a series of voluntary negotiations and landowner consultation, Linford Household Waste and Recycling Centre ("HWRC") was identified as a site where NG will permanently acquire rights to access. Despite the request to meet with NG following this voluntary consultation, no further detail has been provided at this stage from NG. NG have not stated how they wish to acquire the rights to the land and have only provided proposed plans with the proposed land use. Depending on the length, frequency, and nature of NG's required use of the HWRC site, there could be significant implications for the operation of the HWRC which will need to be resolved. 3.2 Thurrock Council requires confirmation as to whether the works are inside or outside the boundary/perimeter fence, as this could have an adverse impact, particularly across access/egress to/from the site. This is important as Thurrock Council has plans to invest as soon as possible due to financial time constraints, and consideration should be given to costs. Thurrock Council has been in touch with NG as this could present issues on the resident entrance, boundaries (what is proposed) and containers. (Appendix A – Submitted documents 2.2 Lands Plans, Section H sheet 4)	The Applicant will continue to engage with Thurrock Council / Linford Household Waste and Recycling Centre (HWRC) regarding the land / land rights that are required for the Project and the possible impacts this may have on the site. The requirement is subject to the positioning of pylons to either side of the road within limits of deviation. Only if the outcome is to move the crossing alignment to the south will the scaffold potentially encroach into the northern part of the site As a result the Applicant may require temporary and permanent rights over the site. Temporary rights for the access and installation of protective scaffolding where the new overhead line crosses Buckingham Hill Road in two separate locations. Permanent access rights will be required should the scaffolding need to be reinstalled for future maintenance. It is the Applicant's position that suitable mitigation can be agreed to reduce the potential effects upon the site's day to day operations if infringement occurs.
Property acquisition	*Compulsory purchase: Thurrock Blackshots Housing Development* 3.3 A parcel of land was identified for acquisition by NG that is proposed to host Thurrock Council's Blackshots Housing	The Applicant has engaged with Thurrock Council regarding the Blackshots Housing Development, and a communication has recently been sent to the Council confirming that the Project will no longer impinge on the Blackshots Development site with no rights invoked on this land.

Topic	Comment	National Grid's response
	Development. Thurrock Council has asked to engage with NG to avoid or minimise the impact on its development plans but has not yet been able to discuss this with NG. NG have stated that they wish to conclude conversations with National Highways before discussing this site with The Council as there is a crossover with the LTC project. The acquisition of this land could have significant implications for Thurrock Council's Blackshots Housing Development programme, so this must be resolved before development consent is granted for the Project. 3.4 As the owner of this land over which NG is seeking compulsory acquisition powers, the Council would expect to be having regular discussions with NG to fully understand NG's proposals in this area and to see whether any accommodation can be made to the Council with regard to the Project to minimise the land take and impact on the Council. To-date no meaningful discussions on this have taken place, despite attempts by the Council to arrange these	The potential infringement arose as a result of the potential for diversions to accommodate Lower Thames Crossing. Following confirmation of a change of design by LTVC and further design consideration, the Applicant has identified that the connection of Tilbury North substation to the YYJ overhead line should be progressed by underground cable (which will pass under the Lower Thames Crossing project). In this scenario all related works to implement the YYJ connection occur to the east of Brentwood Road avoiding Chapel Farm. There may still be a residual need for temporary construction access across part of the wider area, linked to YYJ diversion/ connection works further east, and if this is the case the Applicant will liaise with Thurrock Council.
Hydrology Land Drainage and Flood Risk	*Impact on overland water flow* 3.5 There is potential for the new haul roads that are proposed to have a significant impact on the overland water flow, particularly around the proposed new substation. NG has not provided enough information for Thurrock Council to be satisfied that this will be adequately mitigated or avoided.	The Applicant has secured commitments to the design of new haul roads to prevent significant effects on overland flow paths, as detailed in measures W08 and W10 within **7.2 Outline Code of Construction Practice [APP-300]**. Further, commitment GG22 secures that the Main Works Contractor(s) would prepare a Surface Water Management Plan which is secured by Requirement 4 in **3.1 Draft Development Consent Order [APP-056]**. The Surface Water Management Plan would demonstrate how runoff would be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes. Construction drainage measures would also be developed in liaison with the Lead Local Flood Authorities, with ongoing dialogue during implementation of the measures.
Historic Environment	*Mitigation measures for harm to designated built heritage assets* 3.6 Thurrock Council accepts the embedded and standard mitigation measures in principle, however, the residual effects of the proposals at both Construction and Operation and Management phases of the project include a medium level of less than substantial harm to the significance of some designated heritage assets. For each designated heritage asset where a medium level of less than substantial harm has been identified to its significance at the Operation and Maintenance phase of the project, Thurrock Council requests further details are provided by National Grid regarding the embedded mitigation measures that have been employed.	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 [APP-300]**. **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. **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.
Draft DCO	*Core working hours* 4.1 Requirement 7 of Schedule 3 of the **draft Development Consent Order (DCO) (APP-056 - Document 3.1 – Draft DCO)** sets out the core working hours proposed by NG. These are 07:00 to 19:00 on Monday to Friday and 07:00 to 17:00 on Saturdays, Sundays, Bank Holidays, and other public holidays. 4.2 The core working hours as proposed extend significantly beyond Thurrock Council's standard core working hours, which are 08:00 to 18:00 on Monday to Friday, 08:00 to 13:00 on	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: 07:00 to 17:00 Details relating to the proposed construction working hours and any associated restrictions are contained within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The working hours are secured through **Requirement 7 of Schedule 3 of 3.1 draft Development Consent Order [APP-056]**. The 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

Topic	Comment	National Grid's response
	Saturdays, and no works on Sundays, Bank Holidays, and other public holidays.	not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or Bank Holiday. The defined core working hours provides essential flexibility. Importantly, the core working hours permit, but do not require, working on Sundays and bank holidays. This flexibility is critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant such as adverse weather, poor ground conditions, supply chain disruption, seasonal restrictions and access constraints. Maintaining programme resilience is also necessary to accommodate interface dependencies between activities and contractors, manage delays to one work element without causing consequential delay to the overall programme, and to enable safe and efficient sequencing of works where extended stoppages would be impractical or disruptive. Where progress can be recovered through limited additional working rather than prolonging the programme, this can reduce overall construction duration and avoid extended impacts on communities, traffic networks, landholdings, and the environment. A blanket prohibition on Sunday and bank holiday working would remove this necessary flexibility, increasing the risk of programme slippage, inefficient stop-start working, and a longer overall construction period, which would itself result in greater long-term exposure to construction impacts than occasional controlled working on those days. Such a restriction would also undermine the deliverability of this critical national priority project, where timely delivery is in the public interest. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other DCO control to manage impacts included in **Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300]**, including controls on nuisance-generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30).
Noise and Vibration	4.3 The core working hours as proposed by NG are expected to cause noise and disruption to residents beyond what Thurrock Council considers reasonable. A Section 61 prior consent is recommended for extended or night-time work, especially near sensitive receptors and for particularly disruptive activities such as piling.	The assessment within the Environmental Statement (Volume 6 of the DCO application) is based on a set of parameters. These include the core working hours for the construction phase of the Project. **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 [APP-300]**, significant effects from noise and vibration during the construction phase are not anticipated. Commitment NV03 within **Table 6.1 of 7.2 Outline Code of Construction Practice [APP-300]** states applications for prior consent under Section 61 of the Control of Pollution Act 1974 may be submitted to the relevant LPA by the Main Works Contractor(s) in certain instances where construction noise and/ or vibration may cause a significant adverse effect at nearby Noise Sensitive Receptors (NSRs). The measures set out within **7.2 Outline Code of Construction Practice [APP-300]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Development Consent Order [APP-056]** within the final Code of Construction Practice.
Cumulative effects	**Cumulative effects with Lower Thames Crossing** 4.4 The Project is proposed to be delivered in the same location and on the same timeframe as other significant development, particularly the Lower Thames Crossing ("LTC") development project which has been granted DCO consent to construct a new road that will connect Kent and Essex through a tunnel beneath the River Thames. The Project's colocation with the LTC is likely to amplify its impacts across a range of impact areas during construction. The potential traffic and noise implications of both projects being under construction at the same time are of particular concern.	The Applicant is working collaboratively with National Highways to resolve the temporal and spatial interfaces between the projects, including through a series of fortnightly technical meetings. Potential noise and vibration effects **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** includes an assessment of construction traffic noise which includes committed developments, including Lower Thames Crossing. An assessment of cumulative effects, which includes noise and vibration (excluding construction traffic noise which is intrinsic in the noise and vibration assessment) was 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]**. No significant cumulative effects have been identified for noise and vibration with the LTC project. Potential impacts resulting from increased traffic movements as a result of the Project are presented in **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]** which includes an assessment of

Topic	Comment	National Grid's response
		construction traffic which includes committed developments, including Lower Thames Crossing. No significant cumulative effects have been identified as a result of traffic movements with the Project and the LTC project. Further to the DCO submission, additional junction modelling has been undertaken at the Orsett Cock Roundabout, Buckingham Hill Road / A1013 junction and the M25 J30 following further engagement with the Lower Thames Crossing Transport Team. The conclusions in **7.11 Transport Assessment [APP-333]** remain valid for Buckingham Hill Road / A1013 junction and the M25 J30. Further engagement with LTC and Thurrock is required for Orsett Cock Roundabout to agree any coordinated mitigation required as a result of the updated modelling at this junction. The Applicant will continue to engage with Thurrock Council.
Cumulative effects	4.5 NG has said that it is engaging with National Highways to mitigate the cumulative impacts of the two projects, and Chapter 17 of the ES for the Project acknowledges some of the effects on Public Rights of Way ("ProW"), bridleways, cycle routes and minor roads. However, Thurrock Council has not yet received adequate evidence from NG to show that these impacts will be mitigated effectively. Consideration must be given to how the Project can be phased alongside delivery of the LTC to avoid the cumulation of impacts. The Council looks forward to receiving further details of the mitigation proposed by NG to offset the cumulative environmental effects.	The Applicant is working collaboratively with National Highways to resolve the temporal and spatial interfaces between the Projects, including through a series of fortnightly technical meetings. A cumulative effects assessment presented in **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]** which includes the Lower Thames Crossing Project. Following the implementation of mitigation measures within **7.2 Outline Code of Construction Practice [APP-300], 7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]** no significant effects have been identified on Public Rights of Way (PRoWs), bridleways, cycle routes and minor roads, therefore no further mitigation is considered necessary. In respect of the Norwich to Tilbury Project, the overall strategy, as set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**, is to maintain access along 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 Thurrock that would be subject to closure without diversion, there would be no severance of the overall network as a result of the Project.
Community impact	4.6 The impact on communities and businesses of the Project occurring at the same time as the LTC has not been adequately communicated to those communities and businesses. NG should produce a plan for communicating impacts of the Project to local communities and businesses.	The Applicant will continue to liaise with communities, businesses and the local authority to plan communications with any affected audiences. The Applicant is committed to minimising disruption on local communities and acknowledges the need to mitigate these impacts wherever possible.
Traffic and Transport	*Construction traffic* 4.7 The scale of construction required for the Project is expected to cause a significant increase in traffic using the borough's highway network. Thurrock Council expects this construction traffic to cause issues for local traffic routes, as well as walking and cycling routes. Thurrock Council considers that NG's proposals to mitigate these impacts have not been adequately evidenced.	The Applicant is committed to minimising disruption on local highway networks and has proposed or is discussing with Thurrock Council suitable mitigation measures to minimise likely adverse effects. **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]** have been developed to provide the management principles which will help mitigate the impacts of construction traffic. This includes traffic management that will be put in place throughout the Project, the routeing of vehicles along Primary Access Routes and how this will be monitored, and the development of a driver information pack. This driver information pack will include details of hotspots related to walking and cycling routes and measures to address any potential safety concerns. These hotspots have been identified from the assessment in the **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** or through engagement with Thurrock Council. Suitable mitigation measures have been proposed and are summarised in Section 16.6 of the **6.16 Environmental Statement Chapter 16: Traffic and Transport [APP-271].** The Applicant has also engaged with Thurrock Council regarding locations where construction traffic may raise safety concerns for users of the Public Rights of Way (PRoWs) network. Through this engagement, two locations have been highlighted for further consideration: the PRoW crossing of Buckingham Hill Road and a section along Hoford Road. In relation to Hoford Road, the Applicant proposes a temporary off-road path to separate vulnerable users from construction traffic. It has been agreed with Thurrock Council that both locations will be subject to appropriate Road Safety Audits at the relevant stages of the design and construction process.

Topic	Comment	National Grid's response
Traffic and Transport	4.8 Thurrock Council requires further information regarding traffic modelling to identify the potential impacts of the proposal on the highway network, air quality, as well as cumulative impacts along with the LTC. Abnormal Indivisible Load information has been provided but not in sufficient detail because NG do not know the potential numbers and contractor yet. A full assessment of the impact on the highway cannot be made without this information.	The Applicant notes this comment. Junction modelling of junctions within Thurrock was undertaken for the AM and PM peak hours, using traffic survey data for each site, to assess the likely impact the increase in traffic as a result of the Project would have in combination with committed developments at key junctions on or connecting to the Primary Access Routes. The Applicant provided further traffic modelling information to Thurrock Council in June and July 2025. Where required, suitable mitigation measures have been proposed or are under discussion with Thurrock County Council and National Highways to reduce potential impacts at junctions as presented within **7.11 Transport Assessment [APP-333].** 7.3 Outline Construction Traffic Management Plan - **Appendix A - Abnormal Indivisible Load (AIL) Access Strategy [APP-310]** presents indicative numbers of movements for the large mobile crane, cable drum delivery and transformer delivery AIL vehicles proposed within Thurrock. The schedule of AIL movements is anticipated to be further developed and shared with the local highway authorities when appropriate, following confirmation of the construction programme by the Main Works Contractor(s). The formal notification of AIL movements will follow the Electronic Service Delivery for Abnormal Loads (ESDAL) system and will follow all formal processes. Further to the DCO submission, additional junction modelling has been undertaken at the Orsett Cock Roundabout, Buckingham Hill Road / A1013 junction and the M25 J30 following further engagement with the Lower Thames Crossing Transport Team to agree any coordinated mitigation required as a result of the updated modelling at this junction. The Applicant will continue to engage with Thurrock Council. Modelling of junctions with AIL flows were not considered necessary as it is assumed these movements would be traveling to and from site outside of peak hours at the request of the local highway authority and Police. The AIL movements are infrequent and volumes are relatively low. Therefore the expected background traffic flow plus the AIL movements are lower than those assessed in the peak hours for the peak construction activity. As a result, no capacity issues are anticipated at the junctions.
Traffic and Transport	4.9 Thurrock Council raises ongoing concerns which have been raised in each of the Council's previous responses regarding potential cumulative construction impacts on transport routes and access for example, emergency vehicles accessing the site, members of public accessing healthcare facilities and other services/amenities, particularly in relation to potential overlap in construction timelines with the LTC.	The Applicant is committed to minimising disruption on local highway networks (including to healthcare facilities and other services / amenities). **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** considers the potential impacts on, and access to, healthcare facilities, including emergency services, ambulances, hospitals and other NHS services associated with the construction of the Project, drawing on information from **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271].** No health facilities are due to be directly impacted by the Project and where road diversions are required traffic management and mitigation measures would be in place to reduce impacts. These include: traffic management, contingency routes, signage and routing measures to ensure access or partial access can be maintained where feasible. Further detail on proposed mitigation measures are presented in **7.3 Outline Construction Traffic Management Plan [APP-309]**. It should also be noted that access to properties and facilities will be maintained throughout construction which may include the use of appropriate, signed diversion routes and temporary access arrangements. Emergency vehicles accessing the construction corridor will be able to do so through crossover points as well as the site access points as both have been designed to allow for emergency vehicles to access the haul roads. Further to the DCO submission and following further engagement with the Lower Thames Crossing Transport Team, additional junction modelling has been undertaken at the Orsett Cock Roundabout, the Buckingham Hill Road / A1013 junction and the M25 J30 to agree any coordinated mitigation based on the updated modelling to reduce the impact at these junctions. The Applicant will continue to engage with Thurrock Council. The access to these sensitive receptors by walkers, cyclists or horse-riders has been considered in the assessment of the pedestrian, cyclist and horse-rider severance and amenity that has been included within the **6.16 Environmental Statement Chapter 16: Traffic and Transport [APP-271].**
Traffic and Transport	4.10 NG is still undertaking its road safety audits ("RSA") which will provide crucial information for assessing the impact on PRoW footpaths at access points and highway crossing points. The potential for a negative impact on PRoWs is significant. Any	The Public Rights of Way (PRoWs) network impacted by the Project was assessed within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. No significant residual effects were identified for users of PRoWs in Thurrock considering the proposed mitigation identified within both **7.3 Outline Construction Traffic Management Plan [APP-309]** and **7.6 Outline Public Rights of Way Management Plan [APP-329],**

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	negative impact on PRoWs would also have the potential to change residents' behaviour regarding their usage, leading to less frequent engagement in leisure and recreation activities along these routes and less physical activity in general, having a negative impact on their health.	which contains a list of all PRoWs affected by the Project along with the management approach proposed for each and the timescales involved. The Applicant has engaged with Thurrock Council regarding locations where construction traffic may raise safety concerns for users of the PRoWs network. Through this engagement, two locations have been highlighted for further consideration: the PRoW crossing of Buckingham Hill Road and a section along Hoford Road. It has been agreed with Thurrock Council that these locations will be subject to appropriate Road Safety Audits at the relevant stages of the design and construction process.
Historic Environment	Impact on built non-designated heritage assets ("NDHA") 4.11 Locally listed buildings 'or those of equivalent quality in their fabric or historical associations' and 'Assets of local importance' have been assigned a Low Value/Sensitivity in NG's Assessment Methodology (**APP-208 Document 6.11 Environmental Statement Chapter 11 – Historic Environment**). The same chapter says: '…The settings of all negligible and low value non-designated heritage assets have not been assessed…, due to the lack of potential for any impacts to these assets to result in significant effects…' 4.12 Chapter 11 of the ES also asserts that this approach was discussed and agreed with stakeholders in February 2025, but Thurrock Council has not agreed that an assessment of the setting of non-designated built heritage assets would not be carried out.	The historic environment thematic group meeting held on 27 February 2025 was principally focused on the updated **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209].** This was shared with all historic environment stakeholders on 13 February 2025 and had been produced in accordance with the approach of not including a written settings assessment for non-designated heritage assets of low and negligible value. This element of the methodology was briefly discussed during the meeting and no objections were raised. The effects of the development on built non-designated heritage assets that are of medium value or above has been carried out and a written settings assessment is presented for those with the potential to experience significant effects from the Project.
Historic Environment	4.13 The effect of the proposed development on the setting and significance of built NDHAs has not, therefore, been assessed. This is not in accordance with paragraph 5.9.7 of the Department for Energy Security and Net Zero Overarching National Policy Statement for Energy (EN-1) which states: The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan making process by plan-making bodies, including 'local listing', or through the application, examination and decision-making process). This is based on clear evidence that such heritage assets have a significance that merits consideration in that process, even though those assets are of lesser significance than designated heritage assets. 4.15 It also prevents a balanced judgement being carried out as required by paragraph 5.9.33 of the Department for Energy Security and Net Zero Overarching National Policy Statement for Energy (EN-1): In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	The 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 [APP-208]**. 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 the nature of potential impacts, this would be at the very lowest end of the harm scale. Instructions in the Overarching National Policy Statement for Energy (EN-1 (2024)) regarding the Applicant's assessment include paragraph 5.9.9 'The applicant should undertake an assessment of any likely significant [Applicant's emphasis] 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'; and in several places there is reference to detail being proportionate to the importance/significance of the heritage asset. The Project therefore considers that it has appropriately complied with relevant policy in National Policy Statement (EN-1) regarding assessment of impacts to non-designated heritage assets.
Historic Environment	*Archaeological evaluation strategy* 4.16 Thurrock Council is concerned that an appropriate level of archaeological evaluation is not going to be completed within the determination period. The level of fieldwork that has been completed to date is not sufficient to fully understand the nature,	Fieldwork for the Project commenced in 2023 and has been ongoing since submission of the application for development consent and now the vast majority of the priority geophysical survey areas are complete. Access has been attempted for all priority survey areas. Trial trenching has also been ongoing and approximately two thirds of the priority areas in Thurrock have been trenched and interim reports have been produced. Any incomplete areas for priority geophysical survey or archaeological trial trenching are a result of access not being

Topic	Comment	National Grid's response
	extent and significance of archaeological and geoarchaeological deposits that may be present within the scheme. Of the seven priority geophysical surveys proposed within Thurrock, six have been fully completed. Three Priority evaluation areas were identified for trial trenching; these have not been completed. This would be considered in conflict with paragraph 207 of the National Planning Policy Framework (2024).	granted. These results have been submitted into the examination as Supplementary Environmental Information. The council has been kept informed of progress through monthly meetings and on-site monitoring visits for the trial trenching.
Historic Environment	4.14 [sic] Without a completed programme of archaeological evaluation to establish archaeological potential and inform a robust mitigation strategy, the Project risks causing avoidable harm to the Historic Environment. This would be contrary to Overarching National Policy Statement for Energy EN-1 section 5.9, which requires impacts (both direct and indirect) to be understood, and harm avoided or minimised through design and mitigation, with loss of archaeological assets preserved by record where justified. An Outline Archaeological Mitigation Strategy ("OAMS") and Outline Written Scheme of Investigation ("OWSI") has been submitted (**APP-328 Document 7.5**). This document still needs to clarify the scope and extent of further evaluation required prior to any agreed mitigation. This will include further geophysical survey and archaeological trial trenching. This will allow all parties to be clear about the scope and level of evaluation that may be required should development consent be given. Archaeological mitigation measures are secured through Requirement 5 of Schedule 3 of the Draft DCO (**APP-056 Document 3.1 – Draft DCO**). Should the Project be granted based on the current levels of evaluation, any DCO requirement should explicitly allow for a separate evaluation stage of archaeological work, before securing a detailed investigation stage as mitigation.	The archaeological evaluation work (geophysics and trial trenching) is ongoing, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information which the council are aware of. At this stage approximately 3,000 trial trenches and 1,440 hectares of geophysical survey have been completed. The phase 2 stage of the geophysical survey and trial trenching will continue in 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 is complete and included in the Supplementary Environmental Information. 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. The update and scope of the document will be informed by the findings of the ongoing fieldwork and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified. **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.
Historic Environment	4.15 [sic] The ES (**APP-208 Document 6.11 Environmental Statement Chapter 11 – Historic Environment**) considers the known non-designated heritage assets to be of high, medium, low and negligible value. However, without completion of the geophysical survey and intrusive evaluation, the value of the known and, as yet, unknown archaeological deposits cannot be determined with confidence. Therefore, without a completed evaluation strategy there remains potential for archaeological deposits of regional to national significance to be present within NG's proposed Project that may be negatively impacted by the groundworks required for elements of the Project. Until the archaeological trial trench evaluation is complete, the full impact of the Project on the historic environment within the district will not be fully defined or assessed pre-determination.	The Applicant disagrees. The assessment presented in **6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210]** has taken a precautionary approach and assessed non-designated heritage assets where there is potential for archaeology, even if this had not been confirmed by field evaluation. This situation is common for all types of development. There are measures in place through **Requirement 5 of 3.1 Draft Development Consent Order [APP-056]** and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** to secure agreement of any further evaluation and/or mitigation prior to the start of works, which provides protection for currently unknown archaeology.
Planning Policy	*Restriction on growth* 4.16 The Project has the potential to have a restricting effect on growth in key opportunity areas identified in the emerging Local Plan for Thurrock Council; sites that are being promoted for development through the Local Plan process might be impacted,	The Applicant has taken into consideration the location of planning applications and housing allocations in establishing the baseline as part of the routeing and siting studies to minimise any potential for direct impacts on housing development sites, where possible. **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**, **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360], 7.21 2024 Design Development**

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	which could potentially reduce the amount of land available for inclusion. Further details of the potential restriction on these growth areas will be provided in Thurrock Council's Local Impact Report.	**Report for the Project [APP-359]** and **7.20 2023 - Design Development Report for the Project [APP-358]** describe the iterative development of the Project from the strategic proposal and draft alignment and document the changes to the Project following the 2024 statutory consultation and additional 2025 targeted consultations. At all stages in the development of the Project, the Applicant has taken into consideration local plan allocations (both adopted and emerging) as well as planning applications along the route. **7.22 2025 - Design Development Report Addendum for Proposed Changes to Connection at Tilbury [APP-360]** and **5.6 Planning Statement [APP-085]** outline where the Project has the potential to impact proposed or consented developments.

Appendix AF. List of Relevant Representations and Themes Raised

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Appendix AF
South Norfolk District Council

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0001 (2 Agriculture Growing Limited)					X								X				
RR-0002 (3 Army Air Corps)		X											X			X	
RR-0003 (A Brasted Watts)							X	X					X		X		
RR-0004 (A H J C Investments Limited)				X													
RR-0005 (Aaron Michael Clapham)			X	X			X	X		X		X	X	X	X		X
RR-0006 (Aaron Pizzey)			X	X				X		X		X	X		X		X
RR-0007 (Abby Srokowski)			X					X		X			X		X		
RR-0008 (Abbygail Dawkin)			X	X		X	X	X	X	X		X			X	X	X
RR-0009 (Abigail Barrell)			X					X	X	X							
RR-0010 (Abigail Bebbington)			X		X			X		X		X	X			X	
RR-0011 (Abigail Elden)	X		X	X				X		X	X		X		X	X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0012 (Abigail Thompson)					X			X		X						X	
RR-0013 (Abigail Tryfan)	X		X	X			X	X	X	X		X	X		X	X	X
RR-0014 (AD and KM Caston Ltd (Farm))					X			X									X
RR-0015 (Adam Dixon-Smith)	X		X	X	X			X								X	
RR-0016 (Adam Gilson)												X	X	X			X
RR-0017 (Adam Greenaway)	X			X				X		X		X	X			X	X
RR-0018 (Adam James Blemings)	X		X				X	X		X	X		X			X	X
RR-0019 (Adam John Hall)			X	X			X	X	X	X		X	X		X	X	
RR-0020 (Adam Keeble)			X					X					X		X		
RR-0021 (Adam Power)								X		X							
RR-0022 (Adam Pudney)	X		X		X	X		X	X	X	X	X	X		X	X	X
RR-0023 (Adam Scott)	X		X		X	X	X	X	X			X	X				X
RR-0024 (Adam Smith)	X		X	X			X	X	X			X	X		X	X	X
RR-0025 (Adam Steed)			X					X			X						
RR-0026 (Adam Whipps)	X		X					X	X								X
RR-0027 (Adam Wilson)			X					X		X			X			X	X
RR-0028 (Adria Pittock)			X	X				X					X		X		X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0029 (Adrian Allen)	X		X	X	X		X	X		X	X	X	X			X	X
RR-0030 (Adrian Boon)								X									
RR-0031 (Adrian Hunt)	X							X	X								X
RR-0032 (Adrian James)			X		X			X			X		X			X	
RR-0033 (Adrian Ramsay MP)	X		X		X	X				X		X	X		X	X	X
RR-0034 (Adrian Spanna)			X					X									X
RR-0035 (Adrianus van Helfteren)			X		X			X		X	X		X			X	
RR-0037 (Agnese Kuci)			X					X	X	X			X			X	X
RR-0038 (Aimee Howlett-Mitchell)								X									X
RR-0039 (Aine Nainby-Luxmoore)			X	X	X			X				X					X
RR-0040 (Alan Baker)																X	
RR-0041 (Alan Bird)			X		X	X		X	X	X		X	X				X
RR-0042 (Alan Chambers)					X			X		X	X						
RR-0043 (Alan Cross)	X		X	X	X			X						X		X	
RR-0044 (Alan Dann)	X		X	X				X		X			X				X
RR-0045 (Alan David Beak)			X	X					X	X			X		X	X	X
RR-0046 (Alan Etherington)			X	X	X			X		X		X	X		X		X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0047 (Alan George Page)			X					X		X	X	X	X			X	
RR-0048 (Alan Greenwood)			X		X			X		X	X						
RR-0049 (Alan Groves)			X	X				X		X		X	X			X	X
RR-0050 (Alan J Cross)	X		X	X			X	X					X	X		X	
RR-0051 (Alan J Waddoups)				X				X		X	X						X
RR-0052 (Alan Leslie Holmes)	X	X	X	X	X	X	X	X	X	X			X		X		X
RR-0053 (Alan Martin)			X		X			X		X			X			X	
RR-0054 (Alan Ormston)			X														
RR-0055 (Alan Pallett)			X					X									
RR-0056 (Alan Pudney)			X		X			X	X	X	X	X	X				X
RR-0057 (Alan Pudney Ltd)			X		X			X	X	X	X	X	X				X
RR-0058 (Alan Thomas)	X		X				X						X		X		X
RR-0059 (Alan Thomas Wheat)										X		X			X	X	X
RR-0060 (Alan Wilde)			X	X				X			X	X			X		
RR-0061 (Alan Wrycraft)			X					X									
RR-0062 (Alasdair Daw)			X					X		X							X
RR-0063 (Alastair Stuart Thomas)			X					X		X	X			X			

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0064 (Alcemi Storage Developments 1 Limited)				X	X	X		X		X		X		X		X	X
RR-0065* (Aldham Parish Council)	X		X		X	X	X	X	X				X		X		X
RR-0066 (Alex Brooks)			X					X					X				
RR-0067 (Alex Campbell)			X	X	X	X		X		X	X	X	X		X	X	X
RR-0068 (Alex Levart)	X		X					X	X	X		X	X			X	X
RR-0069 (Alex Smith)	X		X	X	X	X	X	X	X	X	X		X	X	X		X
RR-0070 (Alex Wright)			X		X		X			X			X				
RR-0071 (Alexander Cooper)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0072 (Alexander Glen)								X					X			X	
RR-0073 (Alexander Louth)								X	X			X	X			X	X
RR-0074 (Alexander Ronald Grinsted)			X					X			X		X				
RR-0075 (Alexandra Eden)			X	X	X			X		X			X	X		X	X
RR-0076 (Alexandra Godwin)	X							X					X			X	
RR-0077 (Alexandra Westrop)								X		X						X	X
RR-0078 (Alice Cusworth)			X	X				X		X		X	X			X	
RR-0079 (Alice Lily Shaw)			X					X			X	X	X				
RR-0080 (Alice McKenna)	X		X	X	X	X		X	X	X			X		X	X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0081 (Alice Thomas-Scrine)	X		X	X	X		X	X		X		X	X		X		X
RR-0082 (Alicia Burton)			X					X		X							X
RR-0083 (Alicia Herbert)			X					X		X	X		X			X	
RR-0084 (Alison Brennan)			X	X				X		X		X	X		X		X
RR-0085 (Alison Bryant)			X					X	X	X		X	X			X	X
RR-0086 (Alison Buttery)			X		X	X	X	X		X	X		X	X			X
RR-0087 (Alison Chivers)			X							X						X	
RR-0088 (Alison Claire Ellis)			X	X				X		X		X	X		X	X	X
RR-0089 (Alison Collins-Baldry)				X									X				X
RR-0090 (Alison Davis)			X				X	X		X			X				X
RR-0091 (Alison Dow)			X					X			X						
RR-0092 (Alison Huard)	X		X		X			X		X	X		X		X	X	X
RR-0093 (Alison J. E. Everington)	X		X	X				X	X				X		X	X	
RR-0094 (Alison Jane Pope)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0095 (Alison Jean Dewar)			X					X		X			X	X		X	X
RR-0096 (Alison Leonora Dearlove)								X		X			X				X
RR-0097 (Alison Lesley Dow)			X				X	X	X	X			X			X	X

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RR-0098 (Alison Mary Chapman)	X		X	X				X	X							X	X
RR-0099 (Alison Mary Hayward)	X		X		X	X		X				X	X				
RR-0100 (Alison Munday)			X	X				X		X			X			X	X
RR-0101 (Alison O'Connell)					X			X	X			X	X		X		X
RR-0102 (Alison Reypert)	X		X					X		X	X		X			X	X
RR-0103 (Alison Rowe)			X		X				X	X		X	X			X	
RR-0104 (Alison Seymour-Taylor)			X	X	X			X		X		X	X		X		X
RR-0105 (Alison Shuttleworth)			X					X		X	X						X
RR-0106 (Alison Sparrow)			X					X		X			X			X	X
RR-0107 (Alison Spouncer)			X		X			X		X			X				X
RR-0108 (Alison Stannard)				X			X			X			X		X	X	
RR-0109 (Alison Thomas)								X		X	X		X			X	
RR-0110 (Alison Tottie)								X		X						X	
RR-0111 (Alison Williams)							X	X		X			X				X
RR-0112 (Alistair Holloway)	X		X					X		X			X			X	
RR-0113 (Alix Elizabeth Mason)			X					X									
RR-0114 (Allan Geoffrey Pound)			X					X		X							

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0115 (Allan Hinchliffe)	X		X	X	X		X	X		X		X	X			X	X
RR-0116 (Allen Denyer)	X		X	X				X	X	X		X	X				X
RR-0117 (Allison Murray)			X		X			X		X			X				X
RR-0118 (Allyson Rae)	X		X		X			X	X	X			X	X		X	X
RR-0119 (Amanda Anne McMurray)			X					X		X						X	
RR-0120 (Amanda Arthey)			X		X			X			X	X	X		X	X	
RR-0121 (Amanda Burton)	X		X					X					X			X	X
RR-0122 (Amanda Clowe)			X	X				X		X	X		X		X	X	X
RR-0123 (Amanda Fenwick)								X									X
RR-0124 (Amanda Jane Manchett)			X	X				X		X			X			X	X
RR-0125 (Amanda Kathryn Charleston)			X					X		X			X				X
RR-0126 (Amanda Mary St John Watkins)			X	X				X	X	X						X	X
RR-0127 (Amanda Ruffell)	X		X					X	X	X		X	X			X	X
RR-0128 (Amanda Samms)								X					X				
RR-0129 (Amanda Sloan)			X		X			X		X			X			X	X
RR-0130 (Amanda Whatson)			X					X							X		
RR-0131 (AMC Electrical)	X		X	X	X	X	X	X	X	X	X	X	X		X	X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0132 (Amy Clarke)		X	X		X			X			X						
RR-0133 (Amy D'Sa)			X	X				X		X		X	X			X	X
RR-0134 (Amy J Best)								X					X				X
RR-0135 (Amy Johnson)	X		X					X		X							X
RR-0136 (Amy Lloyd)								X		X			X	X	X	X	X
RR-0137 (Amy Longhurst)	X		X	X			X	X		X			X		X	X	X
RR-0138 (Amy Mullan)			X					X			X					X	
RR-0139 (Amy Savage)			X	X			X	X				X	X		X	X	X
RR-0140 (Amy Saville)	X			X				X				X	X				X
RR-0141 (Amy Wilesmith)			X	X			X	X		X		X	X				X
RR-0142 (Andrea Halsall)	X		X	X	X	X	X	X	X	X	X		X		X	X	X
RR-0143 (Andrea Jones)			X					X									
RR-0144 (Andrea Leno)			X				X	X					X				
RR-0145 (Andrea Short)	X		X					X		X			X			X	X
RR-0146 (Andrew Barnes)	X		X		X			X	X	X		X			X		
RR-0147 (Andrew Bullock)	X		X	X	X		X	X		X			X	X		X	X
RR-0148 (Andrew Butler)					X			X				X			X		X

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RR-0149 (Andrew Claridge)			X	X				X		X			X		X	X	X
RR-0150 (Andrew Cooper)			X	X													
RR-0151 (Andrew d'Angibau)	X		X		X	X	X	X	X	X			X		X		X
RR-0152 (Andrew David Lockwood)			X	X				X		X			X			X	X
RR-0153 (Andrew David Peel)			X	X				X		X		X			X	X	X
RR-0154 (Andrew Denton)	X		X					X		X			X		X		X
RR-0155 (Andrew Deveney)			X					X			X					X	
RR-0156 (Andrew Dowling)								X	X							X	
RR-0157 (Andrew Elmes)	X		X										X				
RR-0158 (Andrew Fitzwater)			X					X		X	X					X	
RR-0159 (Andrew Gordon Tull)			X		X	X		X	X	X	X		X			X	
RR-0160 (Andrew Hardie)					X					X							
RR-0161 (Andrew Harold Kerrison)			X							X	X	X					
RR-0162 (Andrew Hill)			X		X		X	X					X				X
RR-0163 (Andrew Hitchings)			X	X				X		X			X				X
RR-0164 (Andrew Jaggard)	X		X	X	X	X		X	X	X			X		X		X
RR-0165 (Andrew John French)			X		X			X					X			X	

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RR-0166 (Andrew Loveland)			X					X		X							
RR-0167 (Andrew Macmillan)			X					X		X							
RR-0168 (Andrew Malkin)			X					X		X	X						
RR-0169 (Andrew McBride)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0170 (Andrew Mold)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0171 (Andrew Murray)			X					X									
RR-0172 (Andrew Norbury)								X								X	
RR-0173 (Andrew Oakley Gowers)																	X
RR-0174 (Andrew Paul Cross)			X		X			X		X			X			X	
RR-0175 (Andrew Philip Savage)			X							X						X	
RR-0176 (Andrew Phillips)			X		X			X			X		X			X	
RR-0177 (Andrew Piper)			X					X									
RR-0178 (Andrew R Porter)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0179 (Andrew Rackham)															X		X
RR-0180 (Andrew Risk)				X				X			X		X				
RR-0181 (Andrew Rodwell)			X		X			X					X				
RR-0182 (Andrew Rothery)					X			X				X			X		X

