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Norwich to Tilbury

Volume 8: Examination Documents

**Document: 8.4.1.1 Addendum to Applicant's Comments on Relevant
Representations**

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nationalgrid

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1. Introduction

1.1 Purpose of Document

- 1.1.1 This document has been produced in response to the Rule 17 letter issued by the Examining Authority (ExA) on 3 March 2026 [PD-012] and the follow up letter of 6 March [PD-013].
- 1.1.2 The Rule 17 letter requested, in part, that the Applicant expand on its **8.4.1 Comments on Relevant Representations [REP1-132]** submitted at Deadline 1, in order to provide an individual detailed response to Relevant Representations (RRs) submitted by all statutory consultees not addressed in **REP1-132**, including Parish and Town Councils, and to also include Members of Parliament (MPs). This information was requested for Deadline 2.
- 1.1.3 The Applicant has worked proactively to deliver the request, alongside a substantial volume of work required to deliver the Deadline 2 documents, including responding to 10 Local Impact Reports and over 200 Written Representations, within a period of 8 working days.
- 1.1.4 The Applicant is also cognisant of the wider request from the ExA in the Rule 17 letter that responses be detailed and locationally specific, and is undertaking careful consideration of its comments to ensure they are high quality and useful to the ExA and interested parties (IPs).
- 1.1.5 Taking these points into consideration, the Applicant submits at this deadline a first tranche of detailed comments on Relevant Representations by statutory consultees and MPs. The Applicant is working at pace to deliver the remaining responses and will submit them to the ExA as soon as possible.
- 1.1.6 In some instances, the RR from the statutory consultee is the same, or is materially the same but less detailed, than it's Written Representation (WR) submitted at Deadline 1. In these cases, the Applicant has responded only to the WR in **8.8.1 Applicant's Comments on Written Representations**. This is to avoid direct duplication and unnecessary volume. These RRs are as detailed in the table below.

Relevant Representation	NG Comment
Burstall Parish Council [RR-0423]	The Applicant has reviewed the RR and considers the points raised are provided in more detail by Burstall Parish Council [REP1-151] in their Written Representation submitted at Deadline 1. The Applicant has responded to in detail to the WR in the 8.8.1 Applicant's Comments on Written Representations and this therefore provides a sufficient response to the RR as well as the WR.
Holton St Mary Parish Council [RR-1437]	The Applicant has reviewed the RR and considers the points raised are provided in more detail by Holton St Mary Parish Council in their Written Representation [REP1-168] submitted at Deadline 1. The Applicant has responded to in detail to the WR in the 8.8.1 Applicant's Comments on

Relevant Representation	NG Comment
Offton and Willisham Parish Council [RR-2767]	<p>Written Representations and this therefore provides a sufficient response to the RR as well as the WR.</p> <p>The Applicant has reviewed the RR and considers the points raised are provided in more detail by Offton and Willisham Parish Council [REP1-170] in their Written Representation submitted at Deadline 1. The Applicant has responded to in detail to the WR in the 8.8.1 Applicant's Comments on Written Representations and this therefore provides a sufficient response to the RR as well as the WR.</p>

1.1.7 The Applicant has additionally included two IPs who are not identified by the Planning Inspectorate as being statutory consultees but who we consider should be included; Royal Mail and the Essex Police and Suffolk Constabulary; these will be responded to in the second tranche.

1.2 Structure of this document

1.2.1 The Applicant's response to the individual RRs is set out in alphabetical order below, consistent with the approach taken to selected organisations in the main **8.4.1 Comments on Relevant Representations (Revision B)**.

2. Comments on Relevant Representations

2.1 Barking Parish Council

2.1.1 Table 2.1 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Barking Parish Council [RR-0323]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.1 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Landscape and Visual	Barking Parish Council wish to express their concern about their countryside and landscape being ruined by the installation of pylons carrying electricity along the above route.	<p>The Applicant notes the concerns raised on impact to countryside and landscape by Barking Parish Council. It should be noted that transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the Landscape and Visual Impact Assessment (LVIA) Study Area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240].</p> <p>The Landscape and Visual Impact Assessment (LVIA), included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken as part of the EIA. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁷.</p> <p>The assessment of landscape effects considers effects on landscape character and is reported in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228].</p> <p>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].</p>

Topic	Comment	National Grid's response
		<p>The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). Mitigation measures of relevance to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p>
Land and property	<p>The derisory amount of compensation being paid to landowners is a disgrace. In the 1960's a landowner would be paid £3k per pylon and in those days a far smaller pylon and this sum was large enough to buy a house. The sum of £8k which landowners are being offered now should by today's values be well in excess of £100k</p>	<p>The Applicant is satisfied that the payments referred to in the National Grid Land Right Strategy (LRS) are appropriate and justified.</p> <p>The initial consideration paid for permanent easements reflects the market value of the land and the nature of the rights sought. However, this is separate from compensation for loss, which may include disturbance, severance, injurious affection, and losses arising from restrictions on land use or agricultural operations. Where ongoing or future losses in land productivity can be evidenced and attributed to the Project, such matters fall to be assessed and, where justified, compensated in accordance with the Compensation Code rather than through the upfront easement payment alone.</p> <p>The Applicant recognises that some effects, such as restrictions associated with permanent easements or the presence of overhead line infrastructure, may endure for the lifetime of the asset. The compensation framework provides for such matters to be considered where they result in demonstrable financial loss, including impacts on agricultural productivity or the value of retained land. These matters are typically addressed through negotiation on a case-by-case basis, informed by professional valuation evidence.</p>
Alternatives	<p>thus rendering the undersea route far better value for the shareholders</p>	<p>The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.</p>
Costs	<p>It seems that the number of objections and project timetable disruptions by legal and</p>	<p>The proposals are subject to scrutiny through examination by the Planning Inspectorate which is an independent organisation. The Planning Inspectorate is under a duty to complete the examination of the application by the end of the period of 6 months</p>

Topic	Comment	National Grid's response
	political challenges and appeals will add considerably to both the timetable and project costs.	beginning after the close of the preliminary meeting Rule 8 [PD-011] . Should the Secretary of State (SoS) grant development consent then National Grid is fully aware that any legal challenge could be by way of Judicial Review. However, 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 test: whether the claim discloses an arguable case. 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.
Alternatives	The alternative off shore route may cost a little more but could be accomplished on time and would not add to the extra expenditure which will be incurred by National Grid fighting to keep the over land route. In the long run the offshore route overall could be less expensive and less damaging to National Grid.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

2.2 Bracon Ash & Hethel Parish Council

2.2.1 Table 2.2 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Bracon Ash and Hethel Parish Council [RR-0380]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.2 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Need Case	The Parish Council are opposed to the pylons as we believe there are better value and better aesthetic solutions to the power transmissions across our area, either underground or offshore.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government’s strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Landscape and Visual	The visual and health impacts of high-power pylons close to residential areas far outweighs the benefits and the alternative solutions should be considered first	In relation to visual effects, 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 assessment of landscape effects considers effects on landscape character and is reported in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] . The assessment of visual effects considers effects on the visual amenity of people and is presented in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] and 6.13.A4 Environmental Statement Appendix 13.4 – Residential Visual Amenity Assessment – Part 1-2) [APP-233 and APP234] . The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance).

Topic	Comment	National Grid's response
		<p>With regard to health impacts, health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has a carefully thought-out set of policies for managing EMFs, which are incorporated into the decision-making process for Development Consent in National Policy Statement EN-5 (2024). These policies, which include exposure limits, have been set by an independent authoritative scientific body (UK Health Security Agency) who carefully review all science around magnetic fields and health. After decades of research into EMF and health there are no established health effects below the exposure limits. All the infrastructure proposed as part of this project complies with the requirements of NPS EN-5 (2024) and evidence of compliance is available in the 7.8 Electric and Magnetic field Compliance Report [APP-330]. 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 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192].</p> <p>The residual impacts of the Project must be considered in the context of relevant planning policy and the 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 National Policy Statement (NPS) EN-1 and EN-5 (2024) framework, following a detailed assessment of the Project and its likely effects.</p> <p>Pursuant to paragraph 3.2.7 of NPS EN-1 (2024), substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance.</p> <p>Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085].</p>

Topic	Comment	National Grid's response
		<p>EN-1 paragraph 4.1.7 provides '<i>... For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases</i>'.</p> <p>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.</p> <p>The residual environmental effects, for example in relation to landscape and visual 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.</p>
Costing Approach	The constantly contradictory information on the costs of all solutions gives the public no-confidence in the government's ability to fully assess all the impacts for the benefit of all stakeholders. There a no technical reasons that an offshore solution is not possible, and many sources believe it to be the most cost effective and therefore should be the first solution.	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

2.3 Bressingham Parish Council

2.3.1 Table 2.3 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Bressingham Parish Council [RR-0392]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.3 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Alternatives	This needs to go offshore	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government’s strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.
Land and property	Permanent damage to property’s in the area	With regards to potential damage to properties, an assessment of construction vibration is presented in 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] which considers both the potential impact upon people within buildings (i.e. disturbance) and potential damage to buildings and structures. The assessment considers relatively worst-case construction methodologies and does not take account of potential mitigation. This is so that potential ‘hot-spots’ can be identified where there is the potential significant adverse effects, without mitigation. 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). 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 [Revision B] 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

Topic	Comment	National Grid's response
		<p>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 [Revision B] 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.</p>
Land Use	Destroying good quality farm land	<p>With regards to potential impacts on agricultural land, 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].</p> <p>During the construction stage of the Project, there would be areas of agricultural land that would be temporarily disrupted. The Applicant would only use land that is required as part of the Project and would seek to minimise the use of agricultural land where reasonable and safe to do so. 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.</p> <p>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.</p>
Landscape and Visual	Visual impact on the horizon	<p>The Landscape and Visual Impact Assessment (LVIA), included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken as part of the EIA. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual</p>

Topic	Comment	National Grid's response
		<p data-bbox="842 169 2056 240">Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁷.</p> <p data-bbox="842 248 2074 360">The assessment of landscape effects considers effects on landscape character and is reported in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228].</p> <p data-bbox="842 368 2101 480">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].</p> <p data-bbox="842 488 2085 632">The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). Mitigation measures of relevance to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p>

2.4 Brome and Oakley Parish Council

2.4.1 Table 2.4 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Brome and Oakley Parish Council [RR-0414]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.4 Comments and National Grid's response

Topic	Comment	National Grid's response
Alternatives	Brome and Oakley Parish Council object to the scheme in its entirety as the Council believes there are alternatives and as such, firmly support the Suffolk County Council's view that underground and under sea is a better option than the proposed overhead pylons.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122] , paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

2.5 Diss Town Council

- 2.5.1 Table 2.5 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Diss Town Council [RR-0928]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.5 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Landscape and Visual	Visual intrusion and change to rural landscapes	<p>The Landscape and Visual Impact Assessment (LVIA), included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken as part of the EIA. The approach to the LVIA follows professional guidance as set out in 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)⁷.</p> <p>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].</p> <p>The LVIA recognises that there will be significant visual effects of the Project during its construction and operation (and maintenance).</p> <p>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.</p> <p>Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the Landscape and Visual Impact Assessment (LVIA) Study Area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240].</p> <p>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 in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].</p>

Topic	Comment	National Grid's response
Land and property	Potential reduction in residential amenity/house prices	<p>There is no evidence that provision of the Project will lead to the reduction in property prices or values. Further such that is not a consideration that is material to land use decisions such as the decision on the application for the Project</p> <p>Nevertheless if a loss of value were to occur due to certain particular circumstances 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.</p> <p>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.</p>
Biodiversity, ecology and nature conservation	Impacts on ecology	<p>The Applicant has sought to minimise impacts on habitats and wildlife through careful routeing, siting and detailed design. 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. Mitigation and good practice measures are secured through 7.4 Outline Landscape and Ecological Management Plan (Revision C) and 7.2 Outline Code of Construction Practice (Revision B).</p> <p>The Applicant has also committed to delivering at least 10% Biodiversity Net Gain (BNG) with wider environmental and societal benefits as presented within 7.1 Biodiversity Net Gain Report [APP-299], despite it not yet being mandatory for Nationally Significant Infrastructure Project applications.</p>
Historic Environment	Impacts on ... heritage	<p>6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets.</p>
Construction Impact	Disruption from construction	<p>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. The mitigation measures and controls set out in 7.2 Outline Code of Construction Practice [APP-300] are secured through Requirement 4 of Schedule 3 (Requirements) of 3.1 Draft Development Consent Order (revision B).</p>

Topic	Comment	National Grid's response
Alternatives	doubts about alternatives and whether the right balance has been struck	<p>The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. Chapter 3 of the Environmental Statement [APP127] -also reports on the main alternatives that were considered and why the Project was selected.</p>
Needs case	Potential delay/cost increase.	<p>Costings for the Project are set out in the 7.17 2025 Strategic Options Backcheck and Review [APP-355]. The Applicant recognises the urgent need for the Project, which is reflected in policy. National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible.</p> <p>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</p> <p>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.</p>

2.6 Great Waltham Parish Council

2.6.1 Table 2.6 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Great Waltham Parish Council **[RR-1317]**. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.6 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Consultation	Concerns on process.	<p>It is assumed that this comment relates to consultation. 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). Therefore, the Project requires consent under the Planning Act 2008. The proposals are subject to scrutiny through examination by the Planning Inspectorate which is an independent organisation.</p> <p>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 N: Legal Opinions [APP-080].</p>
Land and property	Financial Impact on households.	<p>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. Unfortunately, while we understand that our proposals cause concerns about property value, UK law does not include for compensation in cases of a loss of view or changes to a view.</p> <p>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.</p>

Topic	Comment	National Grid's response
Consultation	Not listening to other options.	<p>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 set out in 5.1 Consultation Report [APP-066] and in 5.15 Design Development Report [APP-122].</p>
Transport and Traffic	Traffic impact .	<p>The construction vehicle routing strategy has been designed to minimise impacts across the highway network as set out within 7.3 Outline Construction Traffic Management Plan [APP-309]. 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.</p> <p>The Applicant has undertaken a complete and full assessment of traffic routes being used by construction vehicles. Details are contained in 7.11 Transport Assessment [APP-333].</p> <p>6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] includes the assessment of the potential impacts of the Project, including changes in traffic flow, delays, road safety and 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 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</p>

Topic	Comment	National Grid's response
Alternatives	The sea route is easily expandable as more and more windfarms come online and we require more space for housing.	<p>are under discussion with the Local Highway Authority/National Highways to minimise likely adverse impacts.</p> <p>The Applicant is required to develop proposals in line with national policy and its regulatory duties. The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.</p>

2.7 Health and Safety Executive

2.7.1 Table 2.7 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by the Health and Safety Executive [RR-1365]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.7 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Order Limits	According to HSE’s records, the proposed Order Limits for this Nationally Significant Infrastructure Project fall into no consultation zones of several Major Accident Hazard Sites [‘MAHS’] and the consultation zones of several notified Major Accident Hazard Pipelines [‘MAHP’]. Due to the scale and complexity of the order limits the GIS files for the order limits were used. This is based on GIS files for the Order Limits were provided by the applicant via email on 17/10/2025 in the zip file “Order_Limits.zip”.	<p>The Applicant is aware of its obligations under the Pipeline Safety Regulations 1996. The HSE has been consulted throughout the consultation activities on the Project. In its response to consultation in 2023, 2024 and 2025, the HSE identified that the draft Order Limits fall into the consultation zones of several Major Accident Hazard Sites and the consultation zones of several notified Major Accident Hazard Pipelines. The Project does not oversail any of the specific sites identified by the HSE. National Grid has been and continues to engage with the relevant site operators in order to ensure there are no adverse impacts. National Grid is in consultation with operators of the Major Accident Pipeline and specialists to assess and mitigate permanent and temporary construction impacts. The Project is not subject to the Control of Major Accident Hazards Regulations 2015.</p> <p>The Applicant sets out its compliance with NPS EN-1 (2024) in paragraphs 7.2.201 to 7.2.206 of 5.6 Planning Statement [APP-085] regarding safety and the requirement to consult HSE.</p>
Further Consultation	<p>There were no identified major accident hazard sites identified interacting with the order limits supplied.</p> <p>The full list of major accident hazard pipelines identified by operator and alphabetically: •</p>	<p>The Applicant has noted this response and will engage with HSE where relevant. We have consulted with the listed pipeline operators where affected and we’re working with our experts to assess impacts. From these results and if required, potential mitigations will be developed in collaboration with the pipeline operators.</p>

Topic	Comment	National Grid's response
	<p>Operated by National Grid Gas PLC: o 18 Feeder Stapleford Tawney / Tilbury Thames North, HSE: 8191, Transco: 2450 o 5 Feeder Braintree / Roxwell, HSE: 7599, Transco: 1852 o 5 Feeder Diss Comp Tee / Stowmarket, HSE: 7448, Transco: 1707 o 5 Feeder Horndon / Tilbury Thames North, HSE: 8189, Transco: 2448 o 5 Feeder Roxwell / Abridge, HSE: 7598, Transco: 1851 o 5 Feeder Roxwell / Horndon, HSE: 8190, Transco: 2449 • Operated by Cadent Gas Limited: o 8 Inlet / Station 81/1 (Chadwell)", HSE:8164, Transco: 2423 o Baker Street / Canvey (Baker St / Stanford)(22), HSE:8176, Transco: 2435 o Bramford / Langham, HSE:7424, Transco: 1683 o Chalk End / Springfield (1SNO), HSE:7577, Transco: 1831 o Connection to STN 33 12", HSE:8140, Transco: 2399 o Daisy Green Tee / Fordham (1XUO), HSE:7584, Transco: 1838 o Eight Ash Green Spur (1XWA), HSE:7585, Transco: 1839 o Hainault / Ashingdon (10), HSE:8179, Transco: 2438 o Hordon / Abridge (2),</p>	

Topic	Comment	National Grid's response
	<p>HSE:8146, Transco: 2405 o Horndon / Clockhouse Lane (111), HSE:8183, Transco: 2442 o Inlet / Station 82/2 (Chadwell), HSE:8165, Transco: 2424 o INLET TO MOUNTNESSING STN 314/315 8"" , HSE:4107406, Transco: 2426 o Langham / Ardleigh (1XHO), HSE:7589, Transco: 1843 o Langham / Daisy Green / Little Braxted (1SKO&1SLO), HSE:7571, Transco: 1826 o Little Braxted / Tye Green (1XOO), HSE:7568, Transco: 1823 o Mardyke / Stock (63), HSE:8169, Transco: 2428 o Orsett / Chadwell St. Mary (21), HSE:8149, Transco: 2408 o Shoulder Hall / Southend Arterial Road (13), HSE:8147, Transco: 2406 o West Bergholt Spur (1XWO), HSE:7586, Transco: 1840 o Wilby / Frenze Hall, HSE:7386, Transco: 1645 o Yelverton / East Carleton, HSE:7385, Transco: 1644</p> <p>The Applicant should contact the above pipeline operators to confirm and to inform an assessment of whether the proposed development is vulnerable to a possible major</p>	

Topic	Comment	National Grid's response
	<p>accident from their pipelines. There are three particular reasons for this: i) The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline. ii) The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation if the development proceeds. iii) To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.</p>	

2.8 Hempnall Parish Council

2.8.1 Table 2.8 below outlines the Applicant's comments on the Relevant Representation (RR) provided by Hempnall Parish Council [RR-1408]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.8 Comments and National Grid's response

Topic	Comment	National Grid's response
Needs Case	We are particularly concerned about the impact of the line stimulating secondary development in its surrounding area.	<p>National Policy Statement EN-1 (2024) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible.</p> <p>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. Enabling the connection of new sources of renewable energy and by contributing to our energy security in the future, helps the country to achieve the government's Net Zero target and ensures that the National Grid meets future power demands.</p> <p>The Project is responding to this need. Other forms of new development is controlled and regulated through separate planning legislation, most likely to be administered and determined by a local planning authority. The acceptability of any secondary development would be considered separately and does not form part of this project or its intended objectives.</p>

2.9 Heywood Parish Meeting

2.9.1 Table 2.9 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Heywood Parish Meeting [RR-1419]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.9 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Alternatives	<p>Inadequate time has been given to alternative options and the costing of these options</p> <p>This project can be carried out without the destruction of the countryside wildlife peoples lives the list is endless I urge the inspectorate to fully examine the proposals and look at the alternatives offered and also to check the costings which I believe to be wrong</p>	<p>The Project has been developed to be meet the identified need for the Project, including the date when the Project is required to be operational, consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option.</p> <p>The 5.15 Design Development Report [APP-122], paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government’s strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.</p> <p>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</p>

2.10 Mining Remediation Authority

- 2.10.1 Table 2.10 below outlines the Applicant's comments on the Relevant Representation (RR) provided by the Mining Remediation Authority [RR-2549]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.10 Comments and National Grid's response

Topic	Comment	National Grid's response
DCO and Planning Matters	As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. The site to which this submission relates is not located within the defined coalfield. On this basis we have no specific comment to make.	Noted.

2.11 Tharston and Hapton Parish Council

2.11.1 Table 2.11 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Tharston and Hapton Parish Council [RR-3624]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.11 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Landscape and Visual	The Parish Council are fully against the project due to it ruining local views.	<p>The objection of the Parish Council is acknowledged. 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)⁷. 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].</p> <p>The LVIA recognises that there will be significant visual effects of the Project during its construction and operation (and maintenance).</p> <p>As reported in 5.6 Planning Statement [APP-085], embedded mitigation has sought to minimise landscape effects as far as practicable.</p> <p>Chapter 8 of the 5.6 Planning Statement [APP-085] provides a summary of the planning balance in accordance with the National Policy Statement (NPS) EN-1 and EN-5 framework, following a detailed assessment of the Project and its likely effects.</p> <p>Pursuant to paragraph 3.2.7 of NPS EN-1 (2024), substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance.</p> <p>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</p>

Topic	Comment	National Grid's response
		<p>national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085].</p> <p>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’.</p> <p>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.</p> <p>The residual environmental effects on 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.</p> <p>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.</p>
Transport and Traffic	Habitat, bridleways and footpaths along with the ongoing issues of the construction and how it will hurt our local parish along with others.	<p>i. Habitats</p> <p>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 [Revision B] 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</p>

Topic	Comment	National Grid's response
		<p>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. 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].</p> <p>ii. Footpath and PRow</p> <p>Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRow). The overall strategy, as set out in 7.6 Outline Public Rights of Way Management Plan [APP-329], is to maintain access along PRow at all times during construction, either through managed access on their existing alignment, or through provision of appropriate diversions. As a result, no PRow would be closed without a diversion in place, and no severance of the overall network is anticipated. Impacts, management proposals and indicative durations for each affected PRow are contained in 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 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.</p> <p>Where PRow 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 Right of Way Management Plan [APP-329].</p> <p>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.</p>

Topic	Comment	National Grid's response
		<p>All PRowWs will be reinstated as soon as practicable to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys.</p> <p>Notwithstanding the above, the Applicant will continue to engage with Local Highway Authorities and affected stakeholders as the detailed PRowW management arrangements are developed.</p>

2.12 Thrandeston Parish Council

2.12.1 Table 2.12 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Thrandeston Parish Council [RR-3664]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.12 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Landscape and Visual	The detrimental impact on the area of the Parish both visually and environmentally.	<p>The objection of the Parish Council is acknowledged. 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)⁷. 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].</p> <p>The LVIA recognises that there will be significant visual effects of the Project during its construction and operation (and maintenance). However, as reported in 5.6 Planning Statement [APP-085], embedded mitigation has sought to minimise landscape effects as far as practicable. 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.</p> <p>Chapter 8 of the 5.6 Planning Statement [APP-085] provides a summary of the planning balance in accordance with the National Policy Statement (NPS) EN-1 and EN-5 framework, following a detailed assessment of the Project and its likely effects.</p> <p>Pursuant to paragraph 3.2.7 of NPS EN-1 (2024), substantial weight should be given to the need for energy infrastructure when considering applications for development consent. Paragraph 4.1.3 also sets out a presumption in favour of granting consent for energy Nationally Significant Infrastructure Projects (NSIPs). EN-1 further provides that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The CNP Policies address how residual effects are considered in the planning balance.</p>

Topic	Comment	National Grid's response
		<p>Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085].</p> <p>EN-1 paragraph 4.1.7 provides ‘... <i>For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases</i>’.</p> <p>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.</p> <p>The residual environmental effects, such as 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.</p>
Biodiversity, ecology and nature conservation	This will also result in severe damage to an area of special scientific interest when the work by National Grid is carried out on Thrandeston Marsh.	<p>As detailed within the 7.2 Outline Code of Construction Practice [Revision B] (commitment GG04) and 7.4 Outline Landscape and Ecological Management Plan [Revision C], works will be supervised by an Ecological Clerk of Works (ECoW) who will ensure impacts on important ecological features, such as Thrandeston Marsh County Wildlife Site (CWS), will be minimised as far as practicable and no impacts beyond those absolutely necessary will be undertaken within the CWS. The cables working area and Limit of Deviation within Thrandeston Marsh, have been reduced as far as practicable to ensure impacts are minimised.</p> <p>The 7.4 Outline Landscape and Ecological Management Plan [Revision C] sets out proposed habitat reinstatement methods, and will include natural regeneration within Thrandeston Marsh CWS. Monitoring visits will also be undertaken at designated sites impacted by the Project, including Thrandeston Marsh CWS, during and following the completion of the habitat reinstatement works over a five-year period as set out within Section 11.4 of the 7.4 Outline Landscape and Ecological Management Plan [Revision C].</p>

2.13 UK Health Security Agency

2.13.1 Table 2.13 below outlines the Applicant's comments on the Relevant Representation (RR) provided by the UK Health Security Agency [RR-3742]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.13 Comments and National Grid's response

Topic	Comment	National Grid's response
Health and wellbeing	<p>With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 24th July 2024 have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health.</p> <p>Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion.</p>	Noted.

2.14 Woodland Trust

- 2.14.1 Table 2.14 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Woodland Trust [RR-3855]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.14 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Biodiversity, ecology and nature conservation	If you change our infrastructure you’ll change how people and animals live.	<p>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.</p> <p>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) [APP-123 to APP-287, AS-026 and AS-068] that accompanies the application for development consent.</p> <p>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 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 (Revision C) and 7.2 Outline Code of Construction Practice (Revision B) 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 commitments.</p>

Topic	Comment	National Grid's response
Needs Case	You change our countryside into London as it's being pushed further out, to keep Britain as Britain you should abide by contrast Helmand natural law and leave it alone.	<p>The increased capacity being provided by the Project is critical to delivering a network which supports the clean power pathways as set out in the Clean Power Action Plan 2030, which is in turn explicitly referenced in the revised National Policy Statement EN-1 (2026). The Project responds to previously established policies and by coming forward as it is, also addresses the urgency and pace required to move towards delivering the necessary improvements to power infrastructure to respond to the challenges of meeting the obligations of the Clean Power Action Plan, and thereafter, net zero, making a significant contribution to both regional and national requirements.</p> <p>The National Energy System Operator's (NESO's) Clean Power 2030 report (Annex 2)¹³ identifies the Project as critical to delivering a network which supports the clean power pathways, but at present has a delivery date after 2030. Support is therefore needed to bring the Project forward for 2030 delivery. NESO's Clean Power 2030 report also states that the Project (AENC and ATNC – the Network Options Assessment code for Norwich to Tilbury) and Sea Link are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional recognition of the need for the Project to what is stated on the need for new electricity networks.</p>

2.15 Yaxley Parish Council

- 2.15.1 Table 2.15 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Yaxley Parish Council [RR-3859]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.15 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Biodiversity, ecology and nature conservation	The negative impact that it will have on the natural beauty of the Parish and the environmental damage that it will do.	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) [APP-123 to APP-287, AS-026 and AS-068] 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 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 (Revision C) and 7.2 Outline Code of Construction Practice (Revision B) 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.

Topic	Comment	National Grid's response
		<p>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.</p> <p>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.</p> <p>Given the Project qualifies as CNP Infrastructure, paragraph 3.3.63 of EN-1 confirms the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh the residual effects that remain following application of the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085].</p> <p>EN-1 paragraph 4.1.7 provides '<i>... For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases</i>'.</p> <p>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.</p> <p>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.</p>

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