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Norwich to Tilbury

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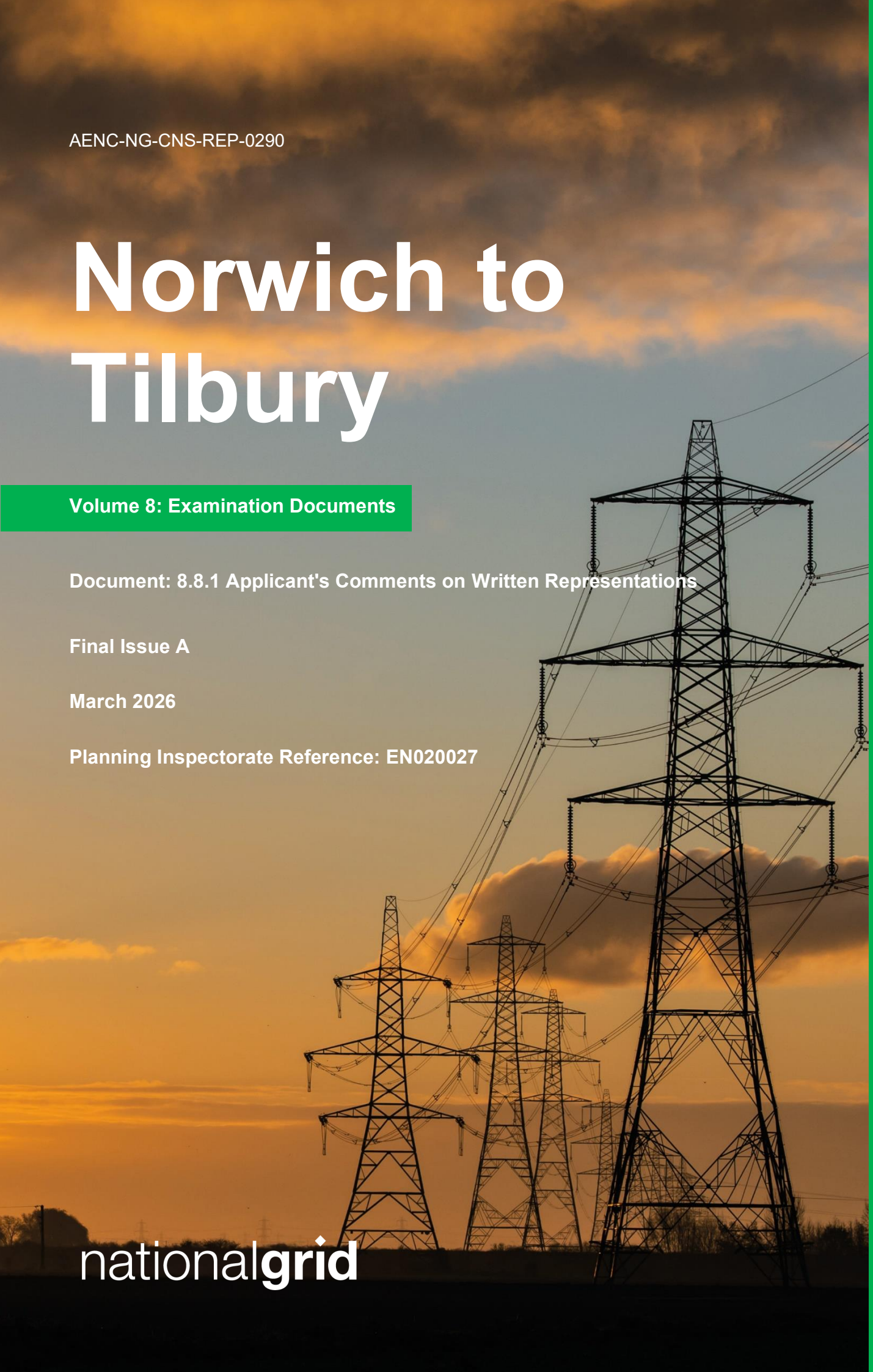

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1. Introduction

1.1 Purpose of this Document

1.1.1 This document has been prepared by National Grid Electricity Transmission plc ('the Applicant') to provide comments on Written Representations ('WRs') made by Interested Parties (IPs) in response to the application for development consent for Norwich to Tilbury ('the Project'). Written Representations were submitted to the Examining Authority (ExA) by Deadline 1, 26 February 2026.

1.1.2 This document is provided at Deadline 2 of the Examination, 12 March 2026.

1.2 Approach to Responding to Written Representations

Overview

1.2.1 The Applicant has reviewed and considered all WRs received.

1.2.2 Given the short timeframe between publication of WRs on the afternoon of 3 March 2026 and Deadline 2, 12 March 2026, this document does not seek to provide a line-by-line response to each WR, however, any absence of a specific response in this document to a comment at this stage does not imply the Applicant's agreement with its contents The Applicant has identified that many matters raised in the WRs are the same or similar to those raised at statutory consultation, through Relevant Representations or as given orally at the hearings held in the week commencing 9 February 2026. The Applicant has previously provided comment on such matters in the **5.1 Consultation Report [APP-066]**, **8.4.1 Applicant's Comments on Relevant Representations, Revision B** (revised from Deadline 1, [REP1-132]) and the **Applicant's Written submissions relating to Issue Specific Hearing 1, Compulsory Acquisition Hearing 1 and the Open Floor Hearings [REP1-137 to REP1-139].**

1.2.3 The Applicant has therefore sought to focus its comments on matters raised in WRs that are new, contain new detail or evidence, or which seek clarification from the Applicant. The Applicant has reviewed all WRs and has identified such matters for extraction into this document and an individual response.

1.2.4 The Applicant has provided a detailed response to a number of thematic issues commonly raised by local authorities in Section 3 of its **Comments on Local Impact Reports [8.2.2]** submitted alongside this document at Deadline 2. To avoid duplication, the Applicant's comments on WRs generally do not cover these matters where raised in WRs, except where it relates to a more specific matter (e.g. locationally-specific, or in relation to new evidence or detail). These topics are:

- Needs Case and Timing
- Alternatives – Offshore Alternatives
- Alternatives – Technology Choice – Overhead Line and Underground Cables

- Alternatives – Waveney Valley
- Alternatives – East Anglia Connection Node Siting
- Alternatives – Great and Little Waltham
- Alternatives – Dunton Hills Garden Village
- Good Design
- Landscape and Visual – Landscape Compensation
- Landscape and Visual – Furthering the Purposes of the National Landscape
- Biodiversity, Ecology and Nature Conservation – Replacement Tree Planting
- Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain
- Land Use – Green belt
- Socio-economics, Recreation and Tourism – Community Benefits
- Socio-economics, Recreation and Tourism – Employment, Skills, Training and Local Supply Chain
- Safety and Security – Airfields
- Draft Development Consent Order, Requirements and Management Plans
- Pre-Commencement Operations

Categorisation of WRs

1.2.5 For ease of identification, the Applicant has grouped WRs into categories reflecting the status of the IP:

- The Applicant has sought to identify and respond to all parties prescribed under Section 42(1)(a) and Section 42(1)(b) of the Planning Act 2008. Many such Interested Parties are also subject to a Statement of Common Ground (SoCG) and, in the case of Local Authorities, have submitted a Local Impact Report (LIR) at Deadline 1. Therefore, the Applicant has not commented in detail on WRs from such parties where the content of the WR is materially the same as that of the relevant SoCG or LIR.
- The Applicant has undertaken best endeavours to identify WRs from IPs who are Affected Parties (APs). As APs are not required to declare themselves as such in submitting their WR, the Applicant has sought to identify APs through the content of their WR – i.e. if reference is made to their landholding – and through cross-referral with information in **4.3 Book of Reference [AS-018]** and **4.4 Land Rights Tracker 4.4, Revision B**. 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. Only WRs that have been confirmed to be from APs are included in the landowner category of this document, however if any APs believe they have not been identified correctly they are encouraged to contact the Project team.

- WRs from other developers interacting with the Project, non-statutory organisations (including interest groups) and all other IPs are separately categorised.

Examination Library

1.2.6 The WRs were published by the Planning Inspectorate (PINS) on Tuesday 3 March, alongside other Deadline 1 submissions and without an accompanying updated examination library. The Applicant has identified that since this publication, minor changes have been made to several of the uploaded documents without explicit notification from PINS, such that submissions were re-uploaded or in some cases re-categorised (e.g. no longer labelled as WRs but as another form of Deadline 1 document). The Applicant has sought to identify such changes whilst preparing its response to the Deadline 1 documents by cross-referring with the published Examination Library. However, given the compressed timescales it is possible that in some instances a change has not been identified and subsequently a WR may be accounted for in another Deadline 1 document such as **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings (Revision A)** or vice-versa.

1.3 Structure of this document

1.3.1 This document is organised by category of WR as explained above:

- Section 2: provides the Applicant's comments on WRs submitted by statutory organisations
- Section 3: provides the Applicant's comments on WRs submitted by Affected Parties (landowners)
- Section 4: provides the Applicant's comments on WRs submitted by developers
- Section 5: provides the Applicant's comments on WRs submitted by non-statutory organisations
- Section 6: provides the Applicant's comments on WRs submitted by other IPs

2. Applicant’s Comments on WRs submitted by Statutory Organisations

2.1 Overview

2.1.1 The Applicant’s comments on WRs submitted by statutory organisations are provided in Table 2.1.

Table 2.1 Applicant’s Comments on WRs submitted by Statutory Organisations, including Historic England

Examination Library ID	Name	Topic	Matter	NG Response
REP1-175	Roydon Parish Council	N/A	N/A	This document was labelled as a written representation on the Planning Inspectorate website at Deadline 1 but is in fact a written summary of the oral submission made at the Open Floor Hearings. It is therefore responded to in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [Revision A]**.
REP1-162	Essex County Council	N/A	N/A	This document was labelled as a written summary of the oral submission made at the Open Floor Hearings on the Planning Inspectorate website at Deadline 1 but it is specified within the document to be a written representation. The Applicant acknowledges the points raised within the WR, which are consistent with those raised and by ECC in its Local Impact Report and Relevant Representation (RR). The Applicant does not provide further detailed comment on this document and refers to the following documents as reflecting the position of both parties: • **8.8.2 Applicant's Comments on Local Impact Reports [Revision A]** • **8.4.1 Applicant's Comments on Relevant Representations [Revision B]** • **5.9.3 Draft Statement of Common Ground - Essex County Council (ECC) (incl LLFA and Highways) [Revision C]**
REP1-197	Affinity Water	N/A	N/A	The Affinity Water submission has a formatting issue as uploaded to the Examination Library, however the Applicant understands that it broadly refers to the ongoing engagement being undertaken with the Applicant since the submission of its Relevant Representation. The Applicant concurs with this update and refers to its **8.3.5 Draft Statement of Common Ground - Affinity Water [REP1-076],** which will be updated in due course to reflect the outcome of ongoing engagement.
REP1-145	Ardleigh Parish Council and Little Bromley Parish Councils	Needs Case	The Applicant needs to be very clear about the objective it seeks to achieve through this proposed development. The Parish Councils have not been able to distil from the material filed by the Applicant to date as to precisely what objective the Applicant is aiming to achieve. Without this information being presented clearly, the public, parties to this examination, and the Examining Authority (“the ExA”) are unable	The objectives of the Project are manifold and are set by statute, National Policy Statements (NPSs), statutory guidance and ministerial and other guidance. In short, the Project seeks to meet the identified urgent need for critical national priority infrastructure in East Anglia identified in NPS EN-1 (2024) (see Sections 2 and 3) for economic, security, sustainability and affordability reasons and in a manner

Examination Library ID	Name	Topic	Matter	NG Response
			to fully understand and respond to the Applicant's proposed development. In respect of costs, the Parish Councils are, and remain, concerned as to how and when the Applicant has investigated and set its costs forecasts for the development as currently before the ExA, as well as the comparative costs of alternatives.	consistent with the provisions and guidance of NPS EN-5 in accordance with the Applicant's statutory duties. The alternatives considered and the reasons for their being discounted are set out above and are reported in **7.17 Strategic Options Backcheck and Review [APP-355]** (Chapter 5 Strategic Option Overview summarises the options), **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** (entire chapter), and **5.15 Design Development Report [APP-122] (**Chapter 2 Project-Wide Considerations Relevant to Design Development). NPS EN-1 (2024) makes it clear, in paragraph 4.3.22, that '*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*'. Paragraph 4.3.23 of NPS EN-1 states, '*The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development*.' These objectives, as they flow from the Applicant's statutory duty, have become the nation's objectives following the publishing of government statutory policy, in particular in NPS EN-5 (2024). The critical, urgent need for new transmission lines has become so much more than only grid capacity and the ways of providing it – the attention is now far more on the cost of not providing it in time. The applicant provided a transparent and detailed model of costs used for the appraisal of alternatives set out in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, Appendix D: Economic Appraisal pages D1-D14l. This methodology is used by the Applicant for all projects in England and Wales and published in our Strategic Options Backcheck and Review at each stage of the Project.
REP1-145	Ardleigh Parish Council and Little Bromley Parish Councils	N/A	The Parish Councils would suggest framing written questions to the Applicant along the following lines: a. What is the defined objective for the Norwich to Tilbury Project? b. When was this objective decided upon and fixed? c. What alternatives were considered to meet that objective? d. When and how were they considered, and the clear reasons for not pursuing those alternatives? 1The Parish Councils support the approach to using these hearings to address the issues on alternatives flagged by Pylons East Anglia Ltd in its Deadline 1 submission. e. Can the Applicant provide detailed breakdowns of the costs of the alternatives considered by it? Particularly, where can it be seen what the difference in costs is between a development involving HVAC and one involving HVDC?	The Applicant notes the request made by the respondent for written questions and will respond at Deadline 3 to written questions issued by the Examining Authority, in accordance with the Rule 8 Letter.

Examination Library ID	Name	Topic	Matter	NG Response
			f. What costs contingencies have been considered and reserved for if the project is granted Development Consent?	
REP1-145	Ardleigh Parish Council and Little Bromley Parish Councils	Needs Case / Alternatives	A specific point of concern arises for the Parish Councils in respect of costs and whether or not the cost of the EACN was factored into the current development at the time at which the alternatives were dismissed by the Applicant. This is discussed further below. The EACN At ISH1 the Applicant described the EACN location as balancing the 400kV transmission system and the landing points for customer connections coming ashore (ISH1 Part 2, 00:03:18–00:05:05). It remains unclear whether the EACN's location was treated as a variable within the alternatives considered or as a fixed asset. If it were treated as a fixed point in the proposed development, it would have effectively shaped the route and the concentration of infrastructure and played a key role in determining the route and proposed development in and around the ALBA.	**7.19 2023 - Strategic Options Backcheck and Review [APP-357]** sets out the alternatives under consideration. Section 15 'Strategic Options appraisal conclusions', page 112, summarises the southern options as follows: **Circuits to the South of East Anglia** • EAS 1 – Twinstead to Tilbury 80km • EAS 2 – Bramford via New Substation to Tilbury 100km • EAS 3 – Bramford via New Substation at Bradwell to Tilbury 130km. All options looked at requirements to connect North Falls, Five Estuaries Windfarms and Tarchon Interconnector. This included considering the EACN Substation, an alternative at Bradwell, as well as the consequences of connection at EAS 1. We also reference the consequences for these generators in the option offshore 1. Therefore, alternatives for EACN were considered and addressed within **[APP-357]** and were evaluated at the alternatives phase.
REP1-145	Ardleigh Parish Council and Little Bromley Parish Councils	N/A	The Parish Councils invite the ExA to explore the following (by way of written questions) with the Applicant in respect of the EACN: a. Was the EACN location treated as a fixed constraint in assessing alternatives? b. What alternative locations were considered with respect to the EACN? c. Further, what alternatives were considered in respect of the permanent access route from the centre of Little Bromley to the EACN? d. What criteria led to rejection? e. Were offshore scenarios modelled that would alter the requirement/design/location of the EACN? f. Was the infrastructure concentration within the ALBA. assessed as a siting factor?	The Applicant notes the request made by the respondent for written questions and will respond at Deadline 3 to written questions issued by the Examining Authority, in accordance with the Rule 8 Letter.
REP1-158	Colchester CC	Consultation	2.Whilst CCC consider the consultation legally compliant in line with the Act, it is clear from the representations and open floor hearing submissions that it was not well received and many IP's consider the route to be predetermined. The then Energy Systems Operator's (ESO's) report of 2024 set out numerous options for energy transmission in East Anglia and shows a very useful example of what the non-statutory consultation could have looked like – a set of clearly different options, with wholly distinct routes and transmission methods and substation locations. CCC consider that if the applicant had taken a similar approach, this would have given the public a genuine set of clearly different, costed options to comment on. If the ESO can produce such a study, why could the applicant not have done the same non-statutory consultation stage?	At each stage of consultation, the Applicant has laid out our consideration of the alternative route options and technologies. The Applicant's consideration of alternatives is set out in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. The Applicant's 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 the government and our regulator Ofgem. The proposals that the Applicant has chosen to consult on and develop are the ones which

Examination Library ID	Name	Topic	Matter	NG Response
				meet our statutory duties, including the duties imposed on us by national policy (National Policy Statements EN-1 and EN-5).
REP1-158	Colchester CC	Planning Policy	3.The position of the East Anglian Connection Node (EACN) substation at Ardleigh was predetermined. It is this location that then dictates the route of the alignment, and the corresponding order limits. It is the location of the EACN that produces a route that in turn causes significant harm to the Dedham Vale National Landscape (NL). This does not comply with NPS EN5 which requires harm to NLs to be avoided in the first instance.	Triage notes to ensure consistency with what is said in our response to the LIR. The siting of the EACN Substation was not predetermined. It was identified as a result of balanced decision making informed by consideration of the effects from the substation itself and both the 400 kV and customer connections to it. This followed identification of the strategic project (Norwich to Bramford to Tilbury) that solved the boundary reinforcement requirement and that the more efficient solution to connect the EACN to the Transmission System was to integrate it with that strategic reinforcement project. The siting of the EACN followed a process set out in the CPRSS. The potential for effects on the Dedham Vale National Landscape informed the iterative and integrated process of routeing the 400 kV connection and siting of the EACN. Paragraphs 2.9.21 to 2.9.23 of National Policy Statement (NPS) EN-5 require consideration of the effects (using the term 'harm') on a National Landscape. These are both the **direct** effects (i.e. physical effects on the designated area) and the **indirect** effects arising from infrastructure proposed outside the designated area. 'Harm' is not reported on in a Landscape and Visual Impact Assessment, the purpose of which is to identify effects in accordance with GLVIA3, as part of the Environmental Impact Assessment (EIA) process, but it is considered in the planning balance, given use of the term in the policy above. The purpose of a National Landscape is to 'conserve and enhance natural beauty', as set out in the Countryside and Rights of Way Act 2000. The Special Qualities of Dedham Vale National Landscape (DVNL) explain the aspects of natural beauty which are important for this nationally protected landscape. When considering effects on Special Qualities, the long term effects, during operation, on the National Landscape will not be significant, and therefore will not constitute 'harm' to these Special Qualities. There will however be some significant **visual** effects on views looking outwards from the DVNL. The fact that the Project will be visible from within the DVNL is not disputed, but the Applicant's position is that the long-term adverse effects on the Special Qualities of the National Landscape will not be significant (and so will not constitute 'harm'). Note that, in terms of indirect effects, the potential for effects on the Special Qualities of the DVNL was considered when siting the Cable Sealing End (CSE) compounds to the north of Raydon airfield and at Great Horkesley. In addition, there will be short to medium-term significant effects on the Special Qualities of DVNL during construction and after reinstatement, as a result of the work required to install underground cabling through this area, and the time taken for vegetation to become established, once the reinstatement work has been completed. This is because of

Examination Library ID	Name	Topic	Matter	NG Response
				the time it takes grassland to establish across disturbed areas, and for hedgerows and trees to grow. **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** presents the assessment of effects of the Project on DVNL. The assessment was undertaken taking into consideration the Special Qualities, which describe which aspects of natural beauty are important in the DVNL. The assessment was also informed by a Position Statement from the Dedham Vale National Landscape Partnership. The Position Statement clarifies that: '*The National Landscape Partnership…considers the setting to the AONB to be the area within which development and land management proposals, by virtue of their nature, design, scale, siting, materials and colour have the potential to result in **substantial** impacts, positive or negative, on the natural beauty and special qualities of the AONB*.' [emphasis added]. It is considered (as informed by Paragraph 5.10.34 of NPS EN-1 (2024)) that the reference to 'substantial' impacts here is taken as meaning the 'likely significant effects' identified through the EIA for the Project. The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant confirms that this duty has been fulfilled 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]**.
REP1-158	Colchester CC	Historic Environment	5. The ES has assigned a sensitivity of 'low' to non-designated heritage assets and has not assessed the impacts of the project on their setting. This approach in the interests of efficiency has therefore undersold the harm to built heritage that the scheme causes. The ES noted the harm to built heritage in terms of designated assets to be in the middle of the spectrum of less than substantial harm. It is noted that this harm occurs to assets of all grades, including Grade I and Grade II*. This residual harm is avoidable as it would be significantly reduced with more undergrounding.	The Applicant has assigned high, medium, low and negligible values to non-designated assets on a case-by-case basis across the Project. All non-designated heritage assets were assessed to determine their value in accordance with the **6.19 Scoping Report [APP-288 to APP-296]**, **6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. In National Policy Statement (NPS) EN-1 (2024), instructions regarding the Applicant's assessment state (paragraph 5.9.9) '*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.

Examination Library ID	Name	Topic	Matter	NG Response
				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.
REP1-158	Colchester CC	Alternatives	9. The Council struggle to rationalise the argument for the siting of pylons over the undergrounded section between the EACN and Boxted. The applicant states that it is not technically feasible to underground into the EACN (through the Dedham Vale NL) and then back out again (towards the Boxted CSE Compound), but this approach doubles the level of harm in this area. This is because the land will be destroyed in the undergrounding construction phase and then will still suffer the addition of pylons over the top of it.	It is unclear which CSE compound is being referred to as the 'Boxted CSE Compound', though this is assumed to be the Great Horkesley (EACN side) CSE Compound and the comment to refer to the overhead line from the EACN Substation to that CSE compound. The Applicant's position is that the use of cables for this section is not justified when considered against the decision making criteria in NPS EN-5. The location is not within a designated landscape (so the strong presumption for overhead line is not reversed); the effects do not constitute harm to the special qualities of the National Landscape; and, even if the thresholds for the tests at paragraph 2.9.23 of NPS EN-5 were met, the balance of factors and technical constraints is such that the change to underground cable is not justified. The technical constraints and further detail is provided in Section 6.5 of **5.15 Design Development Report [APP-122]** which identifies a series of constraints to the use of underground cable on this section. These are: technical constraints at the immediate entry to the EACN; the sterilisation of minerals around TB5 to TB7; the technical restrictions at the railway (cables for both connections may be possible but require tunnel possibly with ventilation headhouses); and routeing across Ardleigh reservoir where trenchless technology would be difficult to accommodate given the working width required for trenchless technology. Whilst conceptually this connection could in part be installed as cable, as set out in **5.15 Design Development Report [APP-122]** the Applicant's view is this is not justified.
REP1-164	Fordham Parish Council	Alternatives	As stated by Colchester City Council (CCC), we consider the Colne River valley as environmentally and aesthetically important as the ANOB of the Dedham Vale and is a "Valued Landscape." As I understand it, the only reason NG have chosen the route through these areas is based on where they have sited the EACN (East Anglia Connection Node), this could have been sited elsewhere, thus avoiding these sensitive places. As I also understand it, the planning laws require NG to avoid such areas entirely. If I might quote from someone else: "A Superior and Cheaper Alternative (to) National Grid's own Strategic Options Back check and Review confirms that the EAS1 southern route meets all project objectives, completely avoids the Dedham Vale, and would reduce lifetime costs by around £140 million. This route runs largely parallel to existing infrastructure, thereby minimising new harm. Yet EAS1	Judgements on landscape value were made as part of the landscape assessment, as set out in Annex A of **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. These judgements were informed by the Landscape Institute's Technical Guidance Note 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). Landscape Character Area (LCA) A4 Colne River Valley Floor and LCA A5 Colne River Valley Slopes are assessed as being of medium-high value. In respect of the Colne Valley, the Applicant does not agree with this interpretation of policy. The correct interpretation of NPS EN-1 (2024) and EN-5 (2024) is a clear strong starting presumption for the use of

Examination Library ID	Name	Topic	Matter	NG Response
			was withheld from consultation and then summarily dismissed. That failure breaches the principle of meaningful public participation required under the Gunning Principles and is contrary to the requirements set out in NPS-EN5. In policy, where an alternative exists which avoids damage to a National Landscape, the duty to select it is absolute even if it results in a longer cable run or increased costs. The failure to adopt or even consult upon EAS1 represents a fundamental procedural defect."	overhead line. That presumption is reversed where the connection crosses nationally designated landscapes, however the Colne Valley is not nationally designated nor within the setting of a nationally designated landscape. The respondent may have an opinion on the relative merits of the Colne Valley relative to the Dedham Vale but the Applicant is clear that the Colne Valley is not a nationally designated landscape. There is also a need to have consideration of whether the use of cable is justified in circumstances where landscape and visual effects are widespread and significant (paragraph 2.9.23 of EN-5 (2024)), however the Applicant's position is this criteria is not met. In regards to EAS1, the various SOBRs have set out why this option was not progressed. This is because whilst it facilitates resolution of the boundary reinforcement aspect of the need case, it does not facilitate the connection of the windfarms and interconnectors (North Falls, Five Estuaries and Tarchon). To address this, to make the solutions comparable, adds an estimated £500m which is significantly greater than the differential between the EAS1 and EAS2 (the option progressed). The Applicant is clear that it has followed the Gunning Principles and is also clear that its obligations are to present its proposals and set out the alternatives it has considered and reasons for its choice (Section 7.3 in 5.15 Design Development Report [APP-122]). The Applicant also disagrees with the characterisation of interactions with a National Landscape. NPS EN-5 (2024) expressly allows for new connections to be routed through such areas, albeit with a reversal of the starting presumption in favour of underground cables. The Applicant's position remains of the view that the Project elements are routed and sited in a manner that is consistent with and justified by policy and in line with its duties.
REP1-164	Fordham Parish Council	Historic Environment	Aside from the temporary and permanent damage to our parish's visual appeal we have a wealth of archaeological heritage that lies underground in the path of the pylons/cables. In fact NG plan to build directly on top of our community dig which has been running for close on eleven years. This is a high status Roman site built over an earlier Bronze/Iron Age site and includes three Roman burials (so far) and later, carbon dated Saxon burials. It has nationally rare features. This has been on the Heritage Environment record for decades, and is clearly visible on Google Earth satellite images from 2016 onwards. NG claim they did a "desktop survey" of the pylon route, yet they have made no attempt to avoid the site. One of the pylons will sit directly on top of a future extension to the site that we know has an unexcavated but verified building in it. And the archaeological heritage destruction won't end there, just half a mile to the north east, around Fossetts Lane there are a further three confirmed Roman sites, two Prehistoric sites and a medieval site. There is also a potentially very important site to us going back to, at least, 1250 (dated finds) which is likely to be the lost, moated	Statutory consultation feedback and the results of archaeological fieldwork have been used to inform design development to reduce as far as practicable impacts to archaeological remains in this area. As a result of this information pylon TB47 was moved north-east to avoid direct physical impact to the archaeological site in this area. The new location for pylon TB47 has been geophysically surveyed, with no results of note, and will be evaluated by archaeological trial trenching to determine if mitigation is required. Various alternative route alignments have been considered that would pass to south and east or west of this area (**5.15 Design Development Report [APP-122]**). Those to the south and east are less preferred due to conflict with areas designated as ancient woodland or where the additional interaction with utility connections means there is insufficient space available to allow for pylon positioning. Those to the west present greater effects on known heritage assets. National Grid has undertaken a detailed routeing and siting exercise, iteratively refined through statutory consultation, geophysical survey and archaeological trial trenching, to limit, so far as practicable, effects on known and potential heritage assets between pylons TB46 and TB52.

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			manor house of Great Fordham. This has also been on the HER for a long time. When I say confirmed, I mean by fieldwalking pottery finds, metal detecting coin finds and geophysical surveys by magnetometer that show underground archaeology. All of these sites are in the path of or very close to the pylons and/or temporary construction roads NG plan to build. They will be severely impacted, if not utterly destroyed by the construction work.	All designated and non-designated heritage assets within the 250 m study area have been assessed in **6.11.A1 Environmental Statement Appendix 11.1 -Historic Environment Baseline Report [APP-209]**. The non-designated assets that intersect the Order Limits or non-designated and designated assets whose settings extend to the Order Limits, are evaluated in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, whilst an assessment of the level of harm designated assets would experience is recorded in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. Landscape and visual effects on the same stretch are illustrated by general LVIA Viewpoints 4.20, 4.24, 4.25 and 4.27 (**7.12 Visualisations - Part 5 of 9 [APP-347]**) and by Heritage Viewpoint HE 26 (photomontage) (**7.12 Visualisations - Part 9 of 9 [APP-351]**), which together confirm that the amended alignment minimises intrusion into key views. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified. The scope and methodology described above were developed in accordance with national policy (NPS EN-1, NPS EN-5 and National Planning Policy Framework), relevant professional guidance, and have been reviewed and agreed at regular archaeology working-group meetings with Historic England and the Local Planning Authorities. On this basis National Grid is confident that the potential impacts on archaeological sites in the TB46–TB52 corridor have been robustly assessed and that proportionate mitigation is secured through the Development Consent Order (DCO) documentation.
REP1-170	Jane Lushington on behalf of Offton and Willisham Parish Council	Environment	Lack of Impact Assessment: No comprehensive impact assessments have been provided, particularly in relation to traffic management, environmental harm, and community disruption. The village of Offton will be split in two, and this must be treated with the same level of concern as the protected Dedham Vale Area of Outstanding Natural Beauty (AONB).	An Environmental Statement (ES) (Volume 6 of the DCO application) has been prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017, **6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297]**. The ES identifies and assesses the likely significant effects on the environment resulting from the construction and operation (and maintenance) of the Project. The Environmental Statement includes an assessment on traffic and transport, environmental harm and community disruption. The village of Offton is not a statutory designated landscape, and therefore, does not carry the same level of protection in National Planning Policy as the Dedham Vale National Landscape. **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** assessed the impact of construction traffic on sensitive receptors along Primary Access Routes (PARs) which connect the Project Site Access Points and haul roads to the Strategic and Major

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				Road Networks. The use of haul roads is proposed as embedded mitigation. Construction traffic will not travel through Offton Village as there are no PARs on the local network through or around the village. Construction traffic will use haul roads connecting to the north via PAR 19 - B1113 Needham Road/B1113 Stowmarket Road (Badley) and to the south via PAR 21- Bullen Lane (Bramford). There are a number of crossover points located on Offton's roads, including Holy Road/Offton Road, and Bildeston Road. The crossover points are installed to allow construction vehicles to cross the public highway and continue along the off-line haul road. No construction traffic is able to leave or join the haul road from these crossover points, unless in a scenario detailed in Section 5.5 of **7.3 Outline Construction Traffic Management Plan [APP-309].** Construction traffic will "give way" to the public highway traffic at these locations. The Main Works Contractor will develop a Driver Information Pack, which will highlight the areas of pedestrians and cyclists to provide additional awareness to the HGV drivers, and improve safety for these user groups. The Applicant has developed **7.3 Outline Construction Traffic Management Plan [APP-309]** which details the proposed mitigations to reduce the impact of construction traffic on the public. There are a number of proposed road closures within Offton, to allow for the safe construction of some highway elements, and also netting and stringing activities. The diversions and closures are anticipated to be short term in nature, less than four weeks, and if relating to Overhead Line Stringing Activities, overnight. The proposed diversion routes are shown on Plan H of **2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section B [APP-034].** Noted in **7.3 Outline Construction Traffic Management Plan [APP-309]**, where a diversion is required, they will follow the principle that they will use the same standard of road, or higher where practicable and available.
REP1-170	Jane Lushington on behalf of Offton and Willisham Parish Council	Landscape and visual	Offton is home to Middlewood, a medieval coppice and Site of Special Interest (SSI), which houses diverse flora and fauna, including rare orchids, dormice, water voles, and otters. The disruption caused by the construction process will severely damage this delicate environment. The visual impact of the pylons would be significant and irreversible, with long-term effects on local views and the character of the village. Given the rolling nature of the landscape, it is unclear whether this has been adequately considered within a Landscape and Visual Impact Assessment (LVIA). The failure to properly account for this in the consultation documents is a significant oversight.	The Applicant has sought to minimise impacts on ecologically designated sites, including the nationally designated Sites of Special Scientific Interest (SSSIs), through careful routeing, siting and detailed design. In the area of Offton the presence of Middle Wood, Offton SSSI, which is designated for its ancient woodland habitat, was considered a key constraint during the design process. The Project has avoided impacts on Middle Wood, Offton SSSI, with no proposed works within the SSSI or within a 15 m buffer. **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. This assessment concludes there will be no significant residual impact on Middle Wood, Offton SSSI. The Applicant has sought to minimise effects on the landscape and on people's views through sensitive routeing of the overhead line past Offton and undergrounding of part of an existing 132 kV overhead line between Offton Road (north of Middle Wood) and Tye Lane (north of

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				Bramford Substation). Between RG187 and RG191 the Project broadly follows the route of the existing 132 kV overhead line (which will be undergrounded). This is shown on pages 23 and 24 of **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]**. A Landscape and Visual Impact Assessment (LVIA) was undertaken as part of the Environmental Statement (ES). This assesses the effects of the Project on landscape character and visual amenity. The LVIA methodology was developed primarily in accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3). The Applicant agrees that the landscape around Offton is rolling in nature; the valley which follows The Channel has rolling valley sides, and the surrounding plateau is gently undulating. Significant effects on landscape character are identified within approximately 1.5 km of the Project, within the Rolling Valley Farmland Landscape Character Type (LCT) and Ancient Plateau Claylands LCT. Further detail is provided in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. Effects on people's views are set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Significant effects are identified within approximately 1.5 km of the Project, within Visual Receptor Areas (VRA) B10, B11, B12 and B13. The photomontage from Viewpoint 2.19: PRoW near Castle Farm, Offton (Offton 27) illustrates the change in view that will be experienced from the edge of Offton, as shown in **7.12 Visualisations - Part 2 of 9 [APP-344]**.
REP1-170	Jane Lushington on behalf of Offton and Willisham Parish Council	Biodiversity, ecology and nature conservation	While Dedham Vale is designated as an Area of Outstanding Natural Beauty (AONB), the environmental impacts on Offton are equally severe, and National Grid's own documentation (indeed these are the only two areas in the proposal that are specifically highlighted in as suffering significant harm), specifically flags that the impact to Offton and Dedham is the same in terms of environmental harm. Therefore, Offton must be treated with the same level of protection and consideration as Dedham. The destruction of vital wildlife habitats, including ancient hedgerows, woodlands, and protected ecosystems, poses a long-term threat to biodiversity in both areas. This is not only a direct violation of national environmental policies but also contravenes the Environment Act 2021, which mandates a net gain in biodiversity and requires that planning decisions do not contribute to irreversible ecological damage.	In relation to the comparison with the Dedham Vale, the Applicant does not agree with this interpretation of policy. The correct interpretation on NPS EN-1 (2024) and EN-5 (2024) is a clear strong starting presumption for the use of overhead line. That presumption is reversed where the connection unavoidable crosses nationally designated landscapes, however the area around Offton is not designated nor within the setting of a nationally designated landscape. The respondent may have an opinion on the relative merits of the Offton area relative to the Dedham Vale but the Applicant is clear that the Offton area is not a nationally designated landscape. Policy does also require that there is consideration of whether the use of cable is justified in circumstances where landscape and visual effects are widespread and significant (paragraph 2.9.23 of EN-5 (2024)), however the Applicant's position is that this criteria is not met around Offton, at least in part by the replacement of around 8 km of an existing 132 kV overhead line by 132 kV underground cable to position the 400 kV overhead line on a similar alignment. In respect of ecological effects, the Applicant has sought to minimise impacts on habitats and protected species through careful routeing, siting and detailed design, including around Offton. The design has been informed by an understanding of the existing biodiversity and ecological constraints, with avoidance prioritised wherever practicable

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				and mitigation applied where impacts cannot be fully avoided. This iterative approach has helped reduce potential effects on ecological receptors. **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]**. Although the mandatory requirement for 10 % Biodiversity Net Gain (BNG) 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.
REP1-170	Jane Lushington on behalf of Offton and Willisham Parish Council	Planning Policy	Furthermore, the National Policy Statements (NPS EN-1 & EN-5) clearly state that the environmental impacts of development should be minimized and alternatives such as undergrounding or subsea cabling must be fully explored where there is potential harm to sensitive areas. The same mitigation measures proposed for Dedham Vale, such as undergrounding, must be considered and applied to Offton to ensure fair and equitable treatment. Ignoring this equivalence in environmental impact between the two areas would be both unjust and inconsistent with the government's own policies on environmental protection and sustainable development. We request a comprehensive assessment of the environmental impacts on Offton and Willisham, including a full Landscape and Visual Impact Assessment (LVIA).	The preferred strategic option for the Project is an AC onshore connection. This is the preferred strategic option because it best aligns with National Grid's statutory obligations under Section 9 of the Electricity Act 1989, and is supported by national government policies, including NPS EN-1 and EN-5. National Grid's starting position for new onshore electricity transmission infrastructure is then informed by NPS EN-5 which, for areas outside nationally designated landscapes, identifies the general acceptability of the use of overhead lines. The Applicant does not agree with the respondent's interpretation of policy. The correct interpretation on NPS EN-1 and EN-5 is a clear strong starting presumption for the use of overhead line. That presumption is reversed where the connection unavoidably crosses nationally designated landscapes, however the area around Offton is not designated nor within the setting of a nationally designated landscape. The respondent may have an opinion on the relative merits of the Offton area relative to the Dedham Vale but the Applicant is clear that the Offton area is not a nationally designated landscape. Policy does also require that there is consideration of whether the use of cable is justified in circumstances where landscape and visual effects are widespread and significant (paragraph 2.9.23 of EN-5 (2024)), however the Applicant's position is this criteria is not met around Offton. Alternatives have been fully considered throughout project development. Embedded mitigation has sought to minimise adverse 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*