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RR-0183 (Andrew Seaton Hogg)							X	X		X			X			X	
RR-0184 (Andrew Simpson)			X					X	X	X			X			X	X
RR-0185 (Andrew Slade)			X		X			X		X			X			X	X
RR-0186 (Andrew Smith)	X			X				X		X			X		X		X
RR-0187 (Andrew Stacey)			X	X	X								X				
RR-0188 (Andrew Stevens)			X					X		X							
RR-0189 (Andrew Stevens)				X	X		X	X				X	X		X		X
RR-0190 (Andrew Stokes)								X					X				
RR-0191 (Andrew Thorpe-Apps)			X					X		X							
RR-0192 (Andrew Todd)			X					X									
RR-0193 (Andrew Upson)	X		X							X		X					
RR-0194 (Andrew Wilks)	X		X		X	X		X	X	X			X		X	X	X
RR-0195 (Andrew Youngs)	X		X	X	X			X	X	X	X	X	X		X	X	
RR-0196 (Andy Simpson)			X		X					X	X		X		X		X
RR-0197 (Andy Smith)			X	X				X		X						X	X
RR-0198 (Andy Wallace)								X									
RR-0199 (Angel Simms)			X		X			X		X			X			X	

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RR-0200 (Angela Aird)			X	X				X	X	X			X		X		X
RR-0201 (Angela Biggs)			X					X	X				X			X	X
RR-0202 (Angela d'Angibau)	X		X		X	X		X	X	X			X		X		X
RR-0203 (Angela Durrant)			X					X	X	X		X	X		X		X
RR-0204 (Angela Edgar)			X					X		X	X	X	X		X	X	X
RR-0205 (Angela Gourlay)								X							X		
RR-0206 (Angela Mae Roope)			X		X			X		X	X		X		X		X
RR-0207 (Angela Marie Jones)			X		X			X		X	X	X	X		X	X	
RR-0208 (Angela Marriage)			X		X				X								
RR-0209 (Angela Marshall-Bull)			X	X				X	X	X		X	X			X	X
RR-0210 (Angela Mary Mclauchlan)			X					X		X							
RR-0211 (Angela Pyke)															X	X	X
RR-0212 (Angela Sains)			X					X		X	X					X	X
RR-0213 (Angela Taylor)			X							X						X	
RR-0214 (Angela Thope-Apps)			X					X	X	X	X		X		X	X	
RR-0215 (Angeline Braidwood)								X					X				X
RR-0217 (Angus Campbell)			X		X	X		X		X	X	X	X	X	X	X	X

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RR-0218 (Angus Logansmith)			X							X	X						
RR-0219 (Anita Dorothy FInch)			X							X							X
RR-0220 (Anita Golding)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0221 (Anita Huckle)	X							X		X			X				X
RR-0222 (Anita Moore)	X		X					X		X		X	X				
RR-0223 (Ann Chandler)			X					X		X			X				
RR-0224 (Ann Claydon)								X		X							
RR-0225 (Ann Day)	X		X					X									
RR-0226 (Ann Doyle)			X	X				X		X							X
RR-0227 (Ann J Terry)			X		X			X									
RR-0228 (Ann Laverock)			X		X			X	X	X	X	X			X	X	X
RR-0229 (Ann Lavinia Blyth)	X		X		X		X	X		X			X			X	X
RR-0230 (Ann Monica Ross)								X	X								
RR-0231 (Ann Noy)	X		X	X				X		X					X	X	X
RR-0232 (Ann ODriscoll)				X							X		X				
RR-0233 (Ann Prince)			X						X	X	X					X	X
RR-0234 (Ann Reynolds)			X						X	X		X	X				

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RR-0235 (Ann Scutcher)			X		X			X		X	X	X				X	X
RR-0236 (Ann Stevens)	X	X	X		X	X	X	X	X	X		X	X		X		X
RR-0237 (Ann Stock)								X					X			X	
RR-0238 (Anna Bancroft)			X							X						X	
RR-0239 (Anna Chadwick)					X			X				X			X		X
RR-0240 (Anna Chambers)								X					X		X		X
RR-0241 (Anna F Kowalczyk)			X				X	X		X		X	X		X	X	X
RR-0242 (Anna J Magee)					X	X	X	X		X	X		X			X	X
RR-0243 (Anna Lidzey)					X			X		X			X				X
RR-0244 (Anna Louise Moscrop)								X		X			X				X
RR-0245 (Anna Melling)			X				X	X	X	X	X		X		X	X	X
RR-0246 (Anna Mulholland)			X		X			X	X	X						X	
RR-0247 (Anna Rule)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
RR-0248 (Anna Savage)	X																
RR-0249 (Anna Zakharyeva)			X		X	X		X	X	X	X		X		X	X	X
RR-0250 (Annabel Kiss)			X	X	X			X		X		X	X		X		X
RR-0251 (Annabel Stacey)	X		X		X			X		X			X			X	X

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RR-0252 (Annabel Susan Malton)			X					X	X				X		X		X
RR-0253 (Annabel Yule Smith)			X							X			X			X	
RR-0254 (Annabelle Juliet Mary Watson)			X	X	X			X	X	X			X		X	X	X
RR-0255 (Annabelle Woolford)			X	X				X		X			X		X	X	X
RR-0256 (Anne Austin)								X					X				X
RR-0257 (Anne Baker)														X			
RR-0258 (Anne Catherine Hume)				X	X		X	X	X						X	X	X
RR-0259 (Anne Christine Ford)										X							
RR-0260 (Anne Dymond)										X			X				
RR-0261 (Anne Felicity Soames)			X		X	X		X		X			X			X	X
RR-0262 (Anne Fletcher)			X	X	X								X		X	X	
RR-0263 (Anne Hodgson)								X									
RR-0264 (Anne Margaret Banham)			X							X							
RR-0265 (Anne Ridgwell)				X				X		X			X		X	X	X
RR-0266 (Anne Sarah Day)				X	X			X	X						X		
RR-0267 (Anne Stanford)	X		X					X		X							
RR-0268 (Anne Terrell)			X		X		X	X		X			X			X	X

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RR-0269 (Anne Willsher)			X							X						X	
RR-0270 (Anne-Marie Perkins)			X		X			X		X	X		X			X	
RR-0271 (Annette Bettany)			X				X	X		X			X			X	X
RR-0272 (Annette Cole)																X	
RR-0273 (Annette Elsa Redgrave)			X		X			X	X	X	X	X	X			X	X
RR-0274 (Annette Heron)			X					X		X							
RR-0275 (Annette Smallwood)			X		X		X	X		X	X				X	X	X
RR-0276 (Annette Taylor)			X					X									
RR-0277 (Annie Loveland)	X		X		X			X					X				
RR-0278 (Anthea Margaret Stone)			X					X		X							X
RR-0279 (Anthea Sara Wlliams)			X	X	X		X	X			X		X		X	X	X
RR-0280 (Anthony Banks)	X		X		X		X	X		X	X	X				X	
RR-0281 (Anthony Bender)	X		X		X			X			X		X			X	
RR-0282 (Anthony Bottrell)					X			X			X						
RR-0283 (Anthony Hunt)			X					X		X			X			X	
RR-0284 (Anthony James Newman)			X					X	X	X							X
RR-0285 (Anthony Olway)								X					X		X		X

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RR-0286 (Anthony Rennett)	X		X				X			X			X			X	X
RR-0287 (Anthony Wooldridge)	X		X		X	X	X	X		X	X	X	X	X		X	X
RR-0288 (Antje Cassens-Marshall)			X					X		X		X			X	X	
RR-0289 (Antonius Damen)	X		X		X		X	X		X	X					X	X
RR-0290 (Antony Chadwick)	X		X				X	X		X			X				X
RR-0291 (Antony Monger)	X		X	X	X		X	X		X		X	X		X	X	X
RR-0292 (Antony Moore)			X					X								X	
RR-0293 (Antony Pape)			X	X				X		X		X	X			X	X
RR-0294 (Antony Rose)	X		X	X	X			X		X	X	X	X		X	X	X
RR-0295 (Anya Wooddissee)				X				X		X		X	X			X	
RR-0296 (April Barker)	X		X		X		X	X	X	X		X		X			
RR-0297 (APT Holdings Ltd)	X		X		X	X		X	X	X		X	X		X		X
RR-0298 (Archie Clifford)			X	X	X		X	X	X	X		X	X		X		X
RR-0299 (Archie Spence)			X					X		X						X	
RR-0300* (Ardleigh Parish Council)	X		X		X	X		X	X	X						X	
RR-0301 (Arin Andrews)						X		X					X			X	X
RR-0302 (Arthur Hollis)										X							

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RR-0303 (ARU Writtle)			X	X	X		X	X					X		X		X
RR-0304 (Ashgreen Energyfarm Limited)					X									X			
RR-0305 (Ashley Blows)			X					X		X			X			X	X
RR-0306 (Ashley Evans)			X		X			X		X							
RR-0307 (Ashley Newson)			X						X	X	X					X	
RR-0308 (Audrey Penman)			X		X			X		X	X		X		X		X
RR-0309 (Aukera Energy UK Limited)					X							X		X			
RR-0310 (Ava Howard)			X					X		X			X			X	
RR-0311 (Avery StG Fraser)	X							X									X
RR-0312 (Aynsley Evoli)	X		X					X		X			X				X
RR-0313 (Aziz Chaudry)			X	X				X		X			X	X	X	X	X
RR-0314* (Babergh District Council)	X		X	X		X	X	X	X	X		X	X	X	X		
RR-0315 (Barbara Belcher)	X		X		X			X			X	X			X		X
RR-0316 (Barbara Cousins)			X					X			X		X			X	
RR-0317 (Barbara Diane Roberts)			X		X		X	X		X		X	X			X	X
RR-0318 (Barbara Goldring)	X		X		X	X		X	X	X	X				X		X
RR-0319 (Barbara Gutowski)	X						X						X				X

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RR-0320 (Barbara Jane Bullock)	X		X	X	X			X	X	X	X	X	X		X	X	X
RR-0321 (Barbara Pearson)			X					X									
RR-0322 (Barbara Tully)								X				X	X			X	
RR-0323* (Barking Parish Council)			X					X		X	X	X					
RR-0324 (Barrie Stone)				X	X	X		X		X				X		X	
RR-0325 (Barrington Robert Thomas Smith)			X					X		X			X			X	X
RR-0326 (Barry Anthony Hobbs)			X	X		X		X		X			X			X	X
RR-0327 (Barry Bell)		X			X	X		X					X	X	X		
RR-0328 (Barry Foster)			X							X							
RR-0329 (Barry Robinson)			X		X	X		X		X			X				X
RR-0330 (Barry Roger Bull)			X					X							X		
RR-0331 (Barry White)			X		X			X			X					X	
RR-0332 (Barry Whitlow)			X										X				
RR-0333 (Barry Withers)								X									
RR-0334 (Basildon BESS Ltd)					X	X								X			
RR-0336* (Battisford Parish Council)								X					X		X	X	
RR-0337 (Bea Wooldridge)	X							X				X					X

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RR-0338 (Beatrix Wrinch)	X		X		X			X					X			X	
RR-0340 (Becky Harris)			X		X		X	X	X	X			X		X	X	X
RR-0341 (Becky Pope)			X					X		X			X				X
RR-0342 (Belinda James)			X					X		X			X			X	
RR-0343 (Belinda Railton Edwards)	X		X		X			X		X	X	X	X				X
RR-0344 (Belinda Sleigh-Johnson)			X	X				X			X		X				X
RR-0345 (Ben Cattermole)			X					X		X	X	X	X			X	
RR-0346 (Ben Chivers)										X							X
RR-0347 (Ben Falk)	X		X					X		X			X			X	
RR-0348 (Ben Goldsborough MP)	X		X	X	X		X	X	X	X		X	X	X	X	X	X
RR-0349 (Ben Grose)			X					X		X		X	X			X	X
RR-0350 (Ben Minter)	X		X					X									X
RR-0351 (Ben Stephens)													X				
RR-0352 (Benjamin Alec Wallis)			X								X	X	X		X	X	
RR-0353 (Benjamin Collins)			X								X						
RR-0354 (Benjamin Reynolds)	X		X	X	X		X	X		X	X	X	X		X		X
RR-0355 (Benjamin Wooldridge)							X	X					X				

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0356 (Benn Holbrook-Morris)								X							X		
RR-0357 (Berkeley Strategic Land Limited)			X		X									X			
RR-0358 (Bernadette Harrow)				X				X							X		X
RR-0359 (Bernard William Green)	X		X		X			X	X	X		X	X		X		X
RR-0360 (Bernie King)			X					X		X					X	X	X
RR-0361 (Bertie Keep)			X	X			X	X		X			X			X	X
RR-0362 (Beth Franklin)								X		X							
RR-0363 (Beth Harrowven)			X		X			X		X	X	X	X		X	X	X
RR-0364 (Betty Prior)			X					X		X		X	X	X	X	X	X
RR-0365 (Beverley Grant)			X		X			X			X		X		X	X	
RR-0366 (Bianca Jade Hallett)			X	X	X			X		X		X	X		X		X
RR-0367 (Bianca Moller)	X	X	X		X	X	X	X					X			X	
RR-0368* (Billericay Town Council)			X	X				X	X	X		X	X	X			X
RR-0369 (Billericay Tree Wardens)																	X
RR-0370 (Billy Neve)										X			X				
RR-0371 (Billy White)	X		X	X	X		X	X		X	X	X	X		X	X	X
RR-0372 (Bledar Kuci)			X					X	X	X		X	X				X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0373 (Blooms Nurseries Ltd)	X		X				X	X	X	X	X		X			X	X
RR-0374 (Bloor Homes Limited)			X		X	X		X		X		X		X		X	
RR-0375 (Blundell Family)										X						X	
RR-0376 (Bob Sage)		X			X					X							
RR-0377 (Boxted Airfield Historical Group)				X				X									
RR-0378* (Boxted Parish Council)	X		X	X	X	X		X	X	X	X	X	X		X	X	X
RR-0379 (BP Oil UK Limited)					X					X				X			
RR-0380* (Bracon Ash & Hethel Parish Council)			X		X			X		X	X		X				
RR-0381 (Bradley Miles Giltnane)					X			X				X			X	X	X
RR-0382 (Bradley Southgate)			X					X	X	X			X		X	X	X
RR-0383* (Braintree District Council)	X		X	X	X	X	X	X	X	X	X		X	X	X	X	X
RR-0384 (Brenda Ballard)			X		X			X									
RR-0385 (Brenda Blaber)			X					X		X						X	
RR-0386 (Brenda Elizabeth Eyers)			X					X		X						X	X
RR-0387 (Brenda Francis)								X			X	X					
RR-0388 (Brenda Ingrey)	X		X					X		X			X		X	X	
RR-0389 (Brenda Penton)	X		X		X		X	X	X	X		X	X	X	X		X

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RR-0390 (Brenda Westwood)	X		X					X		X			X		X		X
RR-0392* (Bressingham parish council)	X		X					X				X					
RR-0393 (Brett Aggregates Ltd)			X			X	X	X		X				X		X	
RR-0394 (Brett Travers)			X	X		X		X		X	X	X		X	X		
RR-0395 (Brian & Usha Faulkner)	X		X	X	X	X	X	X	X	X	X	X	X	X		X	X
RR-0396 (Brian Charles Asbee)			X					X		X			X			X	
RR-0397 (Brian David Orrell)			X					X		X		X	X			X	X
RR-0398 (Brian George Lee)			X					X									
RR-0399 (Brian Knock)	X		X					X			X		X		X		X
RR-0400 (Brian Lambert)			X					X		X			X			X	X
RR-0401 (Brian Martin)			X		X			X		X	X					X	
RR-0402 (Brian Pearson)			X					X		X						X	X
RR-0403 (Brian Stewart Flack)			X	X	X					X					X	X	
RR-0404 (Brian William Dennis)			X		X			X		X			X			X	
RR-0405 (Brick Barns Farms Ltd)	X		X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-0406 (Brickkiln Farm Solar Limited)			X	X	X		X	X		X		X	X			X	
RR-0407 (Bridget Black)					X												

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RR-0408 (Bridget Bloom)			X							X							
RR-0409 (Bridget Langley)			X		X			X	X	X		X	X				X
RR-0410 (Brigitte Butcher)			X				X	X		X	X	X	X				
RR-0411 (Briony Grogan)			X				X	X		X		X				X	
RR-0412 (British Gliding Association)		X			X											X	
RR-0414* (Brome and Oakley Parish Council)			X							X							
RR-0415 (Brooks Family)	X			X								X					
RR-0416* (Broomfield Parish Council)			X		X			X					X			X	
RR-0417 (Bruce Coverley)			X	X				X		X						X	X
RR-0418 (Bruce Marshall)	X		X		X	X				X	X		X				X
RR-0419 (Brumfelda: Broomfield and District Local History Group)	X	X	X			X	X						X	X	X		
RR-0420 (Bryan Mylod)								X		X			X		X		X
RR-0421 (BTSurveyors Limited)			X	X	X	X		X	X	X	X	X	X	X		X	X
RR-0422* (Bunwell Parish Council)	X		X	X	X	X		X	X	X	X		X		X	X	X
RR-0423* (Burstall Parish Council)			X	X	X			X		X			X	X	X	X	
RR-0424 (C Brennand)			X					X		X			X			X	X
RR-0425 (C Kliskey)			X					X		X			X		X	X	

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RR-0426 (C M Cock)	X		X	X	X	X	X	X	X	X		X	X	X	X		X
RR-0427 (C Macadam & H I Macadam)	X		X		X	X	X	X	X	X				X		X	
RR-0428 (C Moore)	X		X					X					X		X		X
RR-0429 (Cafe Suffolk CIC)																X	
RR-0430 (Caitlin Banks)			X		X			X		X		X	X		X	X	X
RR-0431 (Caitlin Berg)	X												X				X
RR-0432 (Caitlin Croft)			X							X							
RR-0433 (Callum Macdonald)								X		X	X	X					
RR-0434 (Cameron Thick)	X		X	X				X		X		X	X		X	X	X
RR-0435 (Camilla Herrmann)			X					X		X			X				X
RR-0436 (Campaign for the Protection of Rural Wales)			X		X	X					X						
RR-0437 (Cara Evans)	X		X	X	X	X	X	X	X	X	X		X	X	X	X	X
RR-0438 (Carinna Griffiths)									X	X						X	
RR-0439 (Carl Bentley)	X		X	X				X	X	X	X		X		X		X
RR-0440 (Carlous Page)			X					X		X							
RR-0441 (Carly Allan)			X	X	X					X			X				X
RR-0442 (Carly Sherborne)			X	X				X					X		X	X	X

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RR-0443 (Carol Alcock)					X			X				X	X		X		X
RR-0444 (Carol Ann Rowe)			X					X	X				X				X
RR-0445 (Carol Anna Rintoul)				X					X								
RR-0446 (Carol Anne Mott)			X		X												
RR-0447 (Carol Grime)								X					X		X		X
RR-0448 (Carol Holmes)			X					X		X			X			X	
RR-0449 (Carol Jones)			X	X				X		X		X	X		X		
RR-0450 (Carol Page)								X		X		X	X				
RR-0451 (Carol Patricia Cordwell)				X				X		X		X	X		X		X
RR-0452 (Carol Pengelly-Smith)			X		X			X		X	X		X			X	X
RR-0453 (Carol Sharp)			X				X	X		X			X			X	X
RR-0454 (Carol Wilsher)	X		X	X			X	X		X		X	X			X	X
RR-0455 (Carole Axford)			X	X				X							X		
RR-0456 (Carole Handy)	X		X	X	X		X	X		X		X	X		X	X	X
RR-0457 (Carole Lawrence)								X					X			X	X
RR-0458 (Carole Pearce)			X					X		X		X					
RR-0459 (Caroline Ann Kochan)	X		X					X		X			X		X		X

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RR-0460 (Caroline Boyd)			X		X			X			X	X	X				X
RR-0461 (Caroline Darrell)						X		X									
RR-0462 (Caroline Dunn)				X				X					X		X		X
RR-0463 (Caroline Fisher)	X		X		X	X	X	X	X	X	X	X	X		X		X
RR-0464 (Caroline Flanagan)			X		X	X		X	X	X	X		X		X		X
RR-0465 (Caroline Frank)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0466 (Caroline Gouriet)	X		X	X	X	X		X	X	X	X	X		X	X	X	X
RR-0467 (Caroline Guntern-Shea)			X		X	X	X	X		X	X	X	X	X		X	X
RR-0468 (Caroline Heather Watling)								X	X				X		X	X	
RR-0469 (Caroline Holmes)			X						X	X							X
RR-0470 (Caroline Homewood)	X		X		X	X	X	X	X	X		X	X		X		X
RR-0471 (Caroline Hyde-Brown)					X			X			X					X	X
RR-0472 (Caroline Jane Bartholomew)					X												
RR-0473 (Caroline Jane Joyce)	X											X					X
RR-0474 (Caroline Kiff)													X				X
RR-0475 (Caroline Margaret Aldous)			X					X		X		X				X	X
RR-0476 (Caroline Mary Lowe)								X					X		X		X

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RR-0477 (Caroline McShane)	X		X					X		X							
RR-0478 (Caroline Post)			X				X	X		X							X
RR-0479 (Caroline Susan Dean Blacker)		X	X		X	X	X	X			X					X	X
RR-0480 (Carolyn Carlile)	X		X					X		X			X			X	X
RR-0481 (Carolyn Howell)	X		X		X	X	X	X	X	X	X	X	X		X	X	X
RR-0482 (Carolyn Macer)			X					X	X	X			X	X			
RR-0483 (Carolyn Mason)			X	X	X			X			X	X	X	X	X		X
RR-0484 (Carolyn Parry)			X		X			X		X			X			X	X
RR-0485 (Carolyn Robertson)	X		X		X	X	X	X	X	X	X	X	X	X	X	X	X
RR-0486 (Carolyn Robinson)			X		X	X		X		X			X			X	X
RR-0487 (Carolyn Roots)								X		X		X	X				
RR-0488 (Carolyn Stanley)	X		X				X	X		X			X			X	X
RR-0489 (Carolyne Jeffries)							X	X									
RR-0490 (Carters Meadow)	X		X	X	X			X	X		X				X	X	X
RR-0491 (Catarina Apps)			X										X				
RR-0492 (Catherine Carey)										X		X	X			X	X
RR-0493 (Catherine Hill)	X		X	X				X	X	X		X	X		X	X	X

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RR-0494 (Catherine Joanna Rowett)		X	X		X			X	X	X	X		X	X	X		X
RR-0495 (Catherine Judith Charnaud)					X	X						X		X			
RR-0496 (Catherine Le Tue)			X	X		X	X	X		X		X	X		X	X	X
RR-0497 (Catherine Leech)	X		X	X	X	X	X	X		X		X	X		X	X	X
RR-0498 (Catherine Mary Worf)			X		X			X		X						X	X
RR-0499 (Catherine McAdams-Weber)			X					X		X							X
RR-0500 (Catherine Mead)			X	X	X							X	X			X	
RR-0501 (Catherine Owen)			X		X		X	X		X	X	X	X	X	X		X
RR-0502 (Catherine Rayner)	X			X	X	X	X	X					X		X	X	X
RR-0503 (Catherine Read)								X		X			X		X		X
RR-0504 (Catherine Reed)	X		X		X		X	X	X	X			X				X
RR-0505 (Catherine Rooke Davison)								X	X				X		X	X	
RR-0506 (Catherine Spicer)			X		X					X							
RR-0507 (Catherine Twigg)			X	X				X	X	X	X		X		X	X	X
RR-0508 (Cathryn Elizabeth Brooks)			X		X	X		X	X	X	X	X	X		X		X
RR-0509 (Cathryn Mcdonald)								X		X		X	X				X
RR-0510 (Cathy Alexandrou-Graham)													X				

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RR-0511 (Catriona Taylor)			X														
RR-0512 (Caty McAdams)			X					X		X						X	X
RR-0513 (Cecilia Ireland)	X		X					X	X	X			X				X
RR-0514 (Celia Ann Open)			X							X							
RR-0515 (Ceres Property on behalf of Seventyholds Ltd)					X					X		X		X		X	
RR-0516 (Ceri Price)													X				
RR-0517 (Chantelle Kemp)			X					X		X			X				X
RR-0518 (Charlene Levett)	X		X	X				X		X	X	X	X		X	X	X
RR-0519 (Charles A Cunningham-Reid)			X		X			X		X	X					X	
RR-0520 (Charles Anthony Long)			X					X	X	X			X			X	X
RR-0521 (Charles Carron Brown)			X		X					X	X			X		X	
RR-0522 (Charles Clover)						X		X	X				X				X
RR-0523 (Charles Harvey)			X							X						X	
RR-0524 (Charles Ince)			X					X		X	X		X				
RR-0525 (Charles Jonathan Kemp)			X					X		X			X			X	
RR-0526 (Charles Micklem)	X		X		X	X	X	X	X	X	X	X	X			X	X
RR-0527 (Charles Mildred)		X	X					X		X			X				

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RR-0528 (Charles Richard Penton)	X		X		X		X	X	X	X		X	X	X	X		X
RR-0529 (Charles Spence)	X		X					X	X	X		X	X		X	X	X
RR-0530 (Charles Thomas)	X		X			X		X	X		X				X		
RR-0531 (Charles Waddington)			X					X		X			X			X	
RR-0532 (Charlie Day)	X		X	X			X	X	X	X	X	X	X		X	X	X
RR-0533 (Charlie Longden)			X	X				X		X			X		X	X	X
RR-0534 (Charlotte Anderson-McLean)								X		X	X						X
RR-0535 (Charlotte Banks)	X		X	X				X	X		X	X	X				X
RR-0536 (Charlotte Britton)			X							X						X	
RR-0537 (Charlotte Brotherton)			X	X				X		X			X		X	X	X
RR-0538 (Charlotte Gowers)			X			X		X	X				X				X
RR-0539 (Charlotte Lucas)													X				X
RR-0540 (Charlotte Moore)								X				X			X	X	X
RR-0541 (Charlotte Richmond)			X		X			X		X			X			X	
RR-0542 (Charlotte Ross)			X	X				X		X	X		X		X		X
RR-0543 (Charly Le Marchant)			X					X		X			X				X
RR-0544 (Charmian Robson)	X		X	X			X	X					X		X	X	X

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RR-0546* (Chelmsford Garden Community Council)								X					X	X			
RR-0547 (Cheryl Anne Gerrard)			X	X				X	X				X	X	X	X	X
RR-0548 (Cheryl Bartholomew)	X		X				X	X		X						X	
RR-0549 (Cheryl Bayes)								X					X		X	X	X
RR-0550 (Cheryl Damen)			X	X	X			X		X		X	X		X		X
RR-0551 (Cheryl Dickerson)	X		X				X	X		X			X				X
RR-0552 (Cheryl Homewood)			X	X				X		X			X				X
RR-0553 (Cheryl Norman)			X	X				X				X	X		X		
RR-0554* (Chignal Parish Council)	X		X	X				X	X	X		X	X		X	X	X
RR-0555 (Chloe Berg)								X		X			X				
RR-0556 (Chris Blackmore)								X									X
RR-0557 (Chris Boot)			X					X		X	X		X			X	X
RR-0558 (Chris Bryant)			X					X		X			X			X	
RR-0559 (Chris Dawson)			X					X		X						X	
RR-0560 (Chris Ellis)	X		X	X				X	X	X	X				X		X
RR-0561 (Chris Feltham)			X					X		X			X				
RR-0562 (Chris Griggs)			X					X									

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RR-0563 (Chris Hindle)			X	X				X	X	X						X	X
RR-0564 (Chris Holmes)	X		X					X	X	X	X		X				X
RR-0565 (Chris Jacobs)	X		X					X	X		X			X	X	X	X
RR-0566 (Chris Lawrence)		X								X						X	
RR-0567 (Chris Liles)			X					X		X							
RR-0568 (Chris Lockwood)			X					X		X	X		X				X
RR-0569 (Chris Moon)			X		X		X	X		X	X	X	X				
RR-0570 (Chris Rail)			X	X				X	X				X				
RR-0571 (Chris Whitfield)			X	X		X	X	X	X	X			X		X	X	X
RR-0572 (Chris Wuyts)			X					X					X				
RR-0573 (Christabel Waters)	X		X				X	X		X							X
RR-0574 (Christian James Rudkin)	X		X	X	X			X		X	X	X	X	X	X	X	X
RR-0575 (Christian Simson)			X					X		X							
RR-0576 (Christina Noble)			X	X				X		X			X		X	X	X
RR-0577 (Christina Suckling)			X							X							
RR-0578 (Christina Terry)			X					X		X		X	X			X	X
RR-0579 (Christina Wakeford)			X	X	X			X		X		X	X		X	X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0580 (Christine Ann Murton)			X		X												
RR-0581 (Christine Ann O'Connell)	X		X				X	X		X			X				X
RR-0582 (Christine Atkinson)			X	X	X			X		X	X	X	X		X	X	X
RR-0583 (Christine Avery)			X					X									X
RR-0584 (Christine Barrett)	X		X	X	X	X			X			X	X	X	X	X	X
RR-0585 (Christine Bertoloni)			X	X						X			X		X		
RR-0586 (Christine Bevan)			X		X	X	X	X		X			X			X	X
RR-0587 (Christine Blackery)			X		X			X					X		X	X	X
RR-0588 (Christine Collins)			X		X			X		X		X	X		X	X	X
RR-0589 (Christine Cooper)			X					X		X						X	X
RR-0590 (Christine Dann)			X					X		X			X				X
RR-0591 (Christine Dardry-Welham)	X		X					X				X	X		X		X
RR-0592 (Christine Ilott)	X		X	X	X	X		X	X	X	X	X	X		X	X	X
RR-0593 (Christine Lesley Beacom)								X				X	X		X	X	
RR-0594 (Christine Mills)								X								X	
RR-0595 (Christine Sandra Wenden)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0596 (Christine Taylor)			X							X			X			X	

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0597 (Christine Wells)			X				X						X				X
RR-0598 (Christine Whitlow)													X				
RR-0599 (Christophe Lecoeur)	X		X	X	X	X	X	X		X	X	X	X		X	X	X
RR-0600 (Christophe Spiers)			X					X		X							X
RR-0601 (Christopher Brook)				X	X			X				X					
RR-0602 (Christopher Daniel Stevenson)			X		X	X		X									X
RR-0603 (Christopher Flatman)	X		X					X		X		X	X		X	X	X
RR-0604 (Christopher Frank Smith)	X		X	X				X		X	X		X		X		
RR-0605 (Christopher Hay Gurney)			X					X		X							X
RR-0606 (Christopher John Leney-Brooks Leney)					X												
RR-0607 (Christopher John Vermont)			X	X	X			X	X			X	X		X	X	
RR-0608 (Christopher Jones)			X	X				X		X		X	X	X			
RR-0609 (Christopher Martin Bouckley)			X					X	X	X						X	X
RR-0610 (Christopher Moss)			X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-0611 (Christopher Napier)	X		X		X		X	X	X	X	X	X	X		X	X	X
RR-0612 (Christopher Orme)	X		X		X	X		X		X	X		X		X	X	
RR-0613 (Christopher Osborne)			X					X					X			X	

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RR-0614 (Christopher Owen)	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-0615 (Christopher Pye)			X	X				X		X		X	X		X	X	X
RR-0616 (Christopher Richard John Bullock)			X	X	X			X	X	X		X	X		X	X	X
RR-0617 (Christopher Simon)								X	X			X	X				
RR-0618 (Christopher Speller)			X		X	X		X		X	X		X			X	
RR-0619 (Christopher Stephen Kelly)			X		X	X		X	X	X	X		X		X	X	X
RR-0620 (Christopher Thorogood)			X		X			X	X	X		X	X		X		X
RR-0621 (Christopher Tranter)								X				X		X			
RR-0622 (Chrystal Hollis)								X		X			X				
RR-0623 (Ciara McConaghy)			X		X			X		X						X	X
RR-0624 (Cindy Eves)	X		X	X	X			X	X	X			X	X		X	X
RR-0625 (CJH Farming Ltd)	X		X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-0626 (CJH Holdings Ltd)	X		X		X	X	X	X	X	X		X	X	X	X		X
RR-0627 (Claire Alexander)	X			X	X	X		X	X	X			X		X		X
RR-0628 (Claire Archer)			X					X		X			X				X
RR-0629 (Claire Brough)								X				X	X		X		X
RR-0630 (Claire Culham)			X	X		X		X	X	X		X	X		X		X

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RR-0631 (Claire Cunningham)			X					X		X		X	X		X	X	X
RR-0632 (Claire Gowers)			X							X							
RR-0633 (Claire Hewes)			X						X	X		X	X		X	X	X
RR-0634 (Claire Hogg)				X	X			X		X	X					X	
RR-0635 (Claire Hunt)			X	X				X		X			X		X		X
RR-0636 (Claire James)	X		X	X				X		X					X	X	X
RR-0637 (Claire Lincoln-White)	X			X	X	X		X		X		X	X		X		X
RR-0638 (Claire Matthews)				X	X	X					X	X	X				X
RR-0639 (Claire Pereira)			X					X		X		X	X				X
RR-0640 (Claire Reeve)	X		X							X			X				X
RR-0641 (Claire Reeves)			X	X	X			X		X		X	X		X		X
RR-0642 (Claire Sally Khan)			X	X				X	X	X		X	X		X	X	
RR-0643 (Claire Tebbutt)								X	X			X	X		X		
RR-0644 (Clara Lucy Archer)						X		X						X			X
RR-0645 (Clare Atkinson)			X					X	X	X			X			X	
RR-0646 (Clare Bailey)			X					X		X						X	X
RR-0647 (Clare Davies)	X		X					X	X	X	X		X		X		X

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RR-0648 (Clare Eaton)			X		X	X		X	X		X			X		X	
RR-0649 (Clare Ellen Dyson)		X	X		X			X		X	X		X				X
RR-0650 (Clare Fluck-Offord)			X		X					X						X	
RR-0651 (Clare Frances Thomas)			X		X			X					X		X	X	
RR-0652 (Clare Gallaher)	X		X		X		X	X	X	X	X		X		X	X	X
RR-0653 (Clare Gebel)			X				X	X			X	X	X		X		X
RR-0654 (Clare Jeffs)			X	X	X	X		X	X						X		X
RR-0655 (Clare Lacey)								X					X				
RR-0656 (Clare Lanham)	X		X	X	X		X	X		X		X	X				X
RR-0657 (Clare Lynch)					X			X				X	X				
RR-0658 (Clare Rayner)			X	X	X			X	X	X			X		X		X
RR-0659 (Clare Williams)			X					X		X			X			X	X
RR-0660 (Clare Wright)					X		X	X		X							
RR-0661 (Clarke & Simpson)					X	X											
RR-0662 (Claudine Bateman)			X				X	X				X				X	X
RR-0663 (Clearserve Ltd)				X			X	X		X		X		X	X		
RR-0664 (Clem Shimwell)			X					X		X		X	X				

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RR-0665 (Clementine Petersen)			X					X		X			X		X		
RR-0666 (Clifford Harrington)			X					X		X	X	X	X			X	
RR-0667 (Clifford Jones)			X	X	X			X		X	X	X					
RR-0668 (Clive Abrahams)			X								X					X	
RR-0669 (Clive Drewry)			X									X	X				X
RR-0670 (Clive Haworth)	X		X	X				X			X	X	X		X	X	X
RR-0671 (Clive Jones)			X		X			X	X	X	X		X		X		X
RR-0672 (Clive Salmon)			X					X		X			X				
RR-0673 (Clive Sloman)			X		X			X		X			X			X	
RR-0674 (Cllr Jessica Fleming)		X						X		X	X	X					
RR-0675* (Coggeshall Parish Council)	X		X		X		X	X	X		X		X	X		X	X
RR-0677 (Colin Andrew Sharman)	X		X		X	X		X	X	X	X				X	X	X
RR-0678 (Colin Anthony Leek)			X					X		X	X					X	X
RR-0679 (Colin Bright)			X					X		X			X			X	
RR-0680 (Colin Brown)			X		X			X				X	X				X
RR-0681 (Colin Cutler)	X		X					X			X		X				
RR-0682 (Colin Dyke)			X					X					X			X	X

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RR-0683 (Colin Francis Cownden)		X															
RR-0684 (Colin Frank Chapman)			X		X			X							X		
RR-0685 (Colin John Bowden)			X					X		X							
RR-0686 (Colin John Brown)			X		X			X	X	X		X	X			X	X
RR-0687 (Colin John Walpole)			X					X		X						X	X
RR-0688 (Colin Kinch)								X		X			X				
RR-0689 (Colin Moran)			X					X	X	X	X	X	X				
RR-0690 (Colin Pinson-Roxburgh)			X		X			X			X						
RR-0691 (Colin Smith)			X		X	X		X	X	X		X	X				X
RR-0692 (Colin Theobald)	X		X	X	X				X				X		X		X
RR-0693 (Colin William Clifford)			X										X			X	
RR-0694 (Colleen Moore)								X					X				
RR-0695 (Conrad Energy)			X			X		X		X			X	X		X	X
RR-0696 (Constance MacKenzie)			X		X			X	X	X			X		X	X	X
RR-0697 (Copyfarm (Blackmore) Ltd)	X		X		X	X	X	X	X	X	X	X	X		X	X	X
RR-0698 (Corinne Boyce)			X					X			X		X				
RR-0699 (Corinne Yvonne Hignett)	X		X					X		X		X	X			X	X

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RR-0700* (Cotton Parish Council)	X		X	X	X	X		X	X	X		X	X		X	X	X
RR-0701* (Councillor Lesley Anne Wagland)	X		X	X	X	X	X	X	X	X	X		X	X	X	X	
RR-0702*(Councillor Sara Naylor)								X		X			X			X	
RR-0703 (Courtney Blundell)			X	X	X	X	X	X		X		X	X		X	X	X
RR-0704 (CPRE - The Countryside Charity)			X		X	X	X	X	X							X	X
RR-0705 (CPRE Norfolk)			X		X	X		X		X	X					X	X
RR-0706 (Craig Caveney)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0707 (Craig Peterson)	X		X		X			X		X	X					X	X
RR-0708 (Crest Nicholson)					X	X								X			
RR-0709 (Cristina Villiers)			X					X		X		X	X		X	X	X
RR-0710 (Crouch Solar Farm Limited)			X	X	X		X			X		X		X			
RR-0711 (Cullum Agri Ltd)				X	X												
RR-0712 (Cynthia Mary Hewett)	X		X					X		X		X	X				
RR-0713 (Cyryna Barritt)			X														
RR-0714 (D.N. Grady & Sons Limited)	X		X		X	X		X									X
RR-0715 (Daja Jacqueline O'Kelly)	X		X	X				X	X	X			X		X		X
RR-0716 (Dale Edward Higginbottom)			X		X	X	X	X		X	X	X	X				X

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RR-0717 (Dale Kaszycki)					X			X		X			X			X	X
RR-0718 (Dan Edwards)	X		X					X		X			X			X	X
RR-0719 (Dan Esdale)			X	X	X			X		X			X		X		X
RR-0720 (Dandara Strategic Land)				X													
RR-0721 (Daney Wilkinson)			X								X						
RR-0722 (Daniel Bebbington)			X							X		X	X			X	X
RR-0723 (Daniel Digby)	X		X	X			X	X	X	X	X	X	X		X	X	X
RR-0724 (Daniel Henderson)	X			X	X			X		X		X	X	X			
RR-0725 (Daniel James Bickford)			X	X	X	X		X		X		X	X		X		
RR-0726 (Daniel Marsham)	X		X		X		X	X	X	X		X	X	X		X	X
RR-0727 (Daniel Morris)			X	X				X								X	
RR-0728 (Daniel Osman)	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
RR-0729 (Daniel Parr)								X									X
RR-0730 (Daniel Pratt)			X		X			X	X							X	
RR-0731 (Daniel Robinson)			X		X	X		X		X			X				X
RR-0732 (Daniel Shelley)						X											
RR-0733 (Daniel Shepherd)			X		X			X		X			X				X

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RR-0734 (Daniel Squirrell)					X												
RR-0735 (Daniel Welch)			X					X		X		X				X	
RR-0736 (Daniele Spiers)			X														
RR-0737 (Danielle Booth)			X		X			X		X	X		X				
RR-0738 (Danielle Levart)	X		X					X	X	X	X		X				X
RR-0739 (Danielle Siggins)			X	X	X			X		X		X	X		X	X	X
RR-0740 (Danny Silverosa)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0741 (Daphne Dickson)			X					X					X				
RR-0742 (Daren Andrews)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0743 (Darius G Laws)			X			X		X		X							
RR-0744 (Darran Clarke)					X		X					X	X				X
RR-0745 (Darrell Wood)	X			X				X			X		X		X		X
RR-0746 (Darren Clark)													X				X
RR-0747 (Darren Hepple)			X										X			X	
RR-0748 (Darren James Bartholomew)				X									X		X		
RR-0749 (Darren John Davies)			X				X	X		X			X			X	X
RR-0750 (Darren Luckett)			X				X	X		X			X				X

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RR-0751 (Darren Reynolds)			X		X			X		X							X
RR-0752 (Darren Thompson)					X			X		X	X					X	
RR-0753 (Darren Webster)														X	X		
RR-0754 (Darron Brough)								X									
RR-0755 (Dave Anderson)			X				X	X		X	X	X	X			X	
RR-0756 (Dave Butler)			X	X	X	X		X			X	X	X		X	X	X
RR-0757 (Dave Challinor)				X				X	X						X	X	X
RR-0758 (David and Andrea Llewellyn)			X		X	X		X	X			X	X			X	
RR-0759 (David and Judy Starling)					X												X
RR-0760 (David Anderson)			X					X								X	X
RR-0761 (David Andrew Chapman)			X			X											
RR-0762 (David Andrew Pooley)			X		X			X		X							X
RR-0763 (David Andrews)			X							X						X	
RR-0764 (David Bartle)		X	X					X		X							
RR-0765 (David Berg)			X				X	X		X		X	X		X		
RR-0766 (David Bezkorowajny)			X	X				X		X		X	X		X	X	
RR-0767 (David Black & Son Ltd)			X		X					X							

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RR-0768 (David Bonner)			X		X			X		X	X	X				X	
RR-0769 (David Brothers)			X	X	X	X		X		X		X			X		
RR-0770 (David Brown)													X			X	
RR-0771 (David Bryant)			X					X	X	X		X	X			X	X
RR-0772 (David Burns)	X		X			X		X	X				X	X			X
RR-0773 (David Burton)			X		X		X	X		X			X		X	X	X
RR-0774 (David C Hicks)	X		X	X	X		X	X	X	X			X		X	X	
RR-0775 (David Calvert)			X			X				X						X	X
RR-0776 (David Cant)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0777 (David Charles Lowe)						X		X					X			X	X
RR-0778 (David Collins)			X		X			X	X			X				X	
RR-0779 (David Dunn)	X		X	X	X		X	X		X	X		X	X		X	X
RR-0780 (David Eaton)				X			X	X		X	X		X		X	X	
RR-0781 (David Evans)					X							X	X				X
RR-0782 (David Foulger)		X	X				X	X		X			X				X
RR-0783 (David Francis Taylor)			X		X			X		X						X	
RR-0784 (David Funnell)			X							X	X						

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RR-0785 (David Geary)			X		X	X		X		X	X		X	X		X	
RR-0786 (David Gooderham)			X					X		X							
RR-0787 (David Graham Tuthill)			X			X		X		X	X	X	X			X	X
RR-0788 (David Guntern-Shea)			X					X		X	X		X	X		X	X
RR-0789 (David Hardy)	X			X			X	X					X		X		X
RR-0790 (David Hillyer)								X		X						X	
RR-0791 (David Holmes)			X		X		X	X	X	X	X		X			X	X
RR-0792 (David Hulin)			X					X		X	X		X		X		X
RR-0793 (David Hunt)				X	X			X				X					
RR-0794 (David Ingrey)	X		X					X		X			X		X	X	
RR-0795 (David Ireland)			X		X	X		X	X	X					X		
RR-0796 (David Jewell)			X										X				
RR-0797 (David John Chilvers)			X		X			X		X			X			X	X
RR-0798 (David John Ford)			X		X			X	X	X	X		X		X		X
RR-0799 (David John Goodwin)			X					X		X			X				
RR-0800 (David John Mason)	X		X	X	X			X	X	X		X	X	X	X	X	
RR-0801 (David John Meachem)			X	X				X		X		X	X		X	X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-0802 (David John Parrish)					X		X	X		X			X			X	X
RR-0803 (David John Skinner)	X		X	X		X		X		X		X	X		X		
RR-0804 (David Johnson)	X		X	X	X					X			X	X	X	X	
RR-0805 (David Jones)			X					X	X	X	X		X				
RR-0806 (David Julian Thorne)			X	X				X								X	
RR-0807 (David Kemp)	X			X	X			X		X			X		X		
RR-0808 (David King)	X		X	X	X			X		X			X		X	X	
RR-0809 (David Lavender)								X									
RR-0810 (David Leonard Rhys Charles)			X		X			X	X	X			X		X	X	
RR-0811 (David Lesley Dent)	X		X					X		X		X	X				X
RR-0812 (David Lifton)								X					X		X		
RR-0813 (David Lomas)			X	X				X			X		X				X
RR-0814 (David Madge)	X		X					X	X	X	X					X	
RR-0815 (David Major)			X	X			X	X			X		X		X		X
RR-0816 (David Marcus)				X				X	X	X					X	X	
RR-0817 (David Mathews)	X		X		X	X	X	X	X	X	X	X	X			X	X
RR-0818 (David Mclaren Anderson)			X					X		X						X	X

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RR-0819 (David Meek)			X		X			X	X	X	X						
RR-0820 (David Michael Gillon Lewis)	X																
RR-0821 (David Millar)										X			X			X	
RR-0822 (David Mitchell)			X				X	X		X			X	X			X
RR-0823 (David Morrissey)			X	X			X	X		X						X	X
RR-0824 (David Mould)	X		X					X		X		X	X				X
RR-0825 (David Mumford)								X							X		X
RR-0826 (David Munro)		X															
RR-0827 (David Parrish)							X	X		X			X			X	X
RR-0828 (David Pearce)	X		X		X		X	X	X	X	X	X	X		X	X	X
RR-0829 (David Ralph Metson)					X			X			X						
RR-0830 (David Raymond Jewell)			X					X		X	X		X				
RR-0831 (David Redmond)								X					X			X	
RR-0832 (David Roberts)										X			X				
RR-0833 (David Rusbridge)		X	X										X				
RR-0834 (David Salmon)	X		X	X	X		X	X		X		X	X	X		X	
RR-0835 (David Schofield)	X		X		X	X		X		X		X	X			X	X

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RR-0836 (David Shaw)								X					X			X	
RR-0837 (David Snook)			X										X				
RR-0838 (David Stacey)	X		X		X	X	X	X	X	X	X	X	X		X		X
RR-0839 (David Stanley Sumner)								X							X		
RR-0840 (David Sturgeon)	X		X					X		X	X	X	X				X
RR-0841 (David Thilthorpe)			X	X	X		X	X		X		X	X		X	X	X
RR-0842 (David Thomas)			X					X		X					X		
RR-0843 (David Ward)	X		X							X	X	X			X		X
RR-0844 (David Wass)	X		X		X	X	X	X	X	X	X	X	X		X	X	X
RR-0845 (David Whalley)			X					X								X	
RR-0846 (David William Mallett)								X		X						X	X
RR-0847 (David Williams)										X						X	
RR-0848 (David Wright)	X		X		X			X		X		X	X		X	X	X
RR-0849 (David Yasruddin)			X		X			X		X			X				
RR-0850 (Davina King)			X					X		X			X			X	
RR-0851 (Dawn Beverly Lenox)			X					X					X				
RR-0852 (Dawn Crouchman)								X		X		X	X				X

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RR-0853 (Dawn Elizabeth Flood)	X		X		X		X	X		X	X		X		X	X	
RR-0854 (Dawn Holmes)	X	X	X		X	X	X	X	X	X	X	X	X			X	X
RR-0855 (Dawn Mary Edwards)								X				X	X				X
RR-0856 (Dawn McClean)			X	X				X		X		X					X
RR-0857 (Dawn McMinn)					X			X	X		X		X				X
RR-0858 (Dawn Monrose)								X									
RR-0859 (Dawn Welsby)	X		X	X				X		X	X		X		X		X
RR-0860 (Dean Lincoln)								X				X					X
RR-0861 (Dean Smith)								X	X				X		X		
RR-0862 (Deana Bird)				X				X		X					X		X
RR-0863 (Deb Hodgetts)			X	X				X		X						X	X
RR-0864 (Debbie Gaze)			X							X			X			X	
RR-0865 (Debbie Joyce)	X		X					X									
RR-0866 (Debbie Lamond)			X	X				X	X	X		X	X		X	X	X
RR-0867 (Debbie White)								X									
RR-0868 (Deborah Aitken)			X				X						X				
RR-0869 (Deborah Barker)			X		X			X				X	X			X	X

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RR-0870 (Deborah Blackman)								X								X	
RR-0871 (Deborah Bowring)								X				X	X				X
RR-0872 (Deborah Hardy)			X	X	X			X		X			X			X	
RR-0873 (Deborah Harvey)	X		X		X	X		X	X		X		X	X	X	X	X
RR-0874 (Deborah Jane Millar)			X	X						X			X		X	X	
RR-0875 (Deborah Jane Paddock)								X	X	X			X		X	X	X
RR-0876 (Deborah Jane Poulton)								X									
RR-0877 (Deborah Jane Sharman)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0878 (Deborah Jane Tracey)			X						X	X		X	X			X	
RR-0879 (Deborah Mary Hatchman)	X							X		X			X				
RR-0880 (Deborah Mylod)			X				X	X		X		X	X		X		X
RR-0881 (Deborah Parkin)			X					X		X						X	X
RR-0882 (Deborah Pooley)			X					X		X	X					X	X
RR-0883 (Deborah Rampton)			X		X	X	X	X	X	X	X	X	X		X		X
RR-0884 (Deborah Ribbons)			X				X	X		X	X	X	X			X	X
RR-0885 (Deborah Rogers)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0886 (Deborah Rose Howell)		X	X	X	X			X	X	X					X		X

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RR-0887 (Deborah Stones)			X										X				X
RR-0888 (Deborah Willingale)	X		X								X		X				X
RR-0889 (Debra Davies)	X			X				X		X							
RR-0890 (Debra Kingston)										X						X	X
RR-0891* (Dedham Parish Council)	X		X			X	X	X	X	X			X	X	X	X	X
RR-0892 (Dedham Vale AONB Pylons Campaign group)	X		X		X	X		X	X	X			X	X	X	X	X
RR-0894 (Dedham Vale Society)			X		X	X		X	X	X			X	X		X	X
RR-0896 (Delta Dunston Hall Op Co Ltd)					X			X									
RR-0897 (Denis Coyle)				X				X					X		X		X
RR-0898 (Denise Clarke)		X	X		X			X			X						
RR-0899 (Denise Foster)	X		X	X	X			X			X		X	X	X		
RR-0900 (Denise Giles)				X	X			X		X		X	X			X	X
RR-0901 (Denise Hill)								X				X					
RR-0902 (Denise Jillian Sowerbutts)			X					X		X						X	
RR-0903 (Denise Justina Higginbottom)			X	X	X	X		X		X	X	X	X	X	X	X	X
RR-0904 (Dennis Adams)								X					X		X		X
RR-0905 (Dennis Gosling)			X														X

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RR-0906 (Dennis Herbert Salt)								X		X	X						X
RR-0907 (Dennis Watts)	X		X	X	X	X	X	X	X	X	X		X	X	X	X	X
RR-0908 (Derek Giles)	X	X	X					X		X		X	X				X
RR-0909 (Derek Lance Hartley)				X				X					X				
RR-0910 (Derek Mark Heasman)									X								
RR-0911 (Deren Aygin)			X					X		X							X
RR-0912 (Deryck Russell)			X					X		X			X			X	X
RR-0913 (Desmond O Brien)		X															
RR-0914 (Desmond Pearce)			X				X	X		X			X				
RR-0915 (Details Ltd / operator of Raydon Wings Aerodrome)	X			X	X		X			X			X				
RR-0916 (Diana Acaster)								X	X	X							X
RR-0917 (Diana Gibbs)	X					X	X	X					X				
RR-0918 (Diana Littler)	X		X		X	X		X			X		X		X	X	X
RR-0919 (Diana Lockwood)			X					X		X				X			X
RR-0920 (Diana Taylor)			X		X			X		X	X		X	X		X	
RR-0921 (Diana Whitfield)	X		X	X	X		X	X	X	X	X		X		X	X	X
RR-0922 (Diane Bull)	X			X	X			X		X	X	X	X	X		X	

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RR-0923 (Diane Evelyn Chase)	X		X		X			X	X							X	
RR-0924 (Diane Read)			X					X		X							X
RR-0925 (Dick Lanham)	X		X	X	X			X		X		X	X		X		X
RR-0926 (Dillon Dennis)			X					X		X		X	X			X	X
RR-0927 (Director Tracey Woolley)													X				
RR-0928* (Diss Town Council)			X	X				X	X	X	X	X	X				X
RR-0929 (Dom Kingston)			X	X	X					X			X		X		X
RR-0930 (Dominic Fisher)			X		X			X		X		X	X		X	X	X
RR-0931 (Dominic Petre)	X		X		X	X		X	X	X		X	X	X		X	X
RR-0932 (Dominique McCarthy)			X		X			X		X		X	X	X			X
RR-0933 (Donald Aubrey Murray Birkinshaw)			X					X		X			X				
RR-0934 (Donald John Campbell)			X		X	X		X	X			X	X	X	X	X	X
RR-0935 (Donald Menzies)			X	X				X		X	X					X	
RR-0936 (Donald Milne)													X				
RR-0937 (Donna Hadsley-Chaplin)			X					X					X				
RR-0938 (Donna Jae Parrish)			X					X		X		X					X
RR-0939 (Donna levett)								X					X		X		

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RR-0940 (Donna Wenden)			X		X			X				X	X				
RR-0941 (Doreen Missing)	X		X		X			X		X			X			X	X
RR-0942 (Doreen Mutton)			X					X		X			X			X	X
RR-0943 (Doreen Wrinch)	X			X				X				X	X				
RR-0944 (Dorothy Kathleen Guthrie)	X												X				X
RR-0945 (Douglas Bourn)								X					X			X	X
RR-0946 (Douglas McTurk)	X		X	X	X		X	X		X			X	X		X	
RR-0947 (Douglas Robert Wade)	X	X	X	X	X	X	X	X	X	X			X			X	X
RR-0948 (Douglas Shaw)			X					X			X		X		X		
RR-0949 (Douglas Stevan Scutt)												X	X				
RR-0950 (Douglas Suttle)			X					X		X						X	
RR-0951 (Dr Ann Catherine Robey)			X					X		X			X				X
RR-0952 (Dr Belinda J Godbold)			X								X		X		X		
RR-0953 (Dr Ben Knighton)	X		X					X									
RR-0954 (Dr E D Gordon)					X			X		X			X		X		
RR-0955 (Dr Emma L Harrold)	X		X	X				X	X	X			X			X	X
RR-0956 (Dr Keith Hotchkiss)			X				X	X		X			X		X	X	

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RR-0957 (Dr Mike Armstrong-Jones)								X		X			X				
RR-0958 (Dr Nigel Sleigh- Johnson)			X	X				X			X		X		X		X
RR-0959 (Dr Paul Cattermole)	X		X				X	X			X	X	X			X	
RR-0960 (Dr Peter Batchelor)			X		X			X	X	X	X				X	X	
RR-0961 (Dr. Marion May Black)					X							X					
RR-0962 (Dr. Michael John Merrick)			X		X	X		X	X	X	X		X			X	X
RR-0963 (Dr. Pamela Joy Merrick)			X		X	X		X	X	X	X	X	X			X	X
RR-0964 (Dulcie Louise Lofting)			X					X		X	X		X				
RR-0965 (Dunton Community Association)			X		X	X		X	X	X	X	X	X	X		X	X
RR-0966 (E B Gowing)	X		X		X		X			X	X		X			X	
RR-0967 (E Halsall & Sons LTD)	X				X			X								X	
RR-0968 (E R Lings & Sons Limited)					X												
RR-0969 (E S Cole & Sons Limited)					X												
RR-0970 (E. A. and H. M. Bull Limited (trading as Harlequin))						X						X					
RR-0971* (Earl Stonham Parish Council)	X		X		X	X	X	X	X	X	X	X	X		X		X
RR-0972* (East Bergholt Parish Council)			X					X		X			X		X		
RR-0973* (East Suffolk Council)			X		X	X		X		X				X			

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RR-0975 (EcoPower Suffolk Limited)						X		X						X			
RR-0976 (Edel Rew)			X					X		X	X		X			X	
RR-0977 (Eden Renewables (Eden CF Solar Ltd))				X	X							X		X	X		
RR-0978 (Edward Cleverley)			X					X					X				
RR-0979 (Edward John Mayne)								X								X	X
RR-0980 (Edward Jonathan Lewis)				X				X			X		X			X	X
RR-0981 (Edward Keeler)	X		X							X			X			X	X
RR-0982 (Edward Kettell)	X		X		X	X		X	X	X	X			X	X	X	X
RR-0983 (Edward Towns)			X		X			X		X			X			X	
RR-0984 (Edward Whittle)	X		X	X	X	X		X	X	X	X		X		X	X	X
RR-0985 (Edwin Black)								X	X							X	
RR-0986* (Eight Ash Green Parish Council)	X		X	X	X		X	X		X			X		X		X
RR-0987 (Eileen Collins)								X									
RR-0988 (Eileen Josephine Barratt)			X		X			X		X	X						
RR-0989 (Eileen Shadford)			X	X				X		X	X					X	
RR-0990 (Eira Featley)			X				X	X									
RR-0991 (Elaine Allen)			X					X			X						X

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RR-0992 (Elaine Allen)			X		X			X									
RR-0993 (Elaine Crook)			X		X	X	X	X	X	X	X	X	X			X	X
RR-0994 (Elaine Emmerson)			X					X		X							
RR-0995 (Elaine Hinchliffe)			X	X				X		X	X	X	X		X	X	X
RR-0996 (Elaine Major)			X	X		X		X		X	X		X		X	X	X
RR-0997 (Elaine Murray)			X		X			X	X	X		X	X		X		X
RR-0998 (Elaine Parkinson)			X					X					X				
RR-0999 (Elaine Tuffield)	X		X					X		X						X	X
RR-1000 (Eleana Marshall)			X	X	X	X		X	X	X	X		X	X	X	X	X
RR-1001 (Eleanor Cole-Broatch)	X		X				X	X		X		X	X				X
RR-1002 (Eleanor Day)	X		X	X			X	X	X	X	X	X	X		X	X	X
RR-1003 (Eleanor Hancock)	X		X		X			X		X	X				X		
RR-1004 (Eleanor Jenkins)	X			X	X		X	X		X			X		X	X	X
RR-1005 (Elena Abela)			X					X		X	X		X			X	
RR-1006 (Elinor Taylor)								X		X							
RR-1007 (Elisabeth Ann Tolhurst)								X		X			X				
RR-1008 (Elisabeth Whitehair)	X		X	X	X			X		X	X					X	X

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RR-1009 (Elise Brett)			X	X	X			X		X		X	X		X	X	X
RR-1010 (Elisha Burns)	X		X		X	X		X	X	X	X			X	X	X	X
RR-1011 (Elizabeth Baker)								X								X	
RR-1012 (Elizabeth Baxter)	X		X		X			X	X	X			X			X	X
RR-1013 (Elizabeth Bell)			X		X					X	X		X			X	X
RR-1014 (Elizabeth Bloom)			X							X		X					
RR-1015 (Elizabeth Charlotte Randall Woodhall)	X		X			X	X	X				X	X			X	X
RR-1016 (Elizabeth Charnley)								X							X		
RR-1017 (Elizabeth Clarke)			X					X		X			X			X	X
RR-1018 (Elizabeth Cole)	X							X									X
RR-1019 (Elizabeth Durlacher)			X					X									
RR-1020 (Elizabeth Duvoisin)			X					X									
RR-1021 (Elizabeth Edey)			X										X				
RR-1022 (Elizabeth French)			X							X							
RR-1023 (Elizabeth Mary Baxter)			X		X		X	X		X	X		X			X	X
RR-1024 (Elizabeth Passmore)	X	X	X		X			X	X	X			X	X		X	X
RR-1025 (Elizabeth Potter)			X			X		X		X			X			X	X

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RR-1026 (Elizabeth Reed)	X			X				X							X	X	X
RR-1027 (Elizabeth Reynolds)			X	X	X	X	X	X		X		X	X		X		X
RR-1028 (Elizabeth Sprunt)					X								X				
RR-1029 (Elizabeth Susan Leek)			X					X									X
RR-1030 (Elizabeth Ward)			X									X	X				X
RR-1031 (Elizabeth Xenakis)								X					X				
RR-1032 (Ellalyn Godfrey)			X		X				X				X				
RR-1033 (Elle Youngs)	X		X	X				X		X		X	X				X
RR-1034 (Ellen Jade Radley)			X					X	X	X		X	X			X	X
RR-1035 (Ellen Petersen)			X					X	X	X			X	X	X	X	
RR-1036 (Ellena Benton)										X							
RR-1037 (Elliot MacInnes)								X								X	
RR-1038 (Elliott Peacock)			X	X				X		X		X	X		X	X	
RR-1039 (Elmya Energy UK)														X			
RR-1040 (Elspeth Elinor Knott)	X		X					X		X	X		X	X			
RR-1041 (Emily Barrell)			X					X		X			X		X		X
RR-1042 (Emily Bewg)			X	X	X			X		X			X				

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RR-1043 (Emily Bird)			X					X		X							
RR-1044 (Emily Clark)		X	X		X			X									
RR-1045 (Emily Grace McGougan)	X		X	X	X	X		X		X		X	X	X	X	X	X
RR-1046 (Emily Meaney)			X					X		X			X			X	X
RR-1047 (Emily Muir)								X									
RR-1048 (Emily Norbury)			X						X	X							
RR-1049 (Emily Schaefer)	X						X	X	X				X		X	X	
RR-1050 (Emily Talbut)								X		X		X	X				
RR-1051 (Emily Williams)			X					X		X			X			X	X
RR-1052 (Emma Alfieri)			X					X		X						X	X
RR-1053 (Emma Alice Corbel Scofield)				X	X		X	X		X			X			X	
RR-1054 (Emma Allen)										X			X			X	
RR-1055 (Emma Baker)			X					X		X			X		X		X
RR-1056 (Emma Barron)			X							X		X	X				
RR-1057 (Emma Black)								X		X			X		X		X
RR-1058 (Emma Chipperfield)			X					X		X						X	X
RR-1059 (Emma Christine Wallace)						X		X	X	X			X			X	X

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RR-1060 (Emma Cooke)								X					X				X
RR-1061 (Emma Curtis)			X				X		X				X				X
RR-1062 (Emma Dent)			X	X	X		X	X		X	X		X		X	X	X
RR-1063 (Emma Evans)	X		X	X	X		X	X		X	X	X	X		X	X	X
RR-1064 (Emma Farmer)			X					X					X		X		X
RR-1065 (Emma Featherstone)	X		X					X	X	X	X		X	X		X	X
RR-1066 (Emma Floyd)			X					X		X			X			X	X
RR-1067 (Emma Jane Larner)					X			X		X			X				X
RR-1068 (Emma Katie Tunmore)			X	X		X		X		X	X		X	X	X		
RR-1069 (Emma Rouse)			X	X								X	X		X		X
RR-1070 (Emma Somers)			X					X	X		X		X				X
RR-1071 (Emma Swift)			X				X	X		X			X		X		X
RR-1072 (Emma Wallis)								X	X				X		X	X	
RR-1074 (Eric Roland Creber)			X		X			X			X					X	
RR-1075 (Eric Townsend)			X					X					X	X			X
RR-1076 (Eric Warnes)			X		X			X		X	X					X	X
RR-1077 (Erica Ley)								X		X			X				X

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RR-1078 (Erik Belloy)			X	X	X	X		X		X		X	X	X	X	X	X
RR-1079 (Erik Ellis)		X	X	X	X	X		X	X	X			X		X		X
RR-1080 (Erin Thorogood)	X				X			X				X	X		X		
RR-1081 (Essex Area Ramblers)								X							X		
RR-1082 (Essex Bridleways Association)					X	X				X			X		X		
RR-1084 (Essex Federation of Young Farmer's Clubs)				X	X					X			X				
RR-1085 (Essex Local Access Forum (ELAF))						X											
RR-1086 (Essex Lucinda Hughes)			X					X		X			X				
RR-1087 (Essex Police)					X	X		X		X			X	X	X	X	
RR-1088* (Essex Resilience Forum- Essex Fire & Rescue)													X				
RR-1089 (Essex Scouts and Guides)	X		X	X	X	X	X	X	X	X	X	X	X			X	X
RR-1091 (Estella Woods)								X									
RR-1092 (Estelle Agnew)			X					X		X			X				X
RR-1093 (Esther Hibbler)	X		X	X			X	X		X	X		X			X	X
RR-1094 (Esther Shelton)			X		X			X			X		X		X	X	X
RR-1095 (Eva Margaret Cullum)			X					X		X		X	X				
RR-1096 (Eva Rachel Turner)	X		X		X		X	X					X			X	

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RR-1097 (Eva Wisenbeck)	X		X					X		X			X				X
RR-1098 (Eve Stanton Dunne)			X		X				X	X		X	X			X	X
RR-1099 (Evelyn Leigh)													X				
RR-1100 (Evelyne Conrad-Bell)			X					X	X						X		
RR-1101 (Evergreen Office Supplies Limited)			X					X		X			X			X	X
RR-1102 (Evie Berg)			X					X		X			X			X	X
RR-1104 (F. John Blake)	X		X		X			X					X		X	X	X
RR-1105 (Facial Aesthetics)			X				X			X			X				
RR-1106 (Faith Dawn Hobbs)			X	X				X					X		X		
RR-1107 (Faith Marchal)	X			X	X			X	X						X	X	X
RR-1108 (Farrukh Shamshad)															X		
RR-1109 (Fay Sweet)								X		X	X						X
RR-1110 (Faye Ford)			X					X		X			X		X		
RR-1111 (Faye Wheeler)			X		X			X		X		X	X			X	X
RR-1112* (Feering Parish Council)	X			X				X					X		X	X	
RR-1113 (Felicity Grundy)								X									
RR-1114 (Felicity Spink)			X					X		X						X	

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RR-1115 (Felix Matthew Rogers)			X					X		X			X			X	
RR-1116 (Fergus William Rogers)			X					X									X
RR-1117 (Ffion Acland)	X		X		X		X	X		X					X		X
RR-1118* (Finningham Parish Council)	X		X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-1119 (Finn's)	X		X				X						X				
RR-1120 (Fiona Burgess)			X					X		X			X			X	X
RR-1121 (Fiona Curtis)	X		X		X			X		X	X		X			X	
RR-1122 (Fiona Cutting)										X			X				X
RR-1123 (Fiona Jane Sparrow)			X	X	X			X		X	X				X	X	X
RR-1124 (Fiona Kingston)	X		X				X	X		X			X				X
RR-1125 (Fiona Lau)										X			X				
RR-1126 (Fiona Lucas)	X		X	X		X		X		X		X	X	X	X	X	X
RR-1127 (Fiona Melrose)			X					X								X	
RR-1128 (Fiona Rogers)			X					X		X	X						
RR-1129 (Fiona Smith)	X		X		X			X		X	X	X	X			X	X
RR-1130 (Fiona Stacey)	X		X	X	X					X			X			X	X
RR-1131 (Fiona Webb)			X					X		X							

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RR-1132 (Fiske Lands Trust)	X		X	X	X	X	X	X	X		X	X	X		X	X	X
RR-1133 (Five Estuaries Offshore Wind Farm)						X								X			
RR-1134 (Flora Leone)			X	X				X	X	X	X	X	X		X	X	X
RR-1135 (Flowton Parish Meeting)			X	X	X			X					X	X	X	X	
RR-1136 (Fordham Local History Society)			X					X	X							X	X
RR-1137* (Fordham Parish Council (Essex))	X		X		X	X	X	X	X	X			X		X		
RR-1138* (Forestry Commission)				X				X	X						X		X
RR-1139* (Forncett Nature Matters)			X		X			X	X	X			X	X	X	X	X
RR-1140* (Forncett Parish Council)			X		X			X		X		X				X	X
RR-1141 (Fowler Stephen)				X						X			X		X		
RR-1142 (Frances Beasley)			X		X			X	X		X		X		X		
RR-1143 (Frances Brook)				X	X	X						X					
RR-1144 (Frances Ingleton)	X							X							X	X	
RR-1145 (Frances Moore)	X												X				X
RR-1146 (Francesca Chantry)			X						X			X	X				
RR-1147 (Francis Gomez)			X	X	X	X		X				X	X		X		X
RR-1148 (Francis Ian Rigby)			X	X				X									X

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RR-1149 (Francis Paul Smiddy)													X				
RR-1150 (Francoise and Jamie Ashfield)			X	X				X		X					X	X	
RR-1151 (Frank James Barclay)	X			X	X		X	X		X			X		X	X	X
RR-1152 (Frank Lepand)			X		X			X		X							X
RR-1153 (Fraser Craig)				X	X			X				X	X		X		X
RR-1154 (Fraser Donald)	X		X				X	X		X			X			X	X
RR-1155 (Fraser Massey)				X										X			
RR-1156 (Frederick Davis-Pipe)					X			X	X	X			X		X	X	X
RR-1157 (G W Burton)			X					X		X			X				
RR-1158 (G W Webster & Son Ltd)			X		X				X			X					
RR-1159 (Gabriel Barton)		X				X											
RR-1160 (Gabriella Oshea)	X		X	X				X					X		X		X
RR-1161 (Gail Carpenter)								X					X				X
RR-1162 (Gail Gibson)	X		X	X				X		X					X		X
RR-1163 (Gail Samantha Mary Wilson)			X					X		X							
RR-1164 (Gail Varle)				X								X	X				
RR-1165 (Gail Williamson)	X						X	X					X				

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RR-1166 (Garance Lawrence)			X	X	X			X		X		X	X		X		X
RR-1167 (Gareth Morgan)			X	X	X			X			X						
RR-1168 (Gareth Pressley)	X		X	X	X			X	X	X	X	X	X			X	X
RR-1169 (Gareth Walsh)								X					X				
RR-1170 (Gary and Julie Sharp)	X		X	X	X	X		X	X	X		X	X				X
RR-1171 (Gary Bradshaw)	X		X	X	X	X		X		X		X	X				X
RR-1172 (Gary Dawkin)				X	X				X			X	X				X
RR-1173 (Gary Edward Howell)				X	X										X		
RR-1174 (Gary John Abraham)			X					X		X							X
RR-1175 (Gary John Waller)	X		X		X			X		X		X	X		X	X	X
RR-1176 (Gary Palmer)								X									
RR-1177 (Gary Steven Cole)			X	X		X	X			X	X		X		X	X	X
RR-1178 (Gavin Butcher)			X	X				X		X							
RR-1179 (Gavin Macfarlane)	X		X					X		X							
RR-1180 (Gavin Mills)					X			X		X			X			X	
RR-1181 (Gavin Reed)			X	X			X	X		X			X		X	X	X
RR-1182 (Gavin Sadler)	X		X			X		X	X	X	X		X	X	X	X	X

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RR-1183 (Gavin Tarbard)			X					X		X							
RR-1184 (Gavin White)	X		X		X	X		X	X	X	X			X	X	X	X
RR-1185 (Gaynor Hartley)	X		X				X	X		X			X			X	X
RR-1186 (GDPR N2T-003)	X		X	X		X		X				X	X		X	X	X
RR-1187 (GDPR N2T-008)								X		X						X	
RR-1188 (GDPR N2T-009)	X		X		X	X		X	X	X	X			X	X	X	X
RR-1189 (GDPR N2T-010)								X				X	X		X		
RR-1190 (GDPR N2T-011)								X					X		X	X	
RR-1191 (GDPR N2T-012)								X		X			X				
RR-1192 (GDPR N2T-013)								X				X					
RR-1193 (GDPR N2T-015)					X			X	X				X		X		
RR-1194 (GDPR N2T-016)	X		X			X		X	X	X	X		X	X	X	X	X
RR-1195 (GDPR N2T-018)	X		X	X	X	X		X	X		X		X	X	X	X	X
RR-1196 (GDPR N2T-019)			X					X		X						X	X
RR-1197 (GDPR N2T-020)			X			X		X		X			X			X	X
RR-1198 (GDPR N2T-021)	X	X	X		X	X		X	X	X	X				X	X	X
RR-1199 (GDPR N2T-022)	X		X		X	X		X	X	X	X			X	X	X	X

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RR-1200 (GDPR N2T-023)	X						X	X		X			X		X		X
RR-1201 (GDPR N2T-024)	X		X	X	X	X	X	X	X			X	X			X	X
RR-1202 (GDPR N2T-025)			X		X			X		X			X			X	
RR-1203 (GDPR N2T-026)			X					X		X			X			X	X
RR-1204 (GDPR N2T-027)			X					X		X			X		X		X
RR-1205 (GDPR N2T-028)			X					X		X			X		X		X
RR-1206 (GDPR N2T-030)	X		X			X		X	X	X	X		X	X	X	X	X
RR-1207 (GDPR N2T-031)			X	X	X	X		X	X					X	X	X	X
RR-1208 (GDPR N2T-032)			X					X		X		X	X				
RR-1209 (GDPR N2T-033)			X					X		X	X		X		X		
RR-1210 (GDPR N2T-034)	X		X		X	X		X	X		X		X	X	X	X	X
RR-1211 (GDPR N2T-035)			X		X	X	X	X		X			X		X	X	X
RR-1212 (GDPR N2T-036)			X	X				X	X	X			X		X	X	X
RR-1213 (GDPR N2T-037)			X	X				X	X	X			X		X	X	X
RR-1214 (GDPR N2T-040)			X		X			X		X			X	X	X	X	X
RR-1215 (GDPR N2T-041)	X		X		X	X		X	X	X	X			X	X	X	X
RR-1216 (Gemma Browne)								X					X		X		X

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RR-1217 (Gemma Esdale)			X	X			X	X		X			X		X		X
RR-1218 (Gemma Lambert)		X	X						X	X			X		X		X
RR-1219 (Gemma Martin)			X		X			X	X	X		X				X	X
RR-1220 (Gemma Pike)	X		X					X	X	X							X
RR-1221 (Gemma Vettraino)	X		X				X	X		X			X			X	X
RR-1222 (Gemma Vosper)								X				X					X
RR-1223 (Gemma Watkins)			X					X		X			X			X	X
RR-1224* (General Aviation Awareness Council)		X	X		X								X			X	
RR-1225 (Geoffrey Alcoe)	X		X	X	X		X	X	X		X	X	X		X	X	X
RR-1226 (Geoffrey Gouriet)	X		X	X	X	X		X	X	X	X	X	X	X	X	X	X
RR-1227 (Geoffrey Philip White)			X					X		X	X		X				X
RR-1228 (Geoffrey Robert Bifield)			X					X		X			X				
RR-1229 (Geoffrey Roy Baker)			X		X			X		X						X	
RR-1230 (George Beedie)								X									X
RR-1231 (George Charles Erith)								X	X	X	X		X			X	
RR-1232 (George Constantinides)								X									
RR-1233 (George Henry de Montmorency Carbutt)			X					X		X	X		X			X	X

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RR-1234 (George Pearce)			X								X						
RR-1235 (George Williams)			X		X			X		X	X		X		X	X	X
RR-1236 (Georgeanna Thorogood)	X							X					X			X	
RR-1237 (Georgia Martinez)			X	X	X		X	X		X		X	X		X	X	X
RR-1238 (Georgie Davey)			X				X	X		X		X	X				
RR-1239 (Georgina Anne Gardiner)	X		X	X	X		X	X	X	X	X	X	X			X	
RR-1240 (Georgina Holt-Evans)								X		X							
RR-1241 (Georgina Langton)	X		X		X		X	X		X		X	X		X	X	X
RR-1242 (Georgina Loxton)								X				X	X		X		
RR-1243 (Georgina Moxham)			X		X			X		X		X	X		X	X	X
RR-1244 (Georgina Whittle)	X		X	X	X		X	X	X	X			X		X	X	X
RR-1245 (Gerald Anthony Malton)						X		X	X								
RR-1246 (Gerald Rix)	X		X		X	X		X	X	X	X			X	X	X	X
RR-1247 (Geraldine Menzies)	X		X		X		X	X		X	X		X			X	
RR-1248 (Gerard Marcel Horst)			X					X		X						X	
RR-1249 (Gethan White)													X				
RR-1250 (Ghizala Chaudry)			X	X				X		X		X	X		X		X

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RR-1251 (Giles & Sonia Coode Adams)	X		X		X	X		X	X	X		X	X		X		X
RR-1252 (Gill and John Mather)	X		X	X	X		X	X	X	X	X	X	X		X	X	X
RR-1253 (Gill Christmas)				X	X	X		X	X	X		X	X		X		
RR-1254 (Gill Watson)			X					X		X						X	
RR-1255 (Gillian Ann Whittle)	X			X	X	X		X	X	X		X	X		X		X
RR-1256 (Gillian Aston)			X		X					X	X		X			X	
RR-1257 (Gillian Bridges)			X	X				X			X	X			X	X	X
RR-1258 (Gillian Dockrill)			X			X	X	X	X	X		X	X		X		X
RR-1259 (Gillian Elaine Flack)	X		X	X	X			X		X			X		X		
RR-1260 (Gillian Horrocks)			X					X		X			X			X	X
RR-1261 (Gillian Leech)			X					X		X		X				X	X
RR-1262 (Gillian Marklew Allen)			X					X		X			X			X	
RR-1263 (Gillian Palmer)	X		X	X	X	X		X	X	X		X	X		X	X	X
RR-1264 (Gillian Parrish)	X			X	X			X		X			X			X	X
RR-1265 (Gillian Pyke)	X			X	X			X					X			X	X
RR-1266 (Gillian Smith)										X			X				
RR-1267 (Gillian Walker)	X							X					X		X	X	

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-1268 (Ginette Henderson)					X			X							X		X
RR-1269 (Giovanna Pannone)	X		X	X				X	X	X			X	X			X
RR-1270 (Giselle Flanagan)			X					X		X		X	X				X
RR-1271* (Gislingham Parish Council)				X	X		X	X	X		X		X	X	X	X	X
RR-1272 (Glenda Valerie Pritchard)		X	X	X		X	X	X	X	X	X		X		X		X
RR-1273 (Glenn Maleary)	X		X	X	X					X			X				
RR-1274 (Glyn Cullen)		X	X		X	X		X	X	X	X		X				X
RR-1275 (Glynis Robertson)					X			X		X	X		X				
RR-1276 (Glynis Taylor)	X			X						X		X			X		X
RR-1277 (Gordon Hooper)			X					X									X
RR-1278 (Gordon Steward)	X			X	X			X							X		X
RR-1279 (Goyle Weir)			X	X				X		X			X				X
RR-1280 (Grace Aitken)	X		X					X		X							X
RR-1281 (Graeme Crook)	X		X	X	X	X		X		X	X	X	X		X		X
RR-1282 (Graeme Knott)			X	X	X	X		X		X		X	X	X	X		
RR-1283 (Graeme Piercy)			X		X	X		X									X
RR-1284 (Graeme Robert Derby)			X		X			X	X	X			X			X	X

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RR-1285 (Graeme Robson)			X		X			X	X		X	X	X		X	X	X
RR-1286 (Graham Bagnall)			X			X	X	X		X			X				
RR-1287 (Graham Bernard Terry)			X			X		X		X	X						
RR-1288 (Graham Boutell)			X							X						X	
RR-1289 (Graham Card)			X		X			X		X			X				
RR-1290 (Graham Chappell)			X					X								X	
RR-1291 (Graham Dockrill)			X		X	X	X	X	X	X	X	X	X		X		X
RR-1292 (Graham Hewes)			X		X				X			X	X		X		X
RR-1293 (Graham Holton)			X			X		X	X	X	X	X	X		X	X	X
RR-1294 (Graham John Kitson)			X		X			X							X		X
RR-1295 (Graham John Wootton)								X		X	X		X			X	
RR-1296 (Graham Kenneth Cherry)	X		X		X			X		X			X		X	X	
RR-1297 (Graham Leigh)			X				X	X	X	X	X		X			X	
RR-1298 (Graham Mackenzie Ellison Barber)			X					X		X							
RR-1299 (Graham Moore)	X	X	X		X			X				X	X			X	X
RR-1300 (Graham Philip Wood)			X	X	X					X			X				
RR-1301 (Graham Robert Barney)	X		X					X		X			X	X	X	X	X

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RR-1302 (Graham Rout)								X							X		X
RR-1303 (Graham Rumbelow)			X						X	X			X				X
RR-1304 (Graham Smith)			X	X	X			X		X		X	X		X	X	X
RR-1305 (Graham White)							X	X				X	X				X
RR-1306 (Graham White)					X												
RR-1307 (Graham Wickes)			X						X	X			X		X		
RR-1308 (Graham Wuyts)			X					X					X			X	
RR-1309 (Grant Stanley Pilcher)			X	X	X							X	X				
RR-1310 (GRASSLANDS LTD)		X		X													
RR-1311* (Great and Little Leighs Parish Council)	X		X					X	X		X		X		X		X
RR-1312* (Great Bromley Parish Council)	X		X	X	X		X	X		X	X	X	X		X	X	X
RR-1313 (Great Cowbridge Grange Farm Ltd)	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
RR-1314* (Great Horkesley Parish Council)	X		X	X	X	X	X	X	X	X	X		X	X	X	X	X
RR-1315* (Great Tey Parish Council)			X	X	X		X	X	X	X		X	X		X	X	X
RR-1316 (Great Waltham Electrical Ltd)			X	X			X	X		X					X	X	
RR-1317* (Great Waltham Parish Council)			X		X							X			X		
RR-1318 (Greg Hounsom)			X					X		X			X				

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RR-1319 (Greg John Last)			X					X		X		X	X				
RR-1320 (Greg Stephens)			X														
RR-1321 (Gregory Allman)								X		X					X		
RR-1322 (Greta Price)			X	X	X			X		X		X	X		X	X	X
RR-1323 (Griffin Farms Ltd)			X							X			X	X			
RR-1324 (Guy French)	X		X	X	X	X	X	X		X			X			X	X
RR-1325 (Guy Lennox)										X		X					
RR-1326 (Guy Napthine)											X						
RR-1327 (Guy Varney)	X			X			X	X				X	X		X		X
RR-1328 (Gwyn Church)					X												
RR-1329 (H Tinney Ltd)			X	X			X	X		X		X	X	X			
RR-1330 (Hamish Clinton)			X		X			X					X				
RR-1331 (Hanna Maria Taylor)			X							X						X	
RR-1332 (Hannah Barton-Wells)								X				X	X				
RR-1333 (Hannah Dingley)								X							X		
RR-1334 (Hannah Marshall)	X		X	X	X					X		X	X			X	
RR-1335 (Hannah Miller)								X		X							X

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RR-1336 (Hannah Mulvey)			X					X		X		X					
RR-1337 (Hannah Nixon)				X	X			X			X	X	X		X	X	X
RR-1338 (Hannah Peck)			X					X		X			X			X	X
RR-1339 (Hannah Salisbury)								X								X	
RR-1340 (Hannah Skinsley-Trowsdale)			X					X								X	X
RR-1341 (Hannah Towns)	X		X				X	X		X		X	X			X	
RR-1342 (Hannah Woolvett)			X					X		X			X			X	
RR-1343 (Hannah Wright)			X	X	X			X		X		X	X			X	X
RR-1344 (Hanne Utby Caserta)			X					X		X			X				X
RR-1345 (Hanson Quarry Products Europe Ltd (HQPE Ltd))					X	X											
RR-1346 (Harold George Thomas)	X		X	X		X		X	X	X	X				X	X	X
RR-1347 (Harold William Draycott)	X		X		X			X		X			X			X	
RR-1348 (Harpreet Mitchell)			X				X	X		X			X			X	X
RR-1349 (Harriet Kendall Mutch)								X		X	X		X			X	
RR-1350 (Harriet Thomas)	X		X		X	X		X	X	X	X			X	X	X	X
RR-1351 (Harry Angus Scott Bancroft)			X		X	X	X	X					X		X		X
RR-1352 (Harry Hall)			X					X	X	X							

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RR-1353 (Harry Haydn Law)				X			X			X			X				X
RR-1354 (Harry James Marriott Wilton)	X		X	X	X			X	X	X			X		X	X	X
RR-1355 (Harry Lushington)					X					X	X		X				
RR-1356 (Harry Robert Palmer)				X	X							X	X				
RR-1357 (Harry Steed)	X		X					X		X	X					X	
RR-1358 (Harry Willmore)								X	X			X					
RR-1359 (Harry Wrinch)	X			X				X	X		X	X	X				X
RR-1360 (Hayley Lipscomb)				X				X		X		X	X		X	X	
RR-1361 (Hayley Southwood)			X				X	X		X		X	X			X	
RR-1362 (Hazel Frost)	X		X					X		X			X				
RR-1363 (Hazel Theobald)	X		X					X	X		X		X	X	X	X	X
RR-1364 (Heal My Heart)								X					X				
RR-1365 (Health and Safety Executive)					X									X			
RR-1366 (Heather Clarke)			X					X		X			X		X	X	
RR-1367 (Heather Foster)											X	X					X
RR-1368 (Heather Harris)			X					X	X	X			X		X		X
RR-1369 (Heather Hollamby)			X		X								X				

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RR-1370 (Heather Holland)			X					X		X						X	X
RR-1371 (Heather Hovey)			X		X			X			X	X			X		
RR-1372 (Heather Hyde)	X		X				X	X		X	X		X			X	X
RR-1373 (Heather Lockwood)			X														
RR-1374 (Heather Marks)	X		X	X			X	X					X		X		
RR-1375 (Heather Nevin)			X					X		X						X	X
RR-1376 (Heather Passmore)	X	X	X				X	X	X	X		X	X	X			X
RR-1377 (Heather Shuter)			X	X				X	X	X		X	X			X	X
RR-1378 (Heidemarie Waddoups)			X					X		X			X			X	X
RR-1379 (Helaine Clare)			X					X								X	
RR-1380 (Helen Anderson)	X											X	X		X		X
RR-1381 (Helen Boem)			X										X				X
RR-1382 (Helen Carlile)			X					X		X	X	X	X				
RR-1383 (Helen Catlin)										X							
RR-1384 (Helen Claire Fontaine)	X		X	X	X		X	X				X			X	X	X
RR-1385 (Helen Clarke)			X	X						X			X				
RR-1386 (Helen Collingwood)			X					X		X	X					X	

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RR-1387 (Helen Devenish)					X			X				X	X		X		X
RR-1388 (Helen Garland)	X		X		X			X		X	X		X			X	X
RR-1389 (Helen Grimshaw)			X	X	X					X			X		X		X
RR-1390 (Helen Hogan)	X		X							X							X
RR-1391 (Helen Joyce Tierney)			X							X		X			X		X
RR-1392 (Helen Keeler)			X					X	X				X			X	
RR-1393 (Helen Noble)				X				X					X				
RR-1394 (Helen Porter)				X				X							X		
RR-1395 (Helen Seward)	X		X	X				X		X		X	X			X	X
RR-1396 (Helen Smith)			X		X					X							
RR-1397 (Helen Spencer)	X		X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-1398 (Helen Stuart)	X		X		X		X	X		X		X	X				X
RR-1399 (Helen Taylor)			X					X								X	
RR-1400 (Helen Venner)	X		X					X		X	X		X			X	X
RR-1401 (Helen Wasteney)			X		X		X	X		X	X	X	X				
RR-1402 (Helen Weber)			X				X	X				X	X			X	X
RR-1403 (Helen Willis)			X					X		X						X	

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RR-1404 (Helena Gurney)			X					X		X						X	X
RR-1405 (Helena Jane Black)					X												
RR-1406 (Helena Rayment)	X		X					X					X				X
RR-1407 (Hellen Brookfield Hood)	X		X					X		X						X	X
RR-1408* (Hempnall Parish Council)														X			
RR-1409 (Henrietta Ley)			X					X		X						X	X
RR-1410 (Henrietta Mary Guest)	X		X		X			X	X	X		X	X				X
RR-1411 (Henry Austin Somervell)			X					X									
RR-1412 (Henry Barber-Pickett)	X		X				X	X		X			X				X
RR-1413 (Henry James Micklem)	X		X		X	X		X	X	X	X					X	X
RR-1414 (Henry Julian Aglionby Stanford)			X					X		X						X	
RR-1415 (Henry Langton)	X		X	X	X		X	X		X		X	X		X		X
RR-1416 (Henry Siggers)			X		X			X	X	X	X	X	X				
RR-1417 (Henry Staples)			X					X		X							
RR-1418 (Henry Tinney)								X		X		X	X			X	
RR-1419* (Heywood Parish Meeting)											X						
RR-1420 (Higham Farms)	X																X

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RR-1421* (Higham Parish Meeting)			X					X	X	X			X			X	X
RR-1422 (Hilary Armstrong)			X														
RR-1423 (Hilary Cairns)			X	X				X		X			X			X	X
RR-1424 (Hilary Elizabeth Ann Sellers)								X			X			X			
RR-1425 (Hilary Hooper)			X					X		X						X	X
RR-1426 (Hilary Hosea)			X		X	X	X		X	X			X	X	X	X	X
RR-1427 (Hilary Reed)		X	X		X												
RR-1428 (Hill Residential Ltd)					X												
RR-1429 (Hine Freeman)				X				X					X				
RR-1430* (Hintlesham and Chattisham Parish Council)			X		X	X		X		X	X		X			X	
RR-1431* (Hitchcock Farms Ringshall)	X				X			X				X				X	
RR-1432 (Hollie Williams)			X							X			X			X	
RR-1433 (Holly Harrison-Watson)				X				X		X			X			X	X
RR-1434 (Holly Mountfort)	X		X		X		X	X	X	X	X	X	X	X			X
RR-1435 (Holly Powell)					X			X				X			X		X
RR-1436 (Holly Robinson)			X		X			X		X						X	X
RR-1437* (Holton St Mary Parish Council)			X	X				X	X	X			X		X		

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RR-1438* (Holton St Mary Village Hall Trust)				X				X					X		X		X
RR-1439 (Houchins Enterprises LLP)	X		X	X	X		X	X									X
RR-1440 (Howard and Susan White)								X					X				X
RR-1441 (Howard Head)																X	
RR-1442 (Howard Pitts)			X					X	X	X			X				X
RR-1443 (Howard White)	X				X												
RR-1444 (Hugh David Brown)			X					X									
RR-1445 (Hugh French)	X		X		X			X	X	X		X	X		X	X	X
RR-1446 (Hugh Godfrey)					X												
RR-1447 (Hugh Hamilton)	X		X	X						X							
RR-1448 (Hugh Thorogood)			X		X			X		X	X	X	X		X		
RR-1449 (Hugo Parker)			X					X	X	X							
RR-1450 (Iain Farquharson)			X	X	X	X		X	X	X	X		X		X	X	
RR-1451 (Iain Lyons)	X		X					X		X			X	X		X	X
RR-1452 (Iain Smith)	X		X		X		X	X		X	X	X	X		X	X	
RR-1453 (Iain Wicks)			X				X	X	X			X					X
RR-1454 (Iain Willsher)			X					X			X						

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RR-1455 (Ian Alexander Aitken)	X		X	X				X					X			X	
RR-1456 (Ian Arthur Nicholls)			X												X		
RR-1457 (Ian Bacon)			X					X		X							
RR-1458 (Ian Bigwood)								X							X		
RR-1459 (Ian Bilboe)					X			X				X	X		X		X
RR-1460 (Ian Campen)								X									
RR-1461 (Ian Cannon)								X		X			X				
RR-1462 (Ian Crowe)	X							X					X				X
RR-1463 (Ian David Hunter)			X					X					X	X		X	
RR-1464 (Ian David Mason)								X					X				
RR-1465 (Ian Davis)													X		X		
RR-1466 (Ian Dudley Hollands)	X		X					X								X	
RR-1467 (Ian Gordon Young)												X					
RR-1468 (Ian Head)	X	X	X	X				X		X					X		X
RR-1469 (Ian Huggins)			X					X		X							
RR-1470 (Ian Hume)			X					X					X			X	
RR-1471 (Ian Jasinczuk)			X														

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RR-1472 (Ian Maguire)			X	X				X	X	X			X		X	X	X
RR-1473 (Ian Martin)			X													X	
RR-1474 (Ian Perry)			X					X									
RR-1475 (Ian Plowman)			X					X		X							
RR-1476 (Ian Ponsford)							X			X							X
RR-1477 (Ian R Watts)								X									X
RR-1478 (Ian Robert Baxter)													X				
RR-1479 (Ian Robert Smith)			X					X									
RR-1480 (Ian Robson)			X		X		X	X		X		X	X			X	
RR-1481 (Ian Toner)					X			X									
RR-1482 (Ian Williamson)			X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-1483 (Ian Zdzislaw Garstka)			X		X					X			X				
RR-1484 (iArch Consulting Ltd)														X			
RR-1485* (Ingatestone & Fryerning Parish Council)			X					X	X	X	X					X	
RR-1486 (Ingrebourne Valley Ltd)			X	X	X		X	X		X	X		X	X	X		
RR-1487 (Ingrid Facius)	X		X	X		X		X		X	X	X	X	X	X		
RR-1488 (Ingrid Sykes)			X					X								X	

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RR-1489 (Innova Renewables Limited- Hall Farm BESS)					X	X								X			
RR-1490 (Innova Renewables Limited Parkgate Solar Farm)		X	X	X	X								X				
RR-1491 (Irene Collins)	X	X	X				X	X		X			X				
RR-1492 (Isabella Abraham)			X		X			X		X		X	X		X		X
RR-1493 (Isabelle Dawkin)			X				X		X		X	X	X				X
RR-1494 (Isabelle Fisher)			X					X		X							X
RR-1495 (Isabelle May Reynolds)	X		X	X	X	X		X		X	X	X	X		X		X
RR-1496 (Ivan Boyd)				X	X								X		X		
RR-1497 (J & C Rayner Farms Ltd)	X		X	X	X		X	X		X			X		X	X	X
RR-1498 (J A Brooks Mechanical Services Limited)						X							X				
RR-1499 (J A Bunting & Sons partnership)	X		X		X	X		X		X	X	X	X				X
RR-1500 (J J Tagliaferro)			X				X	X		X		X	X				
RR-1501 (Jabez Eric Smith)								X		X	X						
RR-1502 (Jack Anderson)			X	X				X		X			X		X		X
RR-1503 (Jack Botham)			X		X					X	X	X	X				X
RR-1504 (Jack Buttleman)			X		X	X	X	X	X	X			X				X
RR-1505 (Jack Mansfield)			X					X					X			X	

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-1506 (Jack O'brien)	X		X	X			X	X	X	X	X	X	X		X		X
RR-1507 (Jack Powell)					X			X				X	X		X		X
RR-1508 (Jack Stanton Dunne)			X		X	X		X	X	X		X	X				X
RR-1509 (Jackie Fisher)			X					X				X				X	X
RR-1510 (Jackie Halsall)	X							X				X	X				X
RR-1511 (Jackie James)			X		X	X	X	X	X	X	X		X			X	X
RR-1512 (Jackie Norman)								X					X				
RR-1513 (Jackie Sosta)	X		X					X		X							X
RR-1514 (Jackie Walker)			X					X		X						X	
RR-1515 (Jackie Wood)	X		X		X					X			X				X
RR-1516 (Jacky Willoughby)			X	X			X	X				X	X		X	X	
RR-1517 (Jacqueline Avery)	X			X				X		X	X	X	X				X
RR-1518 (Jacqueline Blundell)			X	X	X	X	X	X		X		X	X			X	X
RR-1519 (Jacqueline Bonner)			X							X					X		
RR-1520 (Jacqueline Boshell)			X					X		X							
RR-1521 (Jacqueline Cass)			X				X	X		X			X		X	X	X
RR-1522 (Jacqueline Cattermole)			X		X			X	X	X			X				X

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RR-1523 (Jacqueline Cork)	X						X	X					X				X
RR-1524 (Jacqueline Cox)			X					X									
RR-1525 (Jacqueline Denise Allum)			X				X	X		X		X	X			X	X
RR-1526 (Jacqueline Evelyn Capps-Coe)								X					X				X
RR-1527 (Jacqueline Jarvis)								X							X		
RR-1528 (Jacqueline Jenkinson)			X					X					X			X	
RR-1529 (Jacqueline King)	X		X		X			X		X	X	X	X	X		X	X
RR-1530 (Jacqueline Nott)								X		X	X					X	
RR-1531 (Jacqueline Pailes)			X					X	X	X	X		X		X	X	
RR-1532 (Jacqueline Rudge)			X	X											X		
RR-1533 (Jacqueline Somani)	X		X	X	X	X			X	X	X	X	X		X	X	X
RR-1534 (Jacqueline Teresa Anne Green)			X		X	X		X		X	X	X	X			X	
RR-1535 (Jacqui Moore)			X					X		X	X					X	
RR-1536 (Jacqui Sanders)			X							X	X						
RR-1537 (Jade Lawson)	X		X		X			X		X			X		X		X
RR-1538 (Jake Sudbery)			X	X				X	X	X	X		X		X		
RR-1539 (Jake Tydeman)	X		X	X	X	X		X		X		X	X	X	X		X

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RR-1540 (James Andrew Hugh Braithwaite)			X	X	X	X			X	X	X		X		X	X	X
RR-1541 (James Anthony Lovatt)			X	X	X		X	X				X	X		X	X	X
RR-1542 (James Bullock)			X		X			X		X	X		X				
RR-1543 (James Carter)			X				X	X			X	X	X		X	X	X
RR-1544 (James Cartlidge MP)			X		X			X		X	X		X				
RR-1545 (James Caton)			X			X		X	X								X
RR-1546 (James Cavanagh)	X		X	X	X	X		X	X	X	X		X		X	X	X
RR-1547 (James Clachan)			X	X	X	X		X	X		X		X		X		X
RR-1548 (James Coates)			X							X	X						
RR-1549 (James Collier)			X					X	X	X			X		X	X	X
RR-1550 (James Cowen)			X				X	X	X	X	X	X	X		X	X	X
RR-1551 (James Creasey)			X		X			X		X	X	X	X	X		X	X
RR-1552 (James Crickmore)			X							X							
RR-1553 (James Dobrzanski)			X					X		X							
RR-1554 (James Easter)		X	X					X	X	X	X					X	
RR-1555 (James Edward Abbott)			X	X	X			X	X			X	X	X	X		X
RR-1556 (James Elliott)			X			X		X		X	X		X		X	X	

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RR-1557 (James Finch)			X		X					X							
RR-1558 (James Forrest)	X																
RR-1559 (James French)			X		X			X	X	X		X	X				X
RR-1560 (James Greve)	X			X				X							X		X
RR-1561 (James Halls)		X						X				X				X	
RR-1562 (James Harper)			X				X	X									X
RR-1563 (James Harry Tutton)			X					X		X	X		X	X	X		X
RR-1564 (James Harvey)			X							X						X	
RR-1565 (James Hector Blyth)	X		X					X		X		X	X			X	
RR-1566 (James Holden)	X		X					X		X	X		X			X	
RR-1567 (James Joseph Reid)	X		X		X	X		X	X	X	X			X	X	X	X
RR-1568 (James Lancaster)			X					X		X	X		X		X		
RR-1569 (James Lane)								X								X	
RR-1570 (James Michael Glerum)				X							X					X	
RR-1571 (James Nainby-Luxmoore)			X	X	X			X				X	X				X
RR-1572 (James Naylor)			X					X		X	X		X				
RR-1573 (James Pattinson)	X		X		X	X	X	X	X	X	X	X	X			X	X

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RR-1574 (James Pattison)			X	X	X			X		X		X	X		X	X	X
RR-1575 (James Raven)	X			X		X		X	X			X					X
RR-1576 (James Roadnight)	X		X				X	X			X	X	X				X
RR-1577 (James Robert Hill)			X														
RR-1578 (James Ruffell)			X					X	X	X		X	X				X
RR-1579 (James Russell St John Holland)	X		X	X			X	X		X			X		X		X
RR-1580 (James Sadler)										X		X					
RR-1581 (James Stephen Roberts)			X		X												
RR-1582 (James Tayler)			X	X	X	X							X				
RR-1583 (James Waterson)								X	X								
RR-1584 (James Wenham)			X						X	X		X	X			X	
RR-1585 (James Wright)			X		X	X		X	X			X	X				X
RR-1586 (Jamie Broatch)	X		X				X	X		X	X		X				X
RR-1587 (Jamie Kiddie)			X			X		X		X		X	X		X	X	X
RR-1588 (Jamie Warner)			X							X	X						
RR-1589 (Jan Crowe)								X		X			X			X	X
RR-1590 (Jan Goldsworthy)	X		X		X			X		X			X				X

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RR-1591 (Jan Marshall)			X					X					X			X	
RR-1592 (Jana Carter)	X							X			X		X				
RR-1593 (Jane A. Sargent)			X														
RR-1594 (Jane Acuta)										X						X	X
RR-1595 (Jane Anne Aiken)								X							X		X
RR-1596 (Jane Askew)			X					X		X			X		X		X
RR-1597 (Jane Bidmead)			X		X	X		X	X	X			X				X
RR-1598 (Jane Braybrook)								X								X	X
RR-1599 (Jane Buckland)			X	X		X		X		X			X		X	X	X
RR-1600 (Jane Caroline March)	X		X		X	X		X	X	X	X			X	X	X	X
RR-1601 (Jane Catherine Richardson)			X		X			X		X			X			X	
RR-1602 (Jane Challis)			X	X		X		X		X		X	X		X	X	X
RR-1603 (Jane Devereux)			X					X		X			X				X
RR-1604 (Jane Fisher)	X		X		X	X	X	X	X	X		X	X		X		X
RR-1605 (Jane Frances Lovell)	X		X				X	X					X				X
RR-1606 (Jane Francis)							X	X			X	X	X		X	X	X
RR-1607 (Jane Harris)					X			X									X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-1608 (Jane House)	X		X					X									
RR-1609 (Jane Howard)			X					X		X				X		X	
RR-1610 (Jane Johns)								X		X		X					
RR-1611 (Jane Lambert-Wade)	X							X									X
RR-1612 (Jane Lawn)			X	X	X	X	X	X	X	X		X	X		X	X	X
RR-1613 (Jane Lushington)					X		X	X							X		
RR-1614 (Jane Marchant)																X	
RR-1615 (Jane Maycock)			X					X		X			X				
RR-1616 (Jane Moore)			X					X		X			X			X	
RR-1617 (Jane Moss)			X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-1618 (Jane Murphy)			X					X									
RR-1619 (Jane Porteous)			X				X	X		X						X	X
RR-1620 (Jane Ryland)			X	X							X	X	X			X	
RR-1621 (Jane Scammell)								X					X				
RR-1622 (Jane Scarfe)			X					X		X	X		X				
RR-1623 (Jane Snook)	X		X	X	X	X	X	X	X	X	X	X	X	X		X	X
RR-1624 (Jane Winter)			X					X									

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RR-1625 (Janet Adams)	X		X					X		X	X		X		X		X
RR-1626 (Janet Ann Campbell)	X		X				X	X		X			X		X		X
RR-1627 (Janet Bettle)			X					X									X
RR-1628 (Janet Burchett)			X		X	X	X	X	X		X		X			X	
RR-1629 (Janet Cleave)			X	X				X		X			X		X	X	X
RR-1630 (Janet Crosland)			X	X				X		X	X						
RR-1631 (Janet Drake)											X						
RR-1632 (Janet Gediking)	X		X	X			X	X		X		X	X			X	X
RR-1633 (Janet Hoban)								X									X
RR-1634 (Janet Lesley Maryon)										X			X				
RR-1635 (Janet Lesley Masterson)	X		X	X				X				X					X
RR-1636 (Janet MacDonald)					X			X		X	X						X
RR-1637 (Janet Patricia Tutton)			X					X	X	X			X		X	X	X
RR-1638 (Janet Scarlett)			X					X		X			X			X	
RR-1639 (Janet Terry)	X		X					X			X		X	X			
RR-1640 (Janet Yeates)								X					X				
RR-1641 (Janette Carr)								X		X							

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RR-1642 (Janette Upson)	X		X					X								X	
RR-1643 (Janice Cheng)	X				X			X		X	X		X		X		X
RR-1644 (Janice Lloyd)	X			X									X				
RR-1645 (Janice Wootton)			X		X			X		X			X			X	
RR-1646 (Janis Middleton)	X									X		X	X		X		X
RR-1647 (Jaqualin A Luckett)			X		X			X		X				X		X	X
RR-1648 (Jason Bright)			X		X												
RR-1649 (Jason Colin Ferryman)			X					X		X		X	X		X	X	
RR-1650 (Jason Davies)			X				X	X		X			X			X	X
RR-1651 (Jason Harrop)			X														
RR-1652 (Jason Middleton)			X					X		X	X			X			
RR-1653 (Jason Nottage)	X		X		X	X		X	X				X				X
RR-1654 (Jason Pettit)			X		X			X		X	X	X	X	X		X	X
RR-1655 (Jasper Trim and Rohanna Trim)			X	X	X			X	X	X			X				X
RR-1656 (Jayanthi Chandrasekaran)			X							X						X	
RR-1657 (Jayne Ainsworth)			X					X						X			
RR-1658 (Jayne Bridget Marshall)	X		X	X	X	X		X	X	X			X		X		X

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RR-1659 (Jayne Munro)								X		X			X		X		X
RR-1660 (Jayne Tann)										X							
RR-1661 (Jean Jennings)			X	X			X						X				X
RR-1662 (Jean Laut)			X					X		X			X				
RR-1663 (Jean Mary Kemp)	X		X	X	X								X		X		
RR-1664 (Jean Willoughby)					X			X		X			X		X		X
RR-1665 (Jean Wright)	X		X					X									
RR-1666 (Jean Yaxley)			X					X					X	X		X	
RR-1667 (Jeanette Bell)	X		X	X			X	X		X			X		X	X	X
RR-1668 (Jeanette East)	X			X			X	X		X			X				X
RR-1669 (Jeanette Moore)																	X
RR-1670 (Jeanette Newman)			X					X		X			X			X	X
RR-1671 (Jeanette Walpole)			X					X	X	X			X			X	X
RR-1672 (Jeanne Teresa Roberts)			X					X		X		X	X				X
RR-1673 (Jeffrey Carter)					X			X		X			X			X	
RR-1674 (Jeffrey Charles Lamb)			X	X	X			X								X	X
RR-1675 (Jeffrey Rosser)			X					X	X	X		X	X				X

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RR-1676 (Jeffrey Snelling)			X					X								X	
RR-1677 (Jenna Louise Morgan)	X		X		X			X	X	X		X	X			X	X
RR-1678 (Jenni Wake-Walker)							X	X									
RR-1679 (Jennie Powell)			X					X		X	X						
RR-1680 (Jennifer Anne Bush)				X				X					X			X	X
RR-1681 (Jennifer Creasey)			X		X			X		X	X	X	X			X	X
RR-1682 (Jennifer Frances Rosemary Penn)								X					X				
RR-1683 (Jennifer Freeman)			X		X			X	X	X	X		X				X
RR-1684 (Jennifer Holmes)	X				X			X				X	X	X	X		X
RR-1685 (Jennifer Kay)	X		X			X		X	X	X	X		X			X	
RR-1686 (Jennifer Micklem)			X		X					X	X						
RR-1687 (Jennifer Noakes)	X		X	X			X	X		X	X		X				X
RR-1688 (Jennifer Norris)	X		X		X	X		X	X	X	X		X	X	X	X	X
RR-1689 (Jennifer Patricia Mint)			X														
RR-1690 (Jennifer Pigeon)			X					X									
RR-1691 (Jennifer Symons)	X			X			X	X				X	X		X		X
RR-1692 (Jenny Atherton)	X		X	X			X	X		X			X				X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-1693 (Jenny Hill)								X									
RR-1694 (Jenny Nichols)					X			X		X							
RR-1695 (Jenny Scofield)	X		X	X	X			X	X				X			X	X
RR-1696 (Jeremy Fisher)			X		X					X							
RR-1697 (Jeremy Hatton)			X					X	X	X		X	X				
RR-1698 (Jeremy John Roope)	X		X	X	X		X	X		X	X		X		X	X	X
RR-1699 (Jeremy Nicholas John Sheppard)			X	X	X	X		X		X	X	X	X	X		X	X
RR-1700 (Jeremy Taylor)					X			X					X				
RR-1701 (Jeremy Warnes)					X						X						
RR-1702 (Jeremy William Acland)	X		X		X		X	X	X	X			X		X		X
RR-1703 (Jessica Blackmore)								X		X							
RR-1704 (Jessica Chadwick)	X		X						X	X			X				X
RR-1705 (Jessica Taylor)			X	X			X	X		X			X				X
RR-1706 (Jessica Tooke-Kirby)			X		X		X	X		X		X	X		X	X	X
RR-1707 (JH Vaudrey & Son (Farms) Ltd)	X		X				X	X		X							X
RR-1708 (Jill Dwyer)			X							X	X						
RR-1709 (Jill Ellery)			X					X		X						X	X

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RR-1710 (Jill Girling)			X		X					X						X	
RR-1711 (Jill Guy)			X									X					
RR-1712 (Jill Hamblin)	X		X	X	X			X	X	X			X		X	X	X
RR-1713 (Jill Locker)			X					X			X		X			X	
RR-1714 (Jill Martin)			X		X	X	X	X		X		X	X		X	X	X
RR-1715 (Jill Newberry)					X			X		X			X			X	X
RR-1716 (Jill Quantrell)		X			X	X	X	X	X	X	X	X	X	X		X		X
RR-1717 (Jill Raeburn Wilson)					X	X				X	X	X	X	X			X	X
RR-1718 (Jill Rosemary Newell)					X						X			X			X	
RR-1719 (Jillian Corke)					X	X				X		X	X			X	X	X
RR-1720 (Jillian Elizabeth Hill)					X					X				X				
RR-1721 (Jim Bourbon)					X					X			X					
RR-1722 (JK Romer-Lee)					X								X	X				
RR-1723 (Jo Childs)					X	X				X				X	X		X	X
RR-1724 (Jo Crossland)					X							X	X					
RR-1725 (Jo Flack)					X	X				X		X					X	
RR-1726 (Jo Palmer)						X	X					X			X			

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RR-1727 (Jo Pike)				X	X	X		X	X	X	X			X	X		X
RR-1728 (Jo Randall)		X		X					X					X			X
RR-1729 (Jo Sharman)											X						X
RR-1730 (Jo Smart)									X			X		X			
RR-1731 (Joan Lockett)				X					X		X			X		X	
RR-1732 (Joan Smith)		X							X		X			X	X		X
RR-1733 (Joanna Askew)				X	X			X	X			X	X	X	X		X
RR-1734 (Joanna Clare Gemmill)		X		X	X	X			X			X				X	X
RR-1735 (Joanna Felicity Knight)		X		X					X		X		X	X			
RR-1736 (Joanna French)				X							X	X					
RR-1737 (Joanna Parr)				X				X	X							X	X
RR-1738 (Joanna Peta Kelleway)				X					X		X			X		X	
RR-1739 (Joanna Petersen)				X				X	X	X		X		X			X
RR-1740 (Joanna Rodwell)				X					X								X
RR-1741 (Joanna Rosemary Steel)											X					X	
RR-1742 (Joanne Bowman)									X	X	X			X			X
RR-1743 (Joanne Broadbent)				X					X		X			X		X	X

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RR-1744 (Joanne Clifford)		X		X	X		X	X	X	X	X	X	X	X	X	X	X	X
RR-1745 (Joanne Foley)				X	X					X	X	X		X	X	X		X
RR-1746 (Joanne Hayter)		X								X						X	X	X
RR-1747 (Joanne Keefe)										X	X				X	X		X
RR-1748 (Joanne Kerley)				X						X		X		X	X		X	
RR-1749 (Joanne King)										X		X						X
RR-1750 (Joanne Laughton)				X						X		X					X	X
RR-1751 (Joanne Lesley Elliott)				X	X		X	X	X	X	X	X	X	X	X	X	X	X
RR-1752 (Joanne Margaret Davies)				X						X		X		X	X		X	X
RR-1753 (Joanne Milton)				X						X								
RR-1754 (Joanne Rowles)				X						X		X	X					
RR-1755 (Joanne Russell)				X						X		X			X		X	X
RR-1756 (Joanne Shapiro)		X		X			X	X		X	X	X	X			X	X	X
RR-1757 (Joanne Topliffe)										X								
RR-1758 (Jodie Austin)				X			X			X			X		X			
RR-1759 (Joe Stephens)										X							X	X
RR-1760 (Joe Thomas Bates)				X								X						

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RR-1761 (Joe White)									X								
RR-1762 (Joel Ackerman)				X			X		X	X		X		X	X	X	X
RR-1763 (John Abel)				X					X	X	X		X	X		X	X
RR-1764 (John Aldridge)				X					X		X	X		X		X	X
RR-1765 (John and Karen Boyton)								X	X	X	X		X				
RR-1766 (John and Rosemary Helliwell)				X					X		X						
RR-1767 (John Anthony White)				X							X	X					
RR-1768 (John Bell)		X		X			X		X		X	X	X	X		X	
RR-1769 (John Bell)		X		X			X		X		X		X	X		X	X
RR-1770 (John Benton)								X	X								
RR-1771 (John Brady)					X									X	X		
RR-1772 (John Braxton)		X							X						X	X	
RR-1773 (John Briggs)							X	X		X							
RR-1774 (John Burton)				X													
RR-1775 (John Cavill)				X					X								
RR-1776 (John Chapman)		X			X				X	X		X		X		X	
RR-1777 (John Charles Mathie Blake)				X			X	X		X	X	X	X		X	X	

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RR-1778 (John Charlton-Jones)		X		X			X	X	X	X	X	X			X	X	X	X
RR-1779 (John Clarke)				X							X							
RR-1780 (John Clements)				X	X						X		X	X		X		X
RR-1781 (John Clifford Marshall)				X	X	X			X				X	X		X		
RR-1782 (John Corke)				X	X		X		X		X			X		X		X
RR-1783 (John D Fryer)		X							X									
RR-1784 (John d'Angibau)		X		X	X	X			X	X	X			X		X	X	X
RR-1785 (John Dawson)				X					X									
RR-1786 (John Edward Collison)				X							X						X	
RR-1787 (John Elliott)											X							
RR-1788 (John Foster)				X				X	X		X	X		X		X		X
RR-1789 (John George Millwood)				X					X		X							X
RR-1790 (John Gilbert)				X					X		X			X			X	X
RR-1791 (John H Ruffle & Son)		X		X			X		X	X	X		X	X		X		X
RR-1792 (John Heath)				X					X		X						X	
RR-1793 (John Henry)		X		X			X		X		X		X	X		X	X	X
RR-1794 (John Henry M Glasse)				X					X			X						

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RR-1795 (John Horner)				X					X		X						
RR-1796 (John Howard Millican)				X					X		X						
RR-1797 (John Jewell)							X		X		X		X	X		X	
RR-1798 (John Joseph Joyce)				X					X		X			X		X	X
RR-1799 (John Lattimore)							X		X							X	
RR-1800 (John Lloyd Davies)		X		X			X	X	X			X			X	X	X
RR-1801 (John Lucas)		X		X	X		X		X		X	X	X	X	X		X
RR-1802 (John Matthissen)											X						
RR-1803 (John Patrick Hartley)									X		X						
RR-1804 (John Playsted Alston)				X					X		X			X			X
RR-1805 (John Richard Browne CAVE)				X					X								
RR-1806 (John Richmond)											X			X			
RR-1807 (John Rix and Jennifer Rix)				X			X		X	X	X		X	X		X	X
RR-1808 (John Roberts)									X							X	
RR-1809 (John Roger Digby)		X							X					X			
RR-1810 (John Smith)				X			X										
RR-1811 (John Smith)				X			X		X					X			X

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RR-1812 (John Stacey)					X	X	X				X		X	X		X	
RR-1813 (John Stacey Ltd)		X		X		X		X	X		X		X	X		X	X
RR-1814 (John Traveller)									X					X	X	X	X
RR-1815 (John Tupper)											X					X	
RR-1816 (John Walker)				X		X	X		X		X			X			X
RR-1817 (John Willoughby)				X	X				X		X		X	X		X	X	
RR-1818 (John Wood)		X		X		X			X		X			X			X
RR-1819 (John Yates)				X		X			X								
RR-1820 (Jon Watson)				X				X	X	X							
RR-1821 (Jonathan Andrew Hedley)		X		X	X	X			X		X			X		X		X
RR-1822 (Jonathan Asbee)				X					X		X			X			X	
RR-1823 (Jonathan Buxton)		X		X	X	X			X	X	X	X	X	X	X	X	X	X
RR-1824 (Jonathan Charles Larner)		X		X	X			X	X	X	X		X	X		X		X
RR-1825 (Jonathan Dixon)				X	X				X		X	X		X		X	X	X
RR-1826 (Jonathan Dudley Darrell)				X		X			X		X	X	X		X		X	
RR-1827 (Jonathan Eddis)									X							X		
RR-1828 (Jonathan Goldring)		X		X		X	X		X	X	X	X			X	X	X	X

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RR-1829 (Jonathan Hammond)				X			X				X						
RR-1830 (Jonathan Hunt)					X		X		X	X	X			X			X
RR-1831 (Jonathan Ireland)				X						X	X					X	X
RR-1832 (Jonathan Jones)										X	X						X
RR-1833 (Jonathan Mallender)		X		X													
RR-1834 (Jonathan McDonald)				X	X					X	X			X	X	X	X
RR-1835 (Jonathan Mitson)				X			X				X						
RR-1836 (Jonathan Osborne)					X			X		X			X	X		X	X
RR-1837 (Jonathan Paul Betts)				X	X			X	X	X	X	X		X	X	X	
RR-1838 (Jonathan Sly)				X	X					X	X			X			X
RR-1839 (Jonathan Taylor)							X							X		X	
RR-1840 (Jonathan Wise)				X						X	X		X	X		X	X
RR-1841 (Jones Family)				X	X		X		X	X	X			X			X
RR-1842 (Jordan Beales)										X							
RR-1843 (Jordan Coleman)		X		X					X	X	X			X			X
RR-1844 (Josef Bird)				X						X	X		X			X	
RR-1845 (Joseph Backhouse)				X						X	X			X			X

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RR-1846 (Joseph Long)		X		X			X	X	X	X	X	X			X	X	X	X
RR-1847 (Joseph Simms)				X			X		X		X			X			X	
RR-1848 (Josephine and David Jaggard)				X			X	X	X	X	X			X		X	X	X
RR-1849 (Josh Wrigglesworth)									X		X		X					X
RR-1850 (Joshua Bebbington)				X					X		X			X			X	X
RR-1851 (Joshua Hector)				X				X	X									X
RR-1852 (Joshua Kiddie)				X	X			X	X		X		X	X		X	X	X
RR-1853 (Joshua Lovedale)				X			X		X	X		X		X	X		X	X	
RR-1854 (Joshua McColl)		X		X	X		X		X	X		X		X	X		X	X	X
RR-1855 (Joshua Seddon)				X					X	X			X		X			X	X
RR-1856 (Josie Barber)		X		X						X		X			X			X	X
RR-1857 (Josie Brown)		X		X	X			X	X	X	X		X	X	X		X	X	X
RR-1858 (Joy Baker)				X						X									
RR-1859 (Joy Burnford)				X						X		X			X			X	
RR-1860 (Joy Cornish)				X								X							X
RR-1861 (Joy Gilfrin)					X					X							X	X	
RR-1862 (Joy Huggins)				X						X		X			X			X	

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RR-1863 (Joy Wakefield)									X					X			
RR-1864 (Joyce A Brooks)		X		X	X			X	X		X		X	X		X	X
RR-1865 (Joyce Goddard)				X							X					X	
RR-1866 (Judith Anita Creber)					X	X									X		
RR-1867 (Judith Bartlett)				X					X				X	X		X	
RR-1868 (Judith Bearman)				X					X		X						X
RR-1869 (Judith Draycott)				X					X		X			X		X	
RR-1870 (Judith Knight)					X										X		
RR-1871 (Judith Livesley)				X					X								
RR-1872 (Judy Fletcher)		X		X	X				X		X		X	X	X	X	X
RR-1873 (Judy Lauder)					X				X				X	X			
RR-1874 (Judy Maria Arselan)				X					X					X			X
RR-1875 (Judy Rose Parmenter)		X		X										X			
RR-1876 (Julia Ainslie)				X					X		X			X	X	X	X
RR-1877 (Julia Campbell)				X		X		X	X		X		X	X	X		X
RR-1878 (Julia Creusson)		X		X		X			X		X	X		X	X		X
RR-1879 (Julia Ewart)		X		X	X		X	X	X		X		X	X	X	X	X

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RR-1880 (Julia Fletcher)					X					X		X					X	X
RR-1881 (Julia Fromings Hill)					X	X	X	X	X	X		X			X		X	X	X
RR-1882 (Julia Keen)					X					X		X			X				X
RR-1883 (Julia Mary Orme)					X		X		X	X	X	X		X	X				X
RR-1884 (Julia Ward)					X				X	X		X		X	X			X	X
RR-1885 (Julia Webster)		X					X	X		X	X	X		X			X		X
RR-1886 (Julia Williams)					X					X		X	X		X			X	
RR-1887 (Julian Allen)					X		X			X									
RR-1888 (Julian Calderara)									X			X			X				
RR-1889 (Julian Clark)				X															
RR-1890 (Julie Alexander)					X		X			X	X			X	X			X	X
RR-1891 (Julie Alston)					X					X		X			X				X
RR-1892 (Julie Anderson)					X				X	X		X						X	
RR-1893 (Julie C Hillary)							X			X	X	X	X						
RR-1894 (Julie Cant)		X			X		X	X		X	X	X	X			X	X	X	X
RR-1895 (Julie Chadwick)					X									X	X				
RR-1896 (Julie Chambers)					X					X		X		X	X			X	

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RR-1897 (Julie Cornish)		X							X				X	X			
RR-1898 (Julie Day)		X		X	X			X	X	X		X	X	X	X	X	X
RR-1899 (Julie Denton)		X		X	X				X		X		X	X	X	X	X
RR-1900 (Julie Eve)							X	X			X		X	X	X		X
RR-1901 (Julie Fahy)				X					X					X			
RR-1902 (Julie Harris)		X							X		X			X			X
RR-1903 (Julie Hatton)									X		X		X	X	X	X	
RR-1904 (Julie Head)				X			X				X						
RR-1905 (Julie Hernandez)				X					X		X			X			X
RR-1906 (Julie Howlett)				X					X		X						X
RR-1907 (Julie Jones)									X		X			X		X	X
RR-1908 (Julie Kistruck)		X		X	X		X							X	X		X
RR-1909 (Julie Leddy)				X					X		X						X
RR-1910 (Julie Mangum)				X					X		X			X			
RR-1911 (Julie McAuliffe)				X					X		X		X	X		X	X
RR-1912 (Julie Orpen)				X					X		X			X	X		X
RR-1913 (Julie Perkins)							X					X		X	X		X

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RR-1914 (Julie Scott)				X			X		X	X		X			X				X
RR-1915 (Julie Smith)				X											X				
RR-1916 (Julie Spurling)							X			X		X			X				
RR-1917 (Julie Srokowski)				X					X			X		X	X		X		
RR-1918 (Julie Stubbings)		X		X		X	X		X	X		X		X	X		X	X	X
RR-1919 (Julie Taylor)				X		X				X		X		X	X		X	X	
RR-1920 (Julie Turner)				X						X		X						X	X
RR-1921 (Julie Worley)		X		X						X		X			X			X	X
RR-1922 (Julie-Ann Cansell)				X						X	X	X							X
RR-1923 (Juliet Francis)		X								X	X	X		X	X			X	X
RR-1924 (Juliette Ackerman)				X			X			X					X				
RR-1925 (Justin Clarke)				X						X		X							
RR-1926 (Justin Oliver Samuel Mountfort)		X		X		X	X		X	X	X	X	X		X	X			X
RR-1927 (Justin Scofield)				X						X		X			X		X	X	X
RR-1928 (Justine Rodgers)				X						X		X		X	X		X	X	X
RR-1929 (K Blake)				X						X		X	X		X			X	
RR-1930 (Kajsa Margaretha Birch)												X						X	

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RR-1931 (Karen Asbee)				X							X					X	
RR-1932 (Karen Blackman)									X		X			X			
RR-1933 (Karen Darrell)				X	X		X		X	X	X		X	X	X		X
RR-1934 (Karen Denton)							X				X						
RR-1935 (Karen Doran)				X			X		X		X		X	X		X	X
RR-1936 (Karen Elaine Deed)				X			X	X	X		X			X		X	
RR-1937 (Karen Fisher)		X		X			X	X	X	X	X	X	X	X	X	X	X
RR-1938 (Karen Hall)				X					X		X			X		X	X
RR-1939 (Karen Karen)		X							X								
RR-1940 (Karen Knapp)				X					X					X			
RR-1941 (Karen Letchford)		X		X					X		X	X	X	X		X	X
RR-1942 (Karen Mallottides)				X				X	X	X	X			X		X	X
RR-1943 (Karen Mansfield)									X					X			X
RR-1944 (Karen Peck)		X		X					X		X			X	X	X	X
RR-1945 (Karen Rayment)		X		X	X		X		X	X	X	X	X	X	X	X	X
RR-1946 (Karen Read)									X		X					X	
RR-1947 (Karen Ruffell)											X			X			X

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RR-1948 (Karen Seward)				X					X	X	X	X		X		X	X
RR-1949 (Karen Shergold)		X		X	X	X		X	X	X	X	X	X	X		X	X	X
RR-1950 (Karen Sullivan)		X		X	X			X	X		X			X		X	X	
RR-1951 (Karen Till)		X		X				X	X	X	X	X	X	X				X
RR-1952 (Karen Tween)				X				X	X		X			X			X	
RR-1953 (Karen Wazny)				X					X			X	X					
RR-1954 (Karen Weir)				X				X	X		X	X		X				X
RR-1955 (Karen White)		X		X	X	X			X	X				X	X	X		X
RR-1956 (Karen Youngs)		X		X	X				X	X	X	X		X		X	X	
RR-1957 (Kari Richardson)					X									X		X		
RR-1958 (Karl Bloomfield)									X									X
RR-1959 (Karl Joseph Owen)		X		X	X	X	X	X	X	X	X		X	X		X	X	X
RR-1960 (Karl Wilkinson)				X	X	X			X		X		X	X			X	
RR-1961 (Karolina Shelley)					X			X										
RR-1962 (Kate Charlton-Jones)		X		X		X	X		X	X	X	X			X	X	X	X
RR-1963 (Kate Collier)				X			X		X	X	X	X		X		X	X	X
RR-1964 (Kate Dowd)				X	X	X	X		X					X		X	X	

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RR-1965 (Kate Golightly)				X					X		X	X	X	X			X
RR-1966 (Kate Hodgkiss)				X	X	X	X		X		X		X	X	X		
RR-1967 (Kate Hunt)				X					X		X			X		X	X
RR-1968 (Kate Martin)				X					X		X	X		X		X	X
RR-1969 (Kate Roscoe)		X		X	X	X	X		X		X		X	X	X	X	X
RR-1970 (Kate Schofield)				X	X				X		X			X		X	X
RR-1971 (Kate Worsley)								X									
RR-1972 (Katharine Allan)		X		X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-1973 (Katharine Bell)				X	X	X		X			X		X			X	X	X
RR-1974 (Katharine Cockshaw)				X					X		X		X	X			X	X
RR-1975 (Katherine Dalton)											X		X	X		X	X	
RR-1976 (Katherine E Tarn)				X			X											
RR-1977 (Katherine Hawkey-Smith)				X			X	X		X		X					X	X
RR-1978 (Katherine Salmon)									X									
RR-1979 (Katherine Verhaag)		X		X	X		X			X	X	X				X	X	X
RR-1980 (Katherine Wenham)				X					X		X	X		X	X		X	
RR-1981 (Kathleen Elizabeth Sapsford)		X		X			X			X		X	X	X		X	X	X

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RR-1982 (Kathleen Flatman)				X	X				X		X		X	X		X	X	X
RR-1983 (Kathleen Forbes Lee)		X					X											
RR-1984 (Kathleen Mary Weber)		X		X					X		X			X				
RR-1985 (Kathryn Hearne)									X		X			X				X
RR-1986 (Kathryn Pepper)				X				X	X									X
RR-1987 (Kathryn Till)				X	X			X	X	X	X		X	X				X
RR-1988 (Kathryn Worvell)				X	X		X	X	X	X	X	X	X	X		X		X
RR-1989 (Kathy Collison)				X							X	X		X				X
RR-1990 (Kathy Shaw)		X		X					X	X				X				X
RR-1991 (Katie Clarke)									X									X
RR-1992 (Katie Cooper)		X		X			X	X	X	X	X	X			X	X	X	X
RR-1993 (Katie Evans)		X		X			X		X	X		X	X	X		X		X
RR-1994 (Katie Holmes)		X		X	X			X	X	X		X	X	X		X	X	X
RR-1995 (Katie Howlett)									X		X							X
RR-1996 (Katie Jane Gunn)				X				X	X									X
RR-1997 (Katie Sambrook)								X	X					X				X
RR-1998 (Katie White)				X			X		X		X			X			X	

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RR-1999 (Katrina Taylor)									X							X	X
RR-2000 (Katrina Tolliday)					X				X		X					X	
RR-2001 (Kay Comer)					X		X	X	X	X		X	X	X	X	X	X	X
RR-2002 (Kay Sheppard)					X				X		X			X		X	
RR-2003 (Kay Sullivan)					X	X	X		X	X		X	X	X	X		X	X
RR-2004 (Kay Williams)					X				X	X	X			X		X	X	X
RR-2005 (Keely Bates)		X			X	X		X	X	X	X	X		X	X		X	X
RR-2006 (Keiron Woolley)									X									
RR-2007 (Keith Andre)					X				X			X		X				
RR-2008 (Keith Davies)					X				X		X			X			X	
RR-2009 (Keith Francis)					X			X				X						
RR-2010 (Keith Fromings)					X	X	X		X		X	X		X		X	X	X
RR-2011 (Keith John Leno)					X				X		X							
RR-2012 (Keith Jones)		X			X		X		X		X	X		X		X	X	X
RR-2013 (Keith Lovering)				X	X	X			X					X		X		
RR-2014 (Keith Mangum)					X						X						X	X
RR-2015 (Keith Martin)					X				X	X		X					X	X

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RR-2016 (Keith Robert Warrington)				X			X		X		X	X	X				
RR-2017 (Keith Savill)		X		X			X	X	X	X	X	X			X	X	X	X
RR-2018 (keith Winterbourne)									X									X
RR-2019 (Keith Worboyes)				X	X		X		X		X	X	X	X			X	X
RR-2020 (Kelly Ludlow)		X		X	X						X	X		X				X
RR-2021 (Kelly Windard)				X				X	X		X			X			X	
RR-2022 (Kelvin Moody)		X		X			X		X		X	X	X				X	X
RR-2023 (Ken Holmes)				X					X		X						X	X
RR-2024 (Kenneth Jenkinson)				X					X				X	X				
RR-2025 (Kenneth John Ewing)				X					X									
RR-2026 (Kenneth Lewis Hemmings)				X													X	
RR-2027 (Kenneth Roy Smith)				X					X	X	X			X				
RR-2028 (Keren Lees)				X			X		X		X	X		X			X	X
RR-2029 (Kerry Ann Clark)									X				X	X				X
RR-2030 (Kerry Bennion)				X					X		X							X
RR-2031 (Kerry Bethell)									X					X				X
RR-2032 (Kerry Ferryman)				X	X				X		X		X	X			X	

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RR-2033 (Kerry Holden)		X							X	X		X		X	X		X		X
RR-2034 (Kerry Parrish)										X									
RR-2035 (Kerry Pasmore)				X			X		X	X				X	X				X
RR-2036 (Kerry Theodore)								X		X				X	X				
RR-2037 (Kevin Baxter)				X						X									X
RR-2038 (Kevin David Head)		X		X		X	X			X	X	X	X		X		X	X	
RR-2039 (Kevin Gunn)				X			X		X	X				X					
RR-2040 (Kevin Howard)										X		X							
RR-2041 (Kevin Huggins)				X			X		X	X		X	X	X	X			X	X
RR-2042 (Kevin Jackson)		X		X			X	X	X	X		X	X	X	X	X	X		X
RR-2043 (Kevin Jennings)				X						X		X							
RR-2044 (Kevin Jones)				X					X	X		X			X			X	
RR-2045 (Kevin Pallett)				X			X	X		X		X	X						
RR-2046 (Kevin Paul Girling)				X						X					X				X
RR-2047 (Kevin Robert Sturdy)		X		X			X	X		X	X	X	X			X	X	X	X
RR-2048 (Kim Bradbury)				X			X					X			X				X
RR-2049 (Kim Davenport)				X								X						X	

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RR-2050 (Kim Davis)									X								
RR-2051 (Kim Hubbard)		X		X					X		X			X		X	X
RR-2052 (Kim Rutter)								X	X				X	X		X	X
RR-2053 (Kimberly Rose Carsok)				X	X		X	X	X	X	X	X		X		X	X	
RR-2054 (Kinga Pachowicz)														X				
RR-2055 (Kirstin Voss)				X					X	X		X			X		X	X
RR-2056 (Kirsty Hudson)										X		X		X	X			X
RR-2057 (Kirsty Pollintine)				X	X		X			X		X	X		X		X	X
RR-2058 (Kreon Quince)		X		X	X					X		X			X	X	X	X
RR-2059 (Kristine Hall)		X		X	X		X	X	X	X	X	X		X	X		X	X
RR-2060 (Krystal Amato)				X			X											
RR-2061 (Kyle Sims)								X										
RR-2062 (L Lrng)				X					X		X		X	X			X	X
RR-2063 (Lana Baxter)				X			X		X		X		X			X		X
RR-2064 (Lana Poole)		X		X			X	X	X	X	X	X			X	X	X	X
RR-2065 (Lance Escobar)									X		X					X		X
RR-2066 (Lance Spurling)				X			X		X									

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RR-2067 (Langdale House)				X					X		X	X			X			X		
RR-2068 (Langham Hall Estates Limited)		X		X			X	X		X	X	X			X			X		X
RR-2069* (Langham Parish Council)				X			X	X		X					X			X		X
RR-2070* (Langham with Boxted Parochial Church Council)				X		X	X	X	X	X	X	X			X			X		
RR-2071 (Latania Kennard)				X						X		X						X		X
RR-2072 (Laura Amos)						X		X		X								X		X
RR-2073 (Laura Bluett)		X		X						X		X						X		X
RR-2074 (Laura Forster)				X		X		X		X		X			X			X		X
RR-2075 (Laura Garside)										X										
RR-2076 (Laura Grover)				X						X		X								X
RR-2077 (Laura Head)		X								X								X		X
RR-2078 (Laura Howard)		X		X			X	X	X	X		X	X	X	X					
RR-2079 (Laura Lennox)							X													
RR-2080 (Laura Nayman)		X		X						X			X		X					
RR-2081 (Laura Parsons)				X					X	X		X		X	X			X		
RR-2082 (Laura Shales)				X		X		X		X		X		X	X			X		X
RR-2083 (Laura Sing Yun Lee)		X		X		X		X		X		X	X		X					X

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RR-2084 (Laura Stephens)				X										X			
RR-2085 (Laura West)				X	X				X		X		X	X		X	
RR-2086 (Laura Williams)					X												X
RR-2087 (Lauren Anderson)		X		X			X	X					X	X		X		X
RR-2088 (Lauren Downing)				X					X	X	X	X				X	X	X
RR-2089 (Lauren Francis)				X					X				X	X				X
RR-2090 (Lauren Lynch)				X					X					X				
RR-2091 (Lauren Mellor)				X					X		X			X			X	X
RR-2092 (Lauren Reeves)									X	X	X			X				X
RR-2093 (Lauren Richardson Beckford)		X		X			X	X	X	X	X	X		X		X		X
RR-2094 (Laurence Dove)									X				X			X		X
RR-2095 (Laurence Munday)				X					X		X						X	X
RR-2096 (Laurence Pizzey)							X											X
RR-2097* (Lawford Parish Council)		X		X	X		X	X	X	X		X	X	X	X	X	X	X
RR-2098 (Lawn Doctor Essex Limited)				X	X				X	X		X			X		X	
RR-2099 (Lazell family)				X			X	X		X		X		X	X		X	X
RR-2100 (Leah Ingrouille)										X			X	X			X	

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RR-2101 (Lee Acaster)				X					X	X		X	X	X		X	X
RR-2102 (Lee Doe)				X					X								
RR-2103 (Lee Graham Smith)				X	X				X		X		X	X			X
RR-2104 (Lee Holohan)		X		X			X	X	X	X	X	X				X	X
RR-2105 (Lee Le Cornu)				X					X		X			X		X	
RR-2106 (Lee Mccarthy)				X					X		X					X	
RR-2107 (Lee McClellan)							X	X					X	X			
RR-2108 (Lee Mcdonald)					X				X				X	X	X		X
RR-2109 (Lee Sargent)		X						X					X	X	X		
RR-2110 (Lee Smith)				X			X		X								X
RR-2111 (Lee Stewart Taylor)				X							X					X	
RR-2112 (Leo Bates)		X		X	X		X	X	X	X	X	X	X	X	X		X
RR-2113 (Leo Verhaag)		X		X			X		X	X	X	X	X	X			X
RR-2114 (Leofric J H Beckford)		X		X			X		X	X	X			X			
RR-2115 (Leon Clarke)				X					X								
RR-2116 (Leon Fisher)				X						X	X					X	X
RR-2117 (Leona Storey)				X					X		X			X		X	

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RR-2118 (Leonard Ernest George Ramsbottom)							X						X	X			X
RR-2119 (Leonard Pincher)							X				X						X
RR-2120 (Leonard Watson)		X		X	X		X		X		X	X	X	X		X	X	X
RR-2121 (Leonie McLaughlin)		X		X	X		X	X	X	X	X	X		X		X	X	X
RR-2122 (Les Judy Holmes)				X														
RR-2123 (Lesa Cotton)									X					X				X
RR-2124 (Lesley Bongard)				X			X											
RR-2125 (Lesley Dean)									X				X			X		
RR-2126 (Lesley Kemp)				X					X		X			X			X	
RR-2127 (Lesley McGroarty)				X					X					X			X	X
RR-2128 (Lesley Oldfield)				X					X								X	
RR-2129 (Lesley Sargeant)				X	X		X	X	X	X	X	X	X	X	X	X	X	X
RR-2130 (Leslie John Canham)				X			X		X		X		X	X		X		
RR-2131 (Leslie Whyte-Venables)				X					X		X		X			X		
RR-2132 (Lewis Barber)				X					X		X			X			X	X
RR-2133 (Lewis Black)		X		X	X			X	X		X	X		X		X		X
RR-2134 (Lexie Wood)									X		X			X		X		X

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RR-2135 (Liane Wilcox)					X	X			X	X		X					X	X
RR-2136 (Lianne Lucas)					X					X			X		X				
RR-2137 (Lilian Obasi)					X			X		X		X		X		X		X	X
RR-2138 (Lincoln Bellett)								X	X		X		X	X		X			
RR-2139 (Linda Ashley)			X		X		X				X		X			X		X	X
RR-2140 (Linda Barbara Smith)					X	X		X										X	
RR-2141 (Linda Boyd)											X					X			
RR-2142 (Linda Carol Nelson)						X					X								
RR-2143 (Linda Catherine Fisher)			X			X			X	X	X	X	X	X		X			X
RR-2144 (Linda Christine Hall)			X			X			X	X		X		X	X	X		X	
RR-2145 (Linda Clements)						X	X					X		X	X	X		X	
RR-2146 (Linda Elaine Dobson)			X			X			X	X	X	X			X	X	X	X	
RR-2147 (Linda Fisher)						X						X	X						
RR-2148 (Linda Geyman)																X			
RR-2149 (Linda Hall)			X			X				X	X		X			X		X	
RR-2150 (Linda Howlett)						X					X		X					X	X
RR-2151 (Linda Jane Mead)			X			X			X	X	X	X	X			X			X

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RR-2152 (Linda Laisure)					X				X		X		X	X			X	X
RR-2153 (Linda Mary Whiscombe)		X		X			X		X	X		X	X	X	X	X	X	X	X
RR-2154 (Linda Murray)				X	X			X	X	X		X		X	X			X	X
RR-2155 (Linda Pettit)		X		X	X		X		X	X	X	X		X	X		X	X	X
RR-2156 (Linda Preece)		X		X					X		X							X	
RR-2157 (Linda Ruth Simpson)				X			X	X		X			X				X	X	X
RR-2158 (Linda Watchorn)				X						X	X	X		X	X				X
RR-2159 (Linda Waterman-Holly)				X			X												
RR-2160 (Lindi Staunton)				X						X					X				
RR-2161 (Lindsay Briggs)															X		X		
RR-2162 (Lindsay Brown)				X	X		X			X		X	X	X	X			X	
RR-2163 (Lindsey Bilston)		X		X									X						
RR-2164 (Lindsey Lewis)		X		X						X		X						X	X
RR-2165 (Lindsey Wright)				X															
RR-2166 (Lisa Bebbington)							X			X		X	X	X	X		X	X	
RR-2167 (Lisa Bertolla)		X		X						X		X		X	X			X	X
RR-2168 (Lisa Kellett)				X					X	X		X			X			X	

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RR-2169 (Lisa Olson)					X				X				X			X	X	X
RR-2170 (Lisa Osborne)				X					X		X			X			X	X
RR-2171 (Lisa Sadler)					X				X		X					X		
RR-2172* (Little Bromley Parish Council)		X		X	X		X	X	X	X	X	X	X	X	X	X	X	X
RR-2173* (Little Horkesley Parish Council)		X		X			X	X	X	X	X	X			X	X	X	X
RR-2174* (Little Watham Parish Council)				X						X				X				
RR-2175 (Liz Bennett)		X		X					X		X						X	X
RR-2176 (Liz Bennion)				X							X			X		X	X	X
RR-2177 (Liz Cornish)				X			X							X				X
RR-2178 (Liz Donald)		X		X					X		X			X				X
RR-2179 (Liz Leaper)									X		X						X	X
RR-2180 (Lloyd Bellett)							X							X	X	X		X
RR-2181 (Lois Beverley Seddon)		X		X	X		X	X	X	X	X	X	X	X	X	X	X	X
RR-2182 (London Diocesan Fund)					X			X							X			
RR-2183 (Longfield Solar Energy Farm Limited)							X	X							X			
RR-2184 (Loose Hall Farm Limited)		X					X		X	X		X		X				
RR-2185 (Lord Rayleigh's Farms Ltd)		X		X			X											

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RR-2186 (Lorenza E Matthews)		X		X	X				X		X			X	X	X	X
RR-2187 (Lorna Cannon)				X	X				X		X				X	X	X
RR-2188 (Lorna Hill)				X	X		X		X	X	X	X		X	X	X	X
RR-2189 (Lorraine Goldberg)									X		X		X	X		X	
RR-2190 (Lorraine Hudson)											X			X			X
RR-2191 (Lorraine Long)				X					X		X			X			X
RR-2192 (Lorraine May)				X					X		X			X			X
RR-2193 (Lorraine Pickett)		X		X							X		X		X	X	X
RR-2194 (Lorraine Thomas)				X									X	X		X	
RR-2195 (Lorraine Thornton)				X	X			X	X	X	X			X	X		X
RR-2196 (Lorrayne Fitzgerald)		X		X	X			X	X	X	X	X	X	X	X	X	X
RR-2197 (Lotte Nickel)				X					X		X					X	
RR-2198 (Louise Allison)				X					X	X			X	X	X		
RR-2199 (Louise Bennell Dolan)				X	X		X	X	X	X		X			X	X	X
RR-2200 (Louise Brown)					X				X					X			X
RR-2201 (Louise Donno)				X					X		X			X		X	
RR-2202 (Louise Dorothy Middleton)				X					X	X	X						

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RR-2203 (Louise Elizabeth Brown)									X				X	X			X
RR-2204 (Louise Elizabeth Thurgar)				X								X	X	X		X	
RR-2205 (Louise Horton)						X								X		X	
RR-2206 (Louise Joplin)				X	X				X		X		X	X			
RR-2207 (Louise Keating)		X		X	X			X	X	X	X	X	X	X	X	X	X
RR-2208 (Louise Louth)				X					X	X	X		X	X		X	X
RR-2209 (Louise MacIntyre)				X					X	X	X			X	X		X
RR-2210 (Louise Marshall)				X						X	X						X
RR-2211 (Louise Reynolds)				X						X	X			X		X	
RR-2212 (Louise Taylor)				X							X					X	
RR-2213 (Louise Waterson)							X			X		X					X
RR-2214 (Louise Yates)		X		X				X		X	X	X					X
RR-2216 (Lucinda Steel)				X							X					X	
RR-2217 (Lucy Alexandra Nutting)					X		X		X	X	X			X			X
RR-2218 (Lucy Breckon)				X			X		X	X	X			X			X
RR-2219 (Lucy Carter)				X						X	X		X	X		X	
RR-2220 (Lucy Drew)				X			X			X	X	X		X			X

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RR-2221 (Lucy Eddis)									X	X				X		X	X	
RR-2222 (Lucy French)									X		X			X				
RR-2223 (Lucy Grace Upson)									X		X		X				X	
RR-2224 (Lucy Howland Jackson)		X			X	X	X	X	X	X	X	X	X	X	X	X	X	X
RR-2225 (Lucy Johnson)					X				X		X						X	
RR-2226 (Lucy Jones)											X			X				X
RR-2227 (Lucy Kerr)					X				X		X		X				X	
RR-2228 (Lucy Mortimer)							X		X				X	X		X	X	X
RR-2229 (Lucy Susan Joan Sadler)		X			X		X	X	X	X	X	X			X	X	X	X
RR-2230 (Lucy Tyler)		X			X			X	X	X	X	X	X	X		X		X
RR-2231 (Lucy Waddington)		X			X		X	X	X	X	X	X		X	X	X	X	X
RR-2232 (Lukas John Thorogood Minet)					X				X	X	X	X		X		X	X	
RR-2233 (Luke Marshall)					X	X	X	X	X	X	X	X		X	X	X	X	X
RR-2234 (Lyn Baran)		X			X	X	X		X	X		X	X	X	X		X	X
RR-2235 (Lyn Simmons)					X	X					X		X	X			X	
RR-2236 (Lyn Tod)					X	X	X	X	X	X		X	X		X			X
RR-2237 (Lynda Brenchley)						X				X			X	X		X		X

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RR-2238 (Lynda Chase-Gardener)		X		X					X	X				X		X	X	
RR-2239 (Lynda Pelham Burn)		X		X									X	X			X	X
RR-2240 (Lynda Smith)									X					X				X
RR-2241 (Lyndon Russell Day)				X					X		X							
RR-2242 (Lyndsey Andrews)		X		X			X	X	X	X	X	X			X	X	X	X
RR-2243 (Lynn Cameron)				X					X	X		X	X		X				X
RR-2244 (Lynn Dorey)				X			X		X		X						X	X
RR-2245 (Lynn Edwards)				X					X					X		X	X	
RR-2246 (Lynn Hale)														X				X
RR-2247 (Lynn Hume)				X	X				X					X				X
RR-2248 (Lynn Martin)									X									
RR-2249 (Lynn Walton)		X		X	X				X		X			X		X	X	X
RR-2250 (Lynn Zanatta)				X					X		X			X			X	X
RR-2251 (Lynne Al-Sad)		X		X			X		X		X			X				
RR-2252 (Lynne Ducker)				X					X	X	X			X				X
RR-2253 (Lynne Jardine)		X		X			X	X	X	X	X			X		X	X	X
RR-2254 (Lynne Riddell)				X			X		X	X								X

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RR-2255 (Lynsey White)				X			X		X				X	X			X
RR-2256 (M Havers)				X					X					X		X	X
RR-2257 (M Kliskey)				X					X								
RR-2258 (M R Bowles Farming)								X			X					X	
RR-2259 (Maddy Everington)		X		X					X		X	X		X		X	X	X
RR-2260 (Madeleine Bean)					X				X		X		X	X		X		X
RR-2261 (Magali Buhrer)				X			X				X							
RR-2262 (Maia Buttleman)					X		X		X	X				X	X		X	X
RR-2263 (Malcolm James Andrew McGougan)				X							X			X		X	
RR-2264 (Malcolm R Bull)				X					X					X			
RR-2265 (Malcolm Smith)				X					X	X				X			X
RR-2266 (Mandy Hessing)				X					X		X			X		X	
RR-2267 (Manjunath Shivakumar)											X					X	
RR-2268 (Marcel Moore)		X		X					X		X			X			X
RR-2269 (Marcella Pallett)				X			X	X	X	X	X	X	X	X		X	X
RR-2270 (Marcia Bell)				X							X						
RR-2271 (Marcia Brocklebank)									X								

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RR-2272 (Marcus Cave)				X							X	X		X			
RR-2273 (Marcus Watkins)				X	X				X		X		X	X		X	
RR-2274 (Margaret Anderson)									X			X					
RR-2275 (Margaret Anne Auld)														X			
RR-2276 (Margaret Anne Thomas)		X		X			X	X	X	X	X	X				X	X
RR-2277 (Margaret Bloor)				X					X							X	X
RR-2278 (Margaret Davies)				X					X								
RR-2279 (Margaret Evelyn Collis)				X				X						X			
RR-2280 (Margaret Galvin)				X					X		X			X		X	X
RR-2281 (Margaret Gillian Thompson)		X		X					X	X			X	X		X	X
RR-2282 (Margaret Grzebalski)		X		X			X	X	X	X	X	X			X	X	X	X
RR-2283 (Margaret Hickman Smith)		X		X	X		X	X	X		X		X	X		X	X	X
RR-2284 (Margaret Jane Bassett)				X					X					X			X	
RR-2285 (Margaret Joy Earl)				X					X		X		X	X			X	X
RR-2286 (Margaret Knock)		X		X					X			X		X		X		X
RR-2287 (Margaret Langton)		X		X					X	X	X			X			X	X
RR-2288 (Margaret Monk)				X					X		X						X	X

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RR-2289 (Margaret Newton)				X				X	X		X		X	X			X
RR-2290 (Margaret Rose King)				X	X				X		X			X			X
RR-2291 (Margaret Rose White)				X	X				X							X	
RR-2292 (Margaret Smith)				X			X		X	X	X	X	X			X	X
RR-2293 (Margaret Stancombe)								X									
RR-2294 (Margaret Wallace)		X		X	X			X	X	X	X	X	X	X		X	X	X
RR-2295 (Maria Fernandez Corugedo)					X					X	X	X					X	X
RR-2296 (Maria Henry)					X		X	X										
RR-2297 (Maria Oats)					X	X		X		X	X	X					X	X
RR-2298 (Maria Paloma Perez-Clemente)		X			X		X	X		X	X	X	X		X	X	X	X
RR-2299 (Maria Pike)		X			X		X	X		X	X		X	X	X		X	X
RR-2300 (Marian Francesca Curson)									X	X		X				X		X
RR-2301 (Marianne Golledge)					X					X	X	X		X	X		X	
RR-2302 (Marianne Golledge)					X					X		X	X	X			X	
RR-2303 (Marie Rahim)					X					X		X		X			X	
RR-2304 (Marie Young)							X					X						
RR-2305 (Marie-Louise Pogudin)					X					X				X	X			

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RR-2306 (Marilyn Bond)				X					X		X	X					
RR-2307 (Marilyn Marston)				X			X		X			X				X	
RR-2308 (Marina Mulliner)				X									X	X		X	
RR-2309 (Mario Duro)				X					X	X	X			X		X	X
RR-2310 (Mario Tagliaferro)		X		X				X	X	X	X	X		X	X	X	X
RR-2311 (Marion Ann Evans)									X				X				
RR-2312 (Marion Downie)		X		X			X		X		X	X		X		X	X
RR-2313 (Marion Drury)		X		X			X	X	X	X	X	X			X	X	X
RR-2314 (Marion Jane Lloyd)		X		X					X	X				X			
RR-2315 (Marion Janette Waller)		X		X			X		X		X		X	X		X	X
RR-2316 (Marion Munro)									X	X	X			X		X	X
RR-2317 (Marion Potts)		X			X				X					X		X	X
RR-2318 (Marion Rout)									X					X			X
RR-2319 (Marius Stuart Nieuwenhuis)		X					X	X	X	X	X	X			X		X	X
RR-2320 (Mark Albert Evans)		X		X			X	X	X	X	X			X		X	X	
RR-2321 (Mark Alexander Waddoups)				X					X		X			X		X	X	
RR-2322 (Mark Allen)				X					X		X						X	X

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RR-2323 (Mark Anderson)					X	X	X		X		X	X				X	
RR-2324 (Mark Ashmore)		X				X	X		X		X		X	X	X	X	X
RR-2325 (Mark Bagley)					X		X							X			X
RR-2326 (Mark Baxter)					X												
RR-2327 (Mark Brewington)					X				X	X		X		X	X			
RR-2328 (Mark Conner)					X					X							X	
RR-2329 (Mark Coomber)				X	X				X	X		X			X		X	X
RR-2330 (Mark Cooper)							X			X	X	X			X			X
RR-2331 (Mark Cornell)					X					X	X	X			X		X	X
RR-2332 (Mark Dawson)		X								X	X	X					X	
RR-2333 (Mark Dines)					X					X	X							X
RR-2334 (Mark Dixon)					X					X				X	X			X
RR-2335 (Mark Dobson)									X	X				X	X			X
RR-2336 (Mark Dobson)					X					X		X			X		X	X
RR-2337 (Mark Dobson)					X	X								X				X
RR-2338 (Mark Duncan)					X	X						X					X	
RR-2339 (Mark Edwards)										X				X	X			X

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RR-2340 (Mark Edwards)				X					X		X					X	X
RR-2341 (Mark Evans)		X		X	X		X		X	X		X	X		X		X	X	X
RR-2342 (Mark Forster)				X						X		X	X		X				X
RR-2343 (Mark Frankland)				X			X			X		X	X						
RR-2344 (Mark Frazer Rogers)				X						X					X				
RR-2345 (Mark Gorsuch)																	X		
RR-2346 (Mark Greenland)				X						X					X				
RR-2347 (Mark Harper)		X		X	X		X					X	X		X			X	X
RR-2348 (Mark Harris)				X			X	X	X	X	X	X	X	X	X	X	X	X	
RR-2349 (Mark Harris)							X			X			X		X			X	
RR-2350 (Mark Heginbotham)										X									
RR-2351 (Mark Holden)				X	X		X			X	X	X	X		X		X		X
RR-2352 (Mark Holden)				X			X			X		X	X			X			
RR-2353 (Mark Honeywood)		X		X			X	X	X	X		X	X	X	X		X	X	X
RR-2354 (Mark Hurn)					X					X					X	X	X		
RR-2355 (Mark Ian Weeks Passmore)				X			X	X		X	X	X	X		X		X	X	X
RR-2356 (Mark Jonathan Melvin)										X								X	

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RR-2357 (Mark Jones)				X	X				X		X					X	X
RR-2358 (Mark Joseph Boyd)									X		X	X	X	X		X	
RR-2359 (Mark McKenna)				X	X		X	X	X	X	X	X		X		X	X
RR-2360 (Mark Munson)									X		X					X	X
RR-2361 (Mark Nicholas Lusher)				X					X		X					X	
RR-2362 (Mark Peck)									X	X	X						X
RR-2363 (Mark Perkins)				X					X	X	X	X				X	X
RR-2364 (Mark Philip John Waine)				X					X		X					X	X
RR-2365 (Mark Pym)				X			X	X	X		X	X		X		X	X
RR-2366 (Mark Readman)				X					X		X					X	
RR-2367 (Mark Richardson)				X	X								X	X	X		
RR-2368 (Mark Shales)				X			X		X	X	X		X	X	X	X	X
RR-2369 (Mark Sheppard)				X					X	X	X		X	X		X	
RR-2370 (Mark Smith)									X								
RR-2371 (Mark Smith)				X					X		X	X		X			
RR-2372 (Mark Varney)		X			X			X	X		X		X	X	X		X
RR-2373 (Mark Watchorn)		X		X				X	X	X	X		X	X	X		X

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RR-2374 (Mark Weight)		X									X			X			X
RR-2375* (Marks Tey Parish Council)				X					X		X			X		X	
RR-2376 (Marlene Bone)		X												X		X	X
RR-2377 (Marlon O'Brien)				X	X		X	X	X	X	X	X		X		X	X
RR-2378 (Marta Makin)					X				X					X		X	
RR-2379 (Martin Bashall)		X		X			X		X	X	X	X	X	X		X	X
RR-2380 (Martin Boast)				X					X							X	
RR-2381 (Martin Brocklesby)		X		X								X		X		X	X
RR-2382 (Martin Chandler)				X					X		X			X		X	X
RR-2383 (Martin Charles West)					X		X		X		X		X	X		X	
RR-2384 (Martin Edward Pope)		X		X			X	X	X	X	X	X			X	X	X
RR-2385 (Martin Ellis)				X					X		X						
RR-2386 (Martin Gardiner)									X								
RR-2387 (Martin Ian Byron)									X							X	
RR-2388 (Martin John Burchett)				X					X		X						
RR-2389 (Martin John Fluck)				X					X			X		X		X	
RR-2390 (Martin Jonathan Hull)				X					X		X					X	X

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RR-2391 (Martin Kevin Payne)					X					X		X		X	X				
RR-2392 (Martin McBride)		X			X	X			X	X		X		X	X		X	X	X
RR-2393 (Martin Meronti)															X				
RR-2394 (Martin Orpen)					X		X	X		X	X	X		X			X	X	X
RR-2395 (Martin Osborne)		X			X								X		X			X	
RR-2396 (Martin Pasmore)					X			X		X			X		X				X
RR-2397 (Martin Richard Mountfort)		X			X		X	X	X	X	X	X		X	X	X	X	X	X
RR-2398 (Martin Simon Whiteley)		X			X		X	X	X	X	X	X	X	X	X	X		X	X
RR-2399 (Martin Snook)		X		X	X		X	X	X	X	X	X	X	X	X	X		X	
RR-2400 (Martin Starkie)					X		X	X	X	X		X		X	X	X			X
RR-2401 (Martin White)					X	X		X	X	X		X	X	X	X		X	X	X
RR-2402 (Martina Collins-stiff)							X	X							X		X		
RR-2403 (Martine Ward)		X			X	X	X			X	X				X	X	X	X	X
RR-2404 (Martn Hancock)					X					X		X	X					X	X
RR-2405 (Martyn Bryant)					X	X	X			X			X	X			X		
RR-2406 (Martyn Hart)		X			X					X	X	X							
RR-2407 (Martyn Pattie)					X					X									

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RR-2408 (Martyn Reynolds)				X	X		X		X		X	X	X	X		X		X
RR-2409 (Martyn Routs)				X			X	X	X	X	X	X			X	X	X	X
RR-2410 (Mary Bancroft)				X			X	X	X	X	X			X		X	X	X
RR-2411 (Mary Bates)				X							X	X						
RR-2412 (Mary Butcher)				X					X			X					X	
RR-2413 (Mary Caroline Durlacher)				X	X		X	X	X	X	X	X		X	X	X		X
RR-2414 (Mary Carter)				X										X				X
RR-2415 (Mary de Las Casas)				X					X		X			X		X		X
RR-2416 (Mary Jennifer Jardine)				X					X									
RR-2417 (Mary Lewis)		X		X					X	X	X		X	X			X	
RR-2418 (Mary Louise Killick)				X					X		X						X	
RR-2419 (Mary Luxmoore-Styles)		X		X				X		X				X				
RR-2420 (Mary Ockendon Cripps)				X					X		X	X		X			X	X
RR-2421 (Mary Wilson)				X					X	X	X		X	X			X	
RR-2422 (Massey Household)		X		X					X		X	X	X				X	
RR-2423 (Matt Addison)				X				X	X					X				
RR-2424 (Matt Bloom)				X			X	X	X	X	X			X			X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-2425 (Matt Day)				X			X		X	X	X	X	X	X		X	X
RR-2426 (Matt Duckworth)		X		X	X				X		X		X	X	X	X	X
RR-2427 (Matt Dyson)							X				X			X			X
RR-2428 (Matt Flack)		X		X	X				X	X	X	X		X	X	X	
RR-2429 (Matt Lennie)				X					X		X			X			
RR-2430 (Matt Noone)					X						X	X	X	X			X
RR-2431 (Matt Wills)				X				X	X					X			X
RR-2432 (Matthew Cave)		X					X		X		X		X			X	
RR-2433 (Matthew Harper)				X					X				X	X			
RR-2434 (Matthew Holland)				X	X				X		X			X	X	X	X
RR-2435 (Matthew Holland)		X		X	X				X	X			X	X	X	X	X
RR-2436 (Matthew House)				X	X				X		X		X	X		X	
RR-2437 (Matthew James Attwood)				X	X		X	X	X		X	X		X			X
RR-2438 (Matthew Lake)				X	X									X		X	
RR-2439 (Matthew Pratt)				X							X						
RR-2440 (Matthew Reed)				X										X			
RR-2441 (Matthew Scott)				X			X		X	X		X		X			X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-2442 (Matthew Shelton)				X					X		X			X		X	X
RR-2443 (Matthew Waters)		X		X					X		X			X		X	X
RR-2444 (Matthew Watson)					X				X					X			
RR-2445 (Mau Grogan)				X			X										X
RR-2446 (Maureen Ann House)				X	X					X	X			X		X	X
RR-2447 (Maureen Annette Shouksmith)		X		X	X				X		X					X	
RR-2448 (Maureen Bishop)				X					X		X						
RR-2449 (Maureen Chapman)		X			X			X						X			X
RR-2450 (Maureen Hooton)		X		X					X					X			X
RR-2451 (Maurice Gallaher)		X		X			X		X	X	X			X		X	X
RR-2452 (Max Goldring)		X		X			X	X	X	X							X
RR-2453 (Maxine Caroline Jane Smith)									X								
RR-2454 (Maxine O'Brien)		X		X	X			X	X	X		X	X	X		X	X	X
RR-2455 (Maxine Suter)				X	X		X		X	X	X	X	X	X		X	X	X
RR-2456 (Megan Powell)							X		X				X			X		X
RR-2457 (Megan Rose Hogg)									X					X				X
RR-2458 (Mehboob Somani)				X	X		X	X		X	X	X	X	X	X	X		X

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RR-2459 (Melanie Ann Lee Soomro)		X		X	X		X		X		X	X	X	X	X	X	X	X
RR-2460 (Melanie Braxton)							X							X				
RR-2461 (Melanie Butcher)				X					X		X	X						
RR-2462 (Melanie Elston)				X				X	X		X		X	X				X
RR-2463 (Melanie Hicks)		X		X	X		X	X	X	X	X			X		X	X	
RR-2464 (Melanie Jane Blackham)		X		X					X									
RR-2465 (Melanie McEwen)				X					X		X			X			X	X
RR-2466 (Melissa Watts)		X		X	X				X		X		X	X			X	
RR-2467 (Melita Hernandez)							X		X	X				X	X		X	
RR-2468* (Mellis Parish Council)				X	X		X	X	X	X	X		X	X		X		X
RR-2469 (Melody Mander)				X			X	X			X	X		X				X
RR-2470* (Mendlesham Parish Council)		X		X	X			X		X	X	X	X	X			X	X
RR-2471 (Mervyn Porter)				X				X		X	X	X		X			X	
RR-2472 (Meryl Blunk)				X						X		X	X	X			X	
RR-2473 (Mia Georgiou)		X		X	X		X		X	X		X	X	X		X	X	X
RR-2474 (Mia Maguire)				X								X		X				X
RR-2475 (Micci Keane)		X		X						X		X		X			X	

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RR-2476 (Michael Arthur Bertie Juby)				X			X					X		X			X
RR-2477 (Michael Atwell)				X					X		X					X	
RR-2478 (Michael Ayrton)		X		X				X	X	X	X		X	X	X		X
RR-2479 (Michael Baldwin)									X						X	X	
RR-2480 (Michael Barnett)											X						
RR-2481 (Michael Bone)				X	X				X		X			X			X
RR-2482 (Michael Charles Huard)		X		X	X		X		X		X	X		X		X	X
RR-2483 (Michael Charles Watson)				X			X										
RR-2484 (Michael Christopher Cushing)		X							X				X				X
RR-2485 (Michael Christopher Land)					X									X		X	
RR-2486 (Michael David Alder)				X			X		X					X		X	X
RR-2487 (Michael Day)		X		X	X				X	X		X	X	X		X	X
RR-2488 (Michael Dempsey)				X					X		X	X		X			
RR-2489 (Michael Edward Grzebalski)				X					X		X			X			X
RR-2490 (Michael Edward Randall Deed)				X				X	X		X			X			
RR-2491 (Michael Firmin)				X													X
RR-2492 (Michael Frankland)				X					X								

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RR-2493 (Michael Geoffrey Woods)				X				X			X	X					
RR-2494 (Michael George Lambert)				X	X				X	X							X
RR-2495 (Michael Gowers)				X							X			X			
RR-2496 (Michael Hallows)				X													
RR-2497 (Michael Hughes)								X					X	X	X	X	
RR-2498 (Michael Iliffe-Bradley)		X		X			X	X	X	X	X	X			X	X	X	X
RR-2499 (Michael J Yardley)				X					X		X			X			X	
RR-2500 (Michael James White)				X					X		X	X		X			X	X
RR-2501 (Michael John Collingwood Crouch)				X	X		X		X			X		X		X	X	
RR-2502 (Michael John Hunter)				X			X		X								X	
RR-2503 (Michael John Stapleton)				X					X		X							
RR-2504 (Michael Kavanagh)					X			X						X		X		
RR-2505 (Michael Moore)				X					X	X	X			X			X	
RR-2506 (Michael Patrick Franklin)				X					X		X						X	X
RR-2507 (Michael Paul Chadwick)									X							X		X
RR-2508 (Michael Poote)				X			X		X		X	X	X	X				X
RR-2509 (Michael Pope)					X				X			X				X		X

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RR-2510 (Michael Reed)				X			X				X						
RR-2511 (Michael Richmond)							X							X			
RR-2512 (Michael Robert Barker)				X			X				X						
RR-2513 (Michael Robert Edge)				X					X	X	X			X	X		X
RR-2514 (Michael Scot)				X	X				X		X			X		X	X	X
RR-2515 (Michael Senior Steel)				X			X									X	
RR-2516 (Michael Seppings)				X			X		X			X		X			
RR-2517 (Michael Shute)		X			X				X		X		X	X		X		X
RR-2518 (Michael Smallwood)							X	X	X		X			X			
RR-2519 (Michael Srokowski)				X					X		X		X	X			X	
RR-2520 (Michael Taylor)				X					X								
RR-2521 (Michael Toomer)				X	X		X		X		X	X	X	X			X	X
RR-2522 (Michael Verhaag)		X		X	X		X		X	X	X			X			X	X
RR-2523 (Michael White)				X													X	
RR-2524 (Michael William Coppeard)		X		X			X	X			X		X	X		X		
RR-2525 (Michael Wyatt)				X					X		X		X	X				X
RR-2526 (Michaela Partner)									X		X		X					

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RR-2527 (Michele Evans)					X				X		X			X		X	X
RR-2528 (Michele Joslin)					X				X				X	X		X	
RR-2529 (Michele Leone)					X	X			X	X	X	X	X	X		X	X	X
RR-2530 (Michelle Donald)		X			X				X		X		X	X				
RR-2531 (Michelle Jaqueline Whipps)		X			X				X		X		X	X				X
RR-2532 (Michelle Kemp)						X			X		X		X					X
RR-2533 (Michelle Lanchester)		X			X				X							X		X
RR-2534 (Michelle Lay-Flurrie)		X		X	X				X	X	X		X	X		X		X
RR-2535 (Michelle Lippert)					X				X		X	X		X			X	X
RR-2536 (Michelle Mckie)							X		X					X				
RR-2537 (Michelle Minnaar)					X	X			X		X		X	X				
RR-2538 (Michelle Munson)					X				X		X	X	X	X			X	X
RR-2539 (Michelle Rennett)		X			X			X	X		X		X	X			X	X
RR-2541 (Miguel Hernandez)					X			X	X	X	X					X		X
RR-2542 (Mike Bardwell)											X							
RR-2543 (Mike Cox)					X		X		X		X							
RR-2544 (Mike Navarro)					X				X					X				X

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RR-2545 (Mike Sapsford)		X			X	X	X			X		X	X	X	X	X	X	X
RR-2546 (Mikolaj Huk)				X	X					X		X			X		X	
RR-2547 (Miles Reeves)					X		X		X	X		X		X	X	X	X	X
RR-2548 (Millie Ruddock)					X	X				X		X		X	X	X		X
RR-2549 (Mining Remediation Authority)								X										
RR-2550 (Miranda Ellis-Marchant)					X	X				X		X		X	X			X
RR-2551 (Miriam Knight)					X	X	X			X		X			X		X	X
RR-2552 (Miss Eileen Shadford)												X						
RR-2553 (Miss Elizabeth Anderson)					X				X	X		X	X		X	X		
RR-2554 (Miss J Ferguson)					X		X				X	X		X	X			X
RR-2555 (Moira Berry)					X							X					X	
RR-2556 (Moira O'Shea)		X										X			X	X		X
RR-2557 (Monica Peters)					X					X		X						X
RR-2558 (Morwenna Sudbery)					X	X				X	X	X	X		X	X		
RR-2559* (Mountnessing Village Council)		X			X	X	X			X	X	X			X	X	X	X
RR-2560 (Mr A Micklem, Mrs J Micklem, Mr C Micklem)					X		X	X		X	X	X		X	X			
RR-2561 (Mr Andrew David Spencer)					X		X			X		X						

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RR-2562 (Mr Andrew Roberts)		X						X	X	X		X			X				
RR-2563 (Mr Andy Downard & Mrs Rachael Downard)											X	X				X	X		
RR-2564 (Mr Bruce Anderson)				X					X	X		X			X			X	
RR-2565 (Mr Christopher Gurney)										X	X								
RR-2566 (Mr Christopher Wood)							X			X		X		X	X		X		X
RR-2567 (Mr David Elwick)		X								X	X	X			X		X	X	X
RR-2568 (Mr Edward Marriage)		X		X	X		X	X	X	X	X	X		X	X			X	X
RR-2569 (Mr G & Mrs K Clark)				X	X		X		X	X	X	X			X				X
RR-2570 (Mr Ian Perkins)										X									X
RR-2571 (Mr J Larkin)				X	X				X	X		X			X		X		X
RR-2572 (Mr Jolyon Browning)				X															
RR-2573 (Mr Joseph Edward Marsh)				X						X		X		X				X	
RR-2574 (Mr Josh C Erith)				X					X										X
RR-2575 (Mr Julian Pawlowski)		X		X					X	X		X	X		X	X		X	
RR-2576 (Mr Kenneth Read)				X					X	X		X		X	X		X	X	X
RR-2577 (Mr N Jones & Mrs G Jones)				X			X	X	X	X	X	X	X	X	X		X	X	X
RR-2578 (Mr Nick Anderson)				X						X		X					X	X	X

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RR-2579 (Mr Peter John Garfoot)					X				X								
RR-2580 (Mr Philip Price)							X					X					
RR-2581 (Mr Rex Coleman)									X		X			X	X		X
RR-2582 (Mr Robert George Mayes)					X						X					X	
RR-2583 (Mr Robert Grover)		X			X	X			X	X	X			X	X	X	X
RR-2584 (Mr Simon Leeper)				X	X				X		X	X	X	X			X
RR-2585 (Mr Timothy PSpurge)				X													
RR-2586 (Mr. Emil Gigov)					X									X			
RR-2587 (Mrs A C Romer-Lee)					X					X			X	X			X
RR-2588 (Mrs A Prior)		X			X	X			X		X			X	X		X
RR-2589 (Mrs A Rostron)																	X
RR-2590 (Mrs Alex Arben)									X								
RR-2591 (Mrs Anne Hardie)					X		X		X		X	X					X
RR-2592 (Mrs Carolyn Jane Durrant)					X	X			X		X		X	X	X	X	
RR-2593 (Mrs Carolyn Jane Nolan)					X						X			X	X	X	X
RR-2594 (Mrs Christina Manning)								X	X					X		X	
RR-2595 (Mrs Elaine Tinsley)							X		X							X	

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RR-2596 (Mrs Elizabeth Nickerson)					X	X	X		X	X				X			
RR-2597 (Mrs Evelyn Scott)					X	X				X		X		X	X			
RR-2598 (Mrs F White)					X		X			X					X		X	X
RR-2599 (Mrs Fiona Davis)		X			X					X		X			X		X	
RR-2600 (Mrs G Tollemache)						X		X		X		X			X		X	X
RR-2601 (Mrs Heather Wager)					X					X								
RR-2602 (Mrs J C Napier)		X			X		X		X	X	X	X	X	X	X		X	X
RR-2603 (Mrs J M Thornton)						X				X								
RR-2604 (Mrs J P Budenberg)					X					X			X			X		
RR-2605 (Mrs Jayne Leeper)				X	X					X		X	X	X	X		X	X	X
RR-2606 (Mrs Karen Sara Coy)					X	X				X		X	X	X	X				X
RR-2607 (Mrs Leigh Gladwin)										X					X				
RR-2608 (Mrs Linda Butcher)		X			X					X	X						X		
RR-2609 (Mrs Lorna Briggs)					X		X			X	X		X		X	X	X		X
RR-2610 (Mrs Lynn Pascoe)					X					X		X						X	X
RR-2611 (Mrs Maia Wright)						X				X				X			X		X
RR-2612 (Mrs Margaret Cleverley)					X	X				X					X		X		

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RR-2613 (Mrs Margaret I.M. Kitson)									X		X						X
RR-2614 (Mrs Margaret Podd)				X			X	X	X		X	X	X	X			
RR-2615 (Mrs Mary Place)		X		X	X				X	X	X	X		X		X	X
RR-2616 (Mrs Norma Joan Finch)				X			X		X		X		X	X		X	X
RR-2617 (Mrs P Ellis)							X		X		X		X	X		X	X
RR-2618 (Mrs Patricia Dorcey)				X					X								X
RR-2619 (Mrs Patricia Steel)		X		X			X		X			X		X		X	
RR-2620 (Mrs Rebecca A Wilton)				X	X		X		X	X	X	X		X	X	X	X
RR-2621 (Mrs Sally French)		X		X					X	X	X			X		X	X
RR-2622 (Mrs Sarah E F Beevers)		X		X	X		X	X	X	X	X	X	X	X	X		X
RR-2623 (Mrs Sarah Lodge)		X		X	X		X		X	X	X		X	X	X	X	X
RR-2624 (Mrs Susan Read)														X		X	X
RR-2625 (Mrs Sylvia McMahon)		X							X		X		X				
RR-2626 (Mrs Tracy Potter)									X					X	X		X
RR-2627 (Mrs Yvonne Ismay)													X		X		
RR-2628 (Mrs. Gertrud Swain)		X						X	X		X			X			X
RR-2629 (Mrs. Sylvia Jean Barclay)				X	X		X	X	X		X			X			X

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RR-2630 (Ms Melody Wood)					X					X	X		X						X
RR-2631 (MSP FAIRWIND LIMITED)						X		X			X								
RR-2632 (Muhammad Ali Chaudry)					X	X					X			X					X
RR-2633 (Mungo James Rogers)					X						X								X
RR-2634 (Myles Jeeves)				X	X			X			X					X			X
RR-2635 (N G Cottey, P M Cottey, L J Cottey and S H Cottey)		X			X	X		X	X	X	X	X	X	X		X	X	X	X
RR-2636 (Nadia Chaudry)					X	X					X			X		X			X
RR-2637 (Nadine Somerville-Cutting)					X						X			X		X			X
RR-2638 (Nancy Elliott)											X			X					
RR-2639 (Nancy Hebron)											X					X			X
RR-2640 (Nancy Hughes)					X						X			X					X
RR-2641 (Nancy Sayer-Schofield)					X					X	X			X					X
RR-2642 (Natalie Hebron)						X					X			X		X			X
RR-2643 (Natalie Humphris)																			X
RR-2644 (Natalie Louise Smith)		X			X	X					X			X		X			
RR-2645 (Natalie Mitchell)		X			X			X	X		X					X			X
RR-2646 (Natalie Plowman)		X			X			X	X		X					X			X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-2647 (Natalie Smith)		X		X			X	X	X	X	X	X			X	X	X	X
RR-2648 (Natalija Robertsa)														X				
RR-2649 (Natasha Kundaiker)				X					X	X	X			X		X	X	X
RR-2650 (Natasha Richards)								X	X					X			X	
RR-2651 (Natasha Woodcock)		X		X			X	X	X	X	X	X			X	X	X	X
RR-2652 (Nathan Clark)									X		X		X			X		X
RR-2653 (Nathan Crame)				X				X	X	X	X						X	X
RR-2654 (Nathan Scofield)				X					X		X			X				
RR-2655 (Nathaniel Stuart Young)				X					X			X						
RR-2656 (National Gas Transmission Limited)							X								X			
RR-2659 (Neil Collins)		X		X					X		X						X	
RR-2660 (Neil Fordham)				X	X		X		X		X		X	X		X	X	
RR-2661 (Neil Gallagher)				X	X		X		X		X			X				X
RR-2662 (Neil Harrison)				X					X		X	X						
RR-2663 (Neil Leigh-Collyer)		X		X			X		X				X	X			X	X
RR-2664 (Neil Luckett)				X			X		X	X	X			X	X		X	X
RR-2665 (Neil Ralph Gregory)		X		X	X							X						X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-2666 (Neil Spooner)				X							X						
RR-2667 (Neil Stock)				X			X		X	X	X	X	X	X	X		X
RR-2668 (Neil Taylor)									X		X			X			X
RR-2669 (Neil Yardley)									X		X						
RR-2670 (Nettlestead (Suffolk) Parish Meeting)		X		X			X		X		X			X		X	X	
RR-2672 (Newlands Partnership)		X		X					X		X			X	X			
RR-2673 (Newney Hall Farm Partnership)		X		X	X		X	X	X	X	X	X	X	X	X		X	X
RR-2674 (Newton Barn Farm Limited)		X					X		X		X		X	X				
RR-2675 (Nichola Davis Pipe)				X	X		X		X	X	X			X		X	X	X
RR-2676 (Nichola Goodwin)				X					X		X	X		X				
RR-2677 (Nicholas Aldridge)				X					X					X				
RR-2678 (Nicholas Bates)							X									X		X
RR-2679 (Nicholas Carr)				X	X		X		X		X			X				
RR-2680 (Nicholas Cheeseman)		X		X	X		X	X	X	X	X			X		X		X
RR-2681 (Nicholas Cutting)		X		X					X	X	X							X
RR-2682 (Nicholas Dent)				X			X		X		X	X	X	X			X	
RR-2683 (Nicholas Edgley)									X					X				

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RR-2684 (Nicholas Jeremy Paul Cooper)					X	X			X		X				X	X		
RR-2685 (Nicholas John Bignell)		X			X	X	X		X		X			X			X	X
RR-2686 (Nicholas John Chandler)					X				X		X			X	X		X	
RR-2687 (Nicholas John Hughes)									X		X						X	
RR-2688 (Nicholas May)					X						X		X	X			X	X
RR-2689 (Nicholas Proud)					X									X				
RR-2690 (Nicholas Rolt)									X			X						
RR-2691 (Nicholas Spiers)					X													
RR-2692 (Nicholas Swift)					X				X		X		X	X			X	X
RR-2693 (Nicholas Ward)		X			X	X	X		X	X	X			X		X	X	X
RR-2694 (Nicholas William Beesley)					X	X	X		X	X	X			X		X	X	X
RR-2695 (Nicholas Wright)					X				X							X	X	X
RR-2696 (Nick Atkins)					X				X		X			X			X	X
RR-2697 (Nick Colling)							X		X		X	X	X	X			X	
RR-2698 (Nick Cresswell)					X			X	X		X					X		X
RR-2699 (Nick Francis)				X	X		X		X	X	X			X		X		X
RR-2700 (Nick Glanvill)								X	X		X			X	X			X

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RR-2701 (Nick Hawkins)				X					X	X				X		X	X	X
RR-2702 (Nick Jacobsen)				X				X	X		X	X						
RR-2703 (Nick Olson)				X			X		X			X		X	X	X		X
RR-2704 (Nick Proud)				X			X							X				
RR-2705 (Nick Sadler)				X					X								X	X
RR-2706 (Nick Spence)				X			X	X	X	X	X	X	X	X	X			X
RR-2707 (Nick Yates)									X									
RR-2708 (Nicky Blair)				X					X		X							X
RR-2709 (Nicky Josselyn)		X		X	X		X	X	X	X		X		X	X			X	X
RR-2710 (Nicola Bird)				X					X	X	X			X			X	X
RR-2711 (Nicola Burrows)				X								X						
RR-2712 (Nicola Carolyn Meachem)				X					X		X		X	X			X	X
RR-2713 (Nicola Casey)				X					X		X			X			X	
RR-2714 (Nicola Coates)									X		X	X					X	X
RR-2715 (Nicola Dann-Smith)		X		X	X				X		X			X		X	X	X
RR-2716 (Nicola Harper)				X														
RR-2717 (Nicola Jack)				X					X									

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RR-2718 (Nicola Johnson)							X		X		X		X		X		X
RR-2719 (Nicola Joshua)				X				X	X		X			X			
RR-2720 (Nicola Kettle)									X		X						X
RR-2721 (Nicola Maguire)				X					X		X	X				X	
RR-2722 (Nicola Miller)		X		X	X	X			X					X		X	X
RR-2723 (Nicola Moore)		X		X		X	X		X				X	X			X
RR-2724 (Nicola Ragon-Paxton)				X	X				X		X		X	X		X	X
RR-2725 (Nicola Sims)				X			X		X	X	X		X	X		X	X
RR-2726 (Nicola White)							X								X		
RR-2727 (Nicole Gibson)		X		X	X				X	X	X			X	X		X
RR-2728 (Nigel Anthony Murphy)				X					X		X			X	X		X
RR-2729 (Nigel Battell)		X		X	X		X			X				X	X		
RR-2730 (Nigel Castle)				X					X	X				X		X	
RR-2731 (Nigel Douglas Dorsett)		X		X						X							X
RR-2732 (Nigel Fisher)				X	X					X		X	X	X		X	
RR-2733 (Nigel James Dowden)				X			X	X	X	X		X		X	X		X
RR-2734 (Nigel Leech)											X					X	

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RR-2735 (Nigel Maguire)							X							X			
RR-2736 (Nigel Markham)							X						X	X			
RR-2737 (Nigel Ronald Tyrrell)				X					X								
RR-2738 (Nigel Roy House)		X		X					X								
RR-2739 (Nigel Wagland)				X			X		X							X	
RR-2740 (Nigel Wasteney)				X			X		X		X		X	X			
RR-2741 (Nikki Atkins)				X					X		X			X		X	X
RR-2742 (Nikki Nelmes)				X					X					X			
RR-2743 (Nikola Cullum)				X				X	X					X	X		X
RR-2744 (Nikolas Mallottides)				X	X						X		X	X		X	
RR-2745 (Nilesh Devshi)											X			X		X	
RR-2746 (Nina Pearce)									X								
RR-2747 (Nina Wu)		X					X		X	X	X			X		X	X
RR-2748 (No pylons lincolnshire)		X		X			X	X	X	X	X	X	X	X	X	X	X
RR-2749 (Noel Boshell)				X					X		X			X		X	
RR-2750 (Noel Carter)				X					X		X					X	
RR-2751 (Noel Mead)		X		X	X			X	X	X	X				X	X	X

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RR-2752 (Noreen McMonagle)				X					X				X	X			
RR-2754 (Norfolk Gliding Club)				X			X					X					
RR-2755 (Norfolk Local Access Forum)					X				X					X		X	
RR-2756 (Norfolk Wildlife Trust)				X			X		X		X						X
RR-2757 (Norma May Pepper)				X				X			X			X			
RR-2758 (Norma Mills)		X		X			X	X	X	X	X	X		X		X		X
RR-2759 (Norman Brown)				X					X			X		X			
RR-2760 (Norman Clowes)				X													X	
RR-2761 (Norman Smith)									X		X			X			X	
RR-2762 (Norman Stevens)		X		X		X	X	X	X	X	X		X	X		X	X	X
RR-2764* (Northumbrian Water Limited)							X				X				X			
RR-2765 (North-West and South-West of Chelmsford Parishes Group)		X			X	X		X	X	X	X							
RR-2766 (Norwich Diocesan Board of Finance Limited)		X		X	X		X	X		X							X	X
RR-2767* (Offton & Willisham Parish Council)		X		X	X		X	X		X	X	X	X	X	X	X	X	X
RR-2768 (Olive Anne Godbold, Diana Joy Johnson and Stephen Andrew Baker)		X		X			X	X		X	X	X			X		X	X
RR-2769 (Oliver Acland)		X		X					X		X	X			X		X	X

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RR-2770 (Oliver Asplin Hearsey)				X	X		X			X			X	X	X	X	
RR-2771 (Oliver Bland)				X	X				X	X		X		X	X	X		
RR-2772 (Oliver Bryan)							X			X			X		X		X	X
RR-2773 (Oliver Fisher)				X						X		X			X			
RR-2774 (Oliver Ford)				X			X			X			X	X	X	X	X	
RR-2775 (Oliver Greene)				X						X		X	X					
RR-2776 (Oliver Passmore)				X			X	X		X	X	X	X		X		X	X
RR-2777 (Olivia Violet Elden)				X						X		X			X		X	X
RR-2778 (Onawhim Investments Limited)		X		X	X		X			X		X						
RR-2779 (Oonagh Delaney)				X			X			X		X		X	X		X	X
RR-2780 (Orsett Golf Club)				X			X	X	X	X	X	X		X	X		X	
RR-2781 (Oscar Spence)		X		X			X		X	X		X		X	X		X	X
RR-2782 (Owen Warnock)				X			X			X	X		X	X	X			X
RR-2783 (P Burk)							X											
RR-2784 (P Feaviour)										X								X
RR-2785 (P Gee)				X	X					X		X			X		X	X
RR-2786 (P Nicholls)				X						X	X	X						X

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RR-2787 (P W Robinson)							X	X					X				
RR-2788 (P.G.Rix Farms Ltd)				X			X	X	X	X	X			X			X
RR-2789 (PACE Nano Energy Limited)				X			X	X			X						
RR-2790 (Paige Jones)		X		X	X		X		X	X			X	X		X	X	X
RR-2791 (Pallavi Devulapalli)		X		X					X	X	X	X				X		X
RR-2792 (Palmer and Klein Limited)		X		X			X		X	X					X			
RR-2793 (Pam Crawford)										X		X						
RR-2794 (Pam Page)				X						X		X		X			X	X
RR-2795 (Pamela Clover)								X		X	X			X	X			X
RR-2796 (Pamela Dawson)				X						X		X						
RR-2797 (Pamela Gooch)				X	X					X	X		X		X			X
RR-2798 (Pamela J King)		X			X					X			X	X	X		X	X
RR-2799 (Pamela Jarrett)					X					X								
RR-2800 (Pamela Mary White)		X			X					X	X	X	X		X		X	X
RR-2801 (Pamela McDonald)					X					X		X			X			X
RR-2802 (Paola Peroni)								X		X	X						X	
RR-2803 (Parker Strategic Land Limited)		X			X	X	X	X		X		X		X	X	X	X	

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RR-2804 (Parkers of Leicester Limited)				X	X		X	X	X		X		X		X		X	
RR-2805 (Pascale Muir)				X			X		X			X		X				
RR-2806 (Pat Bourne)														X				
RR-2807 (Pat Goodwin)				X			X		X	X			X	X		X	X	X
RR-2808 (Patricia Abel)				X					X	X	X		X	X			X	X
RR-2809 (Patricia Ann Walker)		X		X			X		X		X	X		X		X	X	X
RR-2810 (Patricia Fuller)				X			X				X		X					X
RR-2811 (Patricia Georgina Mary Cave)					X			X	X	X	X			X				X
RR-2812 (Patricia Gooding)		X		X			X	X	X	X	X		X	X				X
RR-2813 (Patricia Graves)				X	X				X		X			X				X
RR-2814 (Patricia Jones)				X	X		X		X	X	X	X		X	X	X	X	X
RR-2815 (Patricia Judith Molyneux)									X								X	
RR-2816 (Patricia Leigh)				X					X		X			X				
RR-2817 (Patricia Louise Lockwood)		X		X	X				X		X			X	X	X	X	X
RR-2818 (Patricia M Hadfield)									X					X				
RR-2819 (Patricia McCarthy)				X					X									
RR-2820 (Patricia Wynne-Willson)				X	X				X			X	X	X		X		X

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RR-2821 (Patrick Floyd)		X		X			X		X			X				X	
RR-2822 (Patrick James Hawes)									X				X		X		
RR-2823 (Patrick Larke)				X					X		X			X		X	X
RR-2824 (Paul & Jeanette Lanham - Dukes Farm)		X			X		X	X	X		X	X	X	X	X		X
RR-2825 (Paul Alexander)		X			X				X		X				X	X	X
RR-2826 (Paul and Julia Burns)				X	X		X		X					X	X	X	
RR-2827 (Paul Anthony Roberts)				X				X	X		X			X		X	X
RR-2828 (Paul Armstrong)				X			X		X								
RR-2829 (Paul Barrell)				X								X	X				
RR-2830 (Paul Beevers)				X			X		X		X					X	X
RR-2831 (Paul Bennett)				X			X		X					X	X		X
RR-2832 (Paul Blake)		X		X					X		X						
RR-2833 (Paul Blundell)				X	X		X	X	X		X		X	X			X
RR-2834 (Paul Bowerman)				X					X		X					X	X
RR-2835 (Paul Brian Halsall)		X		X	X		X	X	X	X	X	X	X	X		X	X
RR-2836 (Paul Carter)									X		X						
RR-2837 (Paul Cowper)									X			X			X		

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RR-2838 (Paul Cunningham)				X	X		X		X	X		X		X	X		X	X	X
RR-2839 (Paul Denis Seager)														X		X			
RR-2840 (Paul Donnelly)				X			X			X		X							
RR-2841 (Paul Farrelly)				X			X			X	X	X		X	X	X			X
RR-2842 (Paul Gibson)				X	X					X		X			X	X			X
RR-2843 (Paul Graham Torrington)				X			X	X				X	X		X		X		X
RR-2844 (Paul Hodges)				X						X		X			X			X	X
RR-2845 (Paul Holland)				X											X				
RR-2846 (Paul Howard)		X		X	X		X	X	X	X		X		X	X		X		X
RR-2847 (Paul John Whittle)				X	X		X	X		X	X	X		X	X		X	X	X
RR-2848 (Paul Jonathan Curson)		X		X						X				X	X			X	
RR-2849 (Paul Langford)				X						X	X	X	X	X	X			X	
RR-2850 (Paul Lloyd)										X				X		X			X
RR-2851 (Paul Maleary)				X						X		X	X						
RR-2852 (Paul McEwen)				X						X		X		X				X	
RR-2853 (Paul McNamara)				X															X
RR-2854 (Paul Michael wood)										X		X		X					

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RR-2855 (Paul Molyneux)				X			X	X	X	X	X	X	X	X	X	X		
RR-2856 (Paul Montgomery)				X			X	X		X	X		X		X	X		X
RR-2857 (Paul O'Driscoll)				X						X								
RR-2858 (Paul R Brooks)				X			X			X				X				
RR-2859 (Paul Scutcher)		X		X			X	X		X		X	X	X		X	X	X
RR-2860 (Paul Southwood)				X			X				X							
RR-2861 (Paul Stephen Jarrett)				X						X	X		X					
RR-2862 (Paul Stratford)				X						X	X			X				
RR-2863 (Paul Thompson)		X		X			X	X	X	X	X	X	X	X				X
RR-2864 (Paul Tuckfield)		X		X							X			X				
RR-2865 (Paul Watson)				X							X			X			X	X
RR-2866 (Paul Wenden)					X					X								
RR-2867 (Paul Whittles)				X				X										
RR-2868 (Paul Williams)										X				X				X
RR-2869 (Paula Bland)				X						X		X	X	X				X
RR-2870 (Paula Clark)				X						X		X		X			X	X
RR-2871 (Paula Coleman)										X				X				X

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RR-2872 (Paula Holland)		X			X	X			X	X	X	X	X	X	X	X	X	X
RR-2873 (Paula Howard)					X					X		X			X		X	
RR-2874 (Paula Worrow)					X				X	X			X	X	X	X	X	X
RR-2875 (Pauline Ann Young)										X					X			
RR-2876 (Pauline Griffiths)				X			X											
RR-2877 (Pauline Leigh-Collyer)					X					X					X			
RR-2878 (Pauline Tan Bee Kean)														X				
RR-2879 (Paulo Pisani)					X		X	X		X	X	X	X		X			X
RR-2880 (Pearce family)		X			X	X	X	X	X	X	X		X	X	X		X	X
RR-2881 (Penelope Ann Lansdown)										X								X
RR-2882 (Penelope Bullock)					X				X	X			X		X	X		X
RR-2883 (Penelope Morgan)					X		X			X		X	X		X		X	X
RR-2884 (Penelope Richards)		X							X	X			X	X				X
RR-2885 (Penelope Savill)					X					X		X						X
RR-2886 (Penelope Szczuka)		X			X					X	X					X		X
RR-2887 (Penny Lang)					X		X	X		X		X			X		X	
RR-2888 (Penny Langran)										X					X			

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-2889 (Perry Foley)				X				X	X		X		X	X			X
RR-2890 (Perry Saunders)				X				X	X	X				X	X	X	
RR-2891 (Pete Lightbown)				X				X	X		X		X	X		X	X
RR-2892 (Pete White)				X					X		X			X		X	X
RR-2893 (Peter Adams)		X							X				X	X	X		X
RR-2894 (Peter Baxter)				X					X		X						X
RR-2895 (Peter Brooker)				X													
RR-2896 (Peter Brown)				X								X				X	
RR-2897 (Peter Charles Finch)				X							X						X
RR-2898 (Peter Cheng)		X		X	X		X		X	X	X	X		X	X	X	X
RR-2899 (Peter Cowling)				X					X		X					X	X
RR-2900 (Peter Davies)				X					X								X
RR-2901 (Peter Dudley)				X			X				X	X					
RR-2902 (Peter Dye)				X	X			X	X		X	X		X		X	
RR-2903 (Peter Edward Crowhurst)				X			X				X						
RR-2904 (Peter Finnie)							X		X		X						X
RR-2905 (Peter Frederick Rowles)				X					X					X			

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RR-2906 (Peter Gibbs)					X	X			X		X					X	
RR-2907 (Peter Gladwin)					X				X							X	
RR-2908 (Peter Godfrey Reynolds)					X					X	X		X	X			
RR-2909 (Peter Gray)					X				X		X	X		X		X	
RR-2910 (Peter Harris)					X	X	X		X	X	X	X		X	X	X	
RR-2911 (Peter Holmes)					X	X			X	X		X	X	X	X		
RR-2912 (Peter John Kendal)					X					X		X					
RR-2913 (Peter John Sampson)					X	X			X		X			X	X	X	X
RR-2914 (Peter John Wells)					X					X				X			
RR-2915 (Peter Josselyn)		X			X	X	X	X	X	X	X		X	X	X	X	X
RR-2916 (Peter Keane)		X			X	X				X	X		X	X		X	
RR-2917 (Peter Lancaster)		X			X					X						X	
RR-2918 (Peter Lofting)										X	X	X		X		X	
RR-2919 (Peter McAdams)					X												
RR-2920 (Peter Mead)					X		X							X			
RR-2921 (Peter Pettigrew)					X	X				X				X		X	
RR-2922 (Peter Purssord)				X	X					X							X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-2923 (Peter Rothera)				X			X	X	X	X	X	X	X		X		X	X	X
RR-2924 (Peter Schmidt-Hansen)		X				X	X				X	X			X	X		X	X
RR-2925 (Peter Sleigh)		X		X			X	X		X	X	X	X			X	X	X	X
RR-2926 (Peter Smith)		X		X			X			X			X						
RR-2927 (Peter Smith)				X		X				X	X	X			X		X		
RR-2928 (Peter Stock)										X							X		X
RR-2929 (Peter Tubby)										X									
RR-2930 (Peter Tyler)				X						X	X	X			X			X	X
RR-2931 (Peter William Colchester)		X		X						X				X	X				X
RR-2932 (Peter William Dudley)										X		X							
RR-2933 (Peter Willows)								X						X	X	X		X	
RR-2934 (Peter Woolley)						X			X	X					X	X	X		X
RR-2935 (Petrina Penn)				X						X		X			X			X	X
RR-2936 (Phil Downs)										X		X			X			X	
RR-2937 (Phil Rees)				X						X	X	X			X			X	X
RR-2938 (Philip Barnes)		X		X			X	X	X	X	X	X	X	X	X				X
RR-2939 (Philip Berry)				X						X	X	X			X			X	

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RR-2940 (Philip Brown)					X					X								X
RR-2941 (Philip C Torr)										X		X		X	X			X
RR-2942 (Philip Christopher Marcus Hamblin)		X			X			X		X		X			X		X	X	X
RR-2943 (Philip Cunningham)											X								
RR-2944 (Philip Dowding-Young)					X					X									
RR-2945 (Philip Edmund Stephen Price)					X					X					X		X		
RR-2946 (Philip Goldberg)					X					X		X						X	
RR-2947 (Philip Hoby)		X			X	X		X		X		X			X		X	X	X
RR-2948 (Philip John Morrey)		X		X	X			X	X	X	X	X	X		X				X
RR-2949 (Philip John Whiscombe)		X			X	X		X	X	X	X	X	X	X	X	X	X	X	X
RR-2950 (Philip Langford)					X					X			X	X	X			X	
RR-2951 (Philip Roy Baker)					X				X	X			X		X		X	X	X
RR-2952 (Philip Studd)					X			X	X	X	X	X	X	X	X			X	X
RR-2953 (Philip Thorpe-Apps)					X					X	X		X		X		X	X	X
RR-2954 (Philip Whitehead)					X					X		X		X					
RR-2955 (Philippa Jessica Agent)					X							X					X	X	
RR-2956 (Philippa Mary Black)										X	X	X			X			X	X

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RR-2957 (Phillip Blyth)					X				X		X			X		X	
RR-2958 (Phillip Palmer)		X			X	X	X	X	X	X	X	X		X		X	X	X
RR-2959 (Phoebe Butcher)				X	X		X		X			X						
RR-2960 (Piers Halsall)		X			X	X	X		X		X	X	X	X		X	X	X
RR-2961 (Piers Sturridge)							X		X									X
RR-2962 (Pippa Baxter)					X									X		X		X
RR-2963 (Pivoted Power LLP)							X								X			
RR-2964 (PJHP LIMITED)		X			X		X	X	X	X	X	X	X	X			X	X
RR-2965 (Polly Darby)																		X
RR-2966 (Polly Eddis)									X							X		
RR-2967 (Polly Rodger Brown)					X		X		X		X	X					X	
RR-2968 (Port of Tilbury London Limited)								X			X					X		
RR-2969* (Priory Farm Aviators (Tibenham))				X	X		X		X			X		X			X	
RR-2970 (Priscilla Victoria Latham)				X		X			X	X			X	X			X	
RR-2971 (Prof. Mike Alder)					X				X			X		X			X	
RR-2972 (Push Energy (Boxted Airfield) Ltd)					X	X		X			X		X					
RR-2973 (Pylons East Anglia Ltd)		X			X		X	X	X	X	X	X	X	X	X	X	X	X

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RR-2974 (Queens Head Great Wenham)				X					X					X	X		
RR-2975 (Quinlan Terry)		X		X			X		X	X		X		X	X			X
RR-2976 (R Balls)		X		X					X	X		X			X		X	
RR-2977 (R D & J Burridge)		X		X			X											
RR-2978 (R G Derriman)		X								X					X		X	
RR-2979 (R Matic)		X		X			X		X	X	X	X	X	X	X		X	
RR-2980 (R Wrince Ltd)		X							X	X		X			X			X
RR-2981 (R Wrinch Ltd)		X			X				X	X	X			X	X		X	
RR-2982 (Rachael Edwards)										X		X			X			
RR-2983 (Rachael Holden)		X		X	X			X		X			X	X	X	X	X	X
RR-2984 (Rachael Hopkins)				X						X								
RR-2985 (Rachael Miller)							X			X		X						
RR-2986 (Rachael Thackery)				X	X					X			X	X	X			
RR-2987 (Rachel Brown)										X					X		X	X
RR-2988 (Rachel Buckenham)				X						X		X						X
RR-2989 (Rachel Canham)				X	X					X		X	X				X	X
RR-2990 (Rachel Cremnitz)				X						X		X		X	X		X	

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RR-2991 (Rachel Gay)					X					X		X			X			X	
RR-2992 (Rachel Hills)		X			X		X		X		X	X			X				X
RR-2993 (Rachel Housden)						X	X		X	X	X	X		X	X		X		X
RR-2994 (Rachel Kiddie)					X	X				X		X		X	X		X	X	X
RR-2995 (Rachel Thomas)										X					X		X	X	
RR-2996 (Rachel Wells)		X			X					X		X	X		X	X			X
RR-2997 (Rachel White)		X			X		X	X		X	X	X	X			X	X	X	X
RR-2998 (Radnoel Ltd)					X		X			X	X	X		X	X				X
RR-2999 (Rae Minnitt)		X			X					X		X							
RR-3000 (Rae Tasyaka)					X					X		X			X			X	
RR-3001 (Ralph Anthony Carpenter)					X		X			X		X	X		X			X	
RR-3002 (Ray Harris)					X	X	X			X	X	X					X	X	X
RR-3003 (Ray Spreadbury)		X			X	X				X		X		X	X		X	X	X
RR-3004 (Raydon and District Model Aircraft Club)				X															
RR-3005 (Raymond Allen)					X	X	X			X	X	X	X	X	X	X	X		X
RR-3006 (Raymond Newby)		X			X		X			X	X	X		X	X		X		X
RR-3007 (Raynor Sumner)					X					X			X				X		X

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RR-3008 (Rebecca Bartle)									X	X		X			X				
RR-3009 (Rebecca Ebbrell)		X			X	X									X			X	X
RR-3010 (Rebecca Emmerson)					X					X									
RR-3011 (Rebecca Gaston)					X					X		X						X	
RR-3012 (Rebecca Gillanders)		X			X	X	X	X		X	X	X			X		X	X	X
RR-3013 (Rebecca Nottage)		X			X			X		X	X	X	X		X	X	X	X	X
RR-3014 (Rebecca Orchard)										X		X			X				X
RR-3015 (Rebecca Paul)					X					X		X						X	
RR-3016 (Rebecca Pretorius)					X					X				X	X			X	
RR-3017 (Rebecca Race)															X				
RR-3018 (Rebecca Warburton)						X				X		X							X
RR-3019 (Rebecca Ward)		X			X					X	X					X			X
RR-3020 (Rebekah Nasta)					X	X				X	X	X			X		X	X	X
RR-3021 (Reece Poole)		X			X	X	X	X		X	X	X	X		X	X	X	X	X
RR-3022 (Reginald George Agambar)					X		X		X	X	X	X		X	X			X	X
RR-3023 (Remus Memorial Horse Sanctuary)					X	X				X	X	X			X		X	X	X
RR-3024 (REMUS MEMORIAL HORSE SANCTUARY)		X			X	X	X		X	X			X		X		X	X	X

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RR-3025 (Renato Schmid)									X								
RR-3026 (Renna Foufouni)											X			X			
RR-3027 (Rev Christopher Willis)				X					X							X	
RR-3028 (Rex Webster)		X		X	X		X	X	X	X	X			X		X	X	X
RR-3029 (Rhona Lucille Canham Bland)				X					X					X		X	
RR-3030 (Richard Alasia)				X					X			X				X	
RR-3031 (Richard Allan)		X		X	X		X	X	X	X	X	X	X	X		X	X	X
RR-3032 (Richard Allard)				X					X					X	X	X		
RR-3033 (Richard Allen)				X							X							
RR-3034 (Richard Ashley Clayton)				X														
RR-3035 (Richard Aston Wright)				X							X			X				
RR-3036 (Richard Baker)				X					X							X		
RR-3037 (Richard Beckensall)				X	X		X		X		X		X	X		X		X
RR-3038 (Richard Billingham)				X	X				X		X		X			X	X	X
RR-3039 (Richard Bloom)		X		X	X			X	X		X			X	X		X	X
RR-3040 (Richard Brotherton)				X					X		X			X			X	
RR-3041 (Richard Bruce, Michael Bruce & Jack Bruce)		X		X														

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RR-3042 (Richard Bullock)					X	X			X	X	X			X	X	X	X	X	X
RR-3043 (Richard Butler)										X		X					X		
RR-3044 (Richard Cattermole)		X			X			X		X	X	X			X		X	X	X
RR-3045 (Richard Clachan)								X		X				X	X				
RR-3046 (Richard Clark)					X					X	X						X		X
RR-3047 (Richard Dilwyn Hawker)					X					X					X				
RR-3048 (Richard Dixon)		X			X	X				X									
RR-3049 (Richard Everitt)					X			X		X	X	X			X			X	
RR-3050 (Richard Gerard Somerville)					X			X		X	X		X		X	X	X	X	X
RR-3051 (Richard Golledge)					X					X	X	X			X				
RR-3052 (Richard Golledge)					X					X		X						X	
RR-3053 (Richard Gough)									X										
RR-3054 (Richard Halfhide)		X			X			X	X	X	X	X		X	X			X	X
RR-3055 (Richard Harrowven)		X		X	X	X		X	X		X	X	X		X		X		X
RR-3056 (Richard Hornbrook)										X									
RR-3057 (Richard James Bullock)		X			X	X		X	X	X	X	X	X	X	X		X	X	X
RR-3058 (Richard James Guy Davies)					X				X		X	X	X		X			X	X

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RR-3059 (Richard John Broom)									X								
RR-3060 (Richard John Pike)				X	X				X		X		X	X		X	X
RR-3061 (Richard John Spencer Mason)				X					X								
RR-3062 (Richard Jowers)									X						X		
RR-3063 (Richard Langton)											X			X			
RR-3064 (Richard Long Group Limited)				X			X	X							X		
RR-3065 (Richard Long Limited)		X		X				X	X								
RR-3066 (Richard Mabey)				X			X		X		X	X	X	X		X	
RR-3067 (Richard Mann)				X					X		X	X		X	X		X
RR-3068 (Richard McLanaghan)									X					X			X
RR-3069 (Richard Negus)		X							X			X				X	X
RR-3070 (Richard Newman Minns)													X				
RR-3071 (Richard P Marriage)					X				X			X	X				X
RR-3072 (Richard Parkin)				X	X		X		X	X	X	X	X	X	X	X	X
RR-3073 (Richard Parrotte)							X		X			X					
RR-3074 (Richard Plummer)				X					X			X					
RR-3075 (Richard Shute)		X		X	X				X		X			X		X	X

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RR-3076 (Richard Sidebottom)					X				X	X		X			X				
RR-3077 (Richard Simpson)					X			X	X		X	X	X		X		X	X	X
RR-3078 (Richard Spencer Culley)															X				
RR-3079 (Richard Stacey)		X			X		X		X						X				
RR-3080 (Richard Thomas Clarke)										X		X			X		X	X	
RR-3081 (Richard Tomkins)				X	X		X		X	X					X			X	X
RR-3082 (Richard Waters)		X			X				X	X		X							X
RR-3083 (Richard Westlake Wall)		X			X	X	X		X	X			X		X	X	X		X
RR-3084 (Richard White)		X				X	X			X			X	X	X		X		X
RR-3085 (Richard William Rackham)					X					X		X	X					X	
RR-3086 (Richard William White)		X			X	X	X	X	X	X		X	X	X	X	X	X	X	X
RR-3087 (Richard Worn)								X		X		X			X			X	X
RR-3088 (Rick Stainton)		X			X		X	X		X	X		X	X	X			X	X
RR-3089 (Rita Dent)										X					X			X	
RR-3090 (Rita Joan Stringer)		X			X	X	X			X	X	X	X	X	X	X	X	X	X
RR-3091 (Rita Watts)		X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
RR-3092 (Rita White)										X									

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RR-3093 (Rob Curtis)					X	X					X			X			
RR-3094 (Rob Davies)							X							X	X	X	
RR-3095 (Rob Swan)				X					X		X	X		X			X
RR-3096 (Robert Alan Brand)				X	X				X		X			X		X	
RR-3097 (Robert Alan Spencer)				X			X		X	X	X		X	X		X	
RR-3098 (Robert Andrew Day)				X	X				X	X				X		X	X	
RR-3099 (Robert Barrett)		X			X		X	X	X	X				X	X	X	X	X
RR-3100 (Robert Beevers)		X		X					X		X			X			X	X
RR-3101 (Robert Christopher Millar)		X		X	X				X		X		X	X		X	X	X
RR-3102 (Robert Cohen)				X	X			X	X							X		
RR-3103 (Robert Crayston)		X		X	X		X		X		X			X	X	X		
RR-3104 (Robert David Mills)							X				X							
RR-3105 (Robert David Reynolds)				X				X	X		X		X	X		X		
RR-3106 (Robert Douglas Finch)				X					X		X		X	X			X	X
RR-3107 (Robert Elliott)				X					X		X			X			X	X
RR-3108 (Robert Erith)				X					X		X	X		X				
RR-3109 (Robert Fletcher)				X					X									

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RR-3110 (Robert Foreman)		X		X					X		X			X			X
RR-3111 (Robert Frederick Barnett)		X		X			X		X	X	X		X	X	X	X	X	X
RR-3112 (Robert George Hewes)				X					X									
RR-3113 (Robert Gooderham)				X					X		X		X				X	
RR-3114 (Robert Hall)		X		X					X	X	X	X	X	X			X	X
RR-3115 (Robert Harrington)		X		X	X		X		X	X	X	X		X		X		X
RR-3116 (Robert Hazell)				X					X		X			X			X	
RR-3117 (Robert Hill)		X		X			X		X	X	X	X	X				X	X
RR-3118 (Robert Holmes)											X							
RR-3119 (Robert Jardine)		X		X			X		X	X	X	X		X				
RR-3120 (Robert John Hosea)				X			X		X					X		X	X	X
RR-3121 (Robert John Middleton)											X			X			X	
RR-3122 (Robert Long)											X			X				
RR-3123 (Robert Mark Johnson)									X							X		X
RR-3124 (Robert Mills)								X										
RR-3125 (Robert Moore)		X		X			X		X		X							
RR-3126 (Robert Nelmes)				X					X		X			X				

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3127 (Robert Open)				X													
RR-3128 (Robert Prior)									X			X	X	X			
RR-3129 (Robert Richardson)									X					X			
RR-3130 (Robert Smith)				X	X	X	X		X	X	X			X	X	X	X	X
RR-3131 (Robert Strathern)		X			X			X	X					X			X	X
RR-3132 (Robert Turner)				X	X	X	X		X	X	X	X		X		X	X	X
RR-3133 (Robert Wallace)				X					X		X							
RR-3134 (Robert Wass)				X	X	X	X	X	X	X	X	X		X			X	X
RR-3135 (Robert Willis)				X	X		X		X	X	X		X	X		X	X	
RR-3136 (Robert Wrinch)		X											X					X
RR-3137 (Robin Andrew Parkinson)		X		X							X			X			X	
RR-3138 (Robin Backhouse)				X			X		X			X					X	X
RR-3139 (Robin Dixon)				X			X	X	X	X	X	X	X	X	X	X		X
RR-3140 (Robin Graygoose)				X	X				X	X				X				X
RR-3141 (Robin James Holmes)									X		X		X				X	X
RR-3142 (Robin Paddock)				X			X		X	X		X					X	
RR-3143 (Robyn Eastwood)									X		X			X		X		X

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RR-3144 (Robyn Holmes)				X	X			X	X	X	X	X	X	X	X		X	X	X
RR-3145 (Rockbroon Ltd)		X		X	X		X	X		X		X		X	X			X	X
RR-3146 (Rod MacDonald)				X						X			X					X	
RR-3147 (Rod Tredgett)				X			X			X					X		X		X
RR-3148 (Rodney Black Design Studios)				X	X				X	X	X				X				X
RR-3149 (Rodney Eric Till)				X	X				X	X	X	X	X	X	X				X
RR-3150 (Roger A Van Egmond)				X						X		X						X	X
RR-3151 (Roger Allen)				X						X			X						
RR-3152 (Roger Goodwin)				X						X				X	X			X	X
RR-3153 (Roger John Heap)		X		X			X	X		X	X	X	X			X	X	X	X
RR-3154 (Roger Jones)							X												
RR-3155 (Roger Luxmoore-Styles)		X		X			X		X	X	X								
RR-3156 (Roger Plowman)										X								X	
RR-3157 (Roger Ranson)				X								X	X			X		X	
RR-3158 (Roger Sparrow)				X						X		X			X				X
RR-3159 (Roger Walker)				X	X					X		X		X				X	X
RR-3160 (Roisin O'Shea)		X					X			X		X		X	X		X	X	

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RR-3161 (Roland Alan Knott)		X		X	X				X				X	X		X	X	X
RR-3162 (Roly Hitchcock)		X		X	X			X	X	X	X	X	X	X		X	X	X
RR-3163 (Romany Foster)		X		X	X				X	X	X	X	X	X		X	X	X
RR-3164 (Ron Goodyear)				X								X	X					
RR-3165 (Ron Lennard)				X						X			X					
RR-3166 (Rona Hammond)				X	X					X		X						
RR-3167 (Ronald Feaviour)							X							X				X
RR-3168 (Ronald Hugo Rosenthal)				X			X					X						
RR-3169 (Ronald William Smith)				X								X						
RR-3170 (Rookery Farm Ltd)				X								X						
RR-3171 (Rory Suckling)				X									X	X	X		X	
RR-3172 (Rosamond Sternberg)				X	X					X		X			X			X
RR-3173 (Rosanna Boscawen)				X						X	X	X					X	
RR-3174 (Rosanna Kellingray)				X						X							X	
RR-3175 (Rosemary Anne Heaney)				X			X					X						
RR-3176 (Rosemary Bennett)		X								X		X			X	X	X	
RR-3177 (Rosemary Carron Brown)				X						X		X		X	X			

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RR-3178 (Rosemary Carter)				X					X		X			X		X	X
RR-3179 (Rosemary Charles)									X		X			X			
RR-3180 (Rosemary Hamilton Coppeard)		X		X					X				X	X	X	X	
RR-3181 (Rosemary Heaney)		X		X			X		X		X	X	X	X		X	X
RR-3182 (Rosemary Jane Black)							X						X				
RR-3183 (Rosemary Leno)				X					X	X	X			X	X		X
RR-3184 (Rosemary Prince)				X	X				X		X			X	X	X	
RR-3185 (Rosemary Rayner)		X		X				X	X		X		X	X	X	X	X
RR-3186 (Rosemary Sarah Lee)		X		X			X							X			
RR-3187 (Rosemary Smith)				X					X								
RR-3188 (Rosemary Warnock)				X			X		X	X	X		X				X
RR-3189 (Rosie Chamberlain)				X					X		X					X	X
RR-3190 (Rosie Jackson)		X		X	X		X	X		X	X			X		X	X
RR-3191 (Rosie Sparkes)								X	X					X		X	X
RR-3192 (Rosina George)				X	X		X		X		X		X	X		X	X
RR-3193 (Roslin Barnes)				X					X	X		X		X		X	X
RR-3194 (Ross Clelland)				X					X		X			X			

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RR-3195 (Rosy Stamp)				X	X				X	X	X			X		X	X
RR-3196 (Rowan Francis)				X	X				X	X	X		X	X			X
RR-3197 (Rowena Burch)		X							X		X	X		X	X	X	X
RR-3198 (Rowland Warboys)					X				X					X			
RR-3199 (Roxy Boyce-Bown)									X	X				X	X	X	
RR-3200 (Roy Clover)									X		X					X	
RR-3201 (Roy Henry Hignett)		X		X					X	X	X		X	X			X
RR-3202 (Roy Trickett)				X						X							
RR-3203* (Royal Mail)					X				X						X		
RR-3204* (Roydon Parish Council)		X		X	X		X	X	X	X	X	X	X	X	X	X	X
RR-3205 (RPM Farming Ltd)		X		X			X	X	X	X	X	X		X	X	X	X
RR-3206 (Rudi Swart)				X						X	X	X		X			X
RR-3207 (Rupert Carter)		X		X						X	X			X			X
RR-3208 (Russell Bacon)													X	X			
RR-3209 (Russell Matthews)				X	X		X		X	X	X	X	X	X	X		X
RR-3210 (Russell Peter Newsham)				X			X			X		X		X			
RR-3211 (Russell Sainty)				X						X				X			

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RR-3212 (Russell Taylor)				X			X		X	X			X	X			X
RR-3213 (Ruth Griffiths)									X					X			
RR-3214 (Ruth Luckham)				X					X		X		X			X	
RR-3215 (Ruth Marsh)				X					X		X		X	X			X
RR-3216 (Ruth Mary Grace Davies)		X		X			X	X	X		X	X			X	X	X
RR-3217 (Ryan Maslen)		X		X					X		X	X		X		X	X
RR-3218 (S J R Farming Ltd)				X			X		X	X	X		X	X			X
RR-3219 (S J Upton Trustees No 1 Limited)		X		X	X		X	X	X	X	X	X	X	X		X	X
RR-3220 (S J Upton Trustees No 2 Limited)		X		X			X		X		X			X			
RR-3221 (S Lewis)				X			X		X		X			X		X	
RR-3222 (S Pearce)							X		X		X	X		X	X	X	
RR-3223 (S V J Sims)				X			X				X						
RR-3224 (Sallianne Taylor)				X					X		X	X		X	X	X	X
RR-3225 (Sally Addington)					X				X				X	X			X
RR-3226 (Sally Barley)									X		X				X	X	
RR-3227 (Sally Charles)				X								X		X			
RR-3228 (Sally Fox)				X					X		X						X

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RR-3229 (Sally Frankland)					X				X			X		X			
RR-3230 (Sally Green)		X			X		X		X	X	X	X	X	X		X	
RR-3231 (Sally Harper)					X						X				X	X	X
RR-3232 (Sally Hibbler)		X		X	X		X		X	X	X	X	X	X	X	X	X
RR-3233 (Sally Jackson)					X				X	X	X		X				X
RR-3234 (Sally Johns Green)					X					X	X						
RR-3235 (Sally Ryan)														X			
RR-3236 (Sally Thurlow)		X			X					X	X			X	X	X	X
RR-3237 (Sally Walker)					X					X	X			X		X	X
RR-3238 (Sally-Ann Valerie Head)		X			X	X	X			X	X	X		X	X	X	
RR-3239 (Samantha Bearman)					X					X	X				X	X	
RR-3240 (Samantha Flower)		X			X		X	X	X	X	X	X	X	X	X	X	X
RR-3241 (Samantha M C Steingold)					X					X			X				X
RR-3242 (Samantha Morgan)					X					X		X		X		X	X
RR-3243 (Samantha Payne)					X					X		X		X			
RR-3244 (Samantha Piercy)					X	X	X	X	X		X	X	X	X	X		X
RR-3245 (Samantha Rodwell)										X							

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RR-3246 (Samantha Rothera)				X	X	X	X	X	X	X	X	X	X	X		X	X	X
RR-3247 (Samantha Selby)				X					X	X	X	X		X				X
RR-3248 (Samantha Sismey)		X		X	X			X	X		X		X			X	X	X
RR-3249 (Sampson Peter Marriage)				X	X	X			X		X	X		X				
RR-3250 (Samuel Dixey)						X			X		X	X						
RR-3251 (Samuel Pike)		X		X		X	X		X	X		X		X	X		X	X
RR-3252 (Samuel Seddon)				X				X			X						X	
RR-3253 (Sanda Elena Bowden)				X					X					X			X	X
RR-3254 (Sandra Ann Smith)				X					X									X
RR-3255 (Sandra Ann Wright)				X					X	X	X			X			X	
RR-3256 (Sandra Bailey)				X					X					X			X	X
RR-3257 (Sandra Betts)		X		X				X	X		X		X	X			X	X
RR-3258 (Sandra Billingham)				X	X				X		X		X	X	X			X
RR-3259 (Sandra Brown)					X				X	X						X	X	X
RR-3260 (Sandra Carter)				X					X		X						X	
RR-3261 (Sandra Ellen Harris)							X		X							X	X	
RR-3262 (Sandra Jacqueline Green)		X		X					X									X

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RR-3263 (Sandra Mortlock)									X		X			X		X			X
RR-3264 (Sandra Peggy Baker)					X				X				X	X				
RR-3265 (Sandra Pressley)		X			X		X	X	X		X	X	X	X					X
RR-3266 (Sandra Williams)					X					X	X		X	X					
RR-3267 (Sandy Campbell-Smith)					X				X	X	X						X		X
RR-3268 (Sara Alison Smith)							X		X	X									X
RR-3269 (Sara Ann Knight)					X						X	X					X		
RR-3270 (Sara Catherine Eley)					X	X				X									
RR-3271 (Sara Crabb)						X					X			X					
RR-3272 (Sara Johnson)						X	X					X		X					
RR-3273 (Sara Prince)					X					X									
RR-3274 (Sarah Allen)					X					X	X	X		X	X			X	X
RR-3275 (Sarah Ayrton)					X	X			X	X	X	X		X	X				X
RR-3276 (Sarah Beckensall)					X	X	X			X	X	X		X	X		X	X	X
RR-3277 (Sarah Bell)		X		X	X				X	X		X			X		X	X	X
RR-3278 (Sarah Bigland)					X					X		X							
RR-3279 (Sarah Bond)					X					X					X	X		X	X

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RR-3280 (Sarah Carr)				X													
RR-3281 (Sarah Casey)					X				X							X	X
RR-3282 (Sarah Clark)				X			X										
RR-3283 (Sarah Dickie)				X			X		X		X			X			
RR-3284 (Sarah Edge)				X				X	X							X	X
RR-3285 (Sarah Evans)				X	X				X				X	X	X	X	X
RR-3286 (Sarah Eyles)				X	X				X		X		X	X		X	X
RR-3287 (Sarah Ferriby)		X		X				X	X		X			X		X	
RR-3288 (Sarah Frost)				X	X				X		X			X		X	
RR-3289 (Sarah Grant)				X					X		X					X	X
RR-3290 (Sarah Groves)				X					X		X			X		X	
RR-3291 (Sarah Hester)					X		X		X				X	X			
RR-3292 (Sarah House)				X	X				X						X		X
RR-3293 (Sarah Jaques)											X					X	
RR-3294 (Sarah Kersch)									X			X	X				X
RR-3295 (Sarah Knock)		X		X						X		X			X		X
RR-3296 (Sarah Langley)									X	X	X						X

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RR-3297 (Sarah Learmont)		X		X	X				X						X		X
RR-3298 (Sarah Liane Sommers)							X				X						
RR-3299 (Sarah Mackay)				X	X	X			X		X		X	X	X	X	X
RR-3300 (Sarah Maclean)									X					X		X	X
RR-3301 (Sarah Manning)				X					X	X		X		X			
RR-3302 (Sarah Matthews)				X							X						
RR-3303 (Sarah Mcgougan)		X		X	X	X	X	X	X		X	X	X	X	X	X	X
RR-3304 (Sarah Mold)		X		X		X	X		X	X	X	X			X	X	X
RR-3305 (Sarah Naylor)														X		X	
RR-3306 (Sarah Orrell)									X	X	X						
RR-3307 (Sarah Parker)				X		X	X	X	X				X	X		X	X
RR-3308 (Sarah Partridge)		X		X		X		X	X	X	X					X	X
RR-3309 (Sarah Radley)				X					X			X					
RR-3310 (Sarah Riddick)									X								
RR-3311 (Sarah Ruddock)		X		X	X	X		X	X	X	X		X	X		X	X
RR-3312 (Sarah Shelton)				X					X	X	X	X		X			X
RR-3313 (Sarah Simpson)				X													

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RR-3314 (Sarah Thornton)				X					X		X					X	
RR-3315 (Sarah Travers)		X		X	X				X		X			X	X	X		X
RR-3316 (Sarah Vermont)		X		X			X	X	X	X	X		X					
RR-3317 (Sarah Waddington)		X		X			X	X	X	X	X	X			X	X	X	X
RR-3318 (Sarah Walsh)				X			X	X	X				X	X			X	X
RR-3319 (Sasha Chipperfield)									X				X	X		X		
RR-3320 (Savannah Elise Morrish)				X	X				X		X			X			X	X
RR-3321 (SBS Spares Ltd)								X									X	
RR-3322 (Scott Bailey)							X		X					X			X	
RR-3323 (Scott Family)					X				X	X				X		X		X
RR-3324 (Scott Francis Huggins)				X			X		X		X	X		X			X	
RR-3325 (Scott Girling)				X			X		X		X	X		X				X
RR-3326 (Scott Huggins)		X		X			X	X	X		X	X		X			X	X
RR-3327 (Scott Wentworth)		X		X			X	X	X		X	X	X	X			X	
RR-3328 (Sean Keeler)		X		X			X	X	X	X	X		X	X		X		X
RR-3329 (Sean Kelly)		X			X		X		X		X							
RR-3330 (Seb Woolford)				X	X				X		X			X			X	

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RR-3331 (Sebastian Black)									X		X					X	X
RR-3332 (Sebastian Rees)				X					X		X	X		X			X
RR-3333 (Sewells Reservoir Construction (SRC) Group Limited)														X			
RR-3334 (Shan Haydn Law)								X			X			X		X	X
RR-3335 (Shannon Barnes)					X								X	X		X	
RR-3336 (Sharn Pye)		X		X					X		X			X		X	X
RR-3337 (Sharon Abela)				X			X		X		X						
RR-3338 (Sharon Ann Ellis)		X			X				X					X			X
RR-3339 (Sharon Bingham)				X	X				X		X			X		X	X
RR-3340 (Sharon Brayley)				X			X		X	X	X			X	X	X	X
RR-3341 (Sharon Farrant)				X			X		X						X		X
RR-3342 (Sharon Ford)														X			
RR-3343 (Sharon Grindey)					X				X		X			X		X	
RR-3344 (Sharon Hall)		X		X					X		X					X	X
RR-3345 (Sharon Manning)		X			X				X					X		X	X
RR-3346 (Sharon Murphy)				X			X		X						X		X
RR-3347 (Sharon Smith)									X	X				X			

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RR-3348 (Sharon Wendy Cook)		X		X					X					X			X
RR-3349 (Shaun Moran)				X					X		X		X	X		X	
RR-3350 (Sheelah Gaul)									X					X			
RR-3351 (Sheena Curran)				X					X					X		X	
RR-3352 (Sheena Mary Morrison Williams)				X							X					X	
RR-3353 (Sheila Beeton)				X			X		X	X	X	X	X	X		X	
RR-3354 (Sheila Charles)		X		X			X		X					X			X
RR-3355 (Sheila Hanner)											X			X			X
RR-3356 (Sheila Jarvis)				X	X				X		X			X	X		
RR-3357 (Sheila Logan)				X					X		X			X			X
RR-3358 (Sheila Mary Alder)		X		X	X		X	X	X	X	X			X		X	X	X
RR-3359 (Sheila Maureen Mountfort)		X		X			X		X		X		X	X	X	X		X
RR-3360 (Sheila Moorcroft)				X					X		X			X			X	X
RR-3361 (Sheila Vivien Ashford)		X							X									
RR-3362 (Sheila Wright)				X	X				X		X					X		X
RR-3363 (Sheldon Furby)				X							X			X				
RR-3364 (Sheliagh Cheesman)				X					X							X		

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3365 (Shelley Bellett)					X	X	X		X		X		X	X	X	X	
RR-3366 (Shelley Whitney)							X		X	X	X						X
RR-3367 (Sheralie Davies)					X				X							X	
RR-3368 (Sheree Lee Gibbs)					X				X		X	X				X	X
RR-3369 (SHERINGHAM SHOAL AND DUDGEON EXTENSIONS PROJCO LIMITED)		X		X	X		X		X			X		X			
RR-3370 (Shesha Courtney)					X				X	X	X			X			X
RR-3371 (Shirley Christine Coupe)		X			X							X			X		
RR-3372 (Shirley Parker)					X				X	X	X			X			X
RR-3373 (Shobha Antony)									X		X	X					X
RR-3374 (Shona Evans)					X	X	X				X	X		X	X	X	
RR-3375 (Sian Clark)							X	X									
RR-3376 (Sian Digby)									X					X		X	
RR-3377 (Sian Morris)					X				X		X			X			X
RR-3378 (Sianne Mann)									X								X
RR-3379 (Sidney Richard Perry)					X						X	X				X	
RR-3380 (Sigrid Miles)					X	X			X	X	X			X		X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3381 (Silke Pinson-Roxburgh)					X				X					X			X
RR-3382 (Silvan Ledwell)					X				X		X	X					
RR-3383 (Silvana Richardson)					X				X		X						
RR-3384 (Simon Alan Bryan)					X	X	X		X		X		X	X	X	X	
RR-3385 (Simon Bird)					X	X		X	X		X			X	X	X	X
RR-3386 (Simon Booth)									X		X		X	X			
RR-3387 (Simon Brown)									X					X		X	
RR-3388 (Simon Fletcher)		X			X	X		X	X	X	X		X	X	X	X	X
RR-3389 (Simon Francis)									X								
RR-3390 (Simon James Hollingworth)					X						X					X	
RR-3391 (Simon James Marshall)					X				X							X	X
RR-3392 (Simon James Tolliday)					X				X		X			X		X	
RR-3393 (Simon James Upton)		X			X		X	X	X				X				
RR-3394 (Simon John Earp)					X				X								
RR-3395 (Simon John Osborn)				X	X				X		X						
RR-3396 (Simon John Reed)					X				X		X			X			
RR-3397 (Simon Laughlin)					X				X	X	X	X		X		X	

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3398 (Simon Nasta)				X	X				X	X	X			X		X	X	X
RR-3399 (Simon Norton)									X			X					X	
RR-3400 (Simon Polley)				X			X	X	X		X			X		X	X	
RR-3401 (Simon Robert Hale)				X														
RR-3402 (Simon Rowe)				X					X		X			X	X			X
RR-3403 (Simon Smith)							X		X					X				X
RR-3404 (Simon Tavner)									X					X				
RR-3405 (Simon Thorogood)		X		X			X	X	X	X	X	X	X	X	X	X		X
RR-3406 (Simone Day)									X							X	X	
RR-3407 (Siobhan Clarke)				X					X		X						X	X
RR-3408 (Sir Bernard Jenkin MP)		X		X			X	X	X	X	X	X		X	X	X	X	X
RR-3409 (Skylark Social Ltd)				X			X	X	X		X	X	X	X			X	
RR-3410 (Sonia Ann Sampson)				X	X			X	X					X		X	X	X
RR-3411 (Sonia Frances White)									X							X		X
RR-3412 (Sophie Birkett)				X					X		X			X		X	X	X
RR-3413 (Sophie Bolwell-Davies)				X					X	X			X				X	X
RR-3414 (Sophie Bowyer)				X			X			X		X		X		X	X	X

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RR-3415 (Sophie Louise Wilton)		X			X	X	X	X	X		X	X		X		X	X	X
RR-3416 (Sophie Morrish)		X			X	X			X		X	X		X		X		X
RR-3418 (Spencer Klingsick)					X				X		X			X			X	X
RR-3419 (Spencer Mott)					X				X		X		X					
RR-3420 (Sport England)				X			X		X	X	X		X	X		X		
RR-3421* (Sproughton Parish Council)						X			X	X				X	X	X	X	X
RR-3422 (Stacey Boot)					X	X			X		X		X	X			X	X
RR-3423 (Stacey Cummings)					X				X		X		X	X			X	
RR-3424 (Stacey Farms)		X			X	X	X	X	X		X	X	X	X	X		X	X
RR-3425 (Stacey Farms Ltd)					X		X	X	X	X	X	X	X	X		X	X	X
RR-3426 (Stacey Taylor)					X				X									
RR-3427 (Stanfords Colchester LLP)		X			X				X		X						X	
RR-3428 (Steph Dodwell)		X			X		X		X		X	X	X	X			X	X
RR-3429 (Stephanie Craig)									X					X		X		X
RR-3430 (Stephanie Ellis)					X				X					X				X
RR-3431 (Stephanie Jane Bickford)					X	X	X	X	X		X		X	X		X	X	
RR-3432 (Stephanie Moran)					X				X	X	X	X						

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RR-3433 (Stephanie Wills)					X					X		X			X			X	
RR-3434 (Stephen Banyard)				X														X	
RR-3435 (Stephen Bays)														X	X				
RR-3436 (Stephen Butcher)										X		X	X					X	
RR-3437 (Stephen Buttery)					X			X	X	X	X		X	X	X	X	X		X
RR-3438 (Stephen Duncan Thomas)					X					X	X	X	X		X			X	
RR-3439 (Stephen Edward Worf)					X			X		X		X							X
RR-3440 (Stephen Finch)		X			X			X	X	X	X	X	X	X	X		X	X	X
RR-3441 (Stephen Folkard)					X			X		X		X	X			X		X	
RR-3442 (Stephen Fordham)					X														
RR-3443 (Stephen Frost)										X									
RR-3444 (Stephen George Waters)		X			X												X		
RR-3445 (Stephen Graham)								X	X										
RR-3446 (Stephen Harold)					X					X									
RR-3447 (Stephen Hyde)		X						X		X			X	X	X			X	X
RR-3448 (Stephen Johnson)						X				X			X		X			X	X
RR-3449 (Stephen Jones)					X			X		X			X	X	X	X		X	

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3450 (Stephen Kemp)		X			X				X				X	X			
RR-3451 (Stephen Kenneth Frost)		X			X				X		X			X			X
RR-3452 (Stephen Knight)					X	X			X					X		X	
RR-3453 (Stephen Langton)					X			X	X		X			X			X
RR-3454 (Stephen Leo Davis)					X				X		X						
RR-3455 (Stephen Mann)					X	X	X	X	X		X	X		X		X	
RR-3456 (Stephen March)		X		X	X	X	X	X	X	X	X	X			X	X	X
RR-3457 (Stephen Meech)							X										
RR-3458 (Stephen Mugliston)					X	X	X	X	X			X	X	X	X		X
RR-3459 (Stephen Murphy)					X	X			X		X		X	X			
RR-3460 (Stephen Paul Garner)		X			X		X		X	X	X	X				X	X
RR-3461 (Stephen Podd)		X			X		X	X	X	X	X					X	
RR-3462 (Stephen Radley)									X			X		X		X	
RR-3463 (Stephen Redmond)							X		X			X					X
RR-3464 (Stephen Richard Mole)					X		X				X						
RR-3465 (Stephen Roger Fletcher)		X			X		X		X		X	X	X			X	X
RR-3466 (Stephen Spinlove)							X		X		X	X	X	X			

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3467 (Stephen Tappin)				X					X		X	X					
RR-3468 (Stephen Thomas Bennett)				X					X								
RR-3469 (Stephen Twigg)				X					X	X	X	X		X		X	X	X
RR-3470 (Stephen Wass)							X	X	X	X	X			X	X		X		X
RR-3471 (Stephen, Donna, Isabella, Francessca, Georgia Chantry)		X				X		X		X		X	X				X		
RR-3472 (Steve Batts)				X					X	X		X			X			X	
RR-3473 (Steve Emney)				X		X				X		X		X			X	X	X
RR-3474 (Steve Folley)				X			X			X		X	X			X		X	
RR-3475 (Steve Graham)		X							X	X	X			X			X		X
RR-3476 (Steve Herron)		X		X		X			X	X	X		X	X			X	X	X
RR-3477 (Steve Hicks)				X		X			X		X			X			X		
RR-3478 (Steve Huggins)				X					X					X					
RR-3479 (Steve Jack Wright)				X		X		X		X							X		X
RR-3480 (Steve Mann)								X		X		X		X			X	X	X
RR-3481 (Steve Marshall)		X		X					X		X			X				X	
RR-3482 (Steve Packard)				X						X								X	
RR-3483 (Steve Trickey)										X				X			X	X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3484 (Steve Walsh)				X			X		X		X		X	X			X
RR-3485 (Steven Bennett)				X					X		X			X	X	X	
RR-3486 (Steven Davis)							X		X		X						
RR-3487 (Steven Ewels)								X	X								X
RR-3488 (Steven Gray)				X					X	X	X		X	X			X
RR-3489 (Steven Jones)				X						X	X			X		X	
RR-3490 (Steven Paul Tunmore)		X		X	X			X	X	X	X	X	X	X	X	X	
RR-3491 (Steven Peter Roberts)				X						X	X					X	X
RR-3492 (Steven Pyne)		X		X			X		X	X	X		X				
RR-3493 (Steven Read)		X		X				X		X	X	X		X			X
RR-3494 (Steven Rosam)				X						X							
RR-3495 (Steven Sleigh)				X						X		X				X	X
RR-3496* (Stoke by Nayland Parish Council)				X			X			X	X	X	X		X	X	
RR-3498* (Stratford St Mary Parish Council)								X									
RR-3499 (Strutt & Parker on behalf of Mr and Mrs Barber)				X	X		X	X		X	X	X		X	X	X	X
RR-3500 (Stuart Alasdair Morris)				X						X		X	X		X	X	X
RR-3501 (Stuart Bowman)					X					X							

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RR-3502 (Stuart Cheek)				X					X	X							
RR-3503 (Stuart Gooding & Sarah Gooding)		X		X	X		X	X	X	X	X	X	X	X	X	X	X	X
RR-3504 (Stuart Gregory)									X					X			
RR-3505 (Stuart Hills)		X		X	X		X	X	X		X	X	X	X			X	X
RR-3506 (Stuart Law)														X			X	X
RR-3507 (Stuart McMinn)							X		X			X						
RR-3508 (Stuart Owen)				X			X		X		X		X			X		X
RR-3509 (Stuart Rudge)				X					X									
RR-3510 (Stuart Taylor)				X			X		X		X	X		X		X		
RR-3511 (Stuart Wright)				X			X		X		X	X	X	X				
RR-3512 (Sue Barrott)				X			X		X		X		X					X
RR-3513 (Sue Bright)				X			X	X	X	X	X			X		X		X
RR-3514 (Sue Browne)		X		X			X	X	X	X	X			X	X	X	X	X
RR-3515 (Sue Burnett)				X					X		X							X
RR-3516 (Sue Moore)				X					X		X						X	X
RR-3517 (Sue Rosser)				X	X				X	X	X			X		X		X
RR-3518* (Suffolk Association of Local Councils)					X									X		X		X

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RR-3519* (Suffolk Constabulary)							X		X		X	X		X	X	X	
RR-3520* (Suffolk County Council)											X	X				X	
RR-3521 (Suffolk Local Access Forum)				X	X		X	X	X	X			X	X		X	X	X
RR-3523 (Sunita Saha)				X						X		X		X			X	X
RR-3524 (Susan Anne Armstrong)		X		X			X									X		X
RR-3525 (Susan Ballard)											X							
RR-3526 (Susan Bancroft)				X	X					X		X					X	X
RR-3527 (Susan Brown)				X			X	X		X	X	X	X				X	
RR-3528 (Susan Card)										X								X
RR-3529 (Susan Cheeseman)		X		X	X		X	X	X	X	X		X	X		X	X	X
RR-3530 (Susan Cole)				X						X		X		X			X	
RR-3531 (Susan Debra Edwards)		X		X	X		X	X	X	X	X	X	X	X		X	X	X
RR-3532 (Susan Elizabeth Cunningham)								X		X				X				
RR-3533 (Susan Elizabeth Haworth)		X		X					X	X		X		X				X
RR-3534 (Susan Elizabeth Kind)				X						X		X		X		X	X	X
RR-3535 (Susan Elizabeth Swan)				X						X		X					X	X
RR-3536 (Susan Elliott)				X						X		X		X				

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RR-3537 (Susan Fiddes)									X					X			
RR-3538 (Susan Fincham)				X					X		X		X			X	
RR-3539 (Susan Fraser)				X	X				X		X			X			X
RR-3540 (Susan Gionis)				X	X				X		X	X	X	X		X	
RR-3541 (Susan Graham)		X		X	X				X	X	X		X	X	X	X	X
RR-3542 (Susan J Martin)							X										
RR-3543 (Susan Jane Sheppard)				X			X	X	X		X	X	X	X		X	
RR-3544 (Susan Kingham)				X					X		X	X		X			X
RR-3545 (Susan Lang)		X		X					X	X	X		X	X		X	X
RR-3546 (Susan Lomas)				X					X								
RR-3547 (Susan Luck)				X					X				X	X	X		
RR-3548 (Susan Mann)				X					X		X						
RR-3549 (Susan Marling)				X					X		X					X	
RR-3550 (Susan Martin)				X					X		X			X	X	X	
RR-3551 (Susan McGurk)									X					X			
RR-3552 (Susan Patricia Spencer)				X					X		X		X	X		X	
RR-3553 (Susan Pearman)									X								X

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RR-3554 (Susan Pereira)		X		X			X		X	X	X	X		X			X	X
RR-3555 (Susan Porter)									X		X			X	X	X		X
RR-3556 (Susan Ramster)				X								X					X	
RR-3557 (Susan Simington)		X																X
RR-3558 (Susan Stephens)									X					X				
RR-3559 (Susan Tuckfield)		X		X					X								X	X
RR-3560 (Susan Wardale)				X					X		X			X				X
RR-3561 (Susan Waton)				X			X	X										
RR-3562 (Susana Dorsett)				X			X		X		X			X				X
RR-3563 (Susannah Duggan)				X					X		X			X			X	
RR-3564 (Susannah Jones)		X		X	X					X	X	X		X		X		X
RR-3565 (Susanne Harknett)		X		X	X				X					X		X		X
RR-3566 (Susanne Ruth Worboys)		X	X						X			X						X
RR-3567 (Susie Bulman)		X		X	X		X	X	X	X				X		X		X
RR-3568 (Susie Eddis)									X	X				X		X	X	
RR-3569 (Susie Goldring)		X		X			X	X	X	X	X	X			X	X	X	X
RR-3570 (Susie Roe)		X									X							

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RR-3571 (Susie Rohde)		X		X					X	X	X			X		X	X
RR-3572 (Suzanna Nunn & Gary Nunn)		X		X			X	X	X	X	X	X	X	X	X	X	X
RR-3573 (Suzanne Bolwell-Davies)		X		X	X				X	X	X	X	X	X		X	X
RR-3574 (Suzanne Campbell)		X		X				X	X		X			X		X	X
RR-3575 (Suzanne Clarke)		X												X			
RR-3576 (Suzanne Dawson)		X							X		X					X	X
RR-3577 (Suzanne Evans)		X		X			X		X	X	X	X		X		X	X
RR-3578 (Suzanne Holden)		X							X					X			X
RR-3579 (Suzanne Larke)																	X
RR-3580 (Suzanne Wateridge)							X		X		X			X			
RR-3581 (Suzanne Whittaker)		X		X			X	X	X		X		X	X	X	X	X
RR-3582 (Suzanne Woods)											X						
RR-3583 (Suzy Barrett-Davis)				X			X		X	X		X	X	X			
RR-3584 (Suzy Naylor)									X		X				X		
RR-3585* (Swainsthorpe Parish Council)				X					X		X			X		X	
RR-3586 (Swim2swim limited)				X	X				X		X			X		X	
RR-3587 (Sylvia Gray)		X											X	X			

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RR-3588 (Sylvia Hemmings)		X					X				X	X		X		X		X
RR-3589 (Sylvia Margaret Ludwig)				X					X	X		X					X	
RR-3590 (Sylvie Fitch)				X							X	X						
RR-3591 (Symone Dahl-Meadows)				X						X		X						X
RR-3592 (T A CULLUM CONTRACTING LTD)		X				X	X	X		X		X					X	X
RR-3593 (T Fairley & Sons Ltd)		X				X	X		X	X				X	X	X		
RR-3594 (T Sanders)				X						X		X						X
RR-3595 (T W Salmon & Co)		X		X		X	X		X	X		X		X	X	X	X	
RR-3596 (Tabitha Palmer)				X						X		X			X			X
RR-3597* (Tacolneston Parish Council)		X		X		X			X	X		X	X	X	X		X	X
RR-3598 (Tamara Simmons)				X						X		X		X				X
RR-3600 (Tanya Carswell)										X		X			X			
RR-3601 (Tanya Marshall)							X			X	X	X			X		X	
RR-3602 (Tanya Riley)				X						X		X						
RR-3603 (Tanya Waters)		X		X			X			X		X			X		X	X
RR-3604 (Tao Tudor-Hart)										X					X			X
RR-3605 (Tarek Nseir)				X			X		X	X		X		X	X			X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3606 (Taryn Everdeen)					X	X			X	X		X			X	X	X	X	
RR-3607 (Tegan Andrews)		X			X		X	X		X	X	X	X			X	X	X	X
RR-3609 (Terence Apps)					X	X	X	X		X		X		X	X		X		X
RR-3610 (Terence Raymond Bush)					X					X		X		X	X				
RR-3611 (Terence William Norton)										X		X							
RR-3612 (Teresa Aken)										X		X			X		X		X
RR-3613 (Teresa Ann MacDonald)					X		X		X	X		X		X	X			X	
RR-3614 (Teresa Harper)					X					X		X							X
RR-3615 (Teresa Jane Lack)				X	X					X									X
RR-3616 (Teresa Mary Kemp)					X	X				X		X	X		X			X	X
RR-3617 (Teresa Navarro)					X					X					X				X
RR-3618* (Terling and Fairstead Parish Council)		X			X		X	X	X	X	X	X	X	X	X	X	X	X	X
RR-3619 (Terry Barr)					X					X					X				X
RR-3620 (Terry Hickman Smith)		X			X	X			X	X		X		X	X		X	X	X
RR-3621 (Terry White)					X	X	X	X		X		X		X	X			X	X
RR-3622 (Tessa Rose)		X			X					X				X	X			X	X
RR-3623 (Thalia Abraham)		X			X	X	X			X		X		X	X		X	X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3624* (Tharston and Hapton Parish Council)					X				X		X			X		X		X
RR-3625 (Thatchers Farm Ltd)		X		X			X	X	X	X	X		X	X		X		X
RR-3626 (The Brice Family)		X					X	X	X	X		X			X			
RR-3627 (The British Horse Society)														X		X		
RR-3628 (The Coggeshall Society)				X			X			X	X	X				X	X	
RR-3629 (The Cole Family)		X					X	X	X	X		X						
RR-3630 (The estate of Colin Creswell Jones)				X						X				X				
RR-3631 (The Freckled Foxglove)		X		X	X			X	X	X			X	X		X	X	X
RR-3632 (The Gallaher family)		X					X		X	X								X
RR-3633 (The Hall Family)				X							X			X				
RR-3634 (The Honourable John Frederick Strutt)		X		X			X			X	X	X						X
RR-3635 (The Jones family)					X					X	X	X		X	X		X	X
RR-3636 (The Lawrence Family)				X	X		X			X		X		X	X		X	
RR-3637 (The Maritime and Coastguard Agency)										X				X	X			
RR-3638 (The Richmond Family)										X		X			X			
RR-3639 (The Rust family)				X						X		X			X			
RR-3640 (The Stour Valley Farmer Cluster)		X			X					X					X	X		X

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RR-3641 (The Three Horseshoes (Fordham)Ltd)				X	X		X	X	X	X	X	X		X	X		X	X	X
RR-3642 (The Trustees of the Newney Settlement)		X		X			X	X		X	X	X	X	X	X		X	X	X
RR-3643 (Thea Dunn)		X		X					X	X				X	X		X		X
RR-3644 (Thelveton Estate (Mann Family and Associated Trusts))					X					X						X			
RR-3645 (Theodora Minet)				X						X	X	X	X		X		X		
RR-3646 (Theresa Mannell)		X		X							X			X	X		X	X	X
RR-3647 (Therese Stokes)		X								X		X			X				X
RR-3648 (Thomas Alan Atkinson)				X						X		X						X	X
RR-3649 (Thomas Allison)										X	X				X		X	X	
RR-3650 (Thomas Antony Tierney)				X						X								X	
RR-3651 (Thomas Bradshaw)				X				X											
RR-3653 (Thomas Hester)															X				
RR-3654 (Thomas Hills)				X						X		X			X			X	X
RR-3655 (Thomas Hitchcock)		X		X						X									X
RR-3656 (Thomas James Brenton)										X									
RR-3657 (Thomas Jones)		X		X						X		X		X	X		X		X
RR-3658 (Thomas Knighton)		X		X	X		X			X		X	X	X	X		X	X	

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RR-3659 (Thomas Marshall)		X			X		X		X		X	X		X		X	X
RR-3660 (Thomas Newton)											X			X			
RR-3661 (Thomas William Fellowes)							X								X		
RR-3662 (Thomas Williamson)					X				X		X	X				X	
RR-3663 (Thornbush Energy Limited)		X				X		X	X	X	X	X	X	X	X	X	X
RR-3664* (Thrandeston Parish Council)									X								
RR-3666* (Thurrock council - Blackshots Ward)							X									X	
RR-3667* (Tibenham Parish Council)		X		X	X	X	X		X	X	X	X		X		X	X
RR-3668 (Tiffany Emma Jones)		X			X	X			X				X			X	X
RR-3669 (Tim Bown)							X	X			X		X	X			X
RR-3670 (Tim Buttling)									X								
RR-3671 (Tim Came)					X				X		X			X			
RR-3672 (Tim Corke)					X		X				X						
RR-3673 (Tim Edwards)		X					X										
RR-3674 (Tim Ellis)					X				X		X			X		X	
RR-3675 (Tim Hancock)		X			X		X	X	X	X	X	X	X	X	X	X	X
RR-3676 (Tim Harrison)					X				X								

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RR-3677 (Tim Hatchman)							X		X			X		X			
RR-3678 (Tim Knighton)		X		X	X		X		X		X		X	X		X	X
RR-3679 (Tim McLoughlin)											X			X			X
RR-3680 (Tim Passmore)				X				X	X		X		X	X	X		X
RR-3681 (Tim Price)		X		X			X		X		X		X	X		X	X
RR-3682 (Tim Woodgett)					X		X	X		X	X		X			X	X
RR-3683 (Timber Aspects Construction)				X				X	X					X		X	X
RR-3684 (Timothy Burton)				X					X		X	X					
RR-3685 (Timothy Butcher)				X			X		X					X			
RR-3686 (Timothy Christopher Edward Jeffs)		X		X			X		X		X			X			X
RR-3687 (Timothy Dennis)		X		X	X		X	X	X	X	X			X		X	X
RR-3688 (Timothy John Highton)									X					X			
RR-3689 (Timothy John Hunt)				X					X		X			X		X	X
RR-3690 (Timothy Matthew Barrott)				X			X	X			X	X		X		X	
RR-3691 (Timothy Pearce)				X					X								X
RR-3692 (Timothy Price)							X		X		X	X		X			X
RR-3693 (Timothy Rogers)		X		X			X	X	X	X	X	X		X	X	X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3694 (Timothy Watkins)				X								X					
RR-3695 (Timothy Williams)		X				X	X		X	X	X		X	X		X		X
RR-3696 (Tina Bull)				X			X			X						X		X
RR-3697 (Tina Cannon)										X								X
RR-3698 (Tina Murton)		X		X						X		X						
RR-3699 (Tina Robinson)				X			X	X		X		X		X		X		X
RR-3700 (Tina Sivyer)				X						X	X	X						X
RR-3701 (Tina Williams)				X						X		X	X					X
RR-3702 (Tobey Giles Butcher)				X			X			X		X		X	X		X	X
RR-3703 (Toby Marshall)				X		X	X	X		X	X			X	X	X		X
RR-3704 (Toby Michael Ormsby Redgrave)				X			X			X	X	X	X	X	X	X	X	
RR-3705 (Toby Pearson)		X		X						X		X			X		X	
RR-3706 (Toby Sisson)				X								X						
RR-3707 (Tom Larner)										X								
RR-3708 (Tom Stiff-Brooks Leney)							X						X					
RR-3709 (Tom Wright)				X		X	X			X		X		X		X	X	
RR-3710 (Tommy Kevin able)										X		X		X	X		X	X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3711 (Toni Collins)		X							X					X			X
RR-3712 (Toni Marion Spurgin)		X							X				X	X		X	X
RR-3713 (Toni Saunders)						X			X		X			X		X	X
RR-3714 (Toni Wrigglesworth)				X	X		X		X								
RR-3715 (Tony Stokes)					X				X	X	X			X			
RR-3716 (Tracey Alberts)						X		X	X				X			X	X
RR-3717 (Tracey Austin)		X			X		X	X	X	X	X	X			X	X	X	X
RR-3718 (Tracey Bennett)					X				X	X		X		X		X	X	X
RR-3719 (Tracey Elsey)		X			X		X			X		X		X			X	X
RR-3720 (Tracey Hazell)					X		X			X			X	X	X	X		X
RR-3721 (Tracey Iliffe Bradley)					X		X		X			X						
RR-3722 (Tracey Mcintyre)					X	X			X									X
RR-3723 (Tracey Smith)		X			X	X					X			X		X		
RR-3724 (Tracy Brownlow)					X			X	X		X			X			X	
RR-3725 (Tracy Hedger-Rossiter)					X			X			X			X		X		
RR-3726 (Tracy Smith)					X						X						X	X
RR-3727 (Trena Walker)					X	X	X							X				X

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3728 (Trevor Easton)					X	X			X	X	X	X		X	X		X	X	X
RR-3729 (Trevor Edwin Harris)					X							X							
RR-3730 (Trevor Graham Lansdown)		X			X			X	X		X	X	X			X	X	X	X
RR-3731 (Trevor James Ducker)					X					X	X	X			X				X
RR-3732 (Trevor Rogers)		X			X			X	X		X	X	X			X	X	X	X
RR-3733 (Trevor Seddon)					X			X			X		X					X	
RR-3734 (Trish Jaggard)					X			X	X		X	X	X		X			X	X
RR-3735 (Trish Smith)					X					X		X			X				
RR-3736 (Tristram Belemore-Smith)					X					X								X	
RR-3737 (Tritton Farming Partnership LLP)		X			X	X		X	X	X	X	X	X	X	X	X	X	X	X
RR-3738 (Trudy Cannin)					X					X			X	X	X			X	
RR-3739 (Trustees of P.G.Rix Farms Ltd Executive Pension Plan)				X		X		X	X	X	X			X				X	
RR-3740 (Trustees of the P G Vellacott Will Trust)										X		X		X					
RR-3741 (Tym Lawrence)					X	X				X		X			X		X	X	X
RR-3742 (UK Health Security Agency)								X							X				
RR-3743 (Ursula Owen)										X		X							
RR-3744 (Val Goodchild)					X														

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RR-3745 (Valerie Godbee)		X		X			X		X		X	X		X		X	X
RR-3746 (Valerie Julia Meyer-Hall)				X	X		X		X		X	X	X	X		X	X	X
RR-3747 (Valerie Smithies)									X		X							
RR-3748 (Vanessa Aparicio-Hancox)		X		X			X		X		X			X		X		X
RR-3749 (Vanessa Briggs)							X		X	X	X						X	
RR-3750 (Vanessa Hodges)											X							X
RR-3751 (Vanessa Wellings)				X					X	X	X		X	X			X	X
RR-3752 (Vaughan Michael Van Niekerk)				X	X		X			X	X	X		X		X	X	X
RR-3753 (Veda Spooner)					X					X	X		X			X	X	
RR-3754 (Venetia Hanison)		X		X						X	X			X	X		X	
RR-3755 (Verity Ann Boxall)											X			X				
RR-3756 (Verity Louise Collins)		X		X	X		X	X	X	X			X	X		X	X	X
RR-3757 (Veronica Burns)		X		X						X								X
RR-3758 (Veronica Lilian Hartley)										X								
RR-3759 (Vicki Karas)				X						X				X				X
RR-3760 (Vicky Minet)				X			X			X	X	X		X		X	X	
RR-3761 (Victoria Botham)				X			X		X	X	X		X	X				X

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RR-3762 (Victoria Boultwood)				X					X				X			X	X	X
RR-3763 (Victoria Chandler)				X	X				X		X			X			X	X
RR-3764 (Victoria Elizabeth Shapiro)				X			X	X	X		X		X	X		X	X	X
RR-3765 (Victoria Farquharson)		X		X			X	X	X	X		X		X	X	X	X	X
RR-3766 (Victoria Hall)				X	X				X		X			X		X	X	
RR-3767 (Victoria Huggins)				X													X	
RR-3768 (Victoria Jones)				X					X		X			X				X
RR-3769 (Victoria McCord)				X					X	X	X						X	X
RR-3770 (Victoria Rampaul)				X					X		X	X		X				
RR-3771 (Victoria Scott)												X						
RR-3772 (Victoria Shepherd)		X		X			X	X	X	X	X			X		X	X	X
RR-3773 (Victoria Simmonds)				X					X							X		X
RR-3774 (Victoria Sisson)				X			X		X		X							
RR-3775 (Victoria Stokes)				X					X					X				
RR-3776 (Victoria Turrell)									X	X	X			X	X	X	X	
RR-3777 (Victoria Wall)		X					X		X					X		X		
RR-3778 (Vikki Gant)					X				X					X		X		

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RR-3779 (Viktoriya Meyus)		X		X	X				X		X			X	X	X	X
RR-3780 (Villages Against Pylons)							X	X	X	X				X			
RR-3781 (Vincent Barham)				X					X	X				X		X	X
RR-3782 (Vincent Ebbrell)				X	X		X		X		X		X	X		X	
RR-3783 (Violet Bugg)				X							X						X
RR-3784 (Virginia d'Angibau)		X		X	X		X	X	X	X	X			X	X	X	X
RR-3785 (Virginia Maria Manley)				X							X			X	X		
RR-3786 (Vivian Sprong)		X		X					X		X					X	
RR-3787 (Vivien Benfield ASBEE)				X					X		X					X	
RR-3788 (W Bradshaw and Son)					X		X	X	X	X				X	X		
RR-3789 (W. Walker)				X					X		X			X		X	X
RR-3790 (Wanda Smith)		X		X					X		X						
RR-3791 (Warnes Family)				X				X	X					X	X	X	
RR-3793 (Wattisham Limited)		X		X			X	X	X		X	X	X	X		X	
RR-3794 (Wayne Hazell)				X			X		X		X		X	X	X		X
RR-3795 (Wellington Pub Company Limited)							X							X			
RR-3796 (Wendy Byford)														X	X		X

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RR-3797 (Wendy Cremin)					X					X		X					X	X
RR-3798 (Wendy Elliott)					X					X		X						X
RR-3799 (Wendy Fryer)										X		X	X		X			
RR-3800 (Wendy Gallaher)		X			X		X		X	X	X	X			X		X	X
RR-3801 (Wendy Hart)				X	X					X				X	X		X	X
RR-3802 (Wendy Johnston)		X			X										X			
RR-3803 (Wendy Joy Stacey)					X		X			X				X	X			X
RR-3804 (Wendy Porch)										X		X					X	
RR-3805 (Wendy Wilkinson)							X	X		X	X	X			X		X	X
RR-3806 (Wendy Wiseman)					X					X		X		X			X	
RR-3807 (Wendy Woolnough)					X					X					X	X		
RR-3808* (Wenham Parva Parish meeting)					X		X			X					X			X
RR-3809* (West Bergholt Parish Council)					X			X		X		X	X					
RR-3810 (Wheathill campsite)										X					X		X	X
RR-3811* (White Notley & Faulkbourne Parish Council)		X				X				X		X			X		X	X
RR-3812 (White Notley FC)					X	X	X	X		X		X		X	X			
RR-3813 (WHITTAKERS NURSERIES LIMITED)					X											X		

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RR-3814* (Wickham Skeith Parish Council)		X			X			X	X	X	X			X		X	X	
RR-3815 (Wilkins Packaging Ltd)									X				X	X			X	
RR-3816 (Will Everington)		X		X					X		X			X		X		X
RR-3817 (Will Freeborough)				X					X		X						X	
RR-3818 (Will Harrowven)				X					X	X	X				X			X
RR-3819 (Will White)		X												X			X	X
RR-3820 (William Alan Kemp)				X	X				X			X		X		X		
RR-3821 (William Arthur John Pigeon)				X					X			X		X			X	
RR-3822 (William Bancroft)				X	X		X		X		X					X	X	
RR-3823 (William Buttleman)				X			X		X		X		X	X		X	X	X
RR-3824 (William Clarke)									X									X
RR-3825 (William Cole)		X							X									X
RR-3826 (William d'Angibau)		X		X			X		X	X	X			X		X		X
RR-3827 (William Day)				X	X				X	X		X	X	X		X		X
RR-3828 (William Duckworth-Chad)								X	X					X				
RR-3829 (William D'Urban Sunnucks)				X			X	X						X				
RR-3830 (William Durlacher)				X							X							

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3831 (William Elphick)						X			X						X		
RR-3832 (William Gerald Doran)					X		X		X		X		X	X		X	X
RR-3833 (William Hosegood- Brooks Leney)		X			X	X	X	X	X	X			X	X	X	X	X
RR-3834 (William John Adshead-Grant)		X			X		X					X	X	X		X	
RR-3835 (William Jones)		X							X	X	X	X		X			X
RR-3836 (William Maturin-Baird)					X					X		X					
RR-3837 (William Moore)		X		X	X	X				X		X		X	X		
RR-3838 (William Morgan)					X		X		X	X		X	X	X	X		
RR-3839 (William Murray)		X			X			X		X	X	X	X	X	X		
RR-3840 (William Petersen)						X	X			X		X			X		
RR-3841 (William Rix & Mandy Rix)					X		X			X	X	X		X	X		
RR-3842 (William Robert Wood)		X					X			X							
RR-3843 (William Rodney Matthews)		X			X		X		X	X	X	X	X	X	X		
RR-3844 (William Sambrook)								X		X					X		
RR-3845 (William Samuel Hugh Laidlaw)							X	X		X		X			X		
RR-3846 (William Shearer)								X		X					X		
RR-3847 (William Somerville)					X							X					

Relevant Representation	Land Use	Safety and Security	Alternatives	Construction Impacts including: air quality and emissions, noise and vibration	Consultation	DCO & Planning matters	Socio-economics, recreation and tourism	Environment	Heritage including: landscape and visual, water environment	Need Case	Project Finance	Property & Compensation	Health and Wellbeing	Third Party Interactions including: cumulative effects	Transport & Traffic	Transmission System and Good Design	Biodiversity, ecology and nature conservation
RR-3848 (William Stacey)		X			X	X	X		X	X		X			X		X	X	X
RR-3849 (William Thomas Black)							X												
RR-3850 (William Thomas Fagg)				X						X							X		X
RR-3851 (William Woodhall)					X		X		X	X		X		X	X		X	X	X
RR-3852 (William Wu)		X					X			X	X	X					X		X
RR-3853 (Williams Family)					X					X		X							
RR-3854* (Winfarthing Parish council)					X		X			X	X	X	X	X	X				X
RR-3855 (Woodland Trust)								X				X			X				X
RR-3856* (Wortham & Burgate Parish Council)		X			X	X	X	X	X	X	X	X		X	X		X	X	X
RR-3857* (Writtle Parish Council)		X			X	X		X	X	X	X	X		X	X		X		X
RR-3858 (Yana Merritt)					X	X	X		X	X		X		X	X		X	X	X
RR-3859* (Yaxley Parish Council)										X									
RR-3860 (Yazan Othman Al-Jalili)										X					X				
RR-3861 (Yvonne Folkard)		X			X					X		X			X				
RR-3862 (Yvonne Goodwin)					X					X							X		X
RR-3863 (Yvonne Meronti)					X					X		X	X		X			X	
RR-3864 (Yvonne Rann)		X								X		X							X

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RR-3865 (Yvonne Snooks)				X					X		X					X	X
RR-3866 (Yvonne Taylor)		X		X	X				X	X	X		X	X	X	X	X
RR-3867 (Zachary Woods)				X					X		X						X
RR-3868 (Zena Marlow)				X			X		X		X	X	X	X			X
RR-3869 (Zoë Barr)				X					X			X			X		
RR-3870 (Zoe Brown)		X		X			X	X	X	X	X	X			X	X	X	X
RR-3871 (Zoe Cain-Tyler)				X					X		X			X		X	X
RR-3872 (Zoe Fairley)							X							X			
RR-3873 (Zoe Goldsmith)				X					X	X	X					X	
RR-3874 (Zoe Kent)		X		X				X	X	X				X			X
RR-3875 (Zoe Reynolds)		X		X	X		X		X	X	X	X				X	X	X
RR-3876 (Zoe Sharman)														X	X	X	X	

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