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				all but the most exceptional cases' (paragraph 4.1.7 of NPS EN-1 (2024)). The Landscape and Visual Impact Assessment (LVIA), included in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, has been undertaken as part of the EIA. The approach to the LVIA follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** which includes Guidelines for Landscape and Visual Impact Assessment (GLVIA3)[1]. The assessment of landscape effects considers effects on landscape character and is reported in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. The assessment of visual effects considers effects on the visual amenity of people and is presented in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). Mitigation measures of relevance to landscape and visual effects are summarised in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**.
REP1-170	Jane Lushington on behalf of Offton and Willisham Parish Council	Traffic and Transport	The proposed construction corridor will split Offton village in two, severing essential travel routes and causing significant disruption. Offton's narrow, single-track roads, with limited passing opportunities, will be ill-equipped to handle the influx of heavy construction traffic. This poses serious risks, particularly for pedestrians and cyclists who use these roads regularly. There has been no consideration in the consultation documents of proposed safety measures to mitigate the increased danger during construction. The construction process will result in increased noise, dust, and air pollution, negatively impacting the mental health & well-being of our residents. We are particularly concerned about the absence of a traffic management plan or impact assessment to address these issues. The fact that Offton will be split by haul roads, with diversions in place, only exacerbates this concern. The lack of transparency regarding the compensation and mitigation measures for these impacts is concerning. We urge the Planning Inspectorate to require National Grid to provide detailed plans for compensation and mitigation for those affected.	The construction routeing strategy is detailed in **7.3 Outline Construction Traffic Management Plan [APP-309]**, where construction HGVs are routed along Primary Access Routes (PARs) to the site access points, from the Major Road and Strategic Road Network. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. There are no PARs within Offton Village. Crossover points are proposed in locations where the haul roads cross the public highway. There are a number of crossover points located on Offton's roads, including Holly Road and Bildeston Road. The crossover points are installed to allow construction vehicles to cross the public highway and continue along the off-line haul road. No construction traffic is able to leave or join the haul road from these crossover points, unless in a scenario detailed in Section 5.5 of **7.3 Outline Construction Traffic Management Plan [APP-309]**. Construction traffic will "give way" to the public highway traffic at these locations. The Main Works Contractor(s) will develop a Driver Information Pack, which will highlight the areas where pedestrians and cyclists are likely to be present to provide additional awareness to the HGV drivers, and improve safety for these user groups. The Applicant has developed **7.3 Outline Construction Traffic Management Plan [APP-309]** which details the proposed mitigations to reduce the impact of construction traffic on the public. There are a number of proposed road closures within Offton, to allow the safe

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

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				construction of some construction activities. The diversions and closures are anticipated to be short term in nature, less than four weeks, and if relating to overhead line stringing activities, overnight. The proposed diversion routes are shown on Plan H of **2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section B [APP-034]**. Noted in **7.3 Outline Construction Traffic Management Plan [APP-309]**, where a diversion is required, they will follow the principle that they will use the same standard of road, or higher where practicable and available. 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 along PARs. As there are no PARs within Offton Village, local roads did not form part of this assessment. Within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** the impact of users of the Public Rights of Way (PRoWs) was assessed in terms of any delay as a result of the construction of the Project. Within and surrounding Offton Village access along the PRoWs would be maintained at all times during construction, either through managed access on their existing alignment, or through provision of appropriate temporary diversions. As a result, no PRoW would be closed without a diversion in place, and no severance of the overall network is anticipated. Therefore, the assessment concluded that, with the mitigation and controls set out in the **7.6 Outline Public Rights of Way Management Plan [APP-329]** significant effects are not anticipated. Details of this assessment are presented within Table A16.4.3 Significance of effect pedestrian, cyclist and horse-rider delay within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275].** 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 has confirmed in **5.1 Consultation Report [APP-066]** 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[2] (LRS), a copy of which can be found on the Project website. With regards to construction noise, this is assessed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Construction noise and vibration will be managed via the commitments in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-**

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

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				306]. These measures ensure that best practicable means (BPM) will be employed by the contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments will be undertaken by the contractor based on their specific methodologies. Specific mitigation measures will be identified during these assessments and incorporated in the final NVMP. With regard to construction impacts on dust generation and air quality, Section 7.2 of **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** discusses the results of the construction dust assessment. This assessment was undertaken in line with IAQM Construction Dust Assessment Guidance. The assessment concludes that with appropriate implementation of the mitigation measures specified in the **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]** there would be no likely significant effect from construction dust emissions. An assessment of how the Project could potentially affect the mental health and wellbeing of local residents is contained in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. The assessment notes that, during the construction phase, there may be heightened levels of stress and anxiety experienced by people as a result of potential environmental impacts in their local area (for example, noise, dust, traffic and visual impacts). A variety of measures have been identified to mitigate these impacts as outlined in **7.2 Outline Code of Construction Practice [Revision B]**. The approach to managing construction traffic is set out in **7.3 Outline Traffic Management Plan [APP-309]**. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. The Project team would continue to engage with people potentially affected during the progress of the Project through regular communication including letters, phone calls and meetings, where necessary.
REP1-170	Jane Lushington on behalf of Offton and Willisham Parish Council	Alternatives	There is a significant lack of clarity regarding the sequence of events concerning the undergrounding of existing pylons and the installation of the proposed new development. Our key question remains: Why is UK Power s undertaking the undergrounding of the existing 132kV powerlines, only for National Grid to come along and install new 400kV overhead lines directly alongside them? This raises serious concerns about both the rationale and the cost-effectiveness of the proposed solution. In our view, the existing 132kV lines could remain in place, and National Grid should be considering the undergrounding of the new 400kV lines instead of introducing new overhead pylons. This alternative would not only minimize the visual and environmental	The installation of 132 kV underground cables and 400 kV underground cables have very different scales of impact and cost. As such it is more economic and with typically lower level of effects to replace the 132 kV as underground cable and install the 400 kV connection as overhead line. The relative difference in scale is explained as follows. The 132 kV cable is typically installed in a single trench within an approximately 30 m wide construction working area. In contrast 400 kV underground cable connections would require 6 trenches (each with 3 cables) over a width of around 55 m within a 120 m wide construction working area. The transition structures from overhead line to cable (one is required at each transition) also vary with the 132 kV comprising a modified pylon whereas the 400 kV equivalent is a compound of around 80 m by 70 m. Given these differences and with substantial divergence in cost (132 kV

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			impact on both Offton but it would also provide a significant financial saving for National Grid by reducing the need for duplicate infrastructure. The costs and disruption caused by the overhead lines could be substantially lowered, and many of the problems currently impacting Offton, such as community disruption and environmental degradation, could be resolved. There has been no detailed information shared on how the existing and new infrastructure will be integrated or how these two separate developments will be sequenced, particularly in relation to the proposed undergrounding of existing lines. The lack of transparency in the planning and sequencing of these developments raises concerns about whether National Grid is genuinely exploring the most efficient, sustainable, and cost-effective options.	undergrounding is substantially cheaper) there is a clear case for the approach taken by the Applicant to underground existing lower voltage lines and retain the 400 kV as overhead line. On the matter of programming, further information will be shared following detailed design and confirmation of the grant of the Development Consent Order (DCO).
REP1-170	Jane Lushington on behalf of Offton and Willisham Parish Council	Land Use	The proposed overhead pylons will severely impact local farming in Offton & Willisham, which depend on agricultural land for their livelihoods. Construction will disrupt crops, especially during the growing season, as heavy machinery damages soil, delays planting, and harms crops, leading to financial losses and long-term farmland degradation. In addition to direct crop damage, the pylons' construction will threaten soil fertility and drainage. Heavy machinery will compact the soil, reducing its ability to retain nutrients and increasing the risk of waterlogging. The disruption to natural drainage systems will exacerbate these issues, causing further soil erosion and heightening flooding risks. Offton already suffers from a high flood risk, as supported by flood maps, and the pylons' construction could worsen this problem. The disruption to drainage and natural water flow could lead to increased surface runoff, further elevating flood risks and damaging both farmland and local infrastructure.	The Applicant's approach to soil management during construction is set out within **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]**, which 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, or as agreed with the landowner. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]** details good practice mitigation measures to prevent the loss of soil structure (i.e., from soil compaction) and details soil protection strategies to prevent soil degradation, including loss of soil organic matter which may result in nutrient loss / decline in soil fertility. **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 (such as crop damage) 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). The Applicant is committed to ensuring the integrity and function of existing land drainage systems. Section 5.7 of **8.2 Drainage Strategy DCO [REP1-072]**, submitted at Deadline 1, provides further details regarding how the Project's interactions with existing field drainage systems would be managed, specifying that where existing systems are affected by the temporary works and/or permanent works, field drainage must be correctly managed, liaising with the agricultural owner or manager of the agricultural land affected by the Project. The mitigation measures and controls set out in **8.2 Drainage Strategy DCO [REP1-072]** are secured through commitments AS05 and GG22 within **7.2 Outline Code of Construction Practice [Revision B]**. These measures would prevent disruption to drainage and mitigate the potential for increases in food risk.
REP1-170	Jane Lushington on behalf of Offton and Willisham Parish Council	Safety and Security	Bildeston Road is a key access route for national emergencies, particularly for Wattisham Airbase, which plays a critical role in defense operations. Any disruption to this route—due to construction traffic or the pylons themselves—could impede emergency	Bildeston Road is not designated as a Primary Access Route (PAR) and is not expected to be used by construction vehicles. Construction HGVs found to be using routes which are not designated as PARs,

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			responses and military operations, further compromising local infrastructure and security.	have been defined as non-compliance, and will be managed in line with **7.3 Outline Construction Traffic Management Plan [APP-309]**. Bildeston Road is proposed to be temporarily closed for a short duration during construction, primarily associated with netting activities to enable overhead line stringing. The Applicant is anticipating that the majority of netting closures can occur overnight, to reduce the impact to residents. Where diversions are necessary, a full point-to-point diversion will be provided, adopting the principle that they will use the same standard of road, or higher where practicable and available. The proposed temporary closure and associated diversion is set out in Plan H of **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section B [APP-034]**.
REP1-151	Burstall Parish Council	Planning policy	The current proposal represents a significant and undeniable doubling up of visual impact, works and access requirements, costs, and environmental disturbance, directly contradicting the established policy. Failure 1: Under NPS EN-1 and EN-5 the mitigation hierarchy makes it clear that the priority is to AVOID impacts first. It is feasible to avoid the visual and environmental impacts at this location, however NGET have not done so. Instead, NGET choose to COMPENSATE for the impact by undergrounding a smaller line instead, which is further down the mitigation hierarchy.	The Applicant disagrees with the interpretation presented which infers that mitigation is applied in order to avoid any and all impacts. The Applicant's position is that planning policy (NPS EN-1 and EN-5) as well as the Project's status as a critical national priority (CNP) project does not require all impacts to be addressed and that some residual effects will remain. The routeing and siting has inherently sought to avoid effects or, where not possible to avoid, to reduce them, and then considered the mitigation hierarchy where unacceptable effects are identified. In this case, the installation of 132 kV underground cables and 400 kV cables have very different scales of impact and cost. As such it is more economic and with typically lower level of effects to replace the 132 kV as underground cable and install the 400 kV connection as overhead line. In combination with the identified routeing for the 400 kV, the Applicant's position is that the extended undergrounding of two existing 132 kV connections does not create unacceptable effects. The Applicant does not consider further change to be required. The Applicant's more detailed assessment of the NPS policy framework and the mitigation hierarchy is set out in **5.6 Planning Statement [APP-085]** (see Section 8).
REP1-151	Burstall Parish Council		Failure 1: NESO NETS SQSS gives details of risks that must be considered when designing the onshore transmission network. This standard defines "Secured Events" for which contingencies must be planned in when designing the transmission system. NGET state in one sentence that choosing Bramford satisfies the NETS SQSS requirements. The standard typically focuses on the loss of a single busbar or double circuit. However, the standard makes clear that it is a minimum requirement. It assumes normal operating or minimum failure scenarios. The NRR and NPSA require CNI risk assessment to be done on the basis of Reasonable Worst Case Scenarios. These are not just the most likely – such as in the NETS SQSS standard - but severe and plausible possibilities. The NRR lists several scenarios, and the application does not address any of them. A major accident or disaster at Bramford substation, considering the concentration of assets, could result in a prolonged and widespread power outage affecting millions of people and critical services like hospitals, as well as having wider costs to the economy, including increased constraint payments to energy generators such as	The Applicant is aware of all of the requirements of the National Electricity Transmission System Security and Quality of Design Standards (NETS SQSS) and Critical National Infrastructure (CNI) requirements. The Applicant has set out how its proposals both meet the Technical and Policy needs case as set out in the National Policy Statements and its Licence obligations as required. CNI assessments and requirements are undertaken on an ongoing basis across the Applicant's network and as can be appreciated are of the upmost sensitivity and disclosure requirements, for reasons of security the written question sets out. A separate major accidents and disasters Environmental Statement Chapter was not prepared, in accordance with **6.19 Scoping Report [APP-288-295]** and **6.20 Scoping Opinion [APP-297]**. This was because '…there are no likely significant effects (as described in the EIA Scoping Report (document reference 6.19))….', following the implementation of embedded mitigation measures that the Applicant adopts on all its projects, however, 'Where appropriate, relevant

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			Sizewell or the EA1 and EA3 windfarms. There is no assessment of a prolonged or catastrophic failure of the Bramford substation itself, from any risk source. There is no answer to the question of what happens to the local, regional, or national electricity supply – in line with The Electricity System Restoration Standard (ESRS) - if Bramford goes offline for weeks or months in any of the scenarios listed for electricity infrastructure.	environmental aspects have identified the likely risks to the Project in relation to potential areas of vulnerability. For example, any flood risk concerns are considered within Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) and are addressed as part of the FRA (document reference 7.9).' Since scoping and receipt of the Scoping Opinion from the Planning Inspectorate in 2022 nothing has changed which would change the approach or the embedded mitigation measures relied upon which would require a major accidents and disasters Environmental Statement chapter to be prepared. The Project is designed to comply with design safety standards including the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) and the suite of National Grid policies and processes which contains details on design standards required to be met when designing, constructing, and operating its projects. These design safety standards constitute an embedded mitigation measure as reported in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. Existing National Grid processes are designed to identify potential security and safety risks during construction and operation (and maintenance) (including risks from MAD) and to design these out at each stage of project development. This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing, and operating assets such as proposed on the Project.
REP1-151	Burstall Parish Council	Alternatives	Failure 2: The applicant's current proposal fails the efficient and economy requirement of Section 9 of the Electricity Act 1989. Paragraph 3.5.9 of ES Chapter 3 states that "technical and cost factors were assessed in parallel with environmental considerations, including construction and delivery complexity, engineering feasibility and constraints...." However, by choosing to underground a smaller 132kV line while simultaneously building a more intrusive 400kV overhead line the applicant is multiplying the construction and mitigation work required. It is creating two sets of environmental assessments, construction routes, work compounds, work schedules, and mitigation requirements, where realistically only one would suffice. Further, if the PCB, PHB, and PLD lines are all operationally sound, removing them is a luxury option that adds complexity and cost. This is not economical for the consumer, or efficient for delivering the benefits of the network reinforcement, and NGET fail to comply with their duty under the Electricity Act.	The Applicant takes a different position regarding the balance of economics and efficiency between the replacement of sections of existing 132 kV lattice pylon by the installation of 132 kV underground cables or the installation of the new 400 kV connection as 400 kV underground cables. This position arises as they have very different scales of impact and cost. As such it is more economic and with typically lower level of effects to replace the sections of existing 132 kV as underground cable and install the 400 kV connection as overhead line. The relative difference in scale is explained as follows. The 132 kV cable is typically installed in a single trench within an approximately 30 m wide construction working area. In contrast 400 kV underground cable connections would require 6 trenches (each with 3 cables) over a width of around 55 m within a 120 m wide construction working area. The transition structures from overhead line to cable (one is required at each transition) also vary with the 132 kV comprising a modified pylon whereas the 400 kV equivalent is a compound of around 80 m by 70 m. Given these differences and with substantial divergence in cost (132 kV undergrounding is substantially cheaper) there is a clear case for the approach taken by the Applicant to underground existing lower voltage lines and retain the 400 kV as overhead line.

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REP1-151	Burstall Parish Council	Alternatives	Failure 3: Under the Horlock Rules, NGET are required to: consider the relationship between the towers and substation to reduce visual impact; to keep the impacts to a minimum; and to reduce the prominence of structures. By erecting 400kV pylons around the Bramford substation, while only undergrounding the smaller 132kV pylon line, NGET are creating a net increase in visual clutter, prominence, and environmental impacts.	The Applicant is fully aware of and has considered the guidance of the Horlock Rules in developing its proposals. Firstly the guidance is more nuanced and for example refers to keeping environmental effects to a reasonably practical minimum rather than to a minimum. The outcome of the consideration has been the extended replacement of existing 132 kV lattice pylons with underground cables as part of the application of the mitigation hierarchy. Residual effects stand to be considered in the planning balance but from a position where the Project has been identified as a Critical National Priority which means the residual effects are outweighed in the planning balance in "all but the most exceptional cases" - those exceptional circumstances being an unacceptable risk to defence, HRA sites / irreplaceable habitats.
REP1-151	Burstall Parish Council	Cost	Failure 4: NPS EN-1 3.3.66 makes it clear that the delivery of infrastructure must balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts. As a CNP project the delivery of the reinforcement works are deemed as urgent. The current proposal to double up work is contradictory to achieving this. Building extra and unnecessary construction routes into the proposal creates extra cost, increases delivery timelines, and increases community and environmental impacts.	Contrary to the respondent's interpretation there is a considerable reduction in cost by retaining the 400 kV as overhead line and undergrounding the existing 132 kV pylons. Whilst detailed comparative programmes have not been established for both arrangements, the Applicant is clear that 400 kV overhead line construction is much quicker to complete than the installation of 400 kV cables. The Applicant does not consider any change is required.
REP1-151	Burstall Parish Council	Alternatives	Failure 5: Under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Schedule 4 Paragraph 2, NGET are required to assess the reasonable alternatives. The Alternatives section does not provide a comparison of our proposed option below, i.e. Underground the 132kV line + Build 400kV pylons versus Retain 132kV line + Underground 400kV line. This is a reasonable and technically feasible alternative, as set out in our Proposed Solution below, and so the applicant has failed to meet the requirement of the EIA Regulations and the ES is incomplete. This omission also fails to satisfy the requirements under paragraphs 2.9.14-15 of NPS EN-5.	The Applicant disagrees with this comment. **6.3 Environmental Statement Chapter 3 – Alternative [APP-127]** has been prepared to meet the requirements of the Infrastructure Planning (EIA) Regulations 2017 which requires '*a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment'.* 'Reasonable' alternatives are not defined in the EIA Regulations, however Chapter 3 provides a definition used for the Project in paragraph 3.2.25. As the EIA Regulations clearly state: 'reasonable alternatives' are those studied by 'by the applicant'. The Project has been developed to be consistent with National Policy Statement (NPS) EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. 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.

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				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 is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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.
REP1-151	Burstall Parish Council	Alternatives	Burstall Parish Council proposes that NGET strategically underground part of the new 400kV double circuit line south of Bramford Substation through Burstall parish, and retain the existing 132kV pylon line. This would require a single construction corridor, rather than multiple corridors. We understand that this requires a Cable Sealing End (CSE) Compound at both the Substation and end of the underground section, however we strongly believe the land area needed for this approach is more reasonable than what is needed under the current proposal. Proposed locations for the CSE Compounds are: • Location 1 - Bramford Substation End: Immediately south or south-west of the existing substation boundary as an additional extension to the current substation footprint. This keeps the visual impact within the existing industrialised area. • Location 2 Option 1 – Underground to Pylon End: Around Hintlesham Fisheries to Buckle's Bridge area. This is near existing woodland which provides natural screening for the lower-height of the compounds. • Location 2 Option 2 (Preferred Option) - As a second option, the cable could continue to Notley Enterprise Park, where NGET propose a CSE Compound to underground the line already. This would eliminate the need for a CSE Compound here entirely as the underground cable would simply continue. Further, while the cost of 400kV cable is higher than 132kV cable, the Applicant has not provided an analysis of the costs that would be avoided by retaining the 132kV cables as they are, including the savings of not duplicating the construction corridor. We ask that NGET make this assessment available. If they haven't written one, then their decision-making process is flawed because they will not have done everything possible in order to evaluate the environmental	As set out above in response to other elements of this respondent's representation, the Applicant's position is that the respondent's proposed alternative is based on incorrect information and incorrect interpretations of effects, costs and programme of 132 kV and 400 kV underground cable works. It also fails to consider the appropriate interpretation of NPS EN-1 and NPS EN-5. The correct interpretation is a clear strong starting presumption for the use of overhead line. That presumption is reversed where the connection unavoidably crosses nationally designated landscapes, however the area around Bramford is not designated nor within the setting of a nationally designated landscape. The respondent may have an opinion on the relative merits of the Bramford area relative to designated areas but the Applicant is clear that the Bramford area is not a nationally designated landscape. Policy does also require that there is consideration of whether the use of cable is justified in circumstances where landscape and visual effects are widespread and significant (paragraph 2.9.23 of EN-5), however the Applicant's position is this criteria is not met around Bramford. In summary, 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. The Applicant disagrees with the basis presented by the response and considers its approach proportionate and appropriate.

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			effects prior to committing to a particular design. Spending millions of pounds to remove up to 30m tall pylons, just to spend millions of pounds to put up 50m pylons is inefficient. While NGET frames the removal of the 132kV line as a benefit, the scale and impact of the larger 400kV line vastly outweighs the removal of the smaller line. The 132kV pylons already provide the baseline landscape environment. Strategic undergrounding would avoid the increasing the visual impact of the larger 50m pylons. In Chapter 3 of the ES: Alternatives, NGET describes the Definition of 'Reasonable Alternatives' for the Project in paragraphs 3.2.25-27. Burstall Parish Council asserts that this alternative proposal satisfies all of those definitions. It would meet the network reinforcement need, it meets the development objectives for the project, it delivers equivalent infrastructure capacity within the same time frames; it is technically feasible; it supports the systems capacity into 2030; it complies with NGET's statutory duties under the Electricity Act 1989; and it is consistent with and does not conflict with the relevant NPS and government policy. By failing to produce a transparent cost-benefit analysis that compares the current proposal to our proposed alternative below the savings and environmental impacts of leaving the 132kV line as it is and undergrounding the new 400kV line, NGET have failed to demonstrate compliance with their duty to provide an efficient and economical system. Rationale 1: This approach directly AVOIDS the primary visual impact – the introduction of a massive new wirescape. Removing a 132kV line only to replace it with a much larger 400kV line is a net increase in visual blight, not a reduction. It meets the higher up requirement of the mitigation hierarchy, rather Burstall Parish Council: Written Representation Deadline 1 Page 9 than the lower down one of compensation that NGET propose. 50m pylons introduce highly significant visual blight compared to lower profile CSE Compounds which can be more effectively screened. Rationale 2: This strategy MINIMISES construction disruption. Work would be focused on a single construction corridor –the new 400kV underground cable - rather than three distinct construction corridors –building 400kV pylons, 132kV underground cable, dismantling the 132kV pylons. This is a more efficient and economic option for the consumer, and a less disruptive construction process for our community. Rationale 3: This approach MINIMISES the cost of the project, and ultimately the cost borne by the consumer. While the costs of 400kV cable is more expensive than 132kV cable, retaining functional 132kV infrastructure and undergrounding the 400kV line provides better long-term value for the consumer (avoided visual blight, community relations, land disturbance) by concentrating on only one construction phase compared to three. Since the removal of the 132kV lines is listed as Associated Development within the project	

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			documents, and NGET are funding the project according to the Funding Statement, instead of removing functional equipment, the costs could be re-directed to undergrounding the 400kV line. No cost-benefit analysis has been supplied by NGET to demonstrate otherwise. Rationale 4: By focusing work on one construction phase the timeline for project delivery becomes more efficient, as construction scheduling conflicts are avoided. Rationale 5: By focusing on one workflow -undergrounding the 400kV pylons – this reduces the land take and disruption time which would be a major benefit on Thornbush Hall Farm, whose farming business faces significant, if not complete, disruption during the proposed construction works. Due to the nature of farming, the level of proposed disruption could cause them to miss an entire season/year of crop production, and subsequently an entire year of business income. More detail can be found in the Godbold submission documents AS-053 to AS-060	
REP1-151	Burstall Parish Council	Transport and traffic	Incomplete Diversion Details and Missing Impact Assessment: We note that traffic is not planned to come through the village centre of Burstall. Instead, it appears traffic would enter the working site off the A1071 before the Burstall junction, use haul roads on site, and cross Burstall Lane. Temporary Traffic Regulation TR-C-004 of the draft DCO requests a speed limit restriction of 30mph along Burstall Lane. We also note the proposed temporary closure of Burstall Lane (SM-C-001 to SM-C-002), with traffic redirected via Burstall Road (SMD-C-002). We would support this temporary speed limit restriction, though we have concerns about the diversion route. Temporary Traffic Regulation TR-C-006 of the draft DCO requests a speed limit restriction of 40mph for the A1071. We also note the proposed temporary closure of A1071 (SM-C003 to SM-C-004), with traffic redirected via Burstall Road (SMD-C-002). We also support this temporary speed limit restriction, though we have concerns about the diversion route. The diversion route SMD-C-002 appears to be a dead end diversion as both ends lead to a temporary road closure. We could see no confirmation that both roads would not be closed at the same time. There is no proposal of where the diverted northbound traffic from the A1071 should continue travel to. Nor is there a proposal of where the southbound traffic towards the A1071 should continue travel to. Without a complete diversion route, and a suitable assessment, with swept path analysis for HGV traffic, it is impossible to identify the impacts and propose mitigation.	The Applicant notes the comments of support on the speed limit restrictions. **7.3 Outline Construction Traffic Management Plan [APP-309]** sets out how diversion routes are proposed following the principle that they will use the same standard of road, or higher where practicable and available. A full point to point diversion on public roads will be provided so that all vehicles that will usually and legitimately use a road can continue to use it to complete their journey. The road closures will be of short term duration (less than four weeks where needed for construction of highway works such as site access points and cross over points, and less than a day, likely overnight, for overhead line netting activities to enable overhead line stringing). The diversion route for closure of Burstall Lane between SM-C-001 and SM-C-002 is via Burstall Lane (SMD-C-002), the A1071 Hadleigh Road (SMD-C-003), and the B113 High Street (SMD-C-004) is shown on Plan A in **2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [APP-035].** The diversion route for closure of the A1071 Hadleigh Road between SM-C-003 and SM-C-004 is via Burstall Lane (SMD-C-002), Burstall Lane (SMD-C-001) and the B113 High Street (SMD-C-004), as shown on Plan A in **2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [APP-035].** The Applicant is proposing to use the Permit Schemes operated by the Local Highway Authority, in order to best coordinate the street works required for the Project. It is not expected that both roads will be closed simultaneously, and the proposed diversion routes will be available to the public.

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REP1-151	Burstall Parish Council	Transport and traffic	Cumulative Construction Impact: NGET propose to construct this project -Norwich to Tilbury - between 2026 and 2032. They are also currently constructing the Bramford to Twinstead NSIP. This gained approval in 2024 and construction works are from early 2026 to 2029. The order limits of Bramford to Twinstead and draft order limits of Norwich to Tilbury both pass through Burstall parish. This means there will be construction overlap of both NSIPs and subsequently a significant increase of accident and damage risk within the parish.	**6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** has been undertaken in accordance with the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** by competent and professional experts. **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment – which includes Bramford to Twinstead and other major developments in the parish (where relevant). **7.3 Outline Construction Traffic Management Plan [APP-309]** provides detail of how the Applicant intends to coordinate with Local Highway Authorities, National Highways and other developments, to ensure a coordinated approach to construction traffic management. **7.11 Transport Assessment [APP-333]** assesses the overlap of construction traffic from committed developments on the roads proposed to be utilised by the Applicant and Primary Access Routes (PARs). An overview of the committed developments that are considered in the assessment of traffic is provided in **7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]**. Table D.12 in that document provides detail on the trip generation for the AM and PM peak hours for each of the included committed developments on the PARs including around Burstall. This includes trip generation for Bramford to Twinstead as this shares the same roads as two PARs for the Project that are PAR 22 A1214 London Road and PAR 23 A1071. In the AM and PM peak hours the same movements are anticipated. As set out in **7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]**, the Applicant is proposing 25 HGV movements, an increase of 2% on both PAR 22 – A1215 London Road and PAR 23 – A1071. These two PARs would see the greater number of movements from Bramford to Twinstead Project (44 total movements and 12 HGVs). Junction modelling assessments on these PARs are presented in Section 7.11 of **7.11 Transport Assessment [APP-333]**. For PAR 22 - A1214 London Road, it was found that Site 31 - A1214 London Rd / A1071 junction would operate within capacity with the proposed mitigation of rationalising intergreens, the addition of phase delays and signal optimisation as detailed within **7.3 Outline Construction Traffic Management Plan [APP-309]**. For PAR 23 – A1071 the junction modelling assessment at Site 32 - A1071 / B1113 Swan Hill roundabout found that the existing roundabout would operate over capacity in the future baseline. The junction would continue to operate over capacity when committed development movements are introduced. However, it should be noted that the introduction of the Project would only have a margin impact on the operation of the junction. The Applicant understands that as part of a separate planning

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				application for Land north of the A1071 (DC/21/02671) the junction will be upgraded to a signalised crossroads. The Applicant has assessed driver/public transport passenger delay, pedestrian, cyclist and horse-rider delay, severance, amenity and fear and intimidation in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. The assessment of the traffic and transport construction effects has been summarised for all road links forming the PARs during the estimated peak year of construction daily (07:00-19:00) activity for the Project along with the significance of these effects. This assessment includes those committed developments likely to overlap with the Project peak year of construction and that could generate additional traffic along the PARs. Details of this assessment are presented within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. A summary of the significance of effects is presented within Table A16.4.8 Summary of impact assessment. The findings of the assessment of effects for PAR 22 - A1214 London Road and PAR 23 – A1071 are that the effects would be temporary and are considered not significant when taking into consideration mitigation and controls detailed within **7.3 Outline Construction Traffic Management Plan [APP-309]**. Road safety has been assessed within the **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. The section of PAR 23 – A1071 that is located in Burstall Parish has not been identified as a collision hotspot or cluster, as only one accident was registered at the junction with Burstall Road during the analysed period 2021-2023. As specified in **7.3 Outline Construction Traffic Management Plan [APP-309]**, the construction traffic drivers will be subject to a driving briefing that will set out expected behaviour, specific routes and any potential conflict points.
REP1-151	Burstall Parish Council	Transport and traffic	Conflict and Policy Failure: NPS EN-1 makes it clear that traffic can have an impact on health, and this must be assessed in the application. The incomplete diverted traffic route poses an issue, and the construction timeline of both NSIP projects clearly has an overlap. Failure 1: Policy 4.4.4 clearly states that traffic impacts must be assessed. The diverted northbound traffic along route SMDC-002 has no onward traffic route defined in the application documents. Instead, it hits another temporary road closure – SM-C-001 to SM-C-002. NGET need to define the onward route for diverted northbound and southbound traffic and assess its suitability and impact for the likely traffic. Without this the ES is incomplete. Failure 2: Policy 4.4.5 clearly states that cumulative impact of multiple projects must be assessed. The application documents do not include any cumulative impact assessment on Burstall parish from construction works of both the Bramford to Twinstead and Norwich to Tilbury NSIP projects. Without this the ES is incomplete.	The Environmental Statement has been developed in line with NPS EN-1 Policy Regulations. The incomplete diversion noted is referenced in the above response, where the diversion for northbound and southbound traffic on the A1071. The proposed diversion is detailed in **2.5 Access, Rights of Way, and Public Rights of Navigation Plans – Section C [APP-035].** As detailed in P10-11, the diversion route is proposed via The Street, Burstall Lane and B1113 High Street to rejoin the A1071. The Applicant is proposing to utilise the Permit Schemes operated and managed by the Local Highway Authority to best coordinate the street works associated with the Project. The Applicant envisages that the road closures will not be simultaneous and the proposed diversion routes will be available to the public. The road closures will be of short term duration (less than four weeks where needed for construction of highway works such as site access points and cross over points, and less than a day, likely overnight, for overhead line netting activities to enable overhead line stringing).

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				7.11 Transport Assessment [APP-333] and **Environmental Statement 16: Traffic and Transport [APP-271]** provide information on the cumulative assessment undertaken, with the inclusion of the transport impacts of Bramford to Twinstead NSIP. Table D.12 in **7.11 Transport Assessment - Appendix D - Committed Developments [APP 337]** provides the detail on Bramford to Twinstead traffic numbers. Details on cumulative impact from the Project and other committed developments including NSIPs can be found within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].**
REP1-151	Burstall Parish Council	Transport and Traffic	Proposed Solutions: 2.4.1 Traffic Impact Assessment We require NGET to identify the full diversion route for northbound and southbound traffic for diversion SMD-C-002, and provide a detailed impact assessment. Based on the temporary road closures, we can see two scenarios here. And both cause considerable concern for Burstall Parish Council. 1. The road closures are not at the same time: Traffic from the A1071, diverted northbound up Burstall Road, is intended to turn right on to Burstall Lane. But Burstall Lane is a single track country road, with limited passing places, and it leads to a weight restricted area. Any HGV would require verge access to turn/pass, creating damage in the process. This is a concern we are already in discussion with Suffolk Highways about. 2. The road closures are at the same time: Traffic from the A1071, diverted northbound up Burstall Road, hits another closed road – Burstall Lane. The shortest route from here is through Burstall village, through Burstallhill, right hand turn on to The Channel, right hand turn on to Tye Lane, and a right hand turn on to Lorraine Way towards Sproughton – a weight restricted area. Except for Lorraine Way, all these roads are single track country roads, with limited passing places, and prone to flood risk. Burstallhill is a Flood Risk Zone 3 area. The impact assessment of the diverted traffic should identify: • The current traffic baseline; • The type and number of expected • traffic to use the diversion; • Analysis of the route for two-way • traffic; • Swept path analysis for HGV traffic. It should be noted that when the Orwell Bridge is closed, or there is an incident on the A12/A14 the above routes are often gridlocked. We acknowledge that the route is not the official diversion in such incidents, however reality is that this is the route people and satnavs choose for all sizes of vehicles.	2.4.1 The full diversion is noted in the responses above, and detailed in **2.5 Access, Rights of Way and Public Rights of Navigation Plans – Section C [APP-035].** Detailed in **7.3 Outline Construction Traffic Management Plan [APP-309]**, the Applicant is proposing to utilise the Permit Scheme operated and managed by the Local Highway Authority to best coordinate the street works associated with the Project. The Applicant envisages that the road closures will not be simultaneous, and will be short in duration. Therefore, any impact as a result of increased traffic flows on diverted roads would be short lived, therefore limiting the impact to road users. On this basis, and in following typical with temporary road closure procedures, the Applicant considers that three is no need for impact assessments of the diversion routes. The diversion routes will follow the principle that they will use the same standard of road or higher where practicable and available. However, this is not practicable for the road closure for the A1071 Hadleigh Road. This closure however is to enable overhead line netting activities only, so will be very short duration closures that are expected to happen overnight. The Applicant acknowledges that users may not follow the proposed diversion route. The Applicant is proposing to support the mitigate this, but providing diversion route signage, in accordance with relevant signage design guidance. Additional detail is included in **7.3 Outline Construction Traffic Management Plan [APP-309]**. 2.4.2 The Applicant is not currently proposing a speed reduction along Burstall Road as there are no highway works proposed. Due to the short duration, temporary nature of the road closures, and following typical temporary road closure procedures, TROs are not being applied for on the diversion routes. However, the Main Works Contractor will engage with the Local Highway Authority on the traffic management requirements including potential speed management as part of the Permit Scheme. 2.4.3 **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** has been undertaken in accordance with the **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]. 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment –

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			Rationale: Without a complete diversion route and detailed impact assessment the diverted traffic may have unintended impacts on unintended communities. A complete diversion route and impact assessment is needed to fully assess the impacts of the proposed temporary road closures and diversion. 2.4.2 Temporary Speed Limit on Burstall Road In December 2025, Burstall Parish Council and Suffolk Highways conducted a traffic survey along Burstall Road, between the A1071 and Burstall Lane junctions. Result in Appendix A. The road has a speed limit of 60mph and there were still recorded instances of speeding. This is a narrow country road where it is difficult in places for vehicles of all sizes to safely pass each other. We ask that a temporary 30mph speed limit be added to the DCO for Burstall Road. Rationale: The proposed temporary speed limit along Burstall Road would increase public road safety for vehicles of all sizes travelling along this diversion road, including any potential lost or misdirected construction traffic. 2.4.3 Assess Cumulative Construction Impact: We ask that NGET review the construction timelines for Burstall parish to identify if there is any overlap of works between the Bramford to Twinstead and Norwich to Tilbury NSIPs. If an overlap is found, a cumulative impact assessment should be produced and submitted to the Examination, along with mitigation proposals. It is important to note that construction impacts are not limited to traffic. Due to the proximity of Burstall to the Bramford Substation, we are also impacted by nighttime lighting, dust, and noise. Rationale: This would complete the ES regarding cumulative construction impacts on Burstall parish.	which includes Bramford to Twinstead and other major developments in the Parish (where relevant). With regards to construction noise, this is assessed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Construction noise and vibration will be managed via the commitments in **7.2 Outline Code of Construction Practice [Revision B]**and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]**. These measures ensure that best practicable means (BPM) will be employed by the contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments will be undertaken by the contractor based on their specific methodologies. Specific mitigation measures will be identified during these assessments and incorporated in the final NVMP.
REP1-151	Burstall Parish Council	Safety and security	Conflict with Policy Requirements: Note: We appreciate that this is likely to be a sensitive topic, but amongst an Examination Library that includes references to other Confidential and Redacted documents, there remains nothing related to risk regarding security, resilience, or major accidents and disasters. On this absence alone it is reasonable to assume that even Confidential or Redacted documents have not been provided to the Examining Authority and Secretary of State. There are eight policy failures we have identified relating to security and resilience. Each of them is enough to refuse consent. Together they represent a wider failure of the project to properly assess risk. Failure 1: NESO NETS SQSS gives details of risks that must be considered when designing the onshore transmission network. This standard defines “Secured Events” for which contingencies must be planned in when designing the transmission system. NGET state in one sentence that choosing Bramford satisfies the NETS SQSS requirements. The standard typically focuses on the loss of a single	The Applicant is aware of all of the requirements of the National Electricity Transmission System Security and Quality of Design Standards (NETS SQSS) and Critical National Infrastructure (CNI) requirements. The Applicant has set out how its proposals both meet the Technical and Policy needs case as set out in the National Policy Statements and its Licence obligations as required. CNI assessments and requirements are undertaken on an ongoing basis across the Applicant’s network and as can be appreciated are of the upmost sensitivity and disclosure requirements, for reasons of security the written question sets out.

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			busbar or double circuit. However, the standard makes clear that it is a minimum requirement. It assumes normal operating or minimum failure scenarios. The NRR and NPSA require CNI risk assessment to be done on the basis of Reasonable Worst Case Scenarios. These are not just the most likely – such as in the NETS SQSS standard - but severe and plausible possibilities. The NRR lists several scenarios, and the application does not address any of them. A major accident or disaster at Bramford substation, considering the concentration of assets, could result in a prolonged and widespread power outage affecting millions of people and critical services like hospitals, as well as having wider costs to the economy, including increased constraint payments to energy generators such as Sizewell or the EA1 and EA3 windfarms. There is no assessment of a prolonged or catastrophic failure of the Bramford substation itself, from any risk source. There is no answer to the question of what happens to the local, regional, or national electricity supply – in line with The Electricity System Restoration Standard (ESRS) - if Bramford goes offline for weeks or months in any of the scenarios listed for electricity infrastructure.	
REP1-151	Burstall Parish Council	Safety and security	Failure 2: NPSA guidance is clear – organisations managing CNI must minimise single points of failure and avoid concentrating assets in a single location. This is exactly what has happened at Bramford substation through a piecemeal consenting process. This project intends to further concentrate assets at Bramford, which is contrary to this principle. Within Chapter 3 – Alternatives – the applicant states 'Bramford was identified as a strategic connection point due to its position within the existing network, its ability to provide necessary system connectivity, and its role in maintaining network resilience and compliance with NETS SQSS requirements.' There appears to be no consideration of alternative proposals through the lens of a dispersed network with security and resilience risk in mind. The cost of constructing alternatives seems to be the prevailing consideration. There is no assessment of the cost in the event of a security and resilience risk event at Bramford substation, and Chapter 3 – Alternatives is incomplete in the scope of its assessment.	The Applicant is aware of all of the requirements of the National Electricity Transmission System Security and Quality of Design Standards (NETS SQSS) and Critical National Infrastructure (CNI) requirements. The Applicant has set out how our proposals both meet the Technical and Policy needs case as set out in the National Policy Statements and our Licence obligations as required. CNI assessments and requirements are undertaken on an ongoing basis across our network and as can be appreciated are of the upmost sensitivity and disclosure requirements, for reasons of security the written question sets out. As stated above the consideration of alternatives and their costs took into account the connection and how they would meet the requirements of all the Applicant's obligations and therefore were considered at the outset.
REP1-151	Burstall Parish Council	Safety and security	Failure 3: NPSA guidance requires a Site-Specific Risk Assessment for major CNI projects. This requirement has not been met. The application contains no site-specific security assessment, and no assessment of physical resilience. There is no attempt to identify, let alone quantify and assess the risks created by the concentration of infrastructure at Bramford.	The Applicant is aware of all of the requirements of the National Electricity Transmission System Security and Quality of Design Standards (NETS SQSS) and Critical National Infrastructure (CNI) requirements. The Applicant has set out how its proposals both meet the Technical and Policy needs case as set out in the National Policy Statements and its Licence obligations as required. CNI assessments and requirements are undertaken on an ongoing basis across our network and as can be appreciated are of the upmost sensitivity and disclosure requirements, for reasons of security the written question sets out.
REP1-151	Burstall Parish Council	Cumulative effects	Failure 4: The Infrastructure Planning (Environmental Impact Assessment) Regulations Regulation 5, and Schedule 4 paragraphs 5 and 8 requires developers to consider the cumulative effect of	**6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** has been undertaken in accordance with the **6.19 Scoping**

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			other developments in the Environmental Statement. Other developments include those already built, projects already consented, projects already in the planning system, and projects that are reasonably foreseeable. The Brunfort BESS – a 1500MW BESS expected to connect into Bramford substation and sit adjacent to its southern boundary is a reasonably foreseeable project. However, it cannot connect into the network now because the capacity does not exist. Its connection is dependent on the approval of this application. However, it is not listed within the Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments. As the Norwich to Tilbury project is being oversized explicitly to accommodate developments like Brunfort BESS, the applicant cannot claim ignorance of its development, and it must account for the cumulative effects of that development in the ES.	**Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** by competent and professional experts. **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of the 1 April 2025. Since the 1 April the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in Environmental Statement then these would be published into Examination as updates to the relevant inter-project cumulative effects documents (as appropriate). The Brunfort BESS project has not been considered within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** as no details associated with this development were available prior to the cut-off date for the cumulative effects assessment (1 April 2025). There is still limited information available online for this development, however this development will be reviewed as part of the post 01 April 2025 review.
REP1-151	Burstall Parish Council	Safety and security	Failure 5: The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Regulation 5, and Schedule 4 paragraphs 5 and 8 identifies the considerations that must be assessed in the Environmental Statement. Included within that are significant effects on 'population and human health', and 'material assets'. It also explicitly states the requirement of considering effects of the 'vulnerability of the proposed development to major accidents or disasters that are relevant to that development' including the 'direct… indirect, secondary, cumulative, transboundary, shortterm, medium-term and long-term, permanent and temporary, positive and negative effects.' The effects of a major accident or disaster at Bramford substation, a key energy hub in the East of England transmission network, would undeniably be significant, including to the extent of the plausible worst-case scenarios outlined in the National Risk Register 2025. However, absolutely none of these risks have been included within the documentation, and so the ES is incomplete. Where the ES is incomplete, Regulation 4 expressly prohibits the Secretary of State from granting development consent. This is not a planning balance or presumption in favour issue, it is a clear prohibition.	**6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135]** Table 5.1 provides details of how the Infrastructure Planning (EIA) Regulations 2017, Regulation 5(2), and Schedule 4 have been met within the Environmental Statement.
REP1-151	Burstall Parish Council	Safety and security	Failure 6: EN-1 Parts 4 and 5 require that impacts be assessed, mitigation proposed, and the residual effects considered in the planning balance. Due to failures 1-4 above, the ES is incomplete. This means it is impossible to determine what residual risks remain, and the planning balance cannot begin.	The Applicant disagrees that the ES is incomplete. The ES has been produced with accordance **6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297]**, industry guidance, professional judgement and experience of other similar projects.
REP1-151	Burstall Parish Council	Safety and security	Failure 7: The presumption in favour of consent under EN-1 4.1.7 does not apply where residual impacts present an unacceptable risk	The Applicant is aware of all of the requirements of the National Electricity Transmission System Security and Quality of Design

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			to public safety or defence. The exceptionally high concentration of energy infrastructure at the Bramford site, and the importance of the substation within the regional and national transmission network, already makes it a single point of failure. Such concentrations of infrastructure are precisely the targets that the NPSA and NRR seek to address because they present a significant risk to public safety and/or defence in the event of a major accident or disaster. That risk extends both to the wider area as a loss of electricity supply, and to the neighbouring rural villages who would be in the immediate hazard area. The proposed project tips that risk even further, and the oversizing of the proposal invites an even greater concentration of environmental risk into the area. When a proposal such as Norwich to Tilbury is put forward for determination, which seeks to further concentrate energy infrastructure and increase exposure to third-party risks, those risks cannot go on ignored. A CNP infrastructure application that does not assess major accidents and disasters, does not quantify cumulative exposure to and from third-party risks, and does not track those risks over time across ownership changes, cannot credibly assert that the associated risk to public safety or defence is controlled, negligible or adequately mitigated.	Standards (NETS SQSS) and Critical National Infrastructure (CNI) requirements. The Applicant has set out how its proposals both meet the Technical and Policy needs case as set out in the National Policy Statements and its Licence obligations as required. CNI assessments and requirements are undertaken on an ongoing basis across our network and as can be appreciated are of the upmost sensitivity and disclosure requirements, for reasons of security the written question sets out.. A separate major accidents and disasters Environmental Statement Chapter was not prepared, in accordance with **6.19 Scoping Report [APP-288-295]** and **6.20 Scoping Opinion [APP-297]**. This was because '…there are no likely significant effects (as described in the **6.19 Scoping Report - Appendix A [APP-288 – 296]**)….', following the implementation of embedded mitigation measures that the Applicant adopts on all its projects, however, 'Where appropriate, relevant environmental aspects have identified the likely risks to the Project in relation to potential areas of vulnerability. For example, any flood risk concerns are considered within **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]** and are addressed as part of **7.9 Flood Risk Assessment [APP-331]**' Safety for the public is achieved in a number of ways. The infrastructure itself is designed to meet the requirements with NPS EN-5 for managing electric and magnetic fields (EMFs), which includes both numerical exposure guidelines to protect against established acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels. Evidence of compliance with these policies is provided in **7.8 Electric and magnetic fields compliance report [APP-330]**. In summary, The Applicant and the infrastructure proposed has a demonstrable track record of safety. We believe the ExA can be confident that there is no reasonable or evidenced basis to consider the infrastructure will not continue to be safe nor to consider that there is any uncertainty that there is no risk to public safety from the Project i.e. it accords with EN1 para 4.1.7.
REP1-151	Burstall Parish Council	Alternatives	Failure 8: A fundamental principle of the Rochdale Envelope is that the assessment is conducted on the worst possible scenario before determination. Therefore, the final construction is either the worst case or better. However, here the worst-case scenario has not even been assessed, and so the Rochdale Envelope principle cannot be relied upon to overcome these failures.	In the Environmental Statement, the design as presented on **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** and **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]** and described in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** was assessed in each environmental topic chapter. A reasonable / most likely case was then assessed. Then in the 'sensitivity testing' section of each topic chapter the Applicant assessed the Limits of Deviation and the alternative design scenarios presented in Table 4.4 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** to ensure that every possibility / worst case was captured / covered by the impact assessment. Therefore the Applicant can confirm that a worst-case scenario has been assessed within the ES.

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REP1-151	Burstall Parish Council	Safety and security	4.4 Proposed Solutions Burstall Parish Council does not oppose the principle of grid reinforcement. Our objection to this project, as submitted in its current form, is that it poses grave risks to the security and resilience of the wider energy network, communities, and economy. This project is being pushed forward by the applicant under the pretence of need and speed as a CNP, but without the risk assessments and safeguards that the law demands of CNP. In its current form the application should be refused. The Inspectors do not have the information needed to come to a different conclusion because the ES is incomplete. To provide the Inspectors with relevant information for them to make an informed decision, we ask the Examining Authority to require the following: 1. The applicant must address the failures identified in this Chapter. 2. The National Protective Security Agency be invited to participate as a consultee. 3. A Planning Inspectorate site visit to the Bramford substation, encompassing all existing, approved and proposed developments, with the specific intention of viewing the scale of concentration of energy infrastructure. 4. A full cumulative resilience, continuity and security review of the Bramford site, including connected sites adjoining it, conducted to NPSA standards and including Reasonable Worst-Case Scenarios in the NRR. Any recommendations as a result of the review should be implemented as part of the DCO. 5. A review of dispersed and alternative design options to include their merits towards designing security in, and the associated costs of doing so vs not doing so in the event of NRR risk events. For example, underground HVDC cables (3 x 2GW trenches) have added protection being underground, and a dispersed route provides further protection. 6. A single point of accountability for the Bramford site to be established. This could be through the Health and Safety Executive, NPSA, NESO, Ofgem, a designated CNI authority, or another appropriate body. They would be responsible for the cumulative design, risk management and emergency planning of all infrastructure on and adjoining the site. Without a single point of accountability for the cumulative safety and security of the overall Bramford site, it is impossible for the Secretary of State to be satisfied that the risks to public health and defence, as required by EN-1 4.1.7 have been adequately assessed and can be managed in the future. 7. A moratorium on the further consenting of development at or adjoining the Bramford site, through any planning process, until a cumulative review in point 4 has been completed and its recommendations fully actioned on and implemented. This could be implemented via a condition restricting NGET from allowing third-	National Grid is a provider of critical infrastructure across the UK. In this role, National Grid maintains regular dialogue with a range of organisations with responsibility for both local and national crime prevention and security. As such, all sites and infrastructure would be designed and operated to the relevant security standards. **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** outlines security measures that have been incorporated into the design to ensure the assets are protected. The Applicant's infrastructure and operating systems are designed to meet strict safety standards that ensure safety to workers on sites as well as the public undertaking lawful activities in the vicinity and other infrastructure and buildings that might be in close proximity. There is also a separate matter of maintaining security of supply of energy which is achieved partly through meeting the project needs case and the integrated resilience that is inherent in the NETS. Security of facilities is achieved through a range of mechanisms that include secure fencing and remote monitoring of sites, controlled access and defined operating procedures within the site for licensed personnel. The details of this and operating procedures will be developed as an inherent part of the detailed design stage. Additionally, the Applicant, in conjunction with UK security services, proactively monitor the potential for malicious interference with critical national infrastructure and respond accordingly. The Applicant is aware of all of the requirements of the National Electricity Transmission System Security and Quality of Design Standards (NETS SQSS) and Critical National Infrastructure (CNI) requirements. The Applicant has set out how its proposals both meet the Technical and Policy needs case as set out in the National Policy Statements and our Licence obligations as required. CNI assessments and requirements are undertaken on an ongoing basis across our network and as can be appreciated are of the upmost sensitivity and disclosure requirements, for reasons of security the written question sets out The Project is designed to comply with design safety standards including the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) and the suite of National Grid policies and processes which contains details on design standards required to be met when designing, constructing, and operating its projects. These design safety standards constitute an embedded mitigation measure as reported in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. Existing National Grid processes are designed to identify potential security and safety risks during construction and operation (and maintenance) (including risks from MAD) and to design these out at each stage of project development. This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing, and operating assets such as proposed on the Project.

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			party connections into Bramford Substation. There is a clear precedent for this approach, as a BESS moratorium was issued by NESO in Scotland in December 2025 to allow improved strategic planning of energy installations.	
REP1-185	Tharston and Hapton Parish Council	Air Quality and Emissions	The construction of the pylons would not only bring unwanted extra traffic to our very small rural roads but also the extra emissions from the large lorries required would bring major concerns over meeting our green agenda.	The Applicant has sought to minimise emissions from construction related traffic. Commitment GG19 in **7.2 Outline Code of Construction Practice [Revision B]** is a commitment to meet certain emissions standards for construction related plant and vehicles (excluding construction worker private vehicles).
REP1-185	Tharston and Hapton Parish Council	Transport and Traffic	It is inevitable, therefore, that the infrastructure needed to put the pylons in place will decimate the local area and wildlife around our many footpaths and small country roads that would not take the heavy traffic needed to install the pylons and also maintain them.	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).** The construction routeing strategy is set out in Section 5.4 of **7.3 Outline Construction Traffic Management Plan [APP-309].** Construction HGVs are permitted to travel on Primary Access Routes (PARs) to reach the site access points, after which they will continue along the internal haul road. There are no proposed PARs within Tharston and Hapton Parish. The nearest PARs are located on Fundenhall Road and the B1113 to the north of the Parish. The construction vehicles will travel on the internal haul roads, utilising crossover points to cross the public highway as required. **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** notes that the operational and maintenance activity would require infrequent access to ensure the operational Project is appropriately surveyed, assessed and maintained. Access would typically be made by foot, 4x4 or tractor and trailer. Land used temporarily for construction will be reinstated to a condition suitable for its former use, or such condition as the relevant planning authority may approve. Reinstatement will be informed by pre-construction condition surveys and post-construction condition surveys, ensuring that land is restored to its former use or to an alternative condition agreed with the landowner (commitments GG06 and GG15 within **7.2 Outline Code of Construction Practice (Revision B)**). Temporary haul roads will be removed following completion of works in the relevant area, with soils stripped, stored, and reinstated in accordance with the **7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource** Plan **[APP-303]**, which sets out measures to avoid compaction, protect soil structure, and restore soil profiles. Where haul roads or temporary access routes cross floodplains, their design, removal and reinstatement will ensure no

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				increase in flood risk and will restore natural ground levels following construction (commitment W10, **7.2 Outline Code of Construction Practice (Revision B)**). Landscape and ecological reinstatement following removal of temporary works is addressed through 7.4 Outline Landscape and Ecological Management Plan (Revision C), which secures reinstatement planting, habitat restoration, and aftercare. Temporary disturbance to habitats will be mitigated through reinstatement and, where relevant, replacement planting, with longer term management to ensure successful establishment. **3.1 Draft Development Consent Order [APP-056]** secures these obligations in Schedule 3 (Requirements) ensuring that temporary works do not result in permanent effects unless expressly authorised and assessed as part of the Project.
REP1-185	Tharston and Hapton Parish Council	Historic Environment	Tharston and Hapton parish council has many old trees in the parish, some of which are on the lines the pylons route will take, and these would be lost to the area should the construction take place	The Applicant has sought to minimise impacts on veteran trees through careful routeing, siting and detailed design, **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** sets out the assessment of arboricultural features supported by extensive surveys undertaken between 2023 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]**. Compensation planting is assigned to veteran trees anticipated to be removed as stated in the **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323].**
REP1-185	Tharston and Hapton Parish Council	Land Use	With the parish being a predominantly farming area the land that will be lost to this construction and the knock-on effects to farming practices will be lost along with the damage to the soil from lack of soil management procedures, which will take many years to recover	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]**. The Project has sought to minimise impacts on Best and Most Versatile (BMV) land and proposes to implement mitigation measures to protect soil resources, as set out in **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303].** 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 **7.2 Outline Code of Construction Practice (Revision B)**). 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]**.

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REP1-185	Tharston and Hapton Parish Council	Transport and Traffic	Tharston and Hapton Parish have and are still suffering from large lorries using the area as a rat run, causing local parishioners, walkers, horse riders along with local car drivers many issues with having to move over to accommodate the large vehicles on what is a C road, which falls well within the Government's own definition of an unsafe route.	The construction routeing strategy is detailed in **7.3 Outline Construction Traffic Management Plan [APP-309]**. Construction HGVs would be permitted to travel on Primary Access Routes (PARs) to reach the site access points, after which they would continue along the internal haul road. There are no proposed PARs within Tharston and Hapton Parish. The nearest PARs are located on Fundenhall Road and the B1113 to the north of the Parish. The construction vehicles would travel on the internal haul roads, utilising crossover points to cross the public highway as required. The Applicant is not proposing to utilise the B1135 between A140 and B1113 Norwich Road. The Applicant is proposing to use the B1113 and a section of the B1135 to access the internal haul road, and construction HGVs will only be permitted to utilise this route, unless agreed with the Local Highway Authority.
REP1-169	Ingatestone & Fryerning Parish Council	Landscape and Visual	The introduction of 50-metre lattice pylons (TB187–TB199) would: • Dominate the skyline and interrupt long-established views; • Introduce overtly industrial vertical elements into a predominantly rural landscape; • Create substantial cumulative visual impact in an area currently largely free from overhead transmission lines; • Permanently erode the tranquillity and undeveloped character of the valley.	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant acknowledges the concerns raised regarding the potential effects of the Project where it crosses the Wid Valley, between pylons TB187 and TB199. 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. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The area around Ingatestone and Fryerning is located within Landscape Character Area (LCA) D2: Brentwood Hills. As set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**, significant adverse effects are identified within approximately 1.5 km of the Project, during construction and operation. The area around Ingatestone and Fryerning is located within Visual Receptor Areas (VRA) F11 Margaretting and Stock, G1 Ingatestone and Fryerning, and G2 Billericay West. Significant adverse effects are identified within approximately 1.5 km of the Project, during construction and operation, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Cumulative effects are set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and supporting appendices. No significant cumulative visual effects are identified within VRA F11 Margaretting and Stock, VRA G1 Ingatestone and Fryerning and VRA G2 Billericay West.

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REP1-169	Ingatestone & Fryerning Parish Council	Historic Environment	The proposed pylons would adversely affect: • The setting of heritage assets within and around the valley; • Conservation areas and historic rural settlement patterns; • Public rights of way and recreational routes where open views form a key component of user experience; • The wider appreciation of the parish's rural character.	The Applicant acknowledges that the settings of some designated assets and some medium/high value non-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 on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of these assets falls within the Order Limits. With regard to the Ingatestone and Fryerning conservation areas; Ingatestone conservation area was scoped out of ES assessment in accordance with the agreed methodology set out in **6.19 Scoping Report [APP288 – APP295]**; whilst **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** concluded that the setting of Fryerning conservation area does not extend to the Order Limits. Landscape and visual effects on the same stretch are illustrated by general LVIA Viewpoints 7.01 and 7.09 (**7.12 Visualisations - Part 7 of 9 [APP-349]**) and by Heritage Viewpoints HE32a, HE32b and HE41 (photomontage) (**7.12 Visualisations - Part 9 of 9 [APP-351]**), which together confirm that the alignment minimises intrusion into key views. In relation to effects on landscape character and visual amenity, please refer to the Applicant's response to 1 [REP1-169]. Severe Landscape and Visual Harm, above. The area around Ingatestone and Fryerning is located within Visual Receptor Areas (VRA) F11 Margaretting and Stock, G1 Ingatestone and Fryerning, and G2 Billericay West. Significant adverse effects are identified within approximately 1.5 km of the Project, during construction and operation, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. This includes significant effects on users of Public Rights of Way (PRoW). The assessment of effects on long-distance routes, including St Peter's Way, is presented in Section 13.12.
REP1-169	Ingatestone & Fryerning Parish Council	Good Design	Require National Grid to demonstrate, with detailed engineering, environmental and financial evidence, why T-pylons or other less intrusive technologies are not suitable for pylons TB187–TB199 and similarly sensitive locations, rather than relying on high-level or generalised cost assumptions.	A standard lattice pylon is the starting point for any overhead line as guided by NPS EN-5 (2024) and the consideration of the mitigation hierarchy. There are two locations where the Applicant is proposing to change to the low-height lattice design. These are Little Waltham (**sheets 3 and 4 of 2.3 Works Plans - Section F [APP-022]**) for heritage reasons and keeping heights below and out of the view of some gardens, and the other location is Thurrock due to technical reasons for the Thurrock airfield (**sheets 1 and 2 of 2.3 Works Plans - Section H [APP-024]**). T-Pylons are considered in locations where the mitigation hierarchy identifies that lattice pylons are unacceptable. The latest independent report on the Comparison of Electricity Transmission Technologies:

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				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 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. 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 is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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

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				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.
REP1-166	Great Waltham Parish Council	Landscape and Visual	The Council believes National Grid has chosen a solution which introduces: a. Severe visual and noise blights created by the use of 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. The presumption is reversed (and a change to underground cable assumed) in Nationally Designated Landscapes and, as explained from 2.9.23 in NPS EN-5 (2024) there is consideration of the use of cable in certain other circumstances. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. Our decision making and how the Holford Rules informed decision making is set out in documents including **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]**). The Applicant recognises that there will be significant effects on visual amenity within Visual Receptor Areas (VRA) F1, F3 and F5 which are within Great Waltham Parish, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. With regards to operational noise from the proposed overhead lines, the Applicant has committed to using a low noise 'triple araucaria' conductor type. Due to its geometrical configuration, the triple Araucaria design is the least electrically stressed conductor system that National Grid uses. It is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. By using this conductor system, adverse effects from operational noise are not expected, even directly underneath line. This includes during wet conditions when corona discharge, and therefore noise generation, would typically occur. On this basis, operational noise from overhead lines was scoped out of the Environmental Statement (ES). Despite this, information regarding noise from overhead lines, including an assessment justifying scoping out, is provided in **6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines Informative [APP-261]**.

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REP1-166	Great Waltham Parish Council	Land and Property	b. A severe impact on property prices along the route, especially for those homes and businesses most directly affected;	Changes in overall property values can be due to several different local, national and global factors affecting the housing market. These are constantly changing. It is difficult to single out any one factor alone which could determine house prices. We do, however, recognise that the visual impact of any new overhead line is likely to be a significant concern for many local communities, so as mentioned we always try to avoid communities and individual properties in balance with our other duties. These include the need to be economic and efficient and keep costs down in the interest of bill-paying customers. Norwich to Tilbury, like all forms of development, is regulated through the statutory planning process to ensure that material impacts are considered and, where appropriate, are mitigated and do not cause blight on neighbouring properties. The Compulsory Purchase Code allows for a claim of compensation for the loss that you may have suffered as a result of the retained part of your property ownership being worth less as a direct result of the works. Diminution in property value known as 'injurious affection' and any other appropriate heads of claim will be considered on an individual basis in accordance with current legislation. Statutory Blight occurs when the value of a property is reduced due to works and the owners are unable to sell it at market value. The diminution in value is assessed on a case-by-case basis and the onus is on the claimant to submit a valid blight notice. Blight applies to land if the compulsory acquisition of the land is authorised by a Development Consent Order (DCO) and the land falls within the Limits of Deviation within which powers of compulsory acquisition conferred by a DCO are exercisable. We note that properties that have a view of the proposed infrastructure do not typically qualify to make a claim as currently UK law does not require developers to compensate for a loss of view.
REP1-166	Great Waltham Parish Council	Socio-economics, recreation and tourism	c. Significant loss of amenity value, including impacts on heritage sites and tourism in the area, and constraints on residents' normal outdoor leisure activities (both during and after construction work);	The Applicant acknowledges the concern about the potential tourism impact during construction and operation. The construction standard mitigation measures outlined in both **7.2 Outline Code of Construction Practice (Revision B)** and **7.3 Outline Construction Traffic Management Plan [APP-309]** are anticipated to mitigate potential impacts on heritage assets and tourism, including leisure activities. Given the rolling nature of the linear works, the construction activities in any particular area are likely to be short-term, and are not anticipated to have a significant adverse effect on the tourism economy within the Wider Study Area during construction. The employment and economy assessment during operation has been scoped out of the ES as agreed in the **6.19 Scoping Report [APP-296]** and **6.20 Scoping Opinion [APP-297]**, where no significant effect is anticipated in the Wider Study Area. The Project is not likely to significantly affect access to the PRoWs within Great Waltham Parish Council. PRoWs access during construction will be managed through a PRoW Management Plan. **7.6**

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				Outline Public Rights of Way Management Plan [APP-329] has been submitted as part of this DCO application. This document sets out management measures and mitigation measures for each PRoW affected by the construction activities and operation of the Project. **7.6 Outline Public Rights of Way Management Plan [APP-329]** has defined the management of the PRoW in the area around Great Waltham Parish Council. The PRoW will be temporarily closed for the duration of the works with managed access, that is, allowing a safe passage throughout of the PRoW users. The Applicant acknowledges that the settings of some designated assets and some medium/high value non-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 on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of these assets falls within the Order Limits. Where archaeological sensitivity remains, **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** requires mitigation and **7.2 Outline Code of Construction Practice (Revision B)**, also provides for an agreed protocol should previously unknown remains be encountered. These documents are secured through Requirements 4 and 5 within **3.1 Draft Development Consent Order [APP-056].**
REP1-166	Great Waltham Parish Council	Land Use	d. A permanent loss of areas of productive, mainly Grade 2, agricultural land;	The Applicant recognises that linear projects will always struggle to avoid 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]**. The Project has sought to minimise impacts on Best and Most Versatile (BMV) land and proposes to implement mitigation measures to protect soil resources, as set out in **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]**.
REP1-166	Great Waltham Parish Council	Transport and Traffic	e. Permanent harms to the countryside by the creation of access roads and the use of existing country lanes which will be entirely unsuitable for the number and type of heavy vehicles which will inevitably be required over a prolonged construction period; and	The construction routeing strategy is detailed in **7.3 Outline Construction Traffic Management Plan [APP-309]**. The Applicant is proposing to route construction traffic along Primary Access Routes (PARs), connecting the Site Access Points (SAPs) to the Major Road and Strategic Road network. The Applicant is proposing a Primary Access Route on the edge of Great Waltham, on the B1008 Braintree Road / B1008 Main Road (PAR 46) onto Chelmsford Road (PAR 48). This Primary Access

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				Route connects to the site access point, located south of Minnows end. The Applicant is proposing a peak of an additional 26 HGVs along PAR 46 and an additional 13 HGVs along PAR 48 in the AM and PM peak, for a duration of 1 week, as shown in **7.11 Transport Assessment - Appendix E – LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]**. From this SAP, the construction traffic will travel along the internal temporary haul road, utilising crossover points where the haul road meets the public highway. Construction traffic will not be able to leave/join the public highway at these crossover points, unless detailed in **7.3 Outline Construction Traffic Management Plan [APP-309].**
REP1-166	Great Waltham Parish Council	Socio-economics, recreation and tourism	f. A failure to recognise the severe financial impacts and inconvenience to residents caused by travel and other general disruptions during construction of an overland route.	The Applicant has prepared **7.3 Outline Construction Traffic Management Plan [APP-309]** as part of the DCO submission, which sets out controls and measures aimed at minimising disruption and inconvenience to local residents, businesses and road users; coordinating works effectively; and maintaining clear communication with local communities and businesses. The Applicant's approach to managing construction traffic and reducing inconvenience is based on the following elements: • Using defined routes suitable for construction traffic, referred to as Primary Access Routes (PARs), between the Major Road and Strategic Road network and the construction corridor. • Providing temporary haul roads along the construction corridor wherever possible, to minimise the use of public highways and keep construction traffic away from local communities. • Coordinating works with other works in the area, using the permit scheme operated by Essex County Council. • Implementing appropriate temporary traffic management. • Providing a dedicated community relations team. • Providing advance notice of works to local residents, businesses, the Police, Fire and Ambulance services and other key stakeholders. • Liaising with residents, local businesses and other key stakeholders to understand specific access needs. The Applicant has undertaken junction modelling 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 PARs. 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 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 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.

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				The Project is not anticipated to significantly affect businesses within Great Waltham as set out in **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]**. The Project is anticipated to generate direct local construction employment (as well as induced employment) during the construction phase, providing a beneficial effect to the local economy.
REP1-166	Great Waltham Parish Council	Alternatives	The Council believes all of these adverse effects can be eliminated or substantially mitigated by using alternative methods of power transmission.	The Applicant disagrees with this assertion and remains of the view that the Project is appropriate and consistent with relevant policy. Consideration has been given to a range of different alternatives and it is clear that each have different consequences with the effects transferred from one set of receptors to another. The justification for an onshore predominantly overhead line solution is that this has been shown to be the optimum solution to meet the need case (most recently in our response at ISH1) in a policy compliant economic and efficient manner. Careful consideration of alternatives has informed the design process in light of an extensive suite of data gathering and surveys. Our consideration through the Environmental Impact Assessment process has further informed design refinement leading to the inclusion of low height pylons north of the River Chelmer (within the DCO submission) and a change to revert to repositioned standard lattice pylons south of the River Chelmer that has been confirmed in our Deadline 1 submission. It is acknowledged that there are residual effects but having **applied the mitigation hierarchy and with the project identified as CNP Infrastructure, the residual effects are outweighed in the planning balance in "all but the most exceptional cases"** - those exceptional circumstances being an unacceptable risk to defence, HRA sites / irreplaceable habitats been set out in submission documents
REP1-166	Great Waltham Parish Council	Cost	The Council is not convinced that, as National Grid has suggested, its preferred use of pylons will ultimately be the most economical solution once all associated costs are properly considered. In particular, the Council believes National Grid has failed to take proper account of the costs for substantial compensation to home and business owners (including the likely compulsory purchase of properties) which it considers inevitable under the proposals. In addition, there has been inadequate provision made for post-implementation costs for removing construction infrastructure, such as access roads, which landowners would want to return to productive use. The Council's view is that while using overhead lines may be National Grid's starting assumption, other fairer and more equitable solutions should be its final answer. Unfortunately National Grid's approach provided no signs of introducing flexibility, innovation, and a holistic financial assessment into its thinking.	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 **7.17 Strategic Options Backcheck and Review [APP-355]** (2025 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

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				underground technology; High Voltage Direct Current (HVDC) overhead line and underground cables; and gas insulated line. Currently, overhead 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 pages D1-D14, which sets out in transparent detail how options appraisal costs were evaluated. The Applicant's approach for the Norwich to Tilbury Project is not to acquire private property unless it is required to construct, operate, maintain or mitigate the Project. Land and rights sought are limited to the minimum necessary, having regard to engineering requirements, health and safety, environmental mitigation and long-term maintenance obligations. The Applicant does not seek to acquire private property that is not required for the Project, and has adopted a proportionate, evidence-led approach that prioritises minimisation of impacts, acquisition of rights in preference to land, and agreement wherever possible.
REP1-166	Great Waltham Parish Council	Alternatives	In particular, the Council believes that the Waltham Gap is an area which should be given special treatment to avoid the use of pylons. The narrowness of the planned swathe inevitably means that pylons of any type will be positioned close to housing and the Great Waltham conservation area. Instead of pylons, the Council requests that a short run HVAC underground option be considered, although it would of course welcome any HVDC solution that covers a longer distance. The Council understands these options are technically feasible and have been used elsewhere on the proposed route. The short run HVAC should be long enough to resolve not only any issues raised in relation to the view from Langleys Park, but also the need for pylons next to Chelmsford Road and in the adjacent fields. An HVAC solution's end sealing compound locations should be positioned in such a way that they too do not impact the views from Langleys, Chelmsford Road or the Great Waltham conservation area.	This has been considered by the Applicant. Paragraph 2.9.23 of **5.15 Design Development Report [APP-122]** concludes that: '*Considering the overall balance of effects on the area between Great Waltham and Little Waltham resulting from a low height lattice pylon alignment in the context of NPS EN-5 Paragraph 2.9.23, it is concluded that this does not provide a clear case to justify the costs and effects arising from the use of underground cable. The effects arising from overhead line on heritage assets comprise less than substantial harm with the Grade II registered park and garden experiencing effects that could overall be considered to be in the middle range of less than substantial harm. With the cost of an underground solution, indicatively estimated to be in the order of £80 million to £100 million for a 2 km to 3 km section (subject to CSE compound location and need for trenchless crossings), National Grid has concluded that the use of an overhead line utilising a section of low height lattice pylons should be taken forward in the vicinity of Great and Little Waltham*.' The Applicant does not propose a change to this conclusion
REP1-166	Great Waltham Parish Council	Alternatives	More specifically, and notwithstanding the comments above, in terms of the current proposals as they differ from those proffered originally, the Council believes that relocating a pylon adjacent to Chelmsford Road will have significant detrimental effect on everyone who walks, cycles, or drives along it, since it is the main route between the parish of Great Waltham and Chelmsford in terms of travel for employment, higher education and shopping. In the new proposals	The Applicant has changed the proposals here in line with this request. We had responded to the feedback about this pylon and indeed signalled its position to consider a change within **5.15 Design Development Report [APP-122]**. The Applicant has now confirmed to the ExA the change from three low height pylons south of the River Chelmer to two standard lattice pylons. This was confirmed in our Deadline 1 submission.

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			the proximity of the pylon on the south side of the road would be overbearing and dominate the street scene, so while shorter pylons may improve the view from a distance, they are wider and more overwhelming close up.	
REP1-166	Great Waltham Parish Council	Good Design	The Council also notes that the pylon on the north side of Chelmsford Road has moved further away from the route, but it would seem an equidistant arrangement on both sides would be better to avoid a pylon being placed immediately up against the road. The Council requests that such an equidistant arrangement is deployed if shorter pylons were to be used. If not, because there would be additional pylons as a result of the reduced height pylon proposal (which only adds to the blight on the landscape to the detriment of all those living in or visiting the parish who enjoy its current natural beauty), the originally proposed taller pylons seemingly represented a better arrangement, their being further from the road.	The Applicant as per the Design Scenarios Table in **8.6.1 Deadline 1 Cover Letter [REP1-141]** has confirmed a decision to progress with Scenario B only in this location, with standard height pylons (not low height pylons) proposed to the south of the River Chelmer. In making this change one of the low height pylons can be removed and the pylon (TB141) proposed closest to Chelmsford Road can be moved approximately 70 m further west away from the road (subject detailed design and Limits of Deviation).This does require a slight movement of the pylon closest to the river (within Limits of Deviation) to the south and west
REP1-166	Great Waltham Parish Council	Cost	The Council's view is that National Grid has, unwittingly or otherwise, allowed perceived financial imperatives (not least its own profit margins and shareholder value targets) to cloud its judgment and take precedence over any arguments that more expensive (and likely less profitable) options are preferred not only by those most directly affected, but also end users. That is, National Grid has chosen the profit motive over what consumers regard as being more precious – the preservation of the rural countryside in which they live and work.	In accordance with Section 9 of the Electricity Act 1989, the Applicant is required to develop and maintain an efficient, coordinated and economical system of electricity transmission. The Applicant is a regulated licence holder to ensure value is delivered for businesses and consumers in Great Britain. Paragraph 2.9.21 of NPS EN-5 says that overhead line should be the strong starting presumption for electricity network developments in general. That strong starting presumption is reversed, but is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in NPS EN-5. The Applicant has applied the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.
REP1-166	Great Waltham Parish Council	Historic Environment	The Council also asserts that National Grid's pylons solution introduces harms which will blight heritage assets in its parish, and indeed along the whole proposed route. In addition, they will blight the parish and surrounding area as a tourist attraction. In reality, there is no upside to deploying pylons beyond National Grid's assumption that their use is the cheapest solution overall – a premise which the Council strongly contests	The Applicant acknowledges that the settings of some designated assets and some medium/high value non-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 on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of these assets falls within the Order Limits. Where archaeological sensitivity remains, **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** requires mitigation and **7.2 Outline Code of Construction**

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				Practice [Revision B], also provides for an agreed protocol should previously unknown remains be encountered. These documents are secured through Requirements 4 and 5 within **3.1 Draft Development Consent Order [APP-056].** 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.
REP1-166	Great Waltham Parish Council	Landscape and Visual	While it can be difficult to put a price on loss of amenity and aesthetic qualities, the Council believes that National Grid has made no worthwhile attempt to quantify the price of the permanent destructive effects to the countryside of what it is proposing. National Grid cites regulations which require it to provide a 'value-for-money' solution, but fails to quantify how aspects such as the loss of a view or the denuded quality of life in future have been considered, quantified, and priced into its calculations. In doing so National Grid has assumed that customers always want the cheapest solution and because of that are willing to accept any and all adverse consequences. The Council considers this to be a profound misconception based on muddleheaded thinking.	Whilst in accordance with Section 9 of the Electricity Act, the Applicant is required to develop and maintain an efficient, coordinated and economical system of electricity transmission, we also under Schedule 9 '*have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest*…'. So, whilst cost is a consideration so are other factors. The submitted alignment has been reached following careful consideration and balancing of environmental and socio-economic constraints and opportunities, engineering feasibility, planning policy and cost. The Environmental Statement **[APP-123 to APP-287, AS-026 and AS-068]** forms part of the development consent application for the Project and provides an assessment of the likely significant residual effects in accordance with the EIA Regulations and national policy. The assessments do not convert the effects identified into a monetary value as Government guidance does not require this nor provide a methodology for such a calculation.
REP1-166	Great Waltham Parish Council	Consultation	The Council believes that its parishioners in particular, and residents in Essex, Suffolk and Norfolk in general, place a far higher value on their countryside than does National Grid, and that they are more willing to bear a financial cost of keeping what they have than National Grid wishes to concede. The Council cannot see any evidence that National Grid has consulted either East Anglia residents or customers in general on their preferences in relation to ultimately paying more in the short- and medium-term for their power supply if it is necessary to avoid the longer-term blight the proposals in the consultation would impose. Why has National Grid chosen not to consult on this and seek residents' and consumers' views on such a crucial question?	The Applicant's 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 the government and our regulator Ofgem. 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 this decision-making process is one of our statutory duties and is not something that we could make representation to the Ofgem to waive. The cost of the Project would be shared by all billpayers, not just those in East Anglia. The Applicant is funded by a price control mechanism which is agreed with and set by Ofgem. National Grid pays up front for the costs to build a new power transmission line. The cost is then

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				gradually passed to consumers through their electricity bills over the next 40 years or so. Any alternative option would also be funded in this way. The proposals that the Applicant has chosen to consult on and develop are the ones which meet our statutory duties, including the duties imposed on us by national policy (National Policy Statements EN-1 and EN-5).
REP1-143	Aldham Parish Council (reference appendices)	Traffic / Route / Safety / Historic Environment / Hours / Noise / Landscape & Visual / Flood Plain	Our Grade II* Listed Church is the tallest building in the village at 30m, including the weather cock. The 12 pylons will all be 50% taller, dwarfing the spire and adversely affecting the setting of the building. No mitigation could be expected to hide 50m pylons. The impact on the Grade II* listed buildings at Aldham Hall is also noted and this is particularly so where the Line crosses Brook Road between Pylons 55 and 57. The proximity of pylons TB055 to residential properties in Hines Close is unacceptable. Formal Requirements (Conditions) should be imposed to give much more protection to these landscapes, replacing lost trees and hedging at a much higher than one for one ratio. Construction will close 8 of our 19 Public Rights of Way (PRoW), equating to 7000m of ProW Working hours will be 10-12 hours a day, 7 days a week with scope for a wide range of activity outside these hours, which will cause unacceptable disturbance. The Code should include a Requirement to establish a formal Liaison Forum with each Parish affected by the development and a requirement to have regular dialogue and up-to-date information on construction progress and timetable. Community benefits have not been defined and discounts to energy bills cannot compensate for either the short term or long term physical impacts. **-Route through Aldham Parish (sheet 6)** Pylon TB049 (situated in Fordham Parish) is sited just 40m from the river bank and the OH line will cross the Essex Way, an important long-distance footpath traversing the whole County from the west to the coast in the east. TB049 sits in a prominent location within the well-used community woodland. TB049 and TB050 the OH line passes across a small plantation adjoining the south bank of the river, requiring the removal of a significant amount of habitat. Habitat will be lost under the OH lines between TB050 and TB051. TB051 will be prominent in views up the hill and out of the Conservation Area and will cause demonstrable harm to the setting of Ford Street Conservation Area.	Public Rights of Way: Through an iterative process of routeing and siting, the Applicant has sought to minimise, as far as practicable, impacts and disruption to all forms of Public Rights of Way (PRoWs). The overall strategy, as set out in **7.6 Outline PRoW Management Plan [APP-329]**, is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate temporary diversions. As a result, no PRoW would be closed without a diversion in place, and no severance of the overall network is anticipated. Notwithstanding the above, the Applicant confirms that the Project will affect eight PRoWs during construction within Aldham Parish. All will be subject to a temporary management regime, and four of them may also be subject to temporary diversion at various times, due to construction activities. During the temporary management regime, the PROWs will remain open on their existing alignments throughout construction, with access managed as necessary through use of appropriate safety measures, in accordance with **7.6 Outline PRoW Management Plan [APP-329]**. The Applicant notes the concern regarding Aldham Bridleway 20 (PROW 123_20). As set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**, a temporary diversion will be implemented while the haul road is in place, including a temporary crossing of the Roman River to maintain connectivity for bridleway users. Following completion of works in this area and the removal of the haul road, the bridleway will be reinstated to its original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre and post-construction condition surveys. The detailed management arrangements for this location, including the specification of the temporary diversion and river crossing, will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRoW Management Plan. Biodiversity, ecology and nature conservation: The Applicant has sought to to reduce, as far as practicable, potential impacts on key ecological features including priority habitats such as woodland. 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 -**

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			TB051 and the CLA will also adversely affect the amenity of FP3 (PRoW123_3) which runs east-west passing across the haul road between TB050 and TB051 to the edge of Fiddlers Wood. The proposed junction with the haul road would have an adverse impact on highway safety. The haul road itself passes through a recognised flood plain, which is subject to frequent fluvial flooding of the River Colne. The haul road then crosses the path of the OH line between TB050 and TB051 passing closer to the river and Conservation Area. The junction of the haul road with the A1124 on Ford Street Hill will be even more dangerous than the junction with Mill Lane Fordham. TB052 on the west side of the A1124 would be at least 40m asl (15m above TB051) and especially prominent in views out of the Conservation Area. **-Route through Aldham Parish (sheet 7)** TB052 and TB053 will be prominent in views from Green Lane and New Road. TB054 will be 140m from the back of the nearest houses in Green Lane and will adversely affect the outlook from 20 properties on the south east side of the Lane and Church Grove. This is likely to cause a loss of amenity through noise and disturbance for an extended period during construction. TB055 is also only 140m from the rear of the nearest properties on the southside of Hines Close, adversely affecting residential amenity during and after construction. Pylons TB054 to TB057 form a line angling away from Brook Road when approached from the south, creating a solid wall of lines and latticework that will harm the setting of St Margaret's and views of the spire. TB057 is only 100m south east of Brick Cottages and both properties will be affected by noise and general disturbance from the haul road and its crossing of Brook Road at a dangerous bend adjacent the entrance to Aldham Hall. **-Route through Aldham Parish (sheet 8)** TB058 is situated 150m north of Brook House and close to PRoW FP12 (PRoW 123_12), that runs from Brook Road adjoining Brook House. Between TB058 and TB059 the OH lines and haul road will cross FP12 causing a detrimental effect on the amenity of the PRoW for walkers. TB059 is sited within30m of the point where FP12 turns north, adversely affecting views across to Church House Wood. The haul road is insensitively routed only 20-30m from the edge of the wood, affecting the margins and the Draft Order Limit almost touches the outer edge of the wood. This will inevitably cause lasting damage to flora and fauna in this locality. TB060 is situated within a gently sloping pasture that falls towards the Roman River, adversely	**Ecology and Biodiversity [AS-026]** clearly sets out all potential impacts on ecological features. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts 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. The Applicant has also committed to a 3:1 replanting ratio for individual trees. Landscape and visual: The Applicant has also sought to reduce potential effects on people's views through sensitive routeing of the Project. The Applicant recognises that there will be significant effects on visual amenity within approximately 1.5 km of the Project, within Visual Receptor Areas (VRA) D5, D6 and D7 which are within Aldham Parish, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Visual receptors assessed within the VRAs include people using the network of local PRoW, open access land, NCN Route 13, and the Essex Way, people living and moving around the local settlements, and people using the local road networks. Effects on the Essex Way are set out within Section 13.12 Assessment of Effects on Routes within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Effects on visual receptors on the Essex Way will range from major and significant (adverse) to minor and not significant (adverse). The siting of proposed Site Access and Crossover Points has been informed by the existing highway geometry, with measures taken to provide safe and suitable junctions with the Public Highway Network. These locations have been developed with engagement with the Local Highway Authority, and subject to Stage 1 Road Safety Audit. Specific traffic management measures available to further support highway safety at proposed site access points are detailed within document **7.3 Outline Construction Traffic Management Plan [APP-309]**. Additionally, the Applicant has applied for supporting Traffic Regulation Orders, which include speed limit reductions such as an extension of the existing 30 mph speed limit on the A1124 to extend to cover the proposed Site Access Point. Impacts on Residential Visual Amenity have been considered in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]**. This has been produced in line with Landscape Institute Technical Guidance Note (LITGN) 2/19 'Residential Visual Amenity Assessment (RVAA)' and assesses where permanent changes to visual amenity, as a result

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			affecting the amenity of the Gatehouse. The section of OH line and proposed routing of the haul road between TB060 and TB061, is one of the most damaging to the landscape and environment. The intrusion caused by Pylons TB060 to TB064 will be detrimental to the visual amenity and cause significant harm. The section of haul road between TB060 and TB061 will destroy the Bridleway (FP20 ProW 123_17) at a particularly sensitive point where it drops down to the bridge that crosses the Roman River. TB061 which is situated on rising ground from the river, making it prominent in views across the Roman River Valley from the north.	of the introduction of pylons and overhead line, may affect living conditions at specific properties within 200 m of the Project centreline, and where the Residential Visual Amenity Threshold (RVAT), as described in LITGN 2/19, may be breached. This includes assessment of properties at Hines Close, Green Lane, Church Grove, Brick Cottages, Brook Road and Brook House. No breaches of the RVAT are reported for properties in these locations. Flood risk: With regard to flood risk and the haul road, commitment W10 in **7.2 Outline Code of Construction Practice [Revision B]** secures that 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 (i.e., ducting). The design of the haul roads themselves will include resilience to flooding for example, incorporating suitable geo-textiles to stabilise the road surfacing, as well as allowing water to flow within the floodplain. Suitable materials would be used to surface the haul roads. In some cases, bespoke construction methodologies may be used based on site constraints and ground conditions. This approach will prevent increases in flood risk elsewhere and provide flood resilience to the Project during its construction. Historic Environment: The Project would lead to less than substantial harm to listed buildings and conservation areas referred to in this response (**6.11 Environmental Statement Chapter 11- Historic Environment [APP-208], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). Embedded and standard mitigation proposals for listed buildings and conservation areas are set out in **7.2 Outline Code of Construction Practice [Revision B]** and **7.4 Outline Landscape and Ecological Management Plan [Revision C].** The Project's mitigation has been developed in consultation with heritage stakeholders, including the Local Planning Authorities 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

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				at worst, less than substantial harm, and the mitigation hierarchy has been followed, NPS EN-1 (2024) does not require the Applicant to take any further measures. Noise and vibration: With regard to construction noise and vibration, this is assessed in 6.**14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Construction noise and vibration will be managed via the commitments in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]**. These measures ensure that best practicable means (BPM) will be employed by the contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments will be undertaken by the contractor based on their specific methodologies. Specific mitigation measures will be identified during these assessments and incorporated in the final NVMP.
REP1-168	Holton St Mary Parish Council	Consultation	**Gunning Principles** First the Gunning Principles have not been followed in that NG has not presented any cost comparison evidence about the other options (Subsea, HVDC, rewiring existing pylons). Therefore, nobody has been able to assess whether the proposed route is cost effective, bearing in mind the value of the long-term damage to the environment, the visual effect on East Anglia and loss of habitat, farming land and the effect on communities, etc.	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 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. A detailed response with regards to our application of the Gunning Principles can be found in **5.1 Consultation Report - Appendix N: Legal Opinions [REP1-007]**.
REP1-168	Holton St Mary Parish Council	Traffic and transport	**Mitigation** Second, HSMPC submitted a comprehensive document last November commenting on the flaws in the NG proposal. There has been no consultation with the PC about how their proposals, unless modified, will cause actual harm and how these will be mitigated, with one exception: the proposed re-engineering of Junction 31 on the A12 where it intersects with the B1070 road to Hadleigh including a new bell mouth and a new temporary road bypassing the houses on the northern side of the B1070. While a new “access” road is welcomed it is still far too close to the village. The PC proposed that the road be moved much further north to track parallel to the dismantled railway line to Hadleigh that starts between Junctions 32A and 32B on the A12 near to the originally proposed Cable Sealing Compound. Besides protecting the inhabitants of HSM this would render the very intrusive bell mouth	The Applicant notes the comments on the suitability of the A12 slip roads, for access of HGV movements. The Applicant is proposing highway mitigation for the A12 and B1070 junction, including the temporary removal of street furniture and the merge taper for the A12 to be increased according to the relevant design guidance to facilitate safe vehicle movements. The proposed mitigation are detailed in Section C, Sheet 6 of **7.3 Appendix C Indicative Highway Mitigation Plans [APP- 315).** Preliminary designs for the bellmouth off the B1070 (JC-B022) and the proposed junction improvements at the A12 slip road have been developed, and subject to the Road Safety Audit (RSAs) process set out in **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]**. The Road Safety Audit process considers safety risks including turning conflicts and potential

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			unnecessary. The existing slipways at A12 Junction 31 to HSM do not support HGV traffic as they are only 5.5 metres wide. The Construction Compound and the Cable Sealing Compound should be moved further north where disruption from traffic and adverse effects on the Raydon airfield would be mitigated. The Sealing Compound should be moved north of Pylon JC26 to protect the airfield. Given the large volume of HGVs already going to and from Notley Enterprise Park from the A12 and the expected NG HGVs there should be an independent safety appraisal of the risk to residents and travellers as the proposed new haul road in its current position will create additional risks at the junction. In regard to traffic the recent map shows that many roads that are used by HSM residents and nearby villages will be closed with the resultant congestion and use of alternative unsuitable lanes.	congestion at each of the proposed locations. For these two sites, the Applicant has engaged with Suffolk County Council as the Overseeing Authority in the development of these RSAs. The Applicant is proposing a Primary Access Route on the B1070, to route construction vehicles from the A12 to the proposed bypass haul road. The Applicant is proposing a number of temporary road closures near Holton St Mary, in order to carry out certain construction activities safely. The proposed roads to be closed, Sandpits Lane and B1068 Holtonwood Road, are detailed in Schedule 3 of **3.1 Draft Development Consent Order [APP-056]**. The Applicant is proposing to use the Permit Schemes managed by the Local Highway Authority to coordinate street works on the Project, and avoid multiple road closures in a similar location taking place at the same time. Residents will be informed of road closures and traffic management measures through the community liaison officer. Additional information on the transport movements and proposed mitigation proposed by the Applicant is detailed in the responses below.
REP1-168	Holton St Mary Parish Council	Historic Environment	Damage to Listed Properties Third, in regard to the earthworks at and around Bacons Green and by Sandpits Lane no assessment of the damage to the six listed buildings has been made and how the residents will be supported. So far as we are aware, discussions with these residents have either not taken place or have been perfunctory.	The Project would lead to no harm or less than substantial harm to listed buildings within the study areas (**6.11 Environmental Statement Chapter 11- Historic Environment [APP-208], 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP_215]).** Embedded and standard mitigation proposals for listed buildings are set out in **7.2 Outline Code of Construction Practice [Revision B]** and **7.4 Outline Landscape and Ecological Management Plan [Revision C].** Although it is not clear from this response exactly which listed buildings are referred to, regarding potential building damage due to vibration, this has been assessed as part of the construction vibration assessment to identify locations with potential risk (**6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]).** Suitable control measures are in place in **7.2 Outline Code of Construction Practice [Revision B**] and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** to ensure that this is reassessed by the contractor(s), and suitable mitigation measures and monitoring are put in place should a risk of potential damage be identified. The Project's mitigation has been developed in consultation with heritage stakeholders, including the Local Planning Authorities 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

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				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, NPS EN-1 (2024) does not require the Applicant to take any further measures.
REP1-168	Holton St Mary Parish Council	Biodiversity, ecology and nature conservation	**Lighting** No statement has been made as to how the effects of lighting at the various Compounds will be mitigated at night during the construction period and thereafter at the Sealing Compound. Our closeness to and visibility from the Dedham Vale National Landscape (formerly Area of Outstanding Natural Beauty-AONB) and the Government's dark skies policy have not been taken into account. Other mitigation issues during the construction period have not been presented e.g. noise, dust, effects on wildlife, traffic etc.	The Applicant has sought to minimise impacts on habitats, wildlife and the surrounding landscape through careful routeing, siting and detailed design. 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. **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** sets out the assessment of ecological effects, both during construction and operational phases, 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].** These documents include measures to mitigation any effect of construction lighting, dust and/or noise on wildlife to ensure no residual significant effects.
REP1-168	Holton St Mary Parish Council	Health and wellbeing	**Operating Hours** The proposed operating hours, including weekends are unacceptable.	The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are: • Monday – Friday: 07:00 to 19:00 • Saturday, Sunday and Bank Holidays/Public Holidays: 07:00 to 17:00. Details relating to the proposed construction working hours and any associated restrictions are contained within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The working hours are secured through Requirement 7 of Schedule 3 of **3.1 Draft Development Consent Order [APP-056]**. The 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

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				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 project.
REP1-168	Holton St Mary Parish Council	Alternatives	**HVDC vs. HVAC** The use of HVAC cabling will permanently remove any possibility of restoring the landscape to the status quo ante. Trees cannot be planted, crops will have to be limited, wild life will not thrive and future disruption will be necessary after just 40 years: such a scar will be ingrained in an area of the county that runs alongside the Dedham National Landscape. We consider that even if the capital cost of other options - HVDC or Offshore- is higher the damage to East Anglia and particularly HSM should be properly considered.	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.
REP1-168	Holton St Mary Parish Council	Consultation	Exhibit A - Holton St Mary Parish Council's submission to the Planning Inspectorate regarding National Grid's Norwich to Tilbury Great Grid Upgrade Targeted Consultation	The targeted consultation feedback from Holton St Mary Parish Council is represented in the in **5.1 Consultation Report [APP-066]** at relevant paragraphs 10-33.9, 10-33.10, 10-33.26, and 10-33.33 and 10-34.17. However, for ease of reference, the Applicant has sought to respond to identified points in Exhibit A in detail below; where a point is reflected above in the main WR it is not repeated.
REP1-168	Holton St Mary Parish Council		**Full Risk Assessments Required** If the current proposal remains, full risk assessments showing in detail the mitigation NG will take to protect drivers, pedestrians, cyclists and horse riders using the B1070 Four Sisters junction. Full reports on the noise and dust impacts on Holton St Mary residents are also needed from NG.	The Applicant considers that safety with respect to highways users has been appropriately assessed for the Proposed Development. Road Safety Audits have been undertaken for the proposals relating to both the A12/B1070 junction and Site Access Point from the B1070. In line with the approach set out in **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]**, these have been carried out in accordance with the Design Manual for Roads and Bridges standard 'GG119 Road Safety Audit' and have been overseen by National Highways (with respect to works interfacing with the A12 as part of the Strategic Road Network) and Suffolk County Council as

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				the Local Highway Authority. These have included consideration with respect to all highway user groups. Where specific mitigation measures have been proposed relating to the highway, these have been identified in **7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315]** Sheet 6, and further additional considerations specific to pedestrians, cyclists, and horse-riders are set out in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**, with particular reference to Table 16.11 for particular mitigation proposals with respect to amenity for these users on the B1070. Section 7.2 of **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** presents the construction dust assessment which includes areas of Holton St Mary located within 250 m of the Order Limits. These are shown on page 12 of 24 in **6.7.F4 Environmental Statement Figure 7.4 - Air Quality Construction Dust Study Area (Final Issue A) [APP-154]**. This assessment was undertaken in line with IAQM Construction Dust Assessment Guidance. The assessment concludes that with appropriate mitigation measures as outlined in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]** there would be no likely significant effect from construction dust emissions for receptors within 250 m of the Order Limits. Construction noise and vibration is assessed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Construction noise and vibration would be managed by the mitigation measures in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]**. These mitigation measures ensure that best practicable means (BPM) would be employed by the Main Works Contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments would be undertaken by the Main Works Contractor based on their specific methodologies. Specific mitigation measures would be identified during these assessments and incorporated in the final NVMP.
REP1-168	Holton St Mary Parish Council		**Safety:** Safety must be a priority. Holton St Mary is within two miles of the local schools in East Bergholt, therefore school children are expected to walk or cycle to school along the B1070 passing the junction with the hall road and the bellmouth proposed. The excessive additional traffic and disruption to the footpath, would make it lethal for children or parents to walk or cycle to school; and for any residents for that matter.	The Applicant considers that safety with respect to highways users has been appropriately assessed for the Project. Refer to the response provided above for details around safety considerations in this area. The Applicant notes the respondent's concern regarding safety with respect to traffic impacts on children walking and cycling to schools located in East Bergholt along the B1070 used as a Primary Access Route to bellmouth (JC-B022). The assessment of construction effects on pedestrians, cyclists and horse-riders on severance, amenity and

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			Please note that for residents of Holton St Mary and Raydon, the B1070 is the only route to the nearest Doctors surgery, chemist, local shops and post office in East Bergholt. It is also transited by all the traffic from the A12 travelling to Notley Enterprise Park, Raydon and other villages to the town of Hadleigh. We haven't received satisfactory traffic assessment studies for this junction and the bellmouth. At this end of Holton St Mary, NG also propose lengthening the North bound entry slip onto the A12. Please note that this two-way slip road from the A12 Northbound to the B1070 is only 5.5M wide and, as National Highways are aware, this is sub-standard as it does not allow two HGVs to pass without mounting the kerb. NG propose that eight metres is required for a Haul Road, so, it is not possible that the current 5.5m two-way A12 slip road is sufficient to accommodate NG's construction traffic. The council believes that proposing the A12/B1070 junction as a major conduit for significant numbers of large construction lorries is completely unsuitable. Not only would it be unfeasible (even impossible) for two large vehicles to pass at this junction (as above), but it would also be difficult (even impossible) to widen the junction as there are properties on either side of the road - Four Sisters Cottage on one side and Gateway Cottage on the other side. Siting the A12 Construction Compound at that junction will only increase the intensity of heavy traffic and potentially cause major delays, even accidents.	fear and intimidation as a result of the Project along PAR 25 - B1070 Hadleigh is presented within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275].** It was concluded that as a result of the increased traffic for the Project during the worst-case peak daily construction activity there would be slight adverse effects on pedestrians and cyclists that would be temporary (over a short duration of two weeks) and are considered not significant when mitigation and controls are taken into account as detailed within Section 5.9 Highway Mitigation Measures of **7.3 Outline Construction Traffic Management Plan [APP-309]**. Mitigation includes the maintenance of overgrown vegetation and low level overspill of vegetation on the footway. This will ensure the full width of the footway is available for users and increasing the distance from traffic on the carriageway. In addition, every construction vehicle driver will receive a driver information pack that will identify locations where pedestrians/ cyclists cross the carriageway or could be cycling on carriageway. This will ensure the safety of users on the footway and pedestrians and cyclists when crossing bellmouth (JC-B022), where crossing facilities for pedestrians and cyclists will be provided. Preliminary designs for the bellmouth off the B1070 (JC-B022) and the proposed junction improvements at the A12 slip road have been developed, and subject to the Road Safety Audit (RSAs) process set out in **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]**. The Road Safety Audit process considers safety risks including turning conflicts and potential congestion at each of the proposed locations. For these two sites, the Applicant has engaged with Suffolk County Council as the Overseeing Authority in the development of these RSAs. With respect to the respondent's comments on the proposals at the A12/B1070 junction, the Applicant notes that Swept Path Analysis has been utilised to assess all proposed Primary Access Routes, and where insufficient carriageway width has been identified, mitigation measures have been proposed. This approach to designated PARs is set out in **7.3 Outline Construction Traffic Management Plan [APP-309]**. The Applicant therefore emphasises that the proposed PAR is considered to be of suitable geometry for the proposed construction traffic usage. The Applicant further notes that the proposed compound in the vicinity of the junction is specifically proposed to support construction of the highway mitigation proposals, as indicated in **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** Section C, Sheet 30. Once the highway works are complete the compound will not be used again until their removal following completion of the Project construction in this area.
REP1-168	Holton St Mary Parish Council		**Access for the duration** So many vital roads will be closed for the duration of the project that access in and out of Holton St Mary will become a nightmare. Traffic travelling East/West along the B1070, including commercial operations at Notley Enterprise Park will be heavily impacted –	The Applicant notes the respondent's concerns around proposed road closures and diversions. However, the Applicant emphasises that the proposed allowances for short term, temporary road closures are necessary for the safe and effective delivery of the Proposed Development. They are also further subject to appropriate design

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			diverting along unsuitable country lanes causing traffic chaos and congestion around the village; and further destruction of valuable roadside verges. Journeys for residents to and from the schools, doctors or shops in East Bergholt will be severely impacted. Traffic transiting the A12 when it is blocked will be diverted through unsuitable country lanes, which include designated Quiet Lanes. NB the number of houses effected: Holton St Mary – 109; East Bergholt - 1,481; Layham 277; Raydon – 280; Wenham – 81; Shelley – 26; Hadleigh – 4,264: a total of 6,518 properties; plus, all the businesses in Hadleigh and those along the route and at the Notley Enterprise Park. Traffic congestion and speeding is already an issue between the A12 and Hadleigh, to push this traffic along smaller lanes will have a devastating effect on residents. Holton St Mary is on the Suffolk Cycle Route, which is used by hundreds of cyclists annually for tournaments and for hundreds of hobby cyclists during weekends and holidays.	development and control measures to mitigate impacts on the highway network, which could result in some of the closures not being required at all. In terms of road closures, the Applicant references **7.3 Outline Construction Traffic Management Plan [APP-309]**, which sets out that: Traffic Management measures will be implemented, where safe and practicable, to deliver works as a first preference to temporary closures. Specific locations, timings and the specific traffic management measures will need to be agreed with the relevant highway authorities. Short-term closures associated with Overhead Line, Underground Cabling, and bellmouth construction are expected to each be in place for no more than four weeks. Where temporary closures of the public highway are required, a full signed point-to-point diversion route will be provided. These diversion routes will make use of the same standard of road as that subject to the temporary closure, or higher where practicable and available. **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C [APP-035]** Sheets 7 and 8 indicate locations with proposed management measures, temporary closures, and signed diversion routes in the vicinity of Holton St Mary. The Applicant is proposing to use the Permit Schemes operated by the Local Highway Authority, in order to best coordinate the street works required for the Project. With respect to the existing cycle usage of the B1070 noted by the respondent, the Applicant confirms that this has been considered. Mitigation measures proposed to reduce the effects of construction traffic on users of this route are set out in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** Table 16.11. Furthermore, additional measures have been considered to minimise disruption to organised events. This has been incorporated under commitment S05 within **7.2 Outline Code of Construction Practice [Revision B]**.
REP1-168	Holton St Mary Parish Council		The area around Holton St Mary and Raydon is blessed with a network of ancient footpaths (Holton St Mary has ten footpaths recorded in the village), tracks, and bridleways. There are a further two footpaths crossing the airfield at Raydon. (There would be less impact with HVDC.) Mitigation: reinstatement of footpaths to a high standard after construction.	The Applicant notes the concern regarding Public Rights of Way (PRoWs) around Holton St Mary and Raydon. As set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**, all PRoW temporarily affected by the works will be reinstated to their original alignment and condition, to the reasonable satisfaction of the Local Highway Authority, informed by pre- and post-construction condition surveys.
REP1-168	Holton St Mary Parish Council	Traffic and Transport	Being constructed of Type 1 stone, the Temporary Access Road will mean that residents are faced with long days of noise and dust from	The Applicant is proposing to use a section of the B1070 (accessed from/to the A12) as a Primary Access Route (PAR 24 and PAR 25) to join the proposed bypass Haul Road in Holton St Mary. For PAR 24 (B1070, A12 Access) and PAR 25 (B1070 Hadleigh Road), the

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			unbound surface of this access road in addition to the disruption they already experience from the A12 and B1070. According to NG figures, the proposals will see traffic volumes of 327 vehicles per 12-hour day, 189 of which would be HGVs travelling along the temporary access road. This would equate to at least one HGV every four minutes during the 'peak build' year. This disturbance from the temporary access road would be in addition to the circa 38,000 traffic movements per week, with which the residents of Holton St Mary are already contending. Holton St Mary believes this will cause unreasonable noise and disturbance, plus unsafe noise/dust levels for its residents.	Applicant is proposing to have a net increase of 74 vehicles in the AM and PM peak hour, of which 26 are proposed to be HGVs. The proposed duration of this peak is one week. Detail is included in **7.11 Transport Assessment - Appendix E LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]**. The proposed daily trip profile for PAR 24 and PAR 25 (detailed in **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**), is not a consistent peak, with the total number of HGVs fluctuating throughout the construction schedule.
REP1-168	Holton St Mary Parish Council	Traffic and Transport	Mitigation/Action required: Robust measures to prevent unsuitable detours taking place. Investment in speeding enforcement in Holton St Mary and surrounding villages. Measures to prevent erosion and destruction of the surfaces of small country roads? If destroyed, what repair contingencies have been built into the NG costings? At least two weeks' notice for residents of planned road closures to allow for alternative personal plans to be made. (With a clear and well-resourced enforcing/responsible body for enforcement?) What is NG planning to do to protect villagers and the surrounding road networks? It will not be sufficient to merely control traffic at the location of your works. There will need to be an active traffic management plan for light vehicles around the area, as otherwise vehicles will be unlikely not to use HGV diversion routes and will attempt to use narrow lanes as rat runs.	The Applicant has developed **7.3 Outline Construction Traffic Management Plan [APP-309]**, which details the construction routeing strategy in Section 5.4. Construction vehicles are prescribed to travel along designated Primary Access Routes (PARs) to site access points from the Strategic and Major Road Network (for Holton St Mary the PARs are PAR 24 and PAR 25). An instance of HGV drivers not adhering to the agreed routes is defined as a matter of non-compliance and will follow the enforcement procedure detailed in **7.3 Outline Construction Traffic Management Plan [APP-309].** To ensure compliance, monitoring data will be collected from HGVs that are fitted with monitoring devices including the routes taken, timing and speed of vehicles when making deliveries. The Applicant has accounted for the potential use of contingency routes, within the construction period, and will liaise with the Local Highway Authority and National Highways where a contingency route needs to be used for a prolonged period of time. As noted in Section 5.2 of **7.3 Outline Construction Traffic Management Plan [APP-309]**, the Applicant is proposing to undertake pre and post construction surveys on proposed HGV and AIL routes. The scope of these surveys (in terms of the routes covered and the methodology of these surveys) is to be agreed with each Local Highway Authority. The results of these pre-condition surveys will be shared with the LHA prior to works commencing, including pre-commencement works relating to the highway. In accordance with commitment GG06 in **7.2 Outline Code of Construction Practice [Revision B]**, a record of condition will be carried out (photographic and descriptive) of the working areas that may be affected by construction activities. This record will be available for comparison following reinstatement after the works have been completed to enable the standard of reinstatement to meet the condition in the pre-condition survey. The Applicant is proposing to use the Permit Schemes managed and operated by the Local Highway Authority for the street works proposed by the Project. The Main Works Contractor(s) will implement a system to provide information to local residents and occupiers about the works. It is anticipated that a community relations team will be appointed to provide dedicated community relations and external communication support during construction. The information to be

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				provided to local residents will be specific to the works to be carried out, describing the nature of the works, the location and extent of the works, the duration of works and the hours to be worked. The Applicant is proposing signage across a number of routes, including the Primary Access Route indicating that these are the proposed routes for construction traffic associated with the Project to use. Where construction HGVs are found to be using different routes, this is defined as a matter of non-compliance and will follow the enforcement procedure detailed in **7.3 Outline Construction Traffic Management Plan [APP-309]**. Any required diversion on the public highway is for the users of the public highway and not construction traffic, and these will be signed appropriately, following regulations and design guidance. All traffic management associated with the Project will be approved by the Local Highway Authority, and communicated to local residents through the Community Liaison Officer.
REP1-199	Anglian Water		Following a review of the draft DCO and associated application documents submitted for examination, our Relevant Representation [RR-0216] outlined the principal areas we identified in terms of outstanding matters to be addressed through the examination.	The Applicant provided a response to Anglian Water's Relevant Representation (RR) **[RR-0216]** at Deadline 1 in Appendix B of **8.4.1 Applicant's Comments on Relevant Representations [REP1-132].** The Applicant has reviewed the Written Representation submitted by Anglian Water, which does not raise any substantively new points in comparison to the RR, and therefore refers to its response to the RR as stated above, with the exception of two points below.
REP1-199	Anglian Water		A copy of Anglian Water's template Protective Provisions was supplied to the Project Team and their legal representatives through the pre-application period. Anglian Water has welcomed further discussion with the Applicant through the pre-examination period, 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. These are substantively agreed between both parties. Anglian Water will therefore maintain our objection 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), until such time bespoke Protective Provisions for the protection of Anglian Water are [sic – WR formatting issue]. Applicant has confirmed that it is the intention that an agreed set of Protective Provisions will be set within the draft DCO.	National Grid notes the advanced nature of discussions substantially agreeing Protective Provisions and continues engagement with Anglian Water so as to include within the draft DCO a set of bespoke and agreed Protective Provisions between both parties. The ongoing Protective Provision discussions are further noted in **5.9.26 Draft Statement of Common Ground - Anglian Water - Letter [APP-113]**.
REP1-199	Anglian Water		Engagement between Anglian Water and National Grid Energy Transmission (the Applicant) up to the point of submission, and outstanding matters for further discussion are outlined in the draft Statement of Common Ground (SoCG) [APP-113]submitted with the DCO application. This is further referenced in Document 5.8 Potential Main Issues for Examination [APP-087] which identifies	The Applicant is currently engaged in ongoing discussions with Anglian Water seeking to resolve the interactions detailed by the respondent within the Statement of Common Ground between both parties. The Applicant seeks to provide a substantial progress update within Deadline 4 reflecting these ongoing discussions and a finalised Statement of Common Ground at Deadline 7.

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			PMI5 Impacts on Statutory Undertakers and reflects the ongoing discussions with Anglian Water to resolve outstanding issues. Anglian Water has continued to engage with the Applicant throughout the intervening pre-examination period which has included further technical meetings on targeted issues of concern, and these continue to be progressed. It is noted in the Rule 8 Letter that updated SoCGs are required at the mid-examination point, at Deadline 4. We will continue to progress outstanding matters with the Applicant in the intervening period to assist in facilitating the updated draft SoCG with Anglian Water at Deadline 4, with final signed/dated SoCGs expected by Deadline 7.	
REP1-195	The Coal Authority	Land Use	The site to which this submission relates is not located within the defined coalfield. On this basis we have no specific comment to make	The Applicant notes this response.
REP1-283	Water Management Alliance			The Applicant has reviewed the Written Representation from the Water Management Alliance, which provides the ExA with an update on matters following discussions since their Relevant Representation was submitted. The Applicant considers this an accurate reflection of the status of discussions and intends to provide a further update through the **5.9.16 Statement of Common Ground - Combined IDBs - Water Management Alliance (Revision B)** at a future deadline.
REP1-194	Natural England			The Applicant has reviewed the Written Representation from the Natural England, which provides the ExA with an update on matters since their Relevant Representation was submitted. The Applicant considers this an accurate reflection of the status of discussions, as reflected in the **5.9.13 Statement of Common Ground with Natural England [REP1-034]** submitted at Deadline 1. Discussions continue and it is anticipated that a further update will be provided at a future deadline.
REP1-252	Network Rail	3rd Party / Land & Property / DCO & Planning	As currently drafted, the Draft Order (document reference number 4.1) does not contain any protective provisions for the benefit of NR to sufficiently protect its assets and to ensure the safe and efficient operation of the railway (Protective Provisions). As such, Network Rail's required form of protective provisions are not included in Order and crucially there is no restriction on the compulsory acquisition of permanent rights over NR's operational land unless NR's prior consent is obtained. The content and format of the protective provisions required by NR to be included in the Order. The Book of Reference (document reference number 4.3) identifies a significant number of plots of land over Network Rail have own, occupy or have rights over. The relevant plots and interests are identified at Appendix 1 to this representation, together the Plots. For clarity, the total number of affected plots is over 200 as set out in Appendix 1 to this representation, rather than the 400 referenced in our s.56 Representation.	The Applicant acknowledges Network Rail's request for Protective Provisions and to negotiate agreement overland rights. Protective Provisions for the benefit of Network Rail are proposed to be included in **3.1 Draft DCO [Revision B]** 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). 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

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			As set out in NR's Relevant Representation, the Promoter is seeking powers to acquire permanent rights over land owned NR land, for example (these being a few non-exhaustive examples): -Plot B-6/76 - Compulsory Acquisition of Rights Overhead Line over 2,287 square metres, or thereabouts, of railway works and land situated to the south east of Spring Farm, Mid Suffolk -Plot B-6/87 - Compulsory Acquisition of Rights – Overhead Line over 455 square metres, or thereabouts, of railway works and land (London to Norwich) situated to the north west of Coldham Grove, Mid Suffolk -Plot B-6/103 - Compulsory Acquisition of Rights – Overhead line and underground cabling system over 104 square metres, or thereabouts, of railway works and land (London to Norwich) and overhead electricity distribution lines situated to the south west of Coldham Grove, Mid Suffolk 10-108483895-1\43283-5243 -Plot B-12/86 - Compulsory Acquisition of Rights – Overhead Line over 1,788 square metres, or thereabouts, of situated to the south west of Tudor Barn, Mid Suffolk. -Plot C-13/68 - Compulsory Acquisition of Rights – Overhead line and underground cabling system over 4,068 square metres, or thereabouts, of railway works and land (Great Eastern Main Line) situated to the south west of Home Farm Cottages, Tendring. -Plot D-8/6 - Compulsory Acquisition of Rights – Overhead Line - 2,203 square metres, or thereabouts, of railway, works and land (Sudbury Branch Line) situated to the south of Church House Wood, Colchester. These non-exhaustive examples above all comprise operational railway track, which the Applicant is proposing to permanently acquire rights over. NR objects to the use of compulsory powers to acquire permanent rights over the Plots, including but not limited to those identified above, on the ground that such rights need to be subject to NR's prior consent. NR must maintain its objection to the DCO unless and until its required form of Protective Provisions (as per those appended to NR's Relevant Representation) are included in the Order (if granted) on the basis that the proposed compulsory acquisition of rights over railway property does not satisfy the test in section 127 of the Planning Act 2008 in that: a) the rights cannot be acquired without serious detriment to the carrying on of the undertaking; and b) such detriment cannot be made good by Network Rail by use of other railway property. The reason for this is that:	to these comments is awaited. This response has most recently been followed up by the Applicant on the 17 February 2026 and 4 March 2026 and a response is still awaited from Network Rail; Draft heads of terms for an agreement over the land rights were issued to Network Rail on 4 December 2025 and correspondence between both parties has been exchanged making constructive progress on reaching agreed terms. We are awaiting Network Rail's proposed first draft of the Framework Agreement. The Applicant is in discussions with Network Rail to seek to agree a form of Protective Provisions for the benefit of Network Rail to be included in the Order. In the event that it is not possible to reach agreement on the form of Protective Provisions for the benefit of Network Rail, the Applicant will submit Protective Provisions within the draft Order at a subsequent deadline, which are as close to an agreed version as it is possible to reach, along with an explanation as to any outstanding differences between the parties. The Applicant has been through the Network Rail's stage 2 technical clearance process in respect of the technical detail of the crossings of Network Rail Assets and obtained clearance certificates. The Applicant is therefore now seeking to agree with Network Rail the voluntary land rights/easements for the necessary overhead line/underground cable crossings of the Network Rail land and assets, which once in place will address Network Rails concerns about permanent acquisition of easements for overhead power lines/underground cables given as examples in their written representation. If it has not been possible to obtain and conclude the necessary voluntary land rights from Network Rail during the examination period, the Applicant will make submissions in accordance with section 127 and 138 of the Planning Act 2008 to explain the Applicant's reasoning as to why the powers sought do not breach these statutory provisions in light of the Applicant's proposed protective provisions and the requirements to enter into an Asset Protection Agreement.

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			1) many of the plots (over which rights are proposed to be compulsorily acquired and or temporarily possessed) comprise operational railway line; 2) unless NR has the ability to require its prior consent and require the Applicant to enter into an easement containing the rights, restrictions and obligations necessary to properly regulate access to operational railway land for the purposes of constructing and maintaining the authorised development, it gives rise to a risk that NR will breach its obligations to maintain standards of safety required by the Network Licence granted to it by the Office of Rail and Road. It is inconceivable that a third party should have compulsory powers to acquire rights to access railway land without first seeking NR's consent as it introduces a risk to public safety which cannot be accepted under any circumstances; and 3) as this involves operational railway line and assets such detriment cannot be made good as the line cannot be relocated to other land in the possession of NR (and not least to say requiring NR to relocate its operational railway to facilitate such rights would be entirely disproportionate both in cost and nature). Accordingly, the section 127 test is failed on the basis of the current form of the Order, with an absence of protective provisions. Proposed Interference with NR's rights The Promoter is seeking powers in the Order to compulsory acquire rights over and/or temporarily possess third party land over which NR owns rights. This will have the effect of impeding NR's exercise of those rights. NR's rights over the plots set out in Appendix 1 below are required for the purposes of carrying on NR's railway undertaking and so must not be extinguished or impeded (as applicable) by the Promoter through powers granted under the Order. Accordingly, NR objects to the granting of the Order on the 10-108483895-1\43283-5243 basis that in absence of protective provisions for NR's benefit, this does not ensure that NR's ability to exercise the rights are not impeded without its prior consent. NR's required form of Protective Provisions contain the necessary safeguards to ensure that this does not happen and so must be included on the Order in order to preserve NR's ability to carry on its statutory undertaking. NR submits that the proposed extinguishment and impediment of its rights over the Plots will cause a serious detriment to NR's statutory undertaking and so do not satisfy the test in section 138 of the Planning Act 2008. Network Rail continues to investigate the extent of the risk to its assets and is liaising with the Promoter with regards to the form of Protective Provisions to be included in the Order. Until satisfactory agreement has been reached with the Promoter on the form of Protective Provisions, Network Rail will not be in a position to withdraw its objection to the granting of the DCO and hereby	

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			respectfully requests that should the Inspector and Secretary of State determine to grant the DCO that NR's required form of Protective Provisions are included.	
REP1-193	National Highways		The Transport Assessment and sections of the Environmental Statement, including the Outline Construction Traffic Management Plan, contain 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. Full details of NH's objection are set out in NH's Relevant Representation (RR2657). To date, limited progress has been made in relation to resolving those issues. On that basis, the Examining Authority is respectfully requested to refer to NH's Relevant Representation (RR-2657) for full details of NH's objection in this regard.	The Applicant has provided additional detail to these responses within Table T1.1 of **8.4.1 Applicant's Comments on Relevant Representations [Revision B]**. Table 5.9 of **7.3 Outline Construction Traffic Management Plan [APP-309]** includes detail of the proposed junction capacity mitigation measures. The Applicant has and will continue to liaise with National Highways on the proposed measures for inclusion within the final CTMP(s).
REP1-193	National Highways		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 which are relevant to NH 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"). As noted in NH's Relevant Representation (RR-2657), in order to check the ownership status of each land parcel, NH requested shape files from the Applicant. These shape files were provided on 10th February 2026. Now that NH has the shape files it is in the process of checking 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. Following its review, it is NH's intention to respond fully to the proposed Compulsory Acquisition of its land and rights on a plot by plot basis. In addition, it is noted that there are proposals to permanently acquire the freehold interest of 17 plots which the Book of Reference notes NH are a Category 1 Owner. There are two additional plots where there are proposals to permanently acquire the freehold interest which the Book of Reference notes NH are a Category 2 Owner. NH object to the compulsory acquisition of both land and interest to ensure that the safe and efficient operation of the SRN can be maintained by NH, in line with its legal obligations. In relation to plots where freehold land (as opposed to rights) is sought, the Applicant has approached NH with a view to agreeing a list of	The Applicant held a productive meeting with National Highways on Thursday 26 February 2026 regarding: 1. National Highways' assessment of the land parcel shapefile shared by the Applicant with National Highways The Applicant understands that National Highways anticipate issuing a formal response direct to the Applicant in March 2026. Once the Applicant is in receipt of this response, the Applicant and National Highways have mutually agreed to meet again to undertake a detailed assessment of all of National Highways land interests, and the rights sought by the Applicant. The Applicant (including its legal representatives) discussed why Class 1 – Compulsory Acquisition of Land from National Highways was required on a case-by-case basis, which commonly relates to acquisition in order to secure sufficient land for highways widening works to meet the respective highways authorities design requirements. The Applicant discussed potential legal mechanisms available that will allow the Applicant to acquire the land and rights required to construction and operate the Project, whilst protecting National Highways, and ensuring National Highways' ability to conduct its statutory undertaking (particularly in respect of the Strategic Road Network (SRN)) will be uninhibited. The Applicant and National Highways legal representatives are meeting on 16 March 2026 to further this conversation. The Applicant is confident that the outstanding discussions will be taken forwards to find a mutually agreeable approach regarding legal agreements to protect National Highways and its ability to ensure safe and efficient operation of the SRN will be agreed and implemented.

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			affected plots and understanding the interactions on these plots. Work in this regard is ongoing between NH and the Applicant. However, in the absence of any agreement to the contrary, 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) and that the grant of the DCO with such provisions would result in serious detriment to the SRN in respect of NH's ability to ensure the safe and efficient operation of the SRN.	
REP1-193	National Highways		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. It is understood that a separate Written Representation will be submitted by NH as undertaker of the Lower Thames Crossing project	The Applicant welcomes the ongoing discussions with the A122 (Lower Thames Crossing) team to ensure both the A122 and the Norwich to Tilbury project can be successfully delivered. The Applicant has committed to a change in the means of connecting from the Tilbury North Substation to the existing YYJ overhead line that reduces the interaction with the A122 project and is actively pursuing the means to resolve other interactions of concern to the A122 team. Progress is captured within **8.3.4 Statement of Common Ground - Lower Thames Crossing [REP1-075]** with unresolved matters subject to ongoing engagement.
REP1-193	National Highways		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. NH requires the Applicant to obtain its consent before exercising powers under various articles where activities affect the SRN or any land in which NH has an interest. These include articles 11, 12, 13, 14, 16, 17, 18, 20, 21, 22, 24, 25, 26, 27, 28, 29, 30, 38, 39, 40, 41, 44, 45, 47, 49, 50. In addition, please also note NH's objections to Article 55 and 58 set out in NH's Relevant Representation (RR-2657).	The Applicant provided a detailed response in Table T1.2 of **8.4.1 Applicant's Comments on Relevant Representations [Revision B]**.
REP1-193	National Highways		The protective provisions currently included in the dDCO are not agreed by NH. Inclusion of NH's protective provisions in a form acceptable to NH (as set out in Appendix 1) are required to ensure the necessary information is provided at the relevant stages and that NH's consent is obtained wherever access or works are to take place over any part of the SRN or land in which NH has an interest.	**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 Representation) 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. To further this aim the parties have arranged a further meeting on 16 March 2026.
REP1-193	National Highways		NH's Relevant Representation (RR-2657) at paragraph 4 (the impact of the proposed development on the SRN) sets out NH's concerns in relation to the proposed works in relation to physical works, traffic and transport (construction impacts), the Environmental Statement and construction management documents. It is not proposed to set out again the position other than to note that to date no progress has been made with a view to resolving any of the concerns raised.	The Applicant notes this comment and has and will continue to engage with National Highways on the matters (comments /recommendations) raised in their Relevant Representation **[RR-2657]**. Since NH issued its Relevant Representation, the Applicant provided in December 2025 further information in response to certain matters raised in paragraph 4 and held a meeting with NH and its transport consultants AECOM in January 2026 to go through the further information and other matters raised in paragraph 4.

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				At the end of February 2026, AECOM issued two technical notes (Technical Note 03 and Technical Note 04), which the Applicant is reviewing. Technical Note 04 confirms that NH/AECOM consider that nine matters are now resolved. The Applicant is preparing further information to respond to the outstanding matters in paragraph 4. The Applicant and NH also held a meeting in advance of Deadline 1 to discuss updates to the draft Statement of Common Ground between National Grid and NH. Following the meeting, both parties made updates to the draft Statement of Common Ground. The Applicant considers that the updates and additional information provided by National Highways on its position is helpful in terms of progressing the draft Statement of Common Ground. The Applicant is preparing updates to its position in response to the updates made by NH.
REP1-193	National Highways		Work is progressing on the Statement of Common Ground. NH returned its comments to the Applicant on the latest draft on 16th Feb and a response is awaited.	The Applicant is preparing updates to its position in response to the updates made by NH.
REP1-190	Environment Agency	Biodiversity, Ecology & Nature Conservation / Water Environment / Legal	1.0 Biodiversity 1.1 In our relevant representation, we stated that there was some missing information and watercourse surveys. It was subsequently confirmed that some of this additional information was submitted during the course of the Relevant Representation consultation. We are therefore providing further clarification on our current position below. 1.2 We welcome the full results of the watercourse surveys in the Environmental Statement Chapter 8 (their ref: EN020027). 1.3 Having reviewed the updated documents, we still require the following information for review: • A method statement that will manage invasive non-native species (INNS) and biosecurity 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. • Detailed plans for Horizontal Directional Drilling 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). It is understood that these may come at a later stage. The Environment Agency request to be consulted when available. 1.4 We have reviewed the Outline Landscape and Ecological Management Plan (document EN020027). Section 9.7.1 - Environmental Areas of the Outline Landscape and Ecological	1.2 The Applicant notes and welcomes this comment. 1.3. As acknowledged by the Environment Agency, the further information requested will be provided at detailed design stage. The need for pre-construction surveys and method statements for invasive species is already identified in **7.2 Outline Code of Construction Practice [Revision B]** with more detail provided in **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. 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 **7.2 Outline Code of Construction Practice [Revision B]** and will form part of the detailed design. **7.2 Outline Code of Construction Practice [Revision B]**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 **7.2 Outline Code of Construction Practice [Revision B]**, commitment B26, specifically commits to a trenchless crossing method statement and contingency plan for the River Stour crossing by the Main Works Contractor(s), once detailed design is available. 1.4 The Environmental Areas in the **7.4 Outline Landscape and Ecological Management Plan [Revision C]** comprise land that would

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			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. This is something that we can address during the Flood Risk Activity Permit stage as suggested enhancement if watercourse activities at Bramford are involved. Therefore, we are happy for this to be excluded for consideration at this stage but should be read by the applicant for awareness. 2.0 Contaminated Land and Land Quality 2.1 In section 8.4 our Relevant Representation, we stated that backfilled ponds should be risk assessed to determine their backfill and that they should be medium risk and individually assessed. If ponds are within the order limits, we would want them individually assessed. We are satisfied that ponds outside the order limits do not need to be assessed. 2.2 In our Relevant Representation, we provided numerous comments in relation to the potential sources of contamination across numerous sites along the route. We note that the applicants response to the Relevant Representations is also due by deadline 1 End 3 and we will be able to provide a further update at deadline 2 or 3 depending on when this information is made available, or as requested by yourselves. We understand the applicant has stated that some matters will be secured by commitment. We look forward to seeing the applicant's response to our Relevant Representation 3.0 Legal Matters 3.1 Limits of deviation – Article 5 is an unusually detailed limits of deviation article. The vertical deviation article has the potential to give the undertaker too much discretion. For example, in this DCO, Article 5(1)(b)(ii), (c) and (d) states that in respect of the pylons, overhead conductors, fibre-optic earth wires and the underground electric line they can deviate vertically to such extent downwards as the undertaker considers necessary or appropriate. We request to be consulted if any changes are made. This should be detailed in the HRA. 3.2 Discharge of water – Article 20. We are pleased to see that Article 20(7) expressly states that nothing in the article overrides the requirement for an environmental permit. 3.3 Requirements 4(3) states that all pre-commencement operations must be carried out in accordance with the outline code of construction practice, [..] the outline landscape and ecological management plan unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned. Aside from the outline plans on the archaeological side (Requirement 5(4)), this appears to	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. Any Biodiversity Net Gain (BNG) deficit, in order to achieve 10% BNG, will be delivered off-site by registered third-party providers. 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.

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			be the only mechanism to control the pre-commencement operations. 3.4 The Environment Agency are not expressly listed as a consultee on the discharge of any requirements, which is unusual to see. It is important that the There are a number of Requirements included in Schedule 3 of the DCO which NH has an interest and would expect to be consulted upon. Please refer to NH's Relevant Representation, (RR-2657) for the required amendments to the draft requirements. In summary however, in respect of Requirements 7 (Construction hours), 8 (Retention and removal of trees, woodland and hedgerow), 9 (Reinstatement planting plan) and 10 (Reinstatement schemes), reference to consultation with NH is required to be added to these Requirements. In addition, NH require approval powers in connection with Requirement 4 (Construction Management Plans). Reference to approval by NH is required to be added to this Requirement. Furthermore, NH cannot agree to Schedule 4 (Discharge of Requirements) Paragraph 1(2) which is effectively deemed consent. In relation to Schedule 4 Paragraph 2 a period of 28 days for requesting further information is required rather than the 5 days set out in the requirement. Environment Agency is given the opportunity to provide comments where commitments are secured by requirement.	
REP1-189	Defence Infrastructure Organisation	Safety and Security	The MOD have previously been consulted at the Scoping (response sent dated 30 November 2022), the Applicants Environmental Impact Assessment (response sent 16 May 2024), and the Pre-examination of the DCO (response sent 25 November 2025) stages for this development. Following the MOD response to the Pre-examination consultation, the Applicant's Representatives have provided additional information to the MOD with regard to the proposed locations of certain electricity towers. The MOD has completed technical assessments using this information which have confirmed that a section of the overhead power line route, as currently proposed, will physically impact upon a microwave link that forms part of the safeguarded East 2 WAM Network. The disruption of this microwave link will affect the timely conveyance of information received from en-route aircraft which is used by air traffic controllers to derive the identity of an aircraft and its altitude to facilitate their delivery of accurate air traffic control services to air space users in this region. In a meeting between the MOD and the Applicant's Representatives on 19 February 2026, the MOD was made aware that the grid references provided for the electricity towers and/or gantries are subject to a lateral tolerance of 20m in any direction. Further technical assessments will now be undertaken to determine if further impacts may be caused taking account of these limits of variation and the expected height profile of relevant sections of overhead cables.	Within **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** (see paragraphs 15.3.18 to 15.3.19) the Applicant recognises Project infringements of statutory safeguarding zones surrounding the East2WAM Network, Wattisham Flying Station (WFS - aerodrome and associated technical assets) and military Low Flying Areas. Our understanding was informed by the Defence Infrastructure Organisation (DIO) response to the Project's 2024 Statutory Consultation as well as engagement with the operator of WFS which commenced in 2023. **5.7 Policy Compliance Document [APP-086]** recognises the need for the Ministry of Defence (MoD) to undertake their own assessment of potential impacts from the Project, in accordance with the Overarching National Policy Statement for Energy (EN-1, 2024, paragraphs 5.5.40, 5.5.45, 5.5.49 and 5.5.51). As described within Table L1.1 of **8.4.1 Applicant's Comments on Relevant Representations [Revision B]** responding to the Relevant Representation (RR) provided by the DIO **[RR-0895]**, the Applicant has consulted with and made available sufficient information to the DIO, as the representative of the MoD, to enable its assessment of potential Project impacts on these military aviation and defence assets. Prior to DIO engagement, Project information was shared with WFS to inform its consideration of aerodrome-based operations and technical assets. On 2 August 2024, the Applicant shared Project information with the DIO, including the coordinates and heights of the pylons as designed

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			At this time the MOD maintains an objection to the development, as currently proposed, due to the unacceptable impact it would have upon the effective operation of the East 2 WAM Network for the provision of air traffic control services. Wattisham Station Statutory Aerodrome Safeguarding Zones The MOD has undertaken assessments to determine what effects the proposed development might cause using the additional information provided on behalf of the Applicant on 27 November 2025. However, in view of the further information provided by the Applicant's Representatives during a meeting on 19 February 2026, further assessments will need to be undertaken to account for the vertical and lateral limits of variation proposed in the siting and design of lattice towers as well as for cranage or temporal structures that may be used during construction. These assessments will determine the need for any siting and design parameters, or other measures, that may be necessary to maintain the safe and effective operation of navigational aids as well as the critical airspace encompassing Wattisham Station. The proposed development also crosses through the statutory aerodrome birdstrike safeguarding zone that encompasses Wattisham Station. 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 the aerodrome. Having reviewed the proposals, the MOD have identified no safeguarding objection with regard to birdstrike. Military Low Flying Training Areas The proposed development occupies Low Flying Areas 5 and 10 (LFA 5 and LFA 10) 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 military aircraft engaged in low flying training activities in this locality. To address this, it will be necessary for details of the completed overhead line development to be submitted for inclusion on lower airspace charts. In addition, during the construction phase the MOD would wish to be notified in advance of the deployment of cranes or temporal tall or narrow profile structures 50m or greater in height, including details of any aviation warning lighting with which they may be fitted. Summary The MOD objects to this application on the grounds that the development as proposed will physically impact upon a microwave link that forms part of the safeguarded East 2 WAM Network which could result in the degradation of aviation safety. Further technical assessments are ongoing to clarify exactly what impact the development will have on the East 2 WAM Network to define siting and design parameters necessary to prevent the impact identified.	at the time. An explanation that terms of the Development Consent Order would ensure the proposed pylon positions would be subject to Limits of Deviation (LoD) was also provided with this information. We described typical constraints to potential latitudinal, longitudinal and vertical movements, and proposed a meeting to discuss further. On 28 April 2025, following further development of the proposed Project alignment, the Applicant provided information requested by the DIO on 8 April 2025 to enable their completion of revised assessments. This information included coordinates and heights of pylons and other structures (with vertical LoD defined). We proposed a meeting to discuss the information further, once reviewed. Since this information sharing, and prior to the 19 February 2026 meeting, the DIO had not met with the Applicant, despite our various requests for meetings, updates on revised impact assessments, queries on additional information requirements, and proposals for progression of the draft Statement of Common Ground (SoCG) made on 12 May 2025, 5 June 2025, 6 July 2025, 3 October 2025 and 27 November 2025. We recognise, as per DIO correspondence of 18 December 2025, that it is managing a high volume of consultation responses, and its preference to discuss impact assessments on their completion. The Applicant wishes to make clear that the Project information provided to the DIO on 27 November 2025 was not additional to that originally shared on 28 April 2025, except to clarify vertical LoD parameters for gantries. Our latter response also provided general information on LoD parameters and electrical loads. East2WAM Network Following information now received that the Project may potentially interact with the East2WAM at a specified location and the DIO's provision of the network's Safeguarding Plan, on 5 March the Applicant has provided GIS and CAD information to inform the DIO's ongoing technical assessment. Furthermore, we have signposted submitted materials including **3.1 Draft Development Consent Order [APP-056]** where the Project LoD are defined within Article 5, Works Plans showing the lines and situations (and the Table of Parameters) as well as **2.7 Elevation Drawings – Overhead Line Profiles – Part 1 of 2 [APP-044]** for the relevant alignment section, and **2.6.2 Design and Layout Plans – Overhead Lines [APP-042]** to illustrate the overhead line LoD and enhance understanding of Project design flexibility and variability. To this end, we have shared **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139],** providing an overview of the approach to Limits of Deviation. We have also

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			A requirement for additional assessment has been identified following a meeting with the Applicant's Representatives on 19 February 2026. These assessments will be undertaken to determine whether the section of the overhead line development that crosses through the safeguarding zones surrounding Wattisham Station will have any impact upon the safe and effective operation of the aerodrome including the navigational aid technical assets located at the aerodrome.	offered technical expertise to support assessments of potential electro-magnetic interference impacts. Subject to the DIO's confirmation of the extent of any interaction between the Project and the East2WAM asset and clarification of safeguarding parameters that might be required to avoid any potentially adverse impacts, we are confident it will be possible to collaborate to identify and agree appropriate mitigation measures. Engagement is continuing at pace to enable this. <u>Wattisham Flying Station</u> The DIO's 2024 Statutory Consultation representation advised no aerodrome height or birdstrike safeguarding concerns had been identified in relation to Wattisham Flying Station (WFS). Table A15.2.4 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** notes the Applicant's seeking of confirmation of this position via engagement with both the DIO and the aerodrome operator following minor changes to the proposed Project alignment (see also Table A15.2.1). **8.3.38 Letter – Wattisham Flying Station [REP1-106]** describes the 27 May 2025 operator's confirmation it had no outstanding safeguarding concerns regarding the aerodrome but was awaiting an MoD appraisal of the acceptability of the Project infringement of the safeguarding zone for the STAR NG technical asset (not addressed within the DIO Statutory Consultation representation). The letter records the Applicant's decision not to submit a draft SoCG agreed with WFS prior to the DIO's confirmation of its review of the proposed Project alignment. The DIO has recently advised that MoD assessment of potential impacts on WFS aerodrome and technical assets is ongoing to take account of the Project LoD. The Applicant recognises the need to consider these parameters, having undertaken LoD sensitivity testing as part of its impact assessments for civil aerodromes within the Study Area (see paragraphs 15.3.25 to 15.3.26 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**). Subject to DIO confirmation of its impact assessment conclusions, we anticipate the agreement of measures such as restrictions to the LoD within the vicinity of aerodrome assets or operational activity, or the installation of obstacle warning lighting, will minimise potential adverse effects. We appreciate DIO confirmation it has no safeguarding concerns with regards to birdstrike. <u>Military Low Flying Areas</u> The Applicant has signposted its commitment to ensuring Project structures can be accurately charted as per commitment S06 within Table 6.1 of **7.2 Outline Code of Construction Practice [Revision**

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				B]. It is anticipated that ongoing engagement will confirm processes for implementation and monitoring. Following DIO concerns raised regarding potential temporary impacts on the aerodrome, technical assets and military low flying, the Applicant has provided provisional information regarding typical heights of construction equipment to inform ongoing assessments. We anticipate standard construction practices[3], involving Civil Aviation Authority (CAA) notification and crane marking and/or lighting, can be agreed as appropriate mitigation measures.
REP1-167	Hempnall Parish Council		It is our opinion that the use of pylons to transmit the energy from Swardston to Tilbury will cause severe damage to countryside and landscape over a large area of Eastern England including locally in South Norfolk.The National Grid is a private company seeking to minimise cost and it is a matter of deep regret that the planning system seems unable to prioritise protection of the countryside over the economic considerations of a private company. Alternative and better solutions exist, including the use of an offshore ring main or the burying of cables. Even though it is late in the development consent process, we hope that the Planning Inspectorate is able and willing to make a decision that protects our most precious national asset, i.e. the countryside.	The Applicant notes the response from Hempnall Parish Council and the general objection to the Project. The Applicant considers the points raised are addressed in Table 2.1 of the **8.4.1 Applicant's Comments on Relevant Representations [Revision B]** and Section 3 of **8.8.2 Applicant's Comments on Local Impact Reports [Revision A].**
REP1-159			This document was labelled as a written representation on the Planning Inspectorate website at Deadline 1 but is in fact a written summary of the oral submission made at the Open Floor Hearings. It is therefore responded to in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [Revision A]**.	
REP1-181			This document was labelled as a written representation on the Planning Inspectorate website at Deadline 1 but is in fact a written summary of the oral submission made at the Open Floor Hearings. It is therefore responded to in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [Revision A]**.	
REP1-191	Historic England	Historic Environment	Chapter 1.5.3 (Historic Environment Baseline Report) summarises the sources used to support the development of the baseline report. It is noted that BGS borehole data has not been utilised, which seems like a missed opportunity. The BGS borehole data would provide valuable information to characterise the sequence of deposits present, help to understand the archaeological potential as well as the potential impacts of the proposed scheme. We recommend BGS date is incorporated into the assessment and deposit models if the scheme is given consent.	The British Geological Survey borehole data are not included on the list of agreed sources as noted in **6.19 Scoping Report [APP-288 to APP-296]**, **6.20 Scoping Opinion [APP-297]**, **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** and **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209].** However, the data were incorporated into **6.11.A6 Environmental Statement Appendix 11.6 – Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**, which was considered the more appropriate context given the nature of the data.
REP1-191	Historic England	Historic Environment	St Regimus' Parish Church, Roydon (NHLE 1050237, listed grade I). 2.17 Describing the church's setting the applicant (Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic	The Applicant disagrees that the Project would result in '*a high level of less than substantial harm*' for the asset. The Applicant has reviewed the assessment of the asset considering the comments provided.

[3] Civil Aviation Authority (2021) *CAP 1096: Guidance to crane users on aviation lighting and notification*

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			Environment Baseline Report 3.2.403-404) states that the church 'for much of its history, was set within a rural landscape with Roydon Hall (NHLE 1373311, listed grade II) to the north-west, dispersed farmsteads and a complex of moated sites and a manor house to the east-northeast [but] the outskirts of the [modern] town now encroaches on the church to the north and east. The setting of the asset, therefore, makes a moderate contribution to its value, but due to open views to the south and south-west from the asset, the setting extends to the Order Limits.' 2.18 This does not comment on the significance of the landscape to the south of the church and that it can be seen from here on a ridge above the largely undeveloped valley of the River Waveney. This part of its setting illustrates its relationship with an agricultural landscape but also its landmark role and is an aspect of its significance. The EIA Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets, page 204 does comment on the church's 'location on the northern edge of the Waveney Valley' but concentrates on the setting within the churchyard and the partial screening of trees on its boundary. 2.19 It also does not give any weight to the church in its landscape or that the valley side location is particularly important, rather than the northern side (the modern Roydon village). The comment that 'the Project would only be occasionally visible from the asset' does also not address views towards the building. 2.20 While it is true that views from the churchyard to the valley are partial due to vegetation Figure 7.12.F208-HE2ii (viewpoint image HE2ii) is situated close to the church and shows the scale of the proposed pylons from the rising ground on which the church sits and the way they would be an almost unavoidable visual presence in views of the valley from this area. Viewpoint image VP 1.15 (Figure 7.12.F15-VP1.15) is situated to the west of the church on the top of the land above the river valley and shows the proposed pylons in visual relationship to the church tower. They compete with the tower in scale and detract from its prominence in the landscape as well as affect the rural character of the valley landscape 2.21 Looking northwards across the river valley are series of viewpoint images give an impression of how the proposed development would affect the wider setting of the church. Figure 7.12.F207-HE2i (viewpoint image HE2i) shows the church on the rising ground above the valley. In this image the pylons are high above the viewer, giving a good impression of how they would dominate the experience of the valley floor and detract from the experience of the landmark value of the church. Viewpoints VP2.01 (figure 7.12.F207_VP2.01) and VP1.22 (figure 7.12.F22_VP1.22) also look from the bottom of the valley towards the church with the former showing a view across the heath towards the opposite side of the valley. VP1.21 F22 looks from the north side, east of the church, but together they all give an impression of how this landscape would	Although the rural landscape to the south and south-west of the asset has remained undeveloped, the view from the church to the south through to the west is largely screened by mature tree growth and shrubbery. Furthermore, the hedged and tree-lined boundary of the car park and beer garden of the White Hart Public House adds yet more screening to the west of the asset. From the church at ground level the views to the Waveney Valley to the south and south-west are largely obscured by the mature vegetation of the churchyard and White Hart grounds. The Project is between 400 m and 520 m to the south of the asset and will only occasionally be glimpsed through the vegetation and it will not distract from the understanding and appreciation of the church as a communal place of worship nor as an example of 12th to 14th century ecclesiastical architecture. Views to the church from the footpath to the south will include overhead lines and pylon RG86 to the south-west, however, as the footpath heads to the east it passes under the wires revealing uninterrupted views north towards the church. The Applicant considers that, whilst not desirable, the Project's interruption of the views across the Waveney Valley from the southern edge of the church's graveyard does not equate to a high level of less than substantial harm. The Applicant is, therefore, satisfied that the assessment's conclusion of a permanent minor adverse significance of effect (not significant) (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and Lower Less Than Substantial Harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**) is proportionate and appropriate. The Applicant has explored a number of options for the Waveney Valley crossing, including alignments further east and west of the final alignment and an undergrounding option that would cross the Waveney Valley in the same location as the final alignment. All the proposed routes were considered with acknowledgement of heritage, ecological, geological, socio-economic, landscape characterisation and visual impact concerns and well as the Waveney and Little Ouse Recovery (WaLOR) proposals (a Suffolk Wildlife Trust and Environment Agency project). The process by which the proposed route was selected can be found in section 4.6 Crossing of the Waveney Valley in document **5.15 Design Development Report [APP-123]**, with the following conclusion: '*Overall, in terms of routeing at Diss for the crossing of the Waveney Valley, it has been concluded that the alignment (comprising an overhead line) is preferred. Despite the refinement since the statutory consultation, effects arising from the overhead line, including on landscape, community effects and heritage assets, are acknowledged. However, they are not considered to be at a level that engages the policy tests in NPS EN-5 (DESNZ, 2024b) for the use of underground cable in circumstances where the land is not associated with nationally designated landscapes. Even if the test were engaged, there would be detrimental consequences from the use of underground cable either for the WaLOR project, on ecology and soils, or because it is at a cost not justified in terms set out in NPS EN-5.*

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			be dominated by the proposed development. Document: 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets (page 204) concludes that 'the Project would result in a small change to the setting of the asset' but the images produced by the applicant contradict that. 2.22 We therefore do not agree with the applicant's assessment that the development would cause 'Lower Less Than Substantial Harm'. The proposed pylons would dominate the most important part of the church's setting, and we consider this would cause a high level of less than substantial harm, and we consider this is a significant effect in EIA terms. 2.23 We have previously advised the applicant that placing the cables underground through the valley would reduce the harm to the church. This had been included in the discussion at an earlier stage, but the scheme as proposed has reverted to overhead lines in this area. We have also recommended alterative overground routes we explored, but these again have been discounted. This will therefore be an area where there is clear residual harm to the significance of the asset for the lifetime of the scheme.	*Alternative routes with some element of underground cable meet similar challenges. It is National Grid's opinion that these alternative routes are less preferred and that tests in NPS EN-5 Paragraph 2.9.23 are not engaged. Even if the tests were engaged, National Grid's view is that the level of effects are insufficient to clearly meet the terms required by the policy and also that, given the additional adverse effects arising from the installation of underground cables, the change in level of effects does not justify the additional costs. On this basis, it is considered that the alignment comprising overhead line remains preferred.'* Although other options were preferred on historic environment grounds, the proposed pylon route was selected on the basis of a balanced decision informed by an array of relevant concerns and constraints.
REP1-191	Historic England	Historic Environment	Bush Hall (1013 non-designated) 2.24 During our assessment of the route and pre-application discussion with the applicant discussion we identified the site of Bush Hall (see Historic Environment Baseline Report, paragraphs 3.2.413 and 3.2.414). This is a moated enclosure known to be the site of a former medieval house or manor known as Bush Hall (applicants ref 1013). We identified the site as a well-preserved moated site in an unusual location within the Waveney valley. It is not currently inhabited with a later period house and has good surviving form as an earthwork and is relatively undisturbed. Recorded excavations confirms a medieval date and there is clear potential for wet preservation and there are records of organic finds from the riverine location. The asset is sat within a meadow on the edge of the river valley and close to Roydon Church, within the quiet rural location. This situation make a very decent contribution to its setting, and the setting contributes strongly to its significance, and it is in a location currently unencumbered by modern infrastructure. 2.25 Moats are a common feature of the medieval landscape of East Anglia, and a number of the better preserved or unusual examples are designated. We appreciate this not a designated heritage asset at the moment, however it has a clear evidential and historic value which means that there are factors here which would favour designation. This include a well-presented layout, good well-preserved earthworks and likely survival of medieval archaeological deposits. The diversity of features and its wetland location contribute to its overall significance. 2.26 In our view this asset should be considered as having a high value in the assessment with its setting also making a higher contribution that considered in the baseline assessment. The overall	The Applicant disagrees that the asset is of high value without further archaeological evaluation and an assessment of the damage caused in the 1960s when earthworks were destroyed and the moat partially backfilled. The Applicant is satisfied with the medium valuation assessed in **6.11.1A Historic Environment Baseline Report [APP-209]** but acknowledges that this could change based on the results of any potential fieldwork. Although partially within the Order Limits, this is due to oversail by the overhead line conductors and Bush Hall moated site is located outside areas of known impact and so physical impact on the asset by the Project is not anticipated. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** is currently in development in conjunction with all relevant statutory bodies including Historic England, and measures to ensure the physical preservation of the asset can be agreed and included in the document. Included measures could consist of toolbox talks for the construction workers and the physical fencing-off of the asset to avoid any accidental damage by construction plant. With regard to the potential for the construction works to require dewatering, **7.2 Outline Code of Construction Practice [Revision B]** states: *'GH07 - Any temporary dewatering activities during construction will be undertaken in accordance with Environment Agency guidance (Environment Agency, 2023b. Environment Agency, 2022. Environment Agency, 2021a, Environment Agency 2021b) including appropriate assessment undertaken as required by the guidance (Environment Agency, 2007), and if required, an Abstraction Licence and Environmental Permit (for the discharge) will be obtained, and the*

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			magnitude of effect would we believe also be higher, although we are aware this has already been noted by the applicant as a significant effect. We also consider that this asset would need to be considered under the policy EN 1 para 5.9.8. 2.27 The impact from the development upon this site is likely to be very severe, primarily from the closeness of pylons RG85-87 which are located immediately adjacent to the asset. This is a concern and we would welcome further conversation with the applicant as to whether there is any further mitigation possible for this site to reduce the high overall effect of the new pylons.	*works will be limited to the depth and time required to facilitate construction activities.*' And: *'GH14 - During dewatering of excavations, any water removed would be discharged as close to the excavations as practicable in line with GH07. Water would be discharged so that the dewatered groundwater body is recharged as much and as soon as practicable.'* With the above controls in place, there is an extremely unlikely potential for physical impacts on the asset. The Applicant, therefore, considers the assessment of the asset presented in **6.11.1A Historic Environment Baseline Report [APP-209],** and **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** as a permanent moderate adverse significance of effect is appropriate and proportionate.
REP1-191	Historic England	Historic Environment	St Mary's Parish Church, Burgate (NHLE 1032797, listed grade II*). 2.28 The applicant has considered the significance and setting of the church in Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.3.311-312. This states that 'the surrounding agricultural landscape, with which the asset has a historical relationship…informs the setting [which] makes a considerable contribution to its value, and due to the proximity of the Project, the setting extends to the Order Limits.' While there is some planting on the boundary there are clear views from the churchyard towards the Order Limits with the proposed pylon RG104 some 788 m away. The ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 245) comments on the screened views from the churchyard and concludes that the proposed development would harm the significance of the parish church at a lower level of less than substantial harm. 2.29 We do not disagree with this level of harm but consider the issue of views towards the church tower as a landmark seen above a shallow valley has not been fully considered in the applicants' assessment. There are existing electricity pylons in this wider setting, but the proposed development is likely to increase that impact and with it the level of residual harm. An image taken from west of the church (Figure 7.12.F25_VP2.04) gives an indication of the how the development would appear in the landscape to the south of it. This could affect the experience of seeing the church in this wider landscape and potentially harm its significance. This might still be harm within the category of lower less than substantial harm but would add to it.	The Applicant has reviewed the assessment of the Church of St Mary in light of the respondent's comments and acknowledges that views towards the asset also inform its setting. However, as the existing PKF 132 kV overhead would be removed and replaced by the proposed 400 kV overhead line, therefore not increasing the amount of overhead line infrastructure in the setting, the Applicant is satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of minor adverse and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm are appropriate. The Applicant therefore proposes to make no changes to the assessment as the conclusion is broadly agreed.
REP1-191	Historic England	Historic Environment	Mellis Conservation Area, including the Parish Church of St Mary the Virgin (NHLE 181735, listed grade II*). 2.30 The applicant has considered the significance and setting of the church and conservation area in document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report.	The Applicant has reviewed the assessment of Mellis conservation area in light of the respondent's comments. The Applicant acknowledges the that view south-west from within the conservation area will include pylons at a distance of over 1 km, and that pylons will be visible in the background of Hall Farm Barn (1032806). The pylons

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			Paragraph 3.3.27 states that 'the setting of the conservation area … makes a considerable contribution to its value, but due to the proximity of the Project within the agricultural landscape c. 120 m to the north west, the setting extends to the Order Limits.' The Baseline Report also comments on St Mary's parish church (paragraphs 3.3.319-320) confirming that '…the setting…is also informed by the surrounding agricultural landscape with which it as a historical relationship. The mature graveyard of the church instils a sense of privacy and peacefulness and so the setting of the asset makes a considerable contribution to its value. Due to proximity of the Project the setting of the asset extends to the Order Limits.' 2.31 We accept this assessment but feel the common at the heart of Mellis conservation area is of particular importance. This part of northwest Suffolk has a number of large commons surviving, but Mellis is one of the more dramatic. This is partly due to its linear layout, and because historic and later development is set along its edges, not dividing it as seen elsewhere. Views westwards along the common should therefore be given particular emphasis when assessing significance and impact upon it. 2.32 Two useful images have been submitted with the application to suggest the likely visual impact of the development on the common and western part of the conservation area. Figure 7.12.F242-HE33 (Viewpoint HE33) shows an image from the eastern end of Mellis conservation area. Rather than looking directly out from the end of the common it is situated to one side of the main axis of the historic common but does give an impression of the line of proposed pylons flanking the conservation area to the north and west. The image from Viewpoint VP2.05 (Figure 7.12.F26_VP2.05) is in the western third of the common looking to where pylon RG102 would be some 635 m away. No images are provided or assessment made of the effect on approaching the common and conservation area, with the exception of viewpoint 2.49 (figure 2.17.F67_VP2.49). This gives an indication of the experience if approaching from Little Green to the north from where the development would appear to pass in front of and then curve around the western part of the common in a dramatic manner. From these three images we consider the development would detract from the setting of the conservation area, in particular the agricultural setting of the historic common and conservation area, but we do not feel they fully represent the full impact on the landscape setting. 2.33 The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 246) considers impact on the conservation area and states that 'due to screening by vegetation the Project would be occasionally visible' and concludes that the proposed development would harm the significance of the listed building at a lower level of less than substantial harm. As noted above, we feel this is not based on a broad enough notion of how the developing might affect a substantial part of the conservation area	here, however, will be replacing existing PKF 132 kV overhead line of smaller pylons. The Applicant does not agree that a '*closer to a mid-level of less than substantial harm'* is possible as the only tangible adverse impact is the pylons in the long-distance view to the south-west. The Applicant does not discount this impact but considers this particular view is proportionally a small contributor to the overall understanding and experience of the conservation area. The Applicant is therefore satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of negligible adverse significance of effect and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm, are appropriate. The Applicant therefore proposes to make no changes to the assessment.

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			and we conclude the level of harm might be closer to a mid-level of less than substantial harm. 2.34 Views from the churchyard of the parish church are restricted by vegetation and the building does not have a strong presence beyond its immediate setting. However, ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets page 218 states that the Project would be within the setting of the church. There are existing electricity pylons to the north of the church which would be replaced by the proposed development. The impact of these is not assessed by the applicant, but we would agree that their harmful intrusion into the largely rural setting of the church would not be increased by the proposed development.	
REP1-191	Historic England	Historic Environment	Moat Yard Plantation Mellis (2253 3.3.372) non designated of equivalent value 2.35 This is another site similar to Bush Hall where the expression of the moat – in this case a possible double enclosure would merit a higher valuation. We note this feature is not shown on Fig A11.1.2 (pp 9 of 43) and would recommend the applicant revisit the assessment of affects on this asset in light of its evident significance.	The Applicant acknowledges that asset (2253) is missing from Figure A11.1.2: Non-Designated Heritage Assets as included in **6.11.1A Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and apologises for the error. Corrected versions of two of the figures from this appendix were submitted at Deadline 1 as errata: **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report Figure A11.1.1 - Designated Heritage Assets [REP1-063]** and **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report Figure A11.1.2 - Non-Designated Heritage Assets [REP1-064]**. The Applicant disagrees that the asset is of high value without archaeological evidence regarding survival but acknowledges its value could change based on the findings of any potential fieldwork. As the asset is located outside the Order Limits and approximately 440 m from the nearest pylon there would be no physical impact and therefore the Project does not propose to undertake any fieldwork within the asset. The assessment concludes the asset is of medium value and that its setting makes a moderate contribution to its value (**6.11.1A Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**). Given its current tree covered condition the Applicant considers that this is a reasonable conclusion for the information available at this time.
REP1-191	Historic England	Historic Environment	Roydon Hall (NHLE 1033215, listed grade II*) and Barn to the North West (NHLE 1284584, listed grade II*), near Creeting St Peter. 2.38 The applicant has considered the significance and setting of the listed buildings in document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.3.1176-1177. This notes the surrounding agricultural landscape 'with which the assets and the non-designated outbuildings have historical and ongoing functional relationships. The setting of the assets, therefore, makes a considerable contribution to their values, and due to the proximity of the Project, the setting extends to the Order Limits.'	The Applicant has reviewed the assessment of the listed Roydon Hall and Barn to the North West and the associated non-designated heritage assets in light of the respondent's comments. The Applicant acknowledges that views back towards the assets from the east beyond 350 m away will include the Project and that the pylons would be seen in the distance in the background of the assets as they are approached along the unnamed private access road. The Applicant is satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of moderate adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of mid less than

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			2.39 The line of proposed pylons would pass to the east of the complex, the closet of which (RG158) would be some 300 m away. The principal frontage of Roydon Hall faces west, so the pylons would be seen from the rear but at that distance they could have a profound impact on views to the fields which, which the Baseline study confirms are part of its setting and make a positive contribution to significance. The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets Hall pages 235-6, state that such views 'would be broken by the asset's outbuildings, the mature trees of the asset's grounds, and mature hedgerows of the Intervening landscape.' 2.40 It is further stated that 'no key views of the asset would be impacted by the Project' although what constitute 'key views' is not set out. We would contend that one key view might be of the farm complex as a whole in its agricultural setting, though this has also not been addressed in the applicant's assessment. A particularly illustrative view is from the east with the main approach to the farmstead and where the frontage of the Hall and the whole group can be seen. Given that the pylons are close to the eastern side of the group there is potential for them to be seen as rising above the buildings to dominate them and their farmland setting in this 'key view'. 2.41 No viewpoint image has been produced to aim an assessment of this effect. However, viewpoint image 2.14 (Figure 7.12.F35_VP2.14) is taken from some distance to the east of the Hall and does not have the listed building as its focus but does give some indication of the likely appearance of the proposed development and how it would change an otherwise agricultural landscape. 2.42 The applicant's conclusions about harmful impact seem to be based on views from the listed buildings rather than views of them in their landscape setting. The EIA, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets Hall (pages 235-6) concludes that 'the Project would result in a moderate change to the setting of the asset resulting in a medium impact on its value. It is concluded, therefore, that the asset would experience Mid Less Than Substantial Harm.' We consider a mid-level of harm is likely, but this would be amplified by that impact on the wider setting.	substantial harm are appropriate. The Applicant therefore proposes to make no changes to the assessment as the conclusion is broadly agreed.
REP1-191	Historic England	Historic Environment	2.43 The applicant has considered the significance and setting of Creeting Hall in document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.3.1184-1185). This notes that its setting includes 'surrounding agricultural landscape, with which the asset has historical and ongoing functional relationships. The setting of the asset, therefore, makes a considerable contribution to its value, and due to the proximity of the Project, the setting extends to the Order Limits.' 2.44 The application includes figure 7.12.F244-HE35 (Viewpoint HE35), an image taken in the rear garden of the listed house from	The Applicant has reviewed the assessment of Creeting Hall in light of the respondent's comments. The Applicant acknowledges that views east and south-east from within the asset's grounds will include wires and pylon tops. The Applicant also accepts that the Project would interrupt the view of the asset from Mill Lane c. 670 m to the north-east. The Applicant, however, disagrees that the adverse impact on the asset caused by the Project could be at the upper level of mid-level less than substantial harm as the Project does not lessen the understanding of the asset as the heart of a working farm complex. Nor does the Project diminish the relationships the asset has with the

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			where pylon RG164 would be some 190m away. This suggests the proposed development would be screened by vegetation on the garden boundary. However, it appears from the image that pylon RG164 is, in this precise view, masked by trees and that the upper part of it does not feature in the image. It is possible it would be more clearly seen by moving the viewer slightly to the left and slightly raising the view. From that viewpoint the pylon might be clearly seen and given the distance have a pronounced, even dominant effect. 2.45 Furthermore, the image location does not assist in considering how the pylons might appear when approaching the house or in views of it from the east and northeast. From these directions the Hall can be seen in a shallow valley surrounded by fields and the pylons could be pronounced features in this setting. Another viewpoint image (number 2,28, Figure 7.12.F49_VP2.28) is reasonably close to the listed building and its farmstead complex. However, this on low lying ground next to the River Gipping so any vegetation obscures much of the historic complex. This image does suggest the proposed pylons would be clearly visible from close to the Hall though a view from directly in front of Creeting Hall would show the pylons more directly relating to the listed building and potentially dominating it. 2.46 The applicant has assessed the visual impact in the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 Assessment of Harm to Designated Heritage Assets, page 238). This again refers to partial views from the building with no reference to landscape setting and concludes that the asset 'would experience Mid Less Than Substantial Harm.' We broadly agree with this categorisation, but in light of our comments above we are of the view that this impact could be at the upper level of mid-level less than substantial harm to the significance of the listed Hall.	non-designated elements of the farm complex, and which positively contribute to the contribution the setting makes to the asset's value. The Applicant is therefore satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of medium adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of mid less than substantial harm are appropriate. The Applicant, therefore, proposes to make no changes to the assessment.
REP1-191	Historic England	Historic Environment	2.48 Badley Green conservation area is a remarkable site containing an important group of buildings. It has a rural setting but is already affected by electricity pylons passing across part of the area. The edge of the conservation area closest to the proposed development would only be some 375 m from RG166 but image VP2.16 (Figure 7.12.F37_VP2.16) which is situated inside the conservation area near the church suggests the proposed pylons, where visible, would be distant from this part of the area and would not add to the impact of the existing pylons. 2.49 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report) considers the conservation area, (paragraphs 3.3.46-49), and the other assets (paragraphs 3.3.528-531). This notes that 'the surrounding agricultural landscape, with which the elements of the Badley Hall Farm complex have a historical and ongoing functional relationship, also contributes positively to the setting' (paragraph 531) but concludes that '…due the focus of the setting being on the former manorial site, the farming complex and the immediate agricultural	The Applicant has reviewed the assessment of Badley Church Green conservation area in light of the respondent's comments. The Applicant acknowledges that the north-eastern limit of the conservation area is closest point to a pylon being c.360 m north-west of pylon RG167. The focus of this section of the conservation is, however, very much focused on the tree lined approach to church and other listed buildings within the conservation area. The views out from the conservation area to the north-east and south-east are crowded by modern residential development, and whilst moderately long-distance glimpsed views of pylon tops and wires might be visible, these views do not contribute to the value of the conservation area at all. The Applicant is, therefore, satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of negligible adverse significance of effect and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm are appropriate.

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			landscape, it does not extend to the Order Limits.' Viewpoint image VP2.16 appears to confirm this conclusion, but it is unclear if the agricultural landscape around the northern end of the conservation area would be more affected due to its proximity to the proposed development. Should this be the case it might result in a low level of less than substantial harm to the conservation area, rather than to the individual listed heritage assets.	The Applicant, therefore, proposes to make no changes to the assessment as the conclusion is broadly agreed.
REP1-191	Historic England	Historic Environment	Little Wenham Castle (NHLE 1003759, Scheduled, and NHLE 1033405, listed grade I), St Lawrence's Parish Church (NHLE 1033410, listed grade I) and Barn North of Castle (NHLE 1194552, listed grade II*). 2.57 The document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report considers the significance and setting of Little Wenham Castle and the two other highly-graded listed buildings which form part of the historic complex, St Lawrence's parish church and the barn to the north of the Castle. The complex also includes five buildings listed at grade II: Little Wenham Hall Farmhouse (NHLE 1285599), the Garden Wall Approximately 20m Northwest of Little Wenham Castle (NHLE 1033406), the Farm Buildings Complex to West of Barn and Buildings Listed 3/80 Little Wenham Castle (NHLE 1351958), the Farm Buildings Complex Approximately 50 m North of Little Wenham Castle Adjacent to South of the Churchyard (NHLE 1194648) and a monument in the churchyard (Table Tomb and Enclosing Railings Approximately 14 m South of South Wall of Chancel, Church of St Lawrence, NHLE 1194704). 2.58 Paragraph 3.4.269 concludes that the proposed development would be visible from the Castle roof, but otherwise its setting does not extend to the Order Limits. Paragraphs 3.4.270-271 consider the church and conclude that its setting does not extend to the Order Limits. Paragraph 3.4.535 concludes that the grade II* listed barn's setting also does not extend to the Order Limits. The grade II listed buildings are also reviewed, and it is concluded that their settings do not extend to the Order Limits. 2.59 Two viewpoint images have been provided with the application to help establish the extent of any impact. Figure 7.12.F209-HE3 (Viewpoint image HE3) shows the view from the roof of the Castle towards the proposed development approximately 1km away. Pylons are visible in part of this view of a landscape largely rural in character. They detract from this, but do not appear to dominate the scene. The map extract showing the location of viewpoint 3.09 (Figure 7.12.F79_VP3.09) is not detailed, but it appears to be adjacent to the grade II* listed barn at the northern edge of the complex. This image shows the line of pylons in the distance, partly hidden by the landform. They are relatively modest features in this view, but this seems to contradict the applicant's conclusion that the setting of the grade II* listed barn does not extend to the Order Limits. Given the relatively low height of the proposed pylons in this viewpoint image and the effect of vegetation and other buildings it	The Applicant has reviewed the assessment of the Grade II* Barn Approximately 150 Metres North of Little Wenham Castle and West of Church of St Lawrence in light of the respondent's comments. The Applicant acknowledges that the line of pylons in the distance may potentially be seen from the Grade II* listed barn. However, the Applicant disagrees with the assumption that intervisibility alone means the setting of the barn extends to the Order Limits. The setting of a heritage asset is not defined solely by whether it is visible from or has visibility to a development. In line with established heritage guidance, the Applicant has considered all relevant factors and has concluded that the setting does not extend to the Order Limits despite some visual connection. Therefore, the Applicant considers the assessment undertaken within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** is appropriate.

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			seems likely they would not be seen from the church, at ground level at the Castle or from the grade II listed Little Wenham Hall and farm buildings NHLE 1351958 and NHLE 1194648. 2.60 In the ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 249) the applicant concludes that the proposed development would result in a low level of less than substantial harm to the significance of the Castle. The importance of views from the Castle roof should not be underestimated, showing as they do the landscape in which it functioned as still largely agricultural in character, but we would agree with the applicant's assessment, although the harm might be closer to a mid-level. As regards the grade II* listed barn, we consider the significance of this would also be harmed, at a low level of less than substantial harm.	
REP1-191	Historic England	Historic Environment	All Saints' Parish Church, Fordham (NHLE 1239789, listed grade I). 2.68 The ES, document 6.11.A1, Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.5.148-149) assesses the significance of All Saints' church. It goes on to describe how the 'setting does not extend to the order limits' due to planting around the churchyard and nearby historic and modern buildings. When visiting the site views from the churchyard towards the closest pylon (TB047, some 523 m away) are more open than the applicant's assessment suggests with potential for the pylons to be partly visible above or between the intervening buildings. Viewpoint image VP4.08 (Figure 7.12.F106_VP4.08) is taken from a location near the church. This shows the proposed pylons diminishing in size towards the south, but larger to the north. It also shows the church tower visible above adjacent trees and houses. This gives further cause to conclude there is potential for visual impact on the setting of the church, although this would result in harm to its significance a low level of less than substantial.	The Applicant has reviewed the assessment of All Saints' Parish Church, Fordham in light of the respondent's comments. The Church is located close to the southern edge of Fordham on the western flank of Church Road. The grounds of the comparatively small parish church contain occasional mature trees, and the eastern flank of Church Road is lined with two-storey residential properties with attendant mature hedgerows and trees. To the immediate south is Fordham Hall and associated farm complex, whilst to the north is a moderately sized 20th century residential housing estate. On the northbound approach to the church along Mill Road/Church Road and to the south of where the Project oversails the road, the church is not visible. This is due to mature hedgerows and tree cover in the intervening landscape as well as the local topography falling away to the south. Moving northwards the church is not visible until the southern edge of the village is reached. On the southbound approach to the church along Church Road, the asset is not visible until the viewer is within approximately 300 m. The view south along Church Road from this point will include the church roof and tower to the left and likely pylons off to the left of the vista at a distance of c.700 m. The visibility of the Project will be restricted, however, by mature hedgerows and a copse in the intervening landscape, as well as the topography falling away to the south. The westbound approach to the church along Fossetts Lane does not offer a view of any part of the asset until the viewer reaches the intersection of Fossetts Lane and Church Road. There are no views of the asset from Fossetts Lane that will include the Project in the intervening landscape. This indicates that the church, whilst being a focus for the village, is not a dominant feature of the wider landscape. The Applicant therefore considers the assessment undertaken within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** is appropriate.
REP1-191	Historic England	Historic Environment	Barn South West of Little Tey House (NHLE 1266779, listed grade II*).	The Applicant has reviewed the assessment of Barn South West of Little Tey House in light of the respondent's comments. The Applicant acknowledges that the Project will introduce pylons and wires to within 200 m of the asset impacting its setting and consequently its value.

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			2.73 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.5.417-418) notes that the agricultural setting of the barn (and the nearby grade II listed Little Tey House, NHLE 1266823) makes a considerable contribution to its significance and confirms that the setting extends to the Order Limits. Viewpoint image HE27 (Figure 7.12.F235 HE37) is taken from immediately south of the listed barn. The proposed pylons are very close to the building (pylon TB064 is only some 186 m away) and the land is level and open. The garden shown in the image is quite domestic and designed in character with nearby agricultural buildings and outbuildings to the property, but beyond this are trees and hedges of a wholly agricultural character over which the pylons rise. 2.74 The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 277 concludes 'that the asset would experience Mid Less Than Substantial Harm.' We agree with this, although the dominant scale of the pylons and the importance of this side of the barn having a clearer relationship to fields would make that of a high order of mid-level high less than substantial harm.	The Applicant, however, disagrees with the respondent's assessment that a 'high order of mid-level high less than substantial harm' should be applied. The methodology by which the Applicant's conclusion of mid less than substantial harm is recorded in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** presenting three categories of less than substantial harm with no further subdivisions. The Applicant is satisfied that the Project would not constitute upper less than substantial harm as defined in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** and, therefore, that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of moderate adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of mid less than substantial harm, are proportionate and appropriate.
REP1-191	Historic England	Historic Environment	Feeringbury Manor (NHLE 1306710, listed grade II*) and Ancillary Building to Southeast (NHLE 1123828, listed grade II*). 2.86 Feeringbury Manor and the ancillary building (which has been suggested to incorporate the remains of a chapel) are part of a farmstead including a waterwheel mounting (NHLE 1337602, listed grade II) and barn (NHLE 1123829, listed grade II) and non-designated farm buildings of 19th century date. Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.6.91-92) comments on the significance of Feeringbury Manor and the ancillary building. It also looks at the setting, identifying the agricultural landscape as contributing to their significance, although we consider its contribution is more than the 'moderate'; level suggest. The section concludes by confirming that the setting of the two highly graded listed buildings extends to the order limits. 2.87 The closest pylon to the Manor (TB077) would be some 310m away. The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 289) states that 'due to screening by mature vegetation and buildings, the Project would only be occasionally visible.' An image (figure 7.12.F246-HE37, Viewpoint HE37) has been provided with the application but is taken from the road beside the Feeringbury Manor complex, looking at the grade II listed barn (NHLE 1123829). The Manor and ancillary building are behind and to the north of the barn so viewpoint HE37 does not assist in determining the visibility of the proposed development from their vicinity. However, it does show the scale of the pylons to the east side of the complex. The farm buildings might wholly or partly	The Applicant acknowledges that the Project would be an intrusive element within the rural landscape as the private access road to the complex of heritage assets is approached along Coggeshall Road either from the south-east or the north-west. However, the mature tree and shrub cover of the large grounds of the heritage complex and the topography dropping down towards the course of the River Blackwater provides considerable screening. The Applicant acknowledges that views to and from the asset complex from the south were under represented in the assessment, but due to the greater distance (c. 600 m), the mature vegetation of the assets' grounds, and the mature vegetation and topography of the River Blackwater valley, the assets are well screened from any more than minor impact. The Applicant is satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of minor adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm in regard to Feeringbury Manor and Ancillary Building to Southeast (both Grade II* listed) are appropriate.

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			obscure them in views from the immediate vicinity of the Manor to the east, but the development would have a pronounced impact on the wider setting on this side. The proposed line of pylons would pass to the east of the complex before turning to pass to the south. It is possible they would be seen when looking to the south from the immediate vicinity of the Manor, and although they would be further away this might still detract from the rural setting. 2.88 In assessing this visual impact ES Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets page 289 'due to screening by mature vegetation and buildings, the Project would only be occasionally visible.' On this basis it is concluded that the highly graded listed buildings 'would experience Lower Less Than Substantial Harm' to their significance. No detailed comment is offered about views southward from the immediate vicinity of the Manor and ancillary building, but the applicant's assessment seems to be wholly concerned with views out from the farmstead towards the development. What image HE37 seems to illustrate is how dominant the pylons would be when approaching it, particularly the eastern entrance to the farmyard but potentially when approaching from the south. For this reason, we consider the level of harm might be higher, perhaps approaching a mid-level of less than substantial harm.	
REP1-191	Historic England	Historic Environment	Parish Church of St Mary and All Saints, Rivenhall (NHLE 1169594, listed grade I) and Roman Villa, Anglo-Saxon Hall, Cemetery and Church Site, Around and to the North and East of St Mary and All Saints' Church (Scheduled Monument NHLE 1013831). 2.93 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.6.45-46) comments on the scheduled site. This states that 'the setting has been eroded by the imposition of the church, by the residential development of the village of Rivenhall immediately to the south and by the Rivenhall Hall farming complex to the north.' We would disagree with this assessment. Firstly, the presence of the medieval All Saints' church is part of a long history of occupation on this site which enriches our understanding of it, rather than detracts from it. Secondly, the proposed development would affect the rural area to the north of the scheduled site, so we do not consider the presence of modern development to the south to be relevant to the assessment of impact.	The Applicant has reviewed the assessment of the scheduled monument 'Roman villa, Anglo-Saxon hall, cemetery and church site, around and to the north and east of St Mary and All Saints Church' (1013831) in light of the respondent's comments. The Applicant considers that the setting of this asset is principally informed by the surrounding agricultural landscape, including areas both to the north and south. However, the original field systems and trackways likely associated with the villa estate have been largely replaced by post-medieval land divisions, resulting in an erosion of the contemporary landscape context. While the presence of the medieval All Saints' Church reflects a long history of occupation and contributes to the understanding of the site, it also represents a significant historic landscape change that has altered the asset's original setting. Similarly, the residential development of the village of Rivenhall to the south and the Rivenhall Hall farming complex to the north have further modified the landscape, impacting the monument's setting. Given these landscape changes and the limited extent of known contemporary features beyond the monument boundary, the Applicant is confident with its conclusion within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. This assessment reflects the balance of factors informing the setting and is consistent with the methodology and guidance applied throughout **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**.

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REP1-191	Historic England	Historic Environment	Cressing Temple (NHLE 1002122, Scheduled), including Wheat Barn (NHLE 1123866, listed grade I) and Barley Barn (NHLE 1123865, listed grade I). 2.97 The Baseline Report (Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, pages 3.6.104-107) provides a summary of the history of this remarkable site and a brief assessment of the significance and setting of the group of heritage assets, which as well as the highly-graded designated assets also includes four grade II listed buildings: Cressing Temple Farmhouse (NHLE 1168891), the Wagon Lodge (NHLE 1169011), the Granary/Stable Block 70m South of the Farmhouse (NHLE 1123867) and the wall enclosing the walled garden 15 m east of the farmhouse (NHLE 1168978). 2.98 The report notes the surrounding agricultural landscape with which the heritage assets 'have historical and former functional relationships' and which 'makes a considerable contribution to their value.' It concludes (paragraph 107) that the setting of the Scheduled monument, Barley and Wheat Barns, Farmhouse and Granary/Stables extend to the Order Limits. However, it also concludes (paragraph 106) that the setting of the Wagon Lodge and Garden Wall is 'focussed on the Scheduled Group' to the extent that their setting does not extend to the Order Limits. As the Wall has a direct visual relationship with the land between it and the Order Limits and the Wagon Lodge is immediately adjacent to the Granary/Stables and no more or less related to other historic farm buildings than it we are unclear how this conclusion has been drawn. We consider the setting of these heritage assets also has potential to be affected by the proposed development.	The Applicant has reviewed the assessment of the wall enclosing the Walled Garden 15 m East of the Farmhouse and the Wagon Lodge within the Cressing Temple complex in light of the respondent's comments. The Applicant disagrees with the assumption that intervisibility alone means the shared setting of the wall and lodge extends to the Order Limits. The setting of a heritage asset is not defined solely by whether it is visible from, or has visibility to, a development. In line with established heritage guidance, the Applicant has considered all relevant factors and has concluded that the setting does not extend to the Order Limits despite some distant visibility. Therefore, the Applicant is satisfied with the assessment undertaken within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**.
REP1-191	Historic England	Historic Environment	St Mary's Parish Church, Fairstead (NHLE 1337780, listed grade II*). 2.106 The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report paragraphs 3.6.153-154) considers the significance and setting of the parish church, noting that it was 'originally designed to be viewable from the surrounding landscape' with which it 'still retains a functional and historical connection'. It states that 'there is likely to be some intervisibility between the asset and the Project' but concludes the setting of the church would not reach to the Order Limits as 'the Project is located in the neighbouring White Notley civil parish'. It is unclear why the parish location is relevant to this conclusion. 2.107 Rural historic churches are commonly landmarks visible beyond the limits of the ecclesiastical parish to which they ministered. This is particularly the case in East Anglia where prominent towers are often found, the result of local church building traditions over several centuries. But rather than acting as some form of limit to setting these long-distance views over multiple parish areas (which can include intervisibility from one church to another) actually enhance an understanding of their role within a large pattern of historic faith communities.	The Applicant has reviewed the assessment of St Mary's Parish Church, Fairstead in light of the respondent's comments. The Applicant acknowledges that in some cases views across neighbouring parishes and intervisibility between churches can have deep historic roots and be an important element when assessing the setting of a heritage asset. The relationship between the parishes of Fairstead and White Notley to the north have been reviewed and the respective parish churches are not visible until the outskirts of each settlement is reached. This is due to the rolling topography of the intervening landscape and screening by mature tree lined hedgerows, copses and tree belts. In the case of St Mary's Parish Church, it is therefore considered appropriate in this instance to describe the extent of its setting in terms of its parish boundary. Consequently, the Applicant considers the assessment undertaken within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** is appropriate.

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			2.108 Setting this aside, viewpoint image number 5.08 (Figure 7.12.F143_VP5.08) is supplied with the application to assist in assessment of impact. This was taken from the opposite side of the village lane from the church and shows pylons in the distance adding to the effect of an existing one. The proposed pylons appear to be some 900 m from the church and are not dominant in this view, but we consider they would further detract from the otherwise rural character and result in a low level of less than substantial harm to the significance of the church.	
REP1-191	Historic England	Historic Environment	Newney's Farmhouse, Ranks Green (NHLE 1123450, listed grade II*). 2.109 The line of proposed pylons would be some 250m from Newney's Farmhouse, compounding the effect of an existing line of pylons approximately 1.3km away. The ES (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.6.137-138) considers the significance of Newney's Farmhouse as well as the adjacent grade II listed barn to the southeast (NHLE 1337819). This notes that the group and its surrounding landscape 'considerably contribute' to the significance of the highly graded listed building, the setting of which extends to the Order Limits. 2.110 The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets page 293, concludes that due to 'screening by mature vegetation and buildings, the Project would only be occasionally visible' from the immediate vicinity of the listed buildings resulting in 'Lower Less Than Substantial Harm.' Figure 7.12.F237- HE29 is a viewpoint image (number HE29) taken to the south of Newney's Farmhouse with the nearest pylon 220 m away while the distance from the listed building to the nearest pylon is approximately 250 m. There is some vegetation on the boundary between the listed building and the fields between it and the proposed development, but given their scale and proximity it seems likely the pylons will be clearly visible from the immediate setting of the house as well as possibly appearing above the house in views along the lane to the north of the property (an effect not considered by the applicant). 2.111 There are some existing electrical poles in this part of the house's setting, but these do not detract from the rural character in the way the much larger pylons would and we consider their scale at this distance would result in a mid, or possibly approaching high level of less than substantial harm to the significance of the grade II* listed building.	The Applicant has reviewed the assessment of Newney's Farmhouse (Grade II*) and its associated barn (Grade II) in light of the respondent's comments. The Applicant acknowledges that the Project would be an intrusive element within the rural landscape to the south of the assets and that the Project would introduce pylons in the background of the assets as they are approached from the north and the west along Fairstead Lodge Road. The front elevations of the farmhouse and barn, however, face westwards away from Project and would be largely unspoiled. Likewise, views back towards the assets from within the associated grounds will not be impacted. The Applicant is therefore satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of minor adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm in regard to Newney's Farmhouse and associated barn are appropriate.
REP1-191	Historic England	Historic Environment	Little Waltham Conservation Area. 2.113 Document 6.11.A1, Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.7.38-46) gives a detailed summary of the conservation area and its setting. The village is based on a main road crossing the valley with the River	The Applicant has reviewed the assessment of Little Waltham conservation area in light of the respondent's comments. The Applicant acknowledges that the Project will introduce pylons and wires to within 150 m of the western edge of the asset impacting its setting. The Applicant, however, disagrees with the respondent's

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			Chelmer to its west and south. The Report considers the significance of the conservation area and its setting and concludes that the latter would extend to the Order Limits. The ES, Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (pages 326-327), concludes that due to screening by mature vegetation, buildings and infrastructure the development would only be 'occasionally' visible. This seems based on limited consideration of the area's setting. 2.114 The proposed pylons would be some 200 m from the edge of the conservation area and some 400 m from the rear of buildings on The Street. We would accept that views from the street might be partial, but where visible the proposed pylons could have a pronounced visual impact because of their proximity. Furthermore, the conservation area boundary projects to the west of The Street buildings and from this area the development would be more visible. Also, in views towards the western side of the conservation area the pylon would be a significant feature in the landscape. 2.115 Figure 7.12.F224-HE16ii (Viewpoint HE16ii) is an image taken from between Little and Great Waltham looking southwest, away from Little Waltham. The reverse view, looking towards Little Waltham is Figure 7.12.F223-HE16i (Viewpoint HE16i). Together these gives an impression of the likely scale of the proposed pylons in the wider setting of the Little Waltham conservation area. More directly pertinent is Figure 7.12.F239-HE31 (Viewpoint HE31). This image is taken from an area of open land at the southern end of the conservation area, near the river Chelmer in a valley between Great and Little Waltham which forms the wider setting of both. Part of the pylons is obscured by tree planting but the presence of the pylons in the landscape setting of the conservation area is clear. At the northern end of the conservation area viewpoint 6.13 (figure 7.12.F168_VP6.13) is situated just outside the area, beside the main road, but the scale of the pylons can again be seen. We consider this effect would detract from the rural setting even though the modern bypass road has already had a negative effect. 2.116 We consider these factors would result in harm to the significance of the conservation area and although we would not disagree with the applicant's conclusion (in the ES, volume 6: Environmental Statement, Document: 6.11.A7, Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, pages 326-327) that this would be less than substantial harm conclude that it would be higher within that category.	assessment that the Project would result in a higher level of less than substantial harm than the Applicant's assessment of lower less than substantial harm. The Applicant acknowledges that the rural land to the west and between the asset and Great Waltham contributes to the value of the conservation area but considers that the construction of the B1008 bypass already reduced this contribution. Furthermore, the contribution this agricultural land makes to the value of the conservation area is proportionally of much less significant than internal vistas along The Street and along the route of the Chelmer River towards the Church of St Martin. The Applicant is, therefore, satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of low adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm are proportionate and appropriate.
REP1-191	Historic England	Historic Environment	Great Waltham Conservation Area including St Lawrence's Parish Church (NHLE 1122058, listed grade I), Badynghams (NHLE 1122056, listed grade II*), Langley Park (NHLE 1000241, Registered grade II) and Langleys (NHLE 1305533, listed grade I). 2.117 The conservation area at Great Waltham incorporates the house and registered park of Langleys as well as the historic village.	The Applicant has reviewed the assessment of Great Waltham conservation area and Langleys Park in light of the respondent's comments. The Applicant acknowledges that the Project will introduce pylons and wires to within 50 m of the south-eastern limit of the conservation area. The Applicant disagrees that a mid-level of less than substantial harm is appropriate for the conservation area. As

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			The significance of all these assets is summarised in the application (document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report) and the setting considered. As the report notes, there are distinctly different settings for the village and park, but both relate at least in part to the Chelmer river valley through which the route of the proposed development runs. Paragraphs 3.7.30-37 comment on the conservation area, noting its 'beneficial views over the Chelmer river valley' and concluding that its setting extends to the Order Limits. Within the conservation area are two highly graded listed buildings. The report comments separately on the settings of St Lawrence's church and Badynghams house, concluding that they chiefly relate to the core of the built settlement (paragraph 3.7.127 and Table A11.1.6, page E85, respectively) and do not extend to the order limits. We would accept these conclusions. 2.118 As well as forming part of the conservation area Langleys Park is given additional consideration in paragraphs 3.7.305-308 of the Baseline Report. This notes how the setting of Langley's house and parkland are 'informed by their relationships with the Chelmer Valley to the north and east and the designed view from the house to the east-north-east takes in a picturesque portion of the river and the eastern flank of the valley beyond the limits of the parkland. The setting of the house and parkland, therefore, makes a considerable contribution to their values and, due to the wider reach of the setting, it extends to the Order Limits.' We would accept these observations and the conclusion. 2.119 A number of viewpoint images have been provided with the application to help illustrate the likely visual impact on the setting of these heritage assets. Viewpoint image HE7 (Figure 7.12.F213-HE7) situated in Langley Park looks northeast from a location near the coach house and confirms the pylons would not be visible from here. Figure 7.12.F222-HE15 (Viewpoint HE15) is an image from the north northwest of the park and shows pylons visible above trees at the park edge. This affects an appreciation of the park's agricultural setting and would detract from it. Viewpoint HE8 (Figure 7.12.F214-HE8) is situated in the northeast area of the park looking to the southeast where the proposed pylons would be visible through and above the trees. 2.120 This would also detract from the parkland quality of the house's setting and from the park itself. Considering the wider setting of the eastern part of the registered park, is viewpoint HE16i (Figure 7.12.F223-HE16i,) looking towards Little Waltham and the edge of the park, while viewpoint 6.16 (figure 7.12.F172_VP6.16) is situated just to the northeast of the registered park. These images give an impression of the likely scale of the proposed pylons in the wider setting of the registered park. Despite the presence of the existing road this is still a predominantly rural setting from which the proposed development could detract, resulting in a low level of less	noted by the respondent, the conservation area includes almost all of Langleys park as well a large proportion of the settlement of Great Waltham as well as the section of Chelmsford Road that links Minnow End to Great Waltham. The setting of the conservation is not only informed by the inclusion of Langleys Park and its buildings but by the characterful buildings and vista along Chelmsford Road, South Street, Main Road and Barrack Lane in the historic core of the settlement. There is no appraisal document for the Great Waltham conservation area, but it seems apparent that Minnow End is included for its listed buildings and the characterful approach to the settlement it provides with Langleys Park to the east and open farmland to the rear of the residential properties to the west. It is concluded that the contribution the agricultural land to the south of the conservation area through which the Project would pass makes to the value of the conservation area is proportionally of much less significance than internal experience of the asset. The Applicant is, therefore, satisfied that the conclusion reached for Great Waltham conservation area in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of low adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm are proportionate and appropriate.

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			than substantial harm to its significance in addition to that found in views from within the park. 2.121 Separating the village part of the conservation area from the park, we consider the southern tip of the area (known as Minnow End) is particularly likely to be affected by the presence of the proposed pylons in the landscape (as illustrated in viewpoint HE16i) and would agree with the applicant's assessment (ES, volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 326) that there would be lower less than substantial harm to the significance of the conservation area. Combined with this is the effect on the registered park and Langleys house, also part of the conservation area. As well as visibility from within the park (viewpoint images HE8 and HE15, referenced above) the setting of its outer edge is within the same valley as the rest of the conservation area and would also be affected by the proposed development in a manner similar to that depicted in viewpoint HE16i. 2.122 We would agree with the assessment (on page 309 of document 6.11.A7, ES Appendix 11.7) that Langleys house, partly screened by planting, would experience a lower level of less than substantial harm but because of visibility from within the park as well as the effect on its setting a mid-level of less than substantial harm would be caused to the significance of the registered park. Given that the park is a large and important element of the conservation area this might also increase the level of harm to the area as whole.	
REP1-191	Historic England	Historic Environment	Former Parish Church of St James, Chignall St James (NHLE 1122199, listed grade II*). 2.125 The former parish church is situated in a small churchyard with light trees on the west boundary and some nearby buildings but is some 300 m from the line of the proposed pylons. Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 3.7.188-189) states that 'the church has a quaint and rural location with views out across the open rural landscape to the… Project. The setting of the asset makes a considerable contribution to the value of the asset and due to the proximity of the Project, the setting extends to the Order Limits.' Viewpoint image number VP6.20 (figure 7.12.F176_VP6.20) is taken from a location near the church and gives an impression of the likely scale of the proposed pylons in the open, flat landscape around the listed building. 2.126 In Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets (page 308) due to screening vegetation there would be 'Lower Less Than Substantial Harm' to the significance of the listed building. The viewpoint image emphasises how close the pylons would be in this otherwise rural setting and we consider this might be a higher level or harm, perhaps approaching a mid-level.	The Applicant has reviewed the assessment of Former Parish Church of St James, Chignall St James in light of the respondent's comments. The Applicant acknowledges that the Project would introduce pylons and wires into the setting of the church with the closest pylon located c. 390 m to the south-east. The church is located within a large graveyard defined by high evergreen hedges and containing mature cover. This creates a very secluded environment for the asset and very much limits its interaction with the local landscape. The Applicant is therefore satisfied that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, of low adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of lower less than substantial harm are proportionate and appropriate.

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REP1-191	Historic England	Historic Environment	Chobbings Farmhouse (NHLE 1306286, listed grade II*). 2.127 Document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report), paragraphs 3.7.196-197, considers the significance of the listed Chobbings Farm house and the adjacent grade II listed barn and granary (NHLE 1237444 and 1237445, respectively. It notes the positive contribution of the agricultural landscape but concludes that 'due to distance and partial screening by development and mature tree-lined hedgerows in the intervening landscape the setting does not extend to the Order Limits. Viewpoint image number HE39 (Figure 7.12.F248-HE39) has been provided with the application to aid in assessing any potential visual impact. This is a view from across the road junction between Chignall Lane and Hollow Lane looking towards the line of proposed pylons to the west. Unfortunately, the viewpoint position chosen means the pylons to the northwest of the listed buildings (including TB153 and TB154 which are some 700 m from it) are obscured by the Farmhouse itself. Those further to the west are visible, giving a sense of the scale the pylons which might have been shown if a more appropriate location at the rear of the listed building had been selected. There is some planting on the rear garden boundary, but the land is flat, open countryside and views to development are likely and, in our view, could result in a low level of less than substantial harm to the significance of the listed building by detracting from its rural setting.	The Applicant acknowledges the comments and has reviewed the assessment of the Grade II* listed 'Chobbing's Farmhouse' (1306286) and the adjacent Grade II listed 'Barn at Chobbings Farm' (1237444) and 'Granary at Chobbings Farm' (1237445), including the positive contribution of the agricultural landscape to their setting. The Applicant agrees that views of the proposed pylons are present from the surrounding area, as illustrated in Viewpoint HE39 (**7.12 Visualisations - Part 9 of 9 [APP-351]**), but disagrees that the setting of these assets extends to the Order Limits based solely on intervisibility. The Applicant is confident in its assessment, which considers the historical and functional relationship of the assets with the agricultural landscape, alongside the significant loss of this relationship due to 20th-century expansion, partial screening by development, and mature tree-lined hedgerows. Therefore, the Applicant is satisfied with the assessment undertaken within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209].**
REP1-191	Historic England	Historic Environment	Hylands Park (NHLE 1000197, Registered grade II*) and Hylands (NHLE 1264253, listed grade II*). 2.130 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report 3.7.464-465 gives extended consideration of the significance and setting of the Registered Park along with the mansion house at its heart and the associated grade II listed 'Cottage (¼ mile North-West of Hylands House, NHLE 1264142). This draws the reasonable conclusion that the house would not be visually affected by the proposed development (which would be some 1.5 km away) because of the planting within the park and particularly the belt of trees around its western edge which is intended to create an enclosed designed landscape area. This is shown by the image from viewpoint number 6.26 (figure 7.12.F187_VP6.26), situated in the centre of the park. 2.131 When discussing the area beyond the Registered Park boundary the Baseline Report mentions the eastern side (where modern development is found), but not the western. Despite this it is concluded that 'the setting of the park does not extend to the Order Limits to the west … [due to the] … intentionally placed tree belt.' This seems to disregard that the western tree belt is itself part of the Registered park within the designation boundary. The land to the west of the outer edge of the tree belt is therefore the setting of the designated heritage asset. This land is not considered by the applicant but is part of the area in which the development is proposed.	The Applicant has reviewed the assessment of Hylands Park in light of the respondent's comments. The Applicant acknowledges that the Project would be located c.800 m to the west of the asset at its closest point. The Applicant concedes that the agricultural land to the west of the asset could be interpreted as an element of the asset's setting, however, the Applicant disagrees that the setting of the asset extends over 800 m beyond its western limits and beyond Margaretting Road. The Applicant is therefore satisfied with the assessment undertaken within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**.

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			2.132 The park, like the designed landscapes of many large rural houses, was surrounded by agricultural land. This was the case until the expansion of Chelmsford changed Hyland Park's eastern setting (as described by the applicant) but to the west it largely remains agricultural. We consider this is a positive element of the Registered park's setting which contributes to its significance. No viewpoint image has been provided to establish the impact of the proposed development on this rural setting. The proposed line of pylons is mostly at some distance from the park, but at one point comes near to its southern extent and would be some 600 m from the designated park boundary. We consider this could detract from this element of Hyland Park's setting and result in a low level of less than substantial harm to its significance.	
REP1-191	Historic England	Historic Environment	Ingatestone Hall (NHLE 1187315, listed grade I), Gatehouse and Courtyard Ranges (NHLE 1197286, listed grade II*) and Granary 130m northwest of Ingatestone Hall (NHLE 1298752, listed grade II*, formerly listed as 'barn'). 2.133 Document 6.11.A1 Environmental Statement Appendix 11.1 – Historic Environment Baseline Report (paragraphs 174-183) considers the significance of Ingatestone Hall, the Gatehouse and Courtyard Ranges and the Granary. It also considers the 8 grade II listed buildings in the complex: Lodge Cottages (NHLE 1187393), Barn 110m northwest of Ingatestone Hall (NHLE 1297189), Shelter Shed and Byre (NHLE 1197288), Byre 80 m northwest of Ingatestone Hall (NHLE 1197287), Cistern House (NHLE 1187282) and garden walls to the north of the Gatehouse (NHLE 1187300) and north and east of the Hall (NHLR 1297190). These form a group with the highly graded listed buildings. 2.134 Paragraph 184 considers the 'setting of the Ingatestone Hall complex' and describes how 'the large garden areas to the north, east and south of the Hall instil a sense of status and openness and despite mature tree lined boundaries views are available across the arable land to the north and the Wid valley and the church [St Mary's, Buttsbury, NHLE 1264434] beyond in the east. The setting of the assets, therefore, makes a considerable contribution to their values…' It concludes that 'the shared setting of the…listed buildings…extends to the Order Limits.' 2.135 The views referred to are of predominantly agricultural land and two viewpoint images provided with the application give an impression of the likely visual presence of the proposed development in it. Viewpoint HE32i (figure 7.12.F240_HE32) is situated close the grade II listed Cistern House, just to the east of Ingatestone Hall while viewpoint HE32ii (figure 7.12.F241-HE32ii) is slightly further east on more open ground. Both images show that despite the planting around the historic complex the development can be seen from some locations where the pylons would be visible, although they would be approximately 1km from the Hall. Viewpoint image VP7.09 (figure 7.12.F191_VP7.09) if further from the listed buildings, west to Ingatestone Hall and some 1.3 km from the nearest pylon.	The Applicant has reviewed the assessment of the listed buildings 'Cistern House' (1187282) and 'Garden Wall North and East of Ingatestone Hall' (1297190) located within the Ingatestone Hall complex, in light of the respondent's comments. The Project will introduce pylons and wires east of the Ingatestone Hall complex. Both listed 'Cistern House' and 'Garden Wall North and East of Ingatestone Hall' are located east of Ingatestone Hall itself. The Applicant concedes that the agricultural land around these assets could be interpreted as an element of their setting, however, it is considered that as the alignment would be beyond the edge of the valley in which they are located it is still reasonable to conclude that the setting of these two listed buildings does not extend to the Order Limits. Therefore, the Applicant is satisfied with the assessment undertaken within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**.

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			However, it shows the pylons rising above the roof of the Hall and making a striking intervention into the landscape between it and the ridge on which St Mary's church, Buttsbury, stands. 2.136 The relationship between the church and the Ingatestone complex could therefore be affected. We consider this would detract from the rural setting of the complex of listed buildings including the Hall and Gatehouse and Courtyard Ranges as well as the grade II listed buildings in the eastern part of the group. The Granary is partly screened by other buildings and views from its immediate vicinity are likely to be fewer with less likelihood of visual impact, as they are for the grade II listed buildings in the western part of the complex. 2.137 In the ES (Volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 330) the applicant concludes that the proposed development would result in a lower level of less than substantial harm to the significance of the Hall and Gatehouse/Courtyard Ranges. We would accept this conclusion. We would note that the applicants' conclusion that the 'setting of the Ingatestone Hall complex' extends to the Order Limits in the Baseline report (paragraph 184) specifically excludes the listed garden wall (north and east of the Hall, NHLE 1297190) and the Cistern House (NHLE 1187282). This is on the basis that the settings of these assets 'are restricted to the confines of the Ingatestone Hall complex'. However, it appears from Viewpoint HE32i that the visual experience of the Cistern House might be affected by the appearance of the proposed development in the landscape beyond the Ingatestone Hall complex. Part of the garden wall north and east of the Hall borders open fields to the east of the complex and so is likely to have a setting which would be affected by the proposed development. We consider this would be a modest effect, perhaps resulting in a lower level of less than substantial harm to their significance.	
REP1-191	Historic England	Historic Environment	St Mary's Parish Church, Buttsbury (NHLE 1264434, listed at grade II*). 2.140 The applicant has assessed the significance of the listed building and its setting in the ES (document 6.11.A1 (Environmental Statement Appendix 11.1 – Historic Environment Baseline Report, paragraphs 3.7.80-810). This states the setting of the asset is 'informed by its isolated roadside location within its small churchyard and by its all-round views of the agricultural landscape with which it has a historical relationship.' We would agree with this, although we do not consider the loss of the medieval settlement which might once have accompanied the church reduces the contribution the setting makes to its significance in any meaningful way (as suggested by the applicant). The rural character and agricultural use of the land make a more than moderate contribution to the asset's significance. 2.141 The applicant concludes that 'due to the proximity of the Project, the setting extends to the draft Order Limits.' The proposed development would be very close to the church with the nearest	The Applicant has reviewed the assessment of St Mary's Parish Church, Buttsbury in light of the respondent's comments. The Applicant agrees that the Project will introduce pylons and wires into the setting of the church with the closest located 230 m east. The Applicant also agrees there will be views to the proposed pylons as illustrated on different viewpoints such as F183_VP7.01 (**7.12 Visualisations - Part 7 of 9 [APP349]**). The methodology by which the Applicant's conclusion of mid less than substantial harm is determined is recorded in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** presenting three categories of less than substantial harm with no further subdivisions. The Applicant is satisfied that the Project would not constitute upper less than substantial harm as defined in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** and, therefore, that the conclusions reached in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment**

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			pylon (TB190) some 259 m away. This would have a quite dominant effect on the experience of viewing the church from several angles. 2.142 A viewpoint image included with the application (number 7.01, (figure 7.12.F183_VP7.01) is taken from close to the churchyard entrance and shows the proposed development as a major feature close to the listed building. Another image, viewpoint number VP7.12 (figure 7.12.F194_VP7.12) looks towards the church from the east and shows the proposed pylons as unavoidable visual intrusions into the open landscape in which the church would be seen. The church is located on a ridge with land falling away to the west, towards the historic complex around Ingatestone Hall (NHLE 1187315). The church can be seen on this ridge when approaching from the direction of Ingatestone. Viewpoint image VP7.09 (figure 7.12.F191_VP7.09) is a considerable distance to the west of the church but usefully suggests the presence the line of pylons would have in the landscape below the ridge on which its sits. When approaching Buttsbury church from this side they could affect long distance views of the church. 2.143 The ES (volume 6: Environmental Statement, Document: 6.11.A7 Environmental Statement Appendix 11.7 -Assessment of Harm to Designated Heritage Assets, page 341) accepts that 'the pylons would be visible from the asset', and they would alter the character of the rural setting of the asset. We would also contend that they would influence views from fields looking towards it as well which would compound this effect. The applicant concludes that 'the asset would experience Mid Less Than Substantial Harm' to its significance. We would accept this but given the proximity of the pylons and the visual impact from a number of viewpoints mentioned above conclude this would be at the high level of that category of harm.	**Assessment Tables [AS-070]**, of moderate adverse significance of effect and in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** of mid less than substantial harm, are proportionate and appropriate as the rural landscape surrounding the church will remain in place beneath and around the proposed overhead line.
REP1-191	Historic England	Historic Environment	Chapter 4: Description of the scheme 3.1 Table 4.3 outlines the elements of the scheme. It is noted that several of the elements will have a below ground impact, but the depths of impacts have not been defined. It is therefore difficult to understand how the proposed development may impact any buried archaeological that may be present within the proposed scheme area. 3.2 It is also not possible to understand how the proposed development may impact the local water environment, which could impact the condition of nearby archaeological sites and deposits of palaeoenvironmental potential that are preserved through waterlogging (anaerobic conditions). It should be noted that the effects of changes to the local water environment can extend beyond the red line boundary of a scheme area and so impacts to archaeology in adjacent areas will also need to be considered. 3.3 For some elements of the proposed scheme, the minimum impact has been stated. For example, it is stated in Table 4.3 that the underground cable trenches would be at minimum 0.9 m deep. We	3.1 For the purposes of assessment it was assumed that any intrusive elements of the Project have the potential to adversely impact any known or unknown near surface archaeological remains that might be present. All areas of the Project where intrusive works are required have been included within the scope of the geophysical survey, followed by archaeological trial trenching to define and characterise the archaeology potentially impacted by the Project and to guide and inform later phases of archaeological mitigation as required. 3.2 **6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181]** concluded that neither groundwater levels nor groundwater receptors would be impacted by construction of above ground infrastructure, open cut trenching and trenchless crossing (paras 9.7.21 – 9.7.25). Therefore, it is concluded that groundwater levels beyond the Order Limits will not be impacted and by extension, the environment of any potential archaeological remains will remain unchanged. 3.3 As noted for paragraph 3.1, all areas of intrusive impact will be subject to geophysical survey and archaeological trial trenching and this will identify sensitive areas where further archaeological mitigation

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			would need to assume a worst-case scenario for possible impacts on the historic environment if additional information is not available, both in terms of direct physical impacts and through potential impacts to the local water environment. 3.4 Table 4.4 summarises the design scenario for the proposed scheme. It is noted that some of the elements will require Horizontal Directional Drilling (HDD) to cross features such as rivers. If this technique is to be used, the potential issues associated with bentonite slurry outbreak will need to be considered in terms of the impact (both direct and indirect) that this may have on any buried archaeological remains. 3.5 The impacts of the HDD on the deposits that are cut through will also need to be considered, particularly in areas of peat where there is potential for organic remains to be preserved. Cutting through waterlogged deposits may impact the preservation of adjacent deposits, which may result in the degradation and loss of organic archaeological remains. 3.6 Some elements of the scheme will require piled foundations. Piling will impact buried archaeological remains and deposits of palaeoenvironmental potential. Piles can impact the historic environment directly, through physical impacts or through changes to the local water environment that results in the degradation and loss of waterlogged remains. We would recommend that the following Historic England documents are referred to: Piling and Archaeology (https://historicengland.org.uk/images-books/publications/piling-and-archaeology/) and Preserving Archaeological Remains (https://historicengland.org.uk/imagesbooks/publications/preserving-archaeological-remains/).	will be required for near surface remains. Likewise, the Applicant's response to the comment in paragraph 3.2 is applicable here. 3.4 The Applicant acknowledges the potential risks posed by clay breakouts during Horizontal Directional Drilling (HDD) river crossings, including both environmental and archaeological impacts. Mitigation measures are secured through commitments GH11 and GH12 in **7.2 Outline Code of Construction Practice [Revision B]**, which require the development of detailed drilling fluid breakout method statements and mitigation plans, informed by appropriate ground investigations. In addition, a specific commitment within **7.2 Outline Code of Construction Practice [Revision B]** commitment B26, specifically commits to a trenchless crossing method statement and contingency plan for the River Stour crossing by the Main Works Contractor(s), once detailed design is available. 3.5. The Applicant has proposed to update **7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303]** with additional text. The current text of paragraph 1.9.36: '*Peatlands will often support or have the potential to support a range of sensitive habitats and species*' The following text will be added: '*Peat deposits are an important source of paleoenvironmental and archaeological information. The interpretation of the stratigraphy of these deposits can be challenging, requiring specialist input to ensure accurate stratigraphic reconstruction. The peaty soil mitigation strategy will be designed with full consideration of potential archaeological impacts and will be developed in consultation with the relevant Local Authority Archaeological Advisor and Historic England Regional Science Advisor*.' Updates relating to Geoarchaeological and Paleoenvironmental Strategy (assessments, design and mitigation) are proposed to be included in the update to **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328**] to take account of detailed comments provided in Written Representations and Local Impact Reports. 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]**. 3.6. The Applicant acknowledges the risk for archaeological remains during piling and fully recognises the importance of safeguarding them, and ensures our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** already includes provision for a range of evaluation and

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				mitigation strategies, including preservation in situ, should highly significant remains be identified. Also, Commitments NV01, NV02, NV03, NV04, NV05, and NV20 in **7.2 Outline Code of Construction Practice [Revision B]** all address the potential damage from vibration from piling activities. These ensure measures will be put in place first to avoid impacts from vibration. NV04 provides a means to repair damage in the highly unlikely event it occurs. The pre-condition surveys committed to in NV04 are an important element to ensure there is a check against which any concerns regarding damage can be measured. 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 and Historic England to consider any detailed comments provided in Local Impact Reports.
REP1-191	Historic England	Historic Environment	Chapter 11: Cultural Heritage 3.7 ,We note the applicant has provided details of the policy context and relevant guidance and summary of engagement, which includes Historic England. We can confirm we have been party to extensive pre-application discussion with regards to the scheme and we provided advice at the scoping and PEIR stages and throughout the pre-examination period. 3.8 The chapter notes that Magnetometry surveys have been carried out in the different sections of the project, but it is noted that not all of the surveys areas have been completed (for example Sections 11.5.22 to 11.5.24, Section 11.5.55 and 11.5.56, Section 11.5.60, Sections 11.5.99-104, Section 11.5.156 & Section 11.5.158, Sections 11.5.196-5.11.200, Sections 11.5.219-5.11.224, Sections 11.5.241-11.5.245, Section 11.5.265). 3.9 It was noted that some of the areas included in the survey represented former natural river channels (e.g. Section 11.5.26, Section 11.5.59). The geoarchaeological assessment has identified peat and alluvial sequences in these areas (e.g. Section 11.5.29-11.5.30, 11.5.59), which can act to mask archaeological features and remains, making it difficult to evaluate these areas using techniques such as magnetometry. Additional techniques will therefore need to be used to evaluate these areas, such as alternative geophysical techniques, geoarchaeology or additional trial trench evaluation excavations. 3.10 Magnetometry will generally not identify organic remains that may be preserved in wetland environments, such as wooden structures (post alignments, fish traps etc.) or artefacts made of wood or leather. 3.11 It is stated that the priority archaeological trial trench investigations have not been undertaken for large parts of the proposed scheme (e.g. Section A (Section 11.5.27), Section B (Section 11.5.64-11.5.66), Section D, Area 43 (Section 11.5.166),	3.8 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-068]** to **[AS-083]**, of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey had 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 **[AS-068]** to **[AS-083]**. 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. 3.9 The Applicant acknowledges the potential for sections of the Project to contain peat and alluvial deposits with the potential to mask deeply buried archaeological material. However, where such deposits are oversailed by the overhead line or are located outside areas of impact, no further evaluation work will be undertaken as there is no potential for physical impact. Provision for further geoarchaeological work in areas of impact is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be updated in consultation with Local Planning Authority Archaeological Advisors and Historic England in response to

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			Section E (Section 11.5.202), Section F (Section 11.5.225, Section G (Section 11.5.246), Section H (Section 11.5.268-11.5.270)). 3.12 In addition, none of the Phase 2 trial trench investigations have been completed. There is therefore only limited evidence available to understand the archaeological potential of this area, or the potential impact of the proposed scheme. 3.13 A programme of geoarchaeological monitoring has been carried out for key areas across the proposed scheme area, particularly within the river valleys. This work has identified complex sequences (e.g. Section 11.5.30, Section 11.5.68, Section 11.5.125, Section 11.5.173) which included deposits of high archaeological, palaeoenvironmental and geoarchaeological value such as peat (Section 11.5.33, Section 11.5.72, Section 11.5.129, Section 11.5.177). 3.14 It is stated that no geoarchaeological and palaeoenvironmental assessment is proposed at this stage (Section E (Section 11.5.203), Section F (Section 11.5.226), Section G (Section 11.5.247)). It should be clarified if work is proposed to be carried out post-consent/pre-construction. 3.15 In relation to the evaluation phase, we are aware that this is only a partial assessment. There are gaps in the walkover surveys and geophysical survey, areas have not been trial trenched and no further geoarchaeological and palaeoenvironmental assessment has been undertaken prior to the examination. Whist all parties have acknowledged this as an issue, it still represents a major risk to the project going forward. It is also a concern for Historic England and will need to be taken into consideration by the ExA in relation to policy and decision making. 3.16 It is good to see that the primary embedded mitigation focuses on avoidance of sensitive heritage assets through routing and siting elements of the scheme (Section 11.6.4). It is also stated that undergrounding cables in four locations, such as the Dedham Vale National Landscape also forms part of the embedded mitigation strategy. It should be noted that while underground cables will reduce the impact of the proposed development on the setting of heritage assets, that buried archaeological features, remains and deposits could be affected. The impacts could be direct, through physical impacts, or through changes to the local water environment that in turn affects the preservation of organic archaeological remains. 3.17 Standard mitigation is presented in the Outline Code of Construction Practice (OCoCP) and includes measures such as the development of WSIs for archaeological work, preservation strategies, and investigations where necessary (Section 11.6.6). 3.18 Additional mitigation measures have also been outlined in the Outline AMS-WSI for measures over and above any embedded and standard mitigation measures. For archaeology, this includes archaeological mitigation, post-excavation analysis and publication (Section 11.6.11).	detailed comments provided in Written Representations and Local Impact Reports. 3.11 Please see response to paragraph 3.8. 3.12 Please see response to paragraph 3.8. 3.14 Please see response to paragraph 3.9 3.15 The Applicant believes this is a misrepresentation of the progress of fieldwork and refers to our comments on paragraph 3.8. Also, to set out the information contained across 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and its appendices in one place: • Priority/Phase 1 geophysical survey was 96% complete when the additional submission documents were submitted in January 2026 (access was denied or ground conditions were not appropriate for 4%) • Phase 2 geophysical survey was 30% complete when the additional submission documents were submitted in January 2026 with the fieldwork currently continuing. The Applicant can add that as of 10 March 2026, the Phase 2 geophysical survey is circa 62% complete • Priority/Phase 1 archaeological trial trenching was 89% complete when the additional submission documents were submitted in January 2026 with the fieldwork currently continuing • Phase 2 archaeological trial trenching has yet to commence. However, the design of trench plans is well advanced, informed by geophysical survey and cropmark analysis • The walkover survey accessed approximately 97% of the survey area (access was denied for 3%). 3.16 The Applicant is confident that the physical impacts of the underground cable sections of the Project on below ground archaeology have been assessed. Through the evaluation process appropriate mitigation will be determined and agreed with stakeholders. Provision for archaeological mitigation excavation and geoarchaeological work is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be updated in consultation with Local Planning Authority Archaeological Advisors and Historic England in response to detailed comments provided in Written Representations and Local Impact Reports. 9.19 **6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181]** concluded that neither groundwater levels nor groundwater receptors would be impacted by construction of above ground infrastructure, open cut trenching and trenchless crossing (paras 9.7.21 – 9.7.25). Therefore, it is concluded that groundwater levels beyond the Order Limits will not be impacted and by extension the environment of any potential archaeological remains would remain unchanged.

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			3.19 Section 11.7 presents the potential residual effects that may occur due to the proposed development. The discussions focus on impacts due to changes in setting of heritage assets, or through physical impacts during construction. The potential issues relating to changes to the local water environment, which may affect the preservation of organic archaeological remains and deposits is not mentioned in this section. It should be noted that the effects of changes to the local water may be felt outside of the red line boundary of the scheme and may therefore affect archaeological remains in adjacent areas. 3.20 It is not clear if the potential impacts of the scheme on palaeoenvironmental remains recorded within the different Sections of the scheme have been included in the discussions of effects to the historic environment. The geoarchaeological work identified deposits of high potential, and the impacts of the proposed scheme would need to be considered, managed and mitigated. 3.21 11.8 states that archaeological mitigation will be undertaken during the preconstruction work and includes non-intrusive and intrusive fieldwork. The works have been outlined in the Outline AMS-OWSI and will be presented in the relevant Detailed WSIs.	3.20 The results of **6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]** and included within **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** will be used to inform proposals for further geoarchaeological and paleoenvironmental works, where such areas correspond with areas of known impact to deeply buried deposits. Provision for this further geoarchaeological and paleoenvironmental work in areas of impact is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be updated in consultation with Local Planning Authority Archaeological Advisors and Historic England in response to detailed comments provided in Written Representations and Local Impact Reports.
REP1-191	Historic England	Historic Environment	Chapter 12: Hydrology, Land Drainage and Flood Risk 3.22 It is noted that dewatering of excavations may be needed for key locations within the proposed development area. Dewatering can impact the historic environment by altering the local water environment, which may affect the preservation of nearby waterlogged archaeological remains. This may result in the degradation and/or loss of organic archaeological and palaeoenvironmental remains. 3.23 We would recommend that the impacts on buried archaeological remains are considered when discussing the impacts of dewatering and changes to the local water environment. 3.24 We would also recommend that the information is shared with archaeologists to help guide the mitigation strategy for the proposed development. For example, if an unexpected waterlogged archaeological site is discovered during construction, an appropriate stand-down buffer will need to be maintained around the site while it is being investigated to ensure that the remains are not dewatered.	3.22 The Applicant acknowledges the potential impacts of dewatering on the historic environment. It should be noted that **6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181]** concluded that neither groundwater levels nor groundwater receptors would be impacted by construction of above ground infrastructure, open cut trenching and trenchless crossing (paras 9.7.21 – 9.7.25). Therefore, it is concluded that groundwater levels beyond the Order Limits will not be impacted and by extension the environment of any potential archaeological remains will remain unchanged. Within the Order Limits provision for further geoarchaeological and paleoenvironmental work is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be updated in consultation with Local Planning Authority Archaeological Advisors and Historic England in response to detailed comments provided in Written Representations and Local Impact Reports. 3.23 **7.2 Outline Code of Construction Practice [Revision B]** includes two controls to mitigate the impacts of dewatering: '*GH07 - Any temporary dewatering activities during construction will be undertaken in accordance with Environment Agency guidance (Environment Agency, 2023b. Environment Agency, 2022. Environment Agency, 2021a, Environment Agency 2021b) including appropriate assessment undertaken as required by the guidance (Environment Agency, 2007), and if required, an Abstraction Licence and Environmental Permit (for the discharge) will be obtained, and the works will be limited to the depth and time required to facilitate construction activities.*' And:

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				'*GH14 - During dewatering of excavations, any water removed would be discharged as close to the excavations as practicable in line with GH07. Water would be discharged so that the dewatered groundwater body is recharged as much and as soon as practicable.*' With these controls in place and the conclusions of **6.9 Environmental Statement Chapter 9 – Contaminated Land, Geology and Hydrogeology [APP-181]** it is not considered that there is potential for significant effects to archaeology from dewatering. 3.24 The Applicant is committed to updating 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 and Historic England and in response to detailed comments provided in Written Representations and Local Impact Reports, which will take account of this comment.
REP1-191	Historic England	Historic Environment	Appendix 11.3: EACN Substation Geophysical Survey Report 3.25 This report presents the results of the magnetometry survey on the block of land identified for the EACN Substation. 3.26 No features of probable arch potential have been identified, but it is not clear if this is a function of the geology.	3.26 The Applicant confirms that the geophysical survey of Site 001, the EACN Substation, Ardleigh revealed only anomalies of uncertain origin as well as anomalies indicative of Ordnance Survey mapped field boundaries, ploughing, land drains, natural variation and magnetic disturbance. The survey also failed to identify cropmarks mapped by the Historic Environment Record (HER) and by the Project. **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213]** includes the assessment report for the trial trench evaluation of Site 001, the EACN Substation, Ardleigh. The evaluation revealed sparse archaeological remains with minor concentrations in the south-west (Area 3) and the eastern edge of Area 1. The identified remains do not correspond to any geophysical anomalies, nor do they correspond with any HER mapped cropmarks; they do, however, correspond to the Project mapped cropmarks in the east of the site. It is likely that the discrepancy between the results of the geophysical survey and the subsequent trial trench evaluation is due to the lack of magnetic contrast between the homogeneous sandy fills and the Thames Group clay, silt and sand geology as reported in **6.11.A3 Environmental Statement Appendix 11.3 - EACN Substation Geophysical Survey Report [APP-211]**. Overall in this location the archaeological trial trenching provided further detail regarding the archaeology that was identified from desk-based sources.
REP1-191	Historic England	Historic Environment	Appendix 11.4: Geophysical Survey Results Report 3.27 It is noted that the report represents an interim report for the surveys carried out for the Priority Areas and that the final report will be submitted at a later date (Section 2.5). The full assessment of the results has not yet been carried out for the interim report, and so the results are of limited use at this stage. 3.28 It is stated in Chapter 11 of the main Environmental Statement that the survey work in the Priority Areas had not been completed at the time of submission. This report does not mention that there is any outstanding work left to complete. This information should have been included in as a figure, so it is clear.	3.27-29 The completed geophysical survey report for Priority Area works was submitted in January 2026 - **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report - Part 1 [AS-072]**, **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report - Part 2 [AS-074]** and **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report - Part 3 [AS-076]**. The additional submission documents also included **6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [AS-082]** and

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			3.29 An interim report of the Phase 2 Geophysical survey work has not been included in this report. Will this information be provided to inform the examination of the proposed scheme? 3.30 A magnetometry survey was proposed, but it is noted in the description of the different Section Areas that they cross several river valleys. The superficial geology recorded in these sorts of locations includes peat and alluvium, that can act to mask archaeological features and remains. In addition, magnetometry may not be able to identify organic archaeological remains, that can be preserved in these sorts of environmental (e.g. trackways, fish traps, boats etc.). We would therefore recommend that alternative evaluation approaches are used in these locations due to the risk of unexpected features and remains being present.	**6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083]** with the former showing the completed areas of survey and the latter showing the preliminary results of the Phase 2 geophysical survey undertaken to that point. The Phase 2 geophysical survey has been ongoing since the January 2026 submission. The results of the fieldwork will be made available to 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 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. 3.30 In most cases any areas of impact within river valleys are limited as the Project oversails them, and so there are very few locations where construction-related excavations will be deep enough to impact geoarchaeologically or paleoenvironmentally sensitive deposits. The main exception to this is the River Stour crossing, where there will be open cut underground cable works to the north and south of the river, the course of which will be crossed using trenchless crossing techniques. Where the potential for such sensitive deposits to exist is identified, and where such areas correspond with areas of known deep impact (e.g. pylon bases, trenchless river crossings) further geoarchaeological and paleoenvironmental work will be carried out. Provision for this further work in areas of impact is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be updated in consultation with Local Planning Authority Archaeological Advisors and Historic England in response to detailed comments provided in Written Representations and Local Impact Reports.
REP1-191	Historic England	Historic Environment	Appendix 11.5: Trial Trenching Results Report 3.31 A total of 16 high priority areas were identified for the first phase of Trial Trench evaluation excavation, which were subdivided into 58 distinct Area parcels. The title of this appendix indicates that it will present the results of the Trial Trenching work, but it is stated that interim reports have been provided. The full reports have not been included with the DCO submission, and only limited information is therefore available. 3.32 None of the interim reports, with the exception of Site 001 (EACN Substation, Ardleigh), include details of the type of samples collected (bulk samples, specialist samples etc.) or if the samples have been processed. No information is available about the range of environmental remains that were recovered, their condition or their potential. Hand collected environmental remains are quantified, but details are not included about the condition of the bone, or if there is evidence of butchery marks on the bone. 3.33 The lack of information available from the interim reports will significantly limit the conclusions that can be drawn about the	3.31 and 3.33 Document **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213]** was part of the DCO submission and included the assessment report for Site 001 as well as a further 15 interim reports. **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [AS-078]** submitted in January 2026 included assessment reports for Sites 002, 006, 007, 009 (part 1), 010, and 013 as well as a further 20 interim reports. The remaining assessment reports for the priority area trial trenching will be shared with Local Planning Authority Archaeological Advisors for approval once complete. 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 Applicant has found that the assessment reports produced to date have not altered the conclusions of the assessment presented in **6.11 Environmental Statement Chapter 11 - Historic**

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			archaeological potential of the proposed scheme area and of the potential impacts. If the information is not available, a worst-case scenario will have to be assumed. 3.34 The evaluation excavations of Site 8, Area 15S confirmed most of the features identified in the geophysical survey, but that additional features were revealed towards the north of field 4, and north and south of fields 5 and 6 respectively. This suggests that there will be potential for previously unknown remains to be present within other areas of the proposed scheme area. 3.35 The quantification of the archive for Site 8, Area 15S states that 21959 g of CBM/fired clay was recovered from the evaluation excavations. It is stated that a high quantity of CBM was recovered in the text, but there is no mention about what this could relate to in the discussion.	**Environment [AS-068]**, where this is based on the combination of desk-based research, geophysical survey and trial trenching results from the interim reporting, indicating that this has reliably identified archaeological sites for the purposes of assessment. 3.32 Full details of the hand-collected environmental remains can be found in the assessment report for each of the Priority Sites. Combining the DCO and January 2026 submissions there are now seven assessment reports available. As and when further assessment reports are submitted to the Applicant by the archaeological contractor, they 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]**. 3.34 There is generally good correlation between the geophysical results and the findings of the trial trenching. However, and as exemplified by Site 008, the trenching in some areas has revealed more archaeological remains than predicted by the geophysical survey. The archaeological trial trenching allows for the geophysical survey results to be tested. 3.35 The assessment report for Site 008 will contain details of the finds assemblage, its origins, and its interpretation. The assessment report will be shared with the Local Planning Authority Archaeological Advisors for approval and discussed at monthly meetings as set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. The Applicant has reviewed the assessment report for Site 008 although this has not yet been finalised and is confident that this report provides clear details about where the ceramic building material (CBM)/fired clay were found, their types (Roman roof tile, medieval floor/roof tile, bricks, pantiles, fired clay), and the features or contexts with which they are associated (e.g. ditches, hedgerow features, floors, walls, pits). The report also specifies which archaeological features (ditches, floors, walls, pits, hedgerows) the CBM/fired clay were found in and interprets them.
REP1-191	Historic England	Historic Environment	Appendix 11.6: Geoarchaeological monitoring of Ground Investigation Works 3.36 This appendix is composed of four reports for geoarchaeological investigations across key valley sections: the River Waveney Valley, the River Stour Valley, and North Tilbury 3.37 The GI interventions have identified deposits of archaeological, geoarchaeological and palaeoenvironmental potential, but the spacings between interventions has limited the resolution of the assessment. This points to where additional work will be required to fill in the gaps in our understanding. 3.38 It was noted in the reports that some samples were recovered, but no information has been included about whether the samples have been assessed. The samples would provide information about the potential and significance of a sampled unit, which in turn would	Samples were recovered by the geoarchaeologists on site but these were not assessed in detail as the methods typically used for GI are not well suited to recovering intact, well-stratified samples that would be appropriate for paleoenvironmental assessment or dating.

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			help inform the mitigation strategy. We feel that this is a missed opportunity and would recommend that they are processed as soon as possible in order to inform the construction design and the mitigation programmes in those locations.	
REP1-191	Historic England	Historic Environment	River Waveney Valley report: 3.39 This report presents the results of the geoarchaeological monitoring of the GI works conducted in the River Waveney valley crossing area. 3.40 2.1.1 states that a total of 24 geotechnical pits and 21 boreholes were investigated for GI works, but with 7 geotechnical pits and 12 boreholes identified as having geoarchaeological potential. 3.41 The summary of the superficial geology has outlined a number of deposits that has archaeological potential. This includes the Hoxnian Stage interglacial Lacustrine Deposits that are preserved on the valley sides (Section 4.2.8). It is noted that the sequence at nearby Hoxne is of national archaeological importance because of the abundant palaeoenvironmental evidence and the rich Palaeolithic archaeological record. This indicates that these deposits will need to be considered carefully as remains of national archaeological importance may be present. 3.42 Peatlands and peat deposits have been recorded in the River Waveney and its floodplain (Section 4.2.11 and 4.2.12), which are generally considered to be of high or very high archaeological and palaeoenvironmental potential. Peat forms in waterlogged conditions and can result in anaerobic conditions that can preserve organic archaeological remains (e.g. wooden structures, leather artefacts etc.) and environmental remains. 3.43 7.3.4 states that grab samples were recovered from the boreholes for geoarchaeological and palaeoenvironmental interest. It is not stated how these samples were recovered (i.e. were the boreholes subsampled in the field or were samples recovered from the arisings?), which could impact the risks of contamination of the sampled material, and if the sampled material had been disturbed. 3.44 Table 7-2 summarises the samples that were collected but it would be useful to state what deposit was sampled (e.g. peat). 3.45 Table 8-3 summarises the thickness of the stratigraphic units, but some of the table headings have been redacted, making the table unreadable. 3.46 The results of the geoarchaeological monitoring have been presented as Transects (Illus 3 and 4), which demonstrates the complexity of the sampled sequences. It is noted that the confidence in the resulting deposit modelling was moderate as there was potential for undiscovered, discontinuous deposits of interest to be present between the borehole locations (Section 8.4.1). 3.47 9.2.6 states that the soft dark brown find sandy silty clay recorded in borehole MM_RG_BH_106 has high potential to be interglacial deposits of Hoxnian age. The deposit could therefore date to a period where hominids were known to have been present	Provision for further geoarchaeological work is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. The Applicant proposes to update this document during the Examination in consultation with the Local Planning Authority Archaeological Advisors and Historic England in response to detailed comments provided in Written Representations and Local Impact Reports. The update and scope of the document will also be informed by the results of the ongoing fieldwork and by recommendations made in **6.11.A6 Environmental Statement Appendix 11.6 – Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**. Also, the Applicant acknowledges the comments regarding the geoarchaeological monitoring and notes that since the completion of the monitoring, there have been design changes which have reduced impacts on deeply buried deposits in the Waveney valley area. Consequently, the scope of groundworks affecting these deposits is now more limited than anticipated during the geoarchaeological monitoring phase. Samples were recovered by the geoarchaeologists on site but these were not assessed in detail as the methods typically used for GI are not well suited to recovering intact, well-stratified samples that would be appropriate for paleoenvironmental assessment or dating. The Applicant is not aware why some of the table headings in Table 8-3 have been redacted but we have raised this with the Planning Inspectorate.

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			within the wider environment. It has been previously stated that these deposits could be of high archaeological and palaeoenvironmental potential. The assessment of the palaeoenvironmental information from these deposits would therefore contribute to addressing research questions. 3.48 It is good to see that the potential of the likely Lodge Farm Clay and Silt Member deposits has been discussed, as well as the information that these deposits may be able to add to our understanding of Palaeolithic environments (Section 9.3.2). 3.49 The geoarchaeological assessment has identified peat in a number of the interventions within the hollows in the river terraces in the uppermost part of the sequences (Section 9.4.1). The palaeoenvironmental value of the peat and alluvial sequences is recognised, which is good to see, but assessing the palaeoenvironmental potential of these units would have helped to guide the mitigation strategy moving forwards. 3.50 The potential presence of tufa within MM_RG_IP_103 is noted (Section 9.4.3), which has the potential to provide valuable information about past climates. 3.51 A number of recommendations have been made for additional work, which includes the assessment of all future GI data by a geoarchaeologist (Section 11.1.2). We would recommend that a geoarchaeologist has direct access to GI cores, as it is better to record and assess continuous core sequences rather than isolated deposits or logs as this allows for greater reliability and confidence in the resulting conclusions. 3.52 We would also recommend that samples are recovered from GI cores where possible to maximise the opportunities to recover information, whilst minimising the duplication of effort. 3.53 Recommendations have been made for fieldwork and sampling, which includes sampling peat sequences (Section 11.2.1), the tufa (Section 11.2.2), the potential interglacial deposits (Section 11.2.3) and the potential Lodge Farm Silt and Clay lacustrine deposits (Section 11.2.4). We agree that further work needs to focus on collecting high-resolution data and recovering secure samples for dating, palaeohydrology and for reconstructing past climate and environments (Section 11.2.5). 3.54 Appendix 1 presents the data from the geoarchaeological logs. It is noted that samples were recovered, but there is no information about if the samples were assessed as part of this work. This information would provide information about the potential and significance of a sampled unit, which in turn would help inform the mitigation strategy.	
REP1-191	Historic England	Historic Environment	River Stour Valley Crossing report: 3.55 2.1 states that the GI works for the Stour Valley Crossing included 19 interventions, of which 16 were geoarchaeologically monitored: ten cable percussion boreholes and six trial pits.	3.62. The Applicant acknowledges the comments regarding the geoarchaeological potential of alluvium deposits as outlined in Section 10.6. The evaluation and mitigation approach is proportionate to the likely impacts, guided by the depth and extent of groundworks associated with the Project. As detailed design advances and further

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			3.56 The summary of the superficial geology has outlined a number of deposits that has archaeological potential. This includes the Kesgrave Catchment Subgroup sands and gravels, the lacustrine 'Marks Tey'-style clay and silt deposits, the River Terrace deposits, and the peat and alluvium (Table 4.1). 3.57 7.3.4 states that grab samples were recovered from the boreholes for geoarchaeological and palaeoenvironmental interest. It is not stated how these samples were recovered (i.e. were the boreholes subsampled in the field or were samples recovered from the arisings?). This information is needed as to indicate if the samples may have suffered from contamination or and if the sampled material had been disturbed 3.58 8.2.9 states that peat and organic alluvium were recorded in several boreholes. Peat is classed as being of high archaeological and palaeoenvironmental potential and should be investigated further (Section 9.6). 3.59 It is stated that the confidence in the deposit modelling produced for this study is moderate (Section 8.3.2). It was noted that the method of investigation (cable percussion boreholes using disturbed samples) means that some of the identified units could not be confidently differentiated (Section 10.3). This points to where additional investigation will be required in the next phase of works on site… 3.60 It is stated in Section 10.2 that mitigation should focus upon capturing stratigraphic sections that are suitable for differentiating the complex sequence of gravels and potential lake deposits, which seems sensible and appropriate. The sequences recorded in this report could potentially produce high resolution records of landscape and environmental change over time. 3.61 Section 10.4 states that stepped trenches may be needed to allow specialists safe entry to investigate deposits once the depth exceeds 1 m. We agree that this would be useful for key sequences and to allow specialist samples to be recovered for palaeoenvironmental and dating assessments. 3.62 Section 10.6 outlines the further sampling priorities for future work. It is stated that alluvium deposits are of low geoarchaeological potential but have the potential to contain deposits of moderate to high geoarchaeological and palaeoenvironmental significance. It is therefore not clear why it is stated that targeted mitigation of these deposits is not suggested. We recommend this is rectified in any proposal going forward. 3.63 Section 10.6 states that organic alluvium is of low to moderate geoarchaeological potential but will only be targeted for further work if they are believed to date to associated archaeology, for which the environmental context would be useful. Can it be clarified how the date of the deposits will be determined? No assessment work has been carried out on any of the geoarchaeological work carried out prior to submission, and so no scientific dating work has been completed to guide these discussions. This is a concern.	information, including results from targeted sampling and investigations, becomes available, the Applicant will update and refine the mitigation strategy accordingly through Detailed Written Schemes of Investigation as set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**. Should significant deposits be identified within the impact zone, appropriate targeted mitigation measures would be implemented. Please also see responses to 3.36 – 3.54.

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			3.64 It is stated that peat deposits will be targeted for further assessment using window samples for palaeoenvironmental and scientific dating, which is good to see. 3.65 It is stated that a targeted programme of OSL dating has been recommended for sands and gravels associated with the River Terrace Deposits during mitigation works. We would recommend that the value of portable OSL (pOSL) is considered for these deposits to help inform the sampling strategy on site. 3.66 We are pleased to see that the potential of the glaciolacustrine deposits has been recognised and that the proposed mitigation work will investigate these deposits in more detail (additional geophysical surveys, borehole samples, dating, palaeoenvironmental assessments and sedaDNA). 3.67 It is recommended that a geoarchaeologist monitors any subsequent GI works, which we would support. This will allow opportunities to record and sample deposits to be maximised where possible 3.68 Appendix 1 presents the data from the geoarchaeological logs, which includes information about the finds and samples that were recovered. It is not clear what type of samples were recovered, just where the samples were recovered from. There is also no information about whether the samples were assessed as part of this work. This information would provide information about the potential and significance of a sampled unit, which in turn would help inform the mitigation strategy.	
REP1-191	Historic England	Historic Environment	North Tilbury report 3.69 2.21 states that a total of 22 interventions were investigated for the GI works, with 19 designated for geoarchaeological monitoring: four cable percussion boreholes, eight trial pits, one infiltration pit and six inspection pits for CPT testing. 3.70 Table 8.2 summarises the trial pit locations and the depths reached for each intervention. The maximum depth reached by the trail pits was 3 m below ground level (bgl), with six trial pits only investigating up to 1.2 m bgl. The final design of the proposed development is not currently available, and so it is not clear how deep the impacts may be in the different areas of the proposed scheme. However, it is likely that additional studies will be needed in this area to understand the impacts of the proposed scheme. 3.71 8.6.2 states that the confidence in the deposit model produced for the North Tilbury study area was classed as good, as there is a relatively high density of boreholes and test pits. 3.72 It is noted that several of the sequences logged by the geoarchaeologist were only available as disturbed bulk samples, which limits the information available as details about the stratigraphy and transitions between layers has been lost (Section 8.6.3).	Please see responses to 3.36 – 3.68

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			3.73 The issues associated with identifying key deposit types, such as the palaeosols has been highlighted, stating that this will need to be addressed during the future works (Section 8.6.4). 3.74 Recommendations have been made for further mitigation work in Section 10.2. It is stated that Head deposits are of low geoarchaeological potential but have the potential to contain deposits of high geoarchaeological and palaeoenvironmental significance, such as buried land surfaces and palaeolithic remains. It is therefore not clear why it is stated that targeted mitigation of these deposits is not suggested. 3.75 We are pleased to see that a targeted borehole survey will be carried out to investigate the buried land surfaces in more detail. 3.76 10.3 states that a targeted programme of OSL dating has been recommended for sands and gravels recorded during monitoring. We would recommend that the value of portable OSL (pOSL) is considered for these deposits to help inform the sampling strategy on site. 3.77 Appendix 1 presents the data from the geoarchaeological recording, including the finds and samples that were recovered. No samples are recorded which seems to be a missed opportunity to understand the potential of the sampled deposits, and to guide the mitigation strategy.	
REP1-191	Historic England	Historic Environment	Watching brief Report 3.78 This report presents the results of archaeological and geoarchaeological monitoring of 54 geotechnical pits across three geographical sections of the route: Section B (Mid Suffolk District Council), Section C (Babergh District Council, Colchester City Council and Tendring Council) and Section D (Colchester City council). This part of the route covered approximately 87 km in length (Section 1.1), and a total of 43 pits were excavated under archaeological supervision (Section 2.1). 3.79 The results section does not really discuss the geoarchaeological potential of the test pits and it does not appear that any samples were recovered to help understand the palaeoenvironmental potential of the sampled deposits, which we feel is a missed opportunity. It was also not clear if the test pits were monitored by a geoarchaeologist.	This reported the archaeological monitoring of GI interventions and was not intended to report on monitoring for geoarchaeology, as this was covered by the other reports in **6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**.
REP1-191	Historic England	Historic Environment	4 Comments on Outline Archaeological Mitigation Strategy and the Outline Written Scheme of Investigation (OAMS-OWSI), (Vol 7: Other Documents, Document 7.5), the OLEMP (Document: 7.2), the CoCP (Document: 7.2) and the Draft DCO (Vol 3, Draft Development Consent Order, Document: 3.3) OAMS/OWSI 4.1 1.3.4 states that appropriate and proportionate geophysical (magnetometer) survey and archaeological trial trenching has been undertaken to date, but we do not feel that this statement is correct. It was stated in the Chapter 11 of the main Environmental Statement that part of the geophysical survey work has not been completed	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

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			(10% of the Phase 1 Priority areas and 50% of the Phase 2 areas), and that the Trial Trench evaluation excavations are also outstanding (85% of the Priority areas and 100% of the Phase 2 areas). 4.2 In addition, the Geophysics and Trial Trench evaluation reports included in Appendices 11.4 and 11.5 respectively are stated to be interim reports only. They do not represent the full assessment of the results, and they do not include the specialist assessment of things like the artefacts or samples. Referring to these documents as 'the results of the evaluation fieldwork' for example (Section 1.8.1) is misleading. 4.3 The result of the geophysical survey and Trial Trench evaluation excavation are needed to understand the potential of the proposed development area as well as the potential impact of the different elements of the scheme. A significant amount of information is therefore not available for review to support the application. 4.4 It is stated in Section 1.3.4 that only limited additional archaeological evaluation will be carried out post-consent, but as stated above, the majority of the Phase 1 and all of the Phase 2 evaluation work has either not been completed or not started at the point of submission. 4.5 It is stated that the OAMS-OWSI describes the mitigation that could be undertaken. Due to the lack of evaluation data available for review, this document will need to allow for a degree of flexibility post-consent to ensure that opportunities to investigate features and deposits are not missed, and will need to be updated regularly. 4.6 Table 2.1 outlines the aims of the mitigation techniques proposed for the project. In general, the approaches summarised in this table are what we would expect to see. However, we would recommend that mitigation approach 1.2 (discussed further in Sections 5.3.6-5.3.11), which proposes the burial or sealing of remains within barrier membrane' is reviewed. The Historic England document 'Preserving Archaeological Remains' (2016), and in particular, Appendix 5, 'The Reburial of Archaeological Sites' (2024) should be referred to, to help define a reburial scheme for the archaeological site: https://historicengland.org.uk/imagesbooks/publications/preserving-archaeological-remains/. 4.7 The 'Reburial of Archaeological Sites' document states that the use of geosynthetic membranes needs to be justified. It is further stated that they are not usually required and can at times cause damage to the assets that they are installed to protect. We would therefore recommend that the potential use of geosynthetics as a barrier membrane is reconsidered and justified. 4.8 The 'Reburial of Archaeological Sites' document helps to define a reburial scheme for an archaeological site that considers the significance of the remains, its condition and an assessment of the impacts and risks facing the site. We would recommend that this document is referred to and the 'Reburial Checklist' and 'Reburial Threats and Risks' documents are completed. This would ensure that	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 **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** to **6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083]**, of which the historic environment stakeholders are aware. At this stage approximately 3,000 trial trenches and 1,650 ha of geophysical survey have been completed. This information included further priority geophysical survey and trial trenching results, and preliminary results of part of the Phase 2 geophysical survey. To clarify, the percentages referred to in paragraph 4.1 of the representation appear to refer to information included in the submission version of Table 11.2 of **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. This table set out the further environmental information to be provided, and which has been submitted to the Planning Inspectorate in January 2026 as **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** to **6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083]**. The reference to 85% stated that in relation to priority trial trenching, the further information '*would contain a minimum of 85% of results of post-submission fieldwork*', not that 85% of priority areas were still outstanding at the time of submission. The vast majority of the priority geophysical survey and trial trenching are complete and included in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** to **6.11.F6 Environmental Statement Figure 11.6 - Phase 2 Geophysical Survey Preliminary Results [AS-083]**. 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 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 Applicant proposes to update **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** to take account of detailed comments provided in Local Impact Reports and Written Representations. The updated version will be shared with the historic environment stakeholders for their review.

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			the reburial strategy is appropriate for the site and for the remains in question. 4.9 5.1.1 states that the DWSI's will be approved by the relevant Local Planning Authority, and if relevant, Historic England. We would recommend that the DWSI's are shared with Historic England, particularly the Science Advisor who can review aspects such as the sampling strategies. 4.10 5.1.12 and 5.3.138 state that no construction will take place on site if unexpected remains are discovered until a suitable approach has been agreed with the Local Planning Authority and Historic England. It should be noted that if waterlogged structures, remains and deposits are discovered, the size of the stand-down area required will need to be considered as the construction work could result in the dewatering of adjacent areas. This could impact the archaeology and result in its degradation and loss. 4.11 5.3.23 states the type of samples that will be collected for geoarchaeological analysis. This includes analysis of chemistry, magnetic susceptibility, particle size, micromorphology and/or other techniques as appropriate. The list of analysis does not mention palaeoenvironmental assessments, but it is stated in Section 5.3.24 that the potential for palaeoenvironmental evidence will be considered. 4.12 We are pleased to see it stated that samples of waterlogged deposits should be retrieved for assessment of the preservation potential of environmental remains (Section 5.3.24). 4.13 5.3.40 states that all evaluation necessary for the purposes of the ES was completed, but we do not agree with this statement. The Geophysics reports in Appendix 11.4 and the Trial Trench evaluation reports presented in Appendix 11.5 are interim reports only and significant portions of the evaluation work is still outstanding. Specialist assessment of the artefacts and environmental samples has not been carried out/completed and so the potential, condition and significance cannot be confidently determined at this stage. 4.14 5.3.50 & 5.3.86 state that artefact and environmental sample processing will be undertaken whilst the investigation proceeds on site, which is good to see. This information can be fed-back to the team on site to inform and guide the strategy. 4.15 5.3.51 states that if waterlogged deposits are identified, the Conservation specialist and the Environmental Archaeology Coordinator or Environmental Archaeology Supervisor will be contacted for advice, which is good to see. In addition, advice will be sought from the Historic England Science Advisor and relevant Local Planning Authority, which is also good to see. 4.16 5.3.69 and 5.3.72 state that hearths and areas of burning will be completed excavated and sampled for techniques such as archaeomagnetic dating. We would recommend that it is made clear that an archaeomagnetic dating specialist will need to assess the potential of a feature for dating before it is excavated, as this	

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			technique requires samples to be recovered from areas of in situ burning. 4.17 It should be noted that some of the features and remains will require a specific sampling strategy to be developed (e.g. structures, industrial features etc). The strategies will need to be included in the DWSIs. 4.18 5.3.84 states that the environmental sampling strategy for each DWSI will be based upon the results of previous assessment work, but with the exception of the EACN evaluation excavations, environmental samples have not been assessed yet. 4.19 5.3.85, 5.3.93 and 5.3.124 state that the Historic England document 'Environmental Archaeology' will be referred to, but it should be noted that a revised version of this document was published in 2025: https://historicengland.org.uk/images-books/publications/environmentalarchaeology-3rd/. 4.20 5.3.88 outlines the sort of remains that will be assessed as part of the investigations. Details of the types of samples that will be recovered will need to be included in the subsequent DWSI, include the size of the samples required to produce statistically reliable assessments. 4.21 We are pleased to see that scientific approaches will be considered to address specific research questions, such as biomolecular approaches (Section 5.3.91). 4.22 We are pleased to see that statistical modelling of the scientific data will be carried out in order to produce robust chronologies. It is stated that the different dating specialists will prepare a strategy prior to the commencements of the works, which will be incorporated in to the DWSIs (Section 5.3.92). 4.23 It is stated that scientific dating will be undertaken at the post-excavation stage (Section 5.3.92) but it should be noted that for some techniques, samples will need to be recovered during the fieldwork phase (e.g. archaeomagnetic dating. OSL etc.).	
REP1-191	Historic England	Historic Environment	4.24 Historic England notes the application contains heritage specific policies within the CoCP (Document 6.1.13 ES Chapter 11: Historic Environment - document reference 6.11). We welcome the recognition that the project could affect the historic environment during construction, including archaeological remains, built heritage and historic landscape assets. We welcome the mitigation measures and commitments (Table 6.1). 4.25 We also welcome the provision of an Outline Archaeological Mitigation Strategy (OAMS) and Written Scheme of Investigation (WSI). As noted above the AMS and WSI would however need to be revised in line with our comments prior to being issued and should consent be granted. We would welcome further discussions post consent with regards to finalising the documents and as part of the approval process as a named party. 4.26 Given the documented issues with regards to the amount of assessment work that is still to be undertaken we would recommend	4.26. **7.2 Outline Code of Construction Practice [Revision B]** already commits to the appointment of an Archaeological Clerk of Work (ACoW) during construction, as set out in Section 3.2 Project Responsibilities. 4.27. Commitment H04 in **7.2 Outline Code of Construction Practice [Revision B]**, to be issued at Deadline 2 is proposed to be updated to: *'Where a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and Historic England and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements. The Principal Contractor(s) will be responsible for making sure staff*

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			that the applicant seek the appointment of an Archaeological Clerk of Works in the event that consent is granted. This role would be responsible for the commitments as set out in the CoCP and would oversee the transition from evaluation to mitigation, and the implementation of the AMS and the WSI. The use of a role such as a clerk of works should be added as a specific agreement in the CoCP and could be added to the CoCP as a commitment and again in Table 6.1. 4.27 Commitment H04 (Table 6.1) should also include reference to Historic England, and we recommend the wording is changed to 'Where a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and Historic England and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements.' 4.28 We note the CoCP also includes Hydrology, Land Drainage and Flood Risk (6.1.15 ES Chapter 12: Hydrology, Land Drainage and Flood Risk (document reference 6.12) which considers the potential effects of the proposal on hydrology, land drainage and flood risk, including surface water receptors. Please note that this could include effects on archaeological sites such as those which retain water (e.g. moats) as well as other archaeological deposits. Regard should be given to archaeology within this mitigation and cross referenced to the archaeological section and again during the detailed design stage. A commitment should be given in Table 6.1 to include identification of archaeological features with sensitivity to hydrological changes 4.29 We accept the restrictions placed on those pylons relating to Langleys' and have included this in our assessment of the impact resulting from the operation of the project in our representations.	*are aware of what to do in the event of an unexpected heritage asset. This should include toolbox talks within site inductions.'* 4.28. Regarding the archaeological features with sensitivity to hydrological changes, there are already conditions set out **7.2 Outline Code of Construction Practice [Revision B]** which would avoid dewatering: '*GH07 - Any temporary dewatering activities during construction will be undertaken in accordance with Environment Agency guidance (Environment Agency, 2023b. Environment Agency, 2022. Environment Agency, 2021a, Environment Agency 2021b) including appropriate assessment undertaken as required by the guidance (Environment Agency, 2007), and if required, an Abstraction Licence and Environmental Permit (for the discharge) will be obtained, and the works will be limited to the depth and time required to facilitate construction activities.*' And: '*GH14 - During dewatering of excavations, any water removed would be discharged as close to the excavations as practicable in line with GH07. Water would be discharged so that the dewatered groundwater body is recharged as much and as soon as practicable.*'
REP1-191	Historic England	Historic Environment	4.30 We are content with the proposals as they relate to designated heritage assess. Sections 7, Vegetation Retention and Protection and 9, Landscape and Ecological Reinstatement and Other Mitigation set out approaches to the retention, reinstatement and post-construction management of trees and hedgerows which could be positive in the setting of heritage assets, particularly where the proposed development is distant from them and this might contribute to screening part of the development. 4.31 HE welcomes proposals for planting in the setting of designated heritage assets and that we have brought these into our assessment of the permanent, operational impact of the development.	The Applicant notes the agreement with the proposals in **7.4 Outline Landscape and Ecological Management Plan [Revision C].**
REP1-191	Historic England	Draft DCO	4.32 We appreciate being a named party within the DCO wording at SCHEDULE 3 REQUIREMENTS 5. Archaeology (pp 105). 4.33 We consider that the requirement wording is however imprecise and would need to be amended. At present the conditions say the following (1) No stage of the authorised development may	The Applicant is grateful for Historic England's comments and has updated Requirement 5 to refer to Historic England as a consultee, rather than a decision-making body, as requested.

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			commence until either a preservation in situ management plan, or a detailed written scheme of investigation of areas of archaeological interest relevant to that stage (if any), as identified within the outline archaeological mitigation strategy and outline written scheme of investigation or identified through evaluation work as set out in the 107 outline archaeological mitigation strategy and outline written scheme of investigation, has been submitted to and approved by the relevant planning authority and, if relevant, Historic England. (2) Any detailed archaeological works must be carried out in accordance with the approved detailed written scheme of investigation for that stage. (3) The detailed written scheme of investigation must be substantially in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation and must identify areas where archaeological works are required and the measures to be taken to protect, record or preserve any significant archaeological remains that may be found and must include— (a) an assessment of significance and research questions. (b) the programme and methodology of site investigation and reporting. (c) the programme for post-investigation assessment. (d) proposals for providing for the analysis of site investigation and recording. (e) proposals for providing archive deposition of the analysis and records of the site investigation. (f) nomination of a competent person or persons/organisation to undertake the works set out within the detailed written scheme of investigation; and (g) an implementation timetable. (4) For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, unless otherwise agreed with the relevant planning authority and, if relevant, Historic England. 4.34 We would recommend the wording at sections (1) and (4) 'and, if relevant' is deleted and replace with 'in consultation with'. This is because Historic England would not be an 'approving' authority in this instance as this is a role for the LPA. 'In consultation' would instead enable HE to be informed of the proposal and provide comment as appropriate to the LPA, to support the LPAs in decision making.	
REP1-191	Historic England	Planning Policy	5.1 We note the applicant has set out some of the relevant policy contexts for the historic environment at 11.2 of Environmental Statement (Chapter 11- Historic Environment Document: 6.11). We are aware that Regard to the Historic environment is considered in both the Horlock Rules and National Policy Statement for Electricity Networks Infrastructure (EN-5), 2025. The Horlock rules state for example that 'Internationally and nationally designated areas of highest amenity, cultural or scientific value are: National Parks; National Landscapes; Heritage Coasts; World Heritage Sites; Ramsar Sites; Sites of Special Scientific Interest; National Nature Reserves; Special Protection Areas; Special Areas of Conservation. Care should be taken in relation to all historic sites with statutory	The Applicant notes that Historic England has included paragraph references from the National Policy Statements (NPSs) which came into force on 6 January 2026. Pursuant to Section 104(3) of the PA 2008, the Application must be decided in accordance the relevant NPS(s). Further to the transitional arrangements applicable to the Application, the relevant NPSs to the Project for the purposes of section 104(3) are EN-1, EN-3 and EN-5 (January 2024). The recently adopted updated EN-1, EN-3 and EN-5 (January 2026) are important and material considerations for the determination. This is highlighted only to assist in avoiding uncertainty where paragraph and text references may deviate between the 2024 and 2026 iterations of the NPSs.

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			protection e.g. Scheduled Monuments, Battlefields and Listed Buildings.' 5.2 EN 5 at 2.2.10 goes on to say that as well as having duties under section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "…have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects." This sets out the commitment by which the applicant would need to consider the and address historic environment matters within the application. 5.3 EN-5 as an overarching policy refers for further guidance on Historic Environment to the specific policies set out in Overarching National Policy Statement for Energy (EN-1), 2025, and specifically Section 5.9. Historic Environment. This mirrors the NPPF and specially includes general historic environment paragraphs as well as sections that cover Applicant Assessment, Mitigation and the role of the Secretary of State in decision making. We have not flagged every policy however we would like to draw attention to the following. 5.4 EN 1 5.9.26 which says the '…Secretary of State should consider the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities, including to their quality of life, their economic vitality, and to the public's enjoyment of these assets.' 5.5 EN 1 para 5.9.29 which stats that '…The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.' 5.6 EN 1 para 5.9.32 also states that '…Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.' 5.7 Again para 5.9.34 notes that in weighing applications that directly or indirectly affecting 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. 5.8 And para 5.9.37 'When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving	**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. Paragraph 7.2.57 of **5.6 Planning Statement [APP-085]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, 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 National Policy Statements (NPSs). Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction 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 critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.

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			the setting of such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval' 5.9 Also, of relevance here and not considered by the applicant in 11.2 would be EN 1 para 5.9.8 which states that '…non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments or Protected Wreck Sites should be considered subject to the policies for designated heritage asset. The absence of designation for such heritage assets does not indicate lower significance or necessarily imply that it is not of national importance. 5.10 And again 5.9.15 The applicant is encouraged, where opportunities exist, to prepare proposals which can make a 'positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected'.	

3. Applicant's Comments on WRs submitted by Affected Parties

3.1 Overview

3.1.1 The Applicant's comments on WRs by Affected Parties are provided in Table 3.1.

3.2 Overarching comment on compulsory acquisition

3.2.1 The Applicant acknowledges that given the nature of the impact of the Project on the landholding of an AP, many of the WRs raised points relating to compulsory acquisition (CA). In order to avoid duplication, the Applicant provides its overarching position on matters raised within the AP WRs regarding compulsory acquisition, as stated at the Compulsory Acquisition Hearing 1 (CAH1) on 11 February 2026. A written summary of that hearing was submitted at Deadline 1 in **8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138].**

Extent of compulsory acquisition and temporary possession

3.2.2 The physical extent of the land sought to be the subject of compulsory acquisition (CA) is set out in full in **4.3 Book of Reference [AS-018]** and shown on **2.2 Land Plans [AS-005 to AS-012]**. CA or temporary possession powers are sought in relation to approximately 8,100 parcels of land, mostly associated with the construction, use and maintenance of the Project. The extent of land over which at least one form of CA is sought is approximately 38,000 square metres, a significant proportion of which would involve the acquisition of rights rather than taking ownership of the land.

3.2.3 The **Draft Development Consent Order (Revision B)** (the 'draft DCO') seeks CA powers for the Applicant and UK Power Networks, together defined as 'the undertaker'. Each part of **4.3 Book of Reference [AS-018]** sets out the respective interest, right or power to be acquired, extinguished or used in relation to each parcel of land. The refinement of requirement for the class of use in relation to the infrastructure has resulted in a multi-class position here, as has been used on other Nationally Significant Infrastructure Projects (NSIPs), such as the Bramford to Twinstead Reinforcement.

Statutory tests for compulsory acquisition and overall compelling case

Section 122(2) of the PA2008

3.2.4 The land and rights sought are reasonably necessary and at all times have been sought proportionately based on the Applicant's experience of other DCOs including the Bramford to Twinstead Reinforcement. Therefore the statutory test under Section 122(2) of the PA 2008 is met.

3.2.5 The Applicant notes that this is an ongoing process, and if at any time it becomes apparent that rights are no longer required or can be proportionately reduced, applying a precautionary principle, then this will be reflected by removing the relevant land or right in accordance with the provisions of the DCO and in accordance with "Planning Act 2008: guidance related to procedures for the compulsory acquisition of land" (MHCLG, 2013) (the Guidance).

Section 122(3) of the PA2008

3.2.6 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 Guidance makes clear that the Secretary of State will seek compelling evidence that the public benefit derived from the proposal would outweigh the private loss suffered by those whose land is to be acquired.

3.2.7 The Applicant takes the view that this is a freestanding test, which falls to be passed separate to, and independent of, the merits of the proposal, but cannot be divorced from those merits if those merits provide a compelling case. Meeting the need represents a public benefit, which should be afforded great weight in accordance with Overarching National Policy Statement for Energy (NPS EN-1) (2024) , paragraphs 3.2.6 to 3.2.8; and meeting the Critical National Infrastructure need will outweigh private losses at a strategic level. Please refer to the Applicant's response in Agenda Item 3.6

Section 123 of the PA2008

3.2.8 Section 123 of the PA 2008 provides the further procedural condition that a development consent order may only include CA powers where the Secretary of State is satisfied that one of three statutory conditions is met. The first of those conditions requires the Applicant to have included a request for powers authorising the CA of land (including rights over land) as part of its application for

development consent. Other alternative conditions are: (i) that there is consent from persons with an interest in land to the inclusion of the CA provision, or (ii) that the appropriate CA procedure has been followed. A request for the authorisation of CA powers was made by the Applicant as part of its development consent application for the Project, and therefore Section 123 is also met.

Compelling case in the public interest

3.2.9 The Applicant considers that there is a compelling case in the public interest for the CA and temporary possession.

3.2.10 In strategic terms, the public benefits would strongly outweigh the generality of the public loss. In the case of policy, NPS EN-1 (2024) states that there is a need for infrastructure which is urgent and should be brought forward at pace (paragraph 3.3.65). 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.

3.2.11 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 interference with private rights has been minimised as far as possible. The general operation of the Holford Rules, the adherence to the clear policy set out in NPS EN-5 (2024), and the National Planning Policy Framework ensures at a strategic level that the interference with private rights is removed or mitigated, such that the strategic need for the proposals is compelling.

Alternatives

3.2.12 The main alternative to CA is acquisition of land or rights by voluntary agreement, which has been and would always be the Applicant's preference. Such a preference for securing land and rights by voluntary means wherever possible has led already to significant landowner engagement and this will continue in parallel to Examination. The Applicant is employing significant resources on the ground to contact the relevant parties recognising that the Project is the longest DCO ever sought at 180 kilometres, with 8,100 parcels of land and 1,900 points of interaction with statutory undertakers. The Project is identified as critical national infrastructure for which there is an urgent need. NESO points to the requirement to accelerate the delivery of this critical project if possible. This means that the delays associated with any requirement to complete voluntary negotiations in advance and prior to seeking powers would potentially stymie the meeting of a national need.

3.2.13 The Guidance states at paragraph 25, the general rule that an applicant should only seek CA if attempts to acquire by agreement fail; but it then goes on to say: '*Where proposals would entail the compulsory acquisition of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land required at the outset.'*

3.2.14 This note is important, because otherwise an applicant could not ensure that parcels of land in series, critical for the delivery of a long linear project are genuinely going to be available and as quickly as government and the national interest requires. The failure to deliver with certainty one or a small number of parcels has a completely disproportionate effect on the delivery of a project.

3.2.15 The Examining Authority on the Bramford to Twinstead DCO in paragraphs 6.6.13-14 stated that the Applicant requires the powers of CA and TP at the outset in order to provide certainty that it will have all the rights required to realise its significant public benefits:

'6.6.13 Without the powers of acquisition being compulsorily, there would be a risk that the urgent national need for the project could not be met because the land and rights required in the Order land may not be assembled.

6.6.14, This approach to making the application for the dDCO in parallel to conducting negotiations to acquire rights in land by agreement wherever practicable, is in accordance with paragraph 25 of the CA Guidance'.

3.2.16 The same logic applies to Norwich to Tilbury except that Norwich to Tilbury is more critical.

3.2.17 Guidance on the CA process issued in 2025 on CA, also makes it clear at paragraph 2.8 that delaying the start of a CA process can mean the proper progress of a project being lost, and in those circumstances it may often be sensible, given the amount of time required, for the acquiring authority to plan a CA timetable and to initiate formal procedures, and then to undertake the issues in parallel.

3.2.18 Whilst the Applicant contends that this guidance is also relevant, the Applicant essentially seeks to rely upon Paragraph 25 of the Guidance, and also the position as set out by the Examining Authority in the context of the Bramford to Twinstead Reinforcement.

3.2.19 A second alternative to CA has been to seek temporary possession of land, and, where appropriate, the Applicant has preferred the use of temporary powers rather than the CA of land or rights as this is more proportionate when the permanent acquisition of land or rights is not required.

3.2.20 Representations made to the Examining Authority, including WRs, suggest that there are other strategic options in relation to the Project which would invariably represent an alternative from a CA perspective. The Applicant does not support that proposition, noting that the delivery of any alternative solution would also inevitably require the acquisition of land and rights in the ownership of parties other than the Applicant.

3.2.21 For example, an increased extent of undergrounding would invariably require the authorisation of CA powers over a larger extent of land, noting that the Order limits for underground cable swathes are typically wider than those required for overhead line.

3.2.22 Similarly, the Applicant's view, and with reference to its very recent experience in the context of the Sea Link Project, is that it is by no means easier or quicker to obtain, whether by compulsion or otherwise, the rights associated with subsea routeing options. Those subsea routeing options would likely interface with gas pipelines, telecommunications equipment, and other utilities infrastructure. Crown licences would also be required.

Engagement with APs

3.2.23 The Applicant is confident that there has been a high degree of meaningful land engagement and has set out that engagement has been early, ongoing, proportionate and multi-layered, extending well beyond the statutory minimum requirements. See **4.4 Land Rights Tracker (Revision B)** which is submitted at Deadline 2.

3.2.24 The Applicant confirms that it has sought to engage with all persons with an interest in land affected by the Project, with a clear preference to secure land rights by voluntary agreement wherever possible, and that this approach has been consistently demonstrated through its actions to date. Engagement has included direct contact, offers to meet, and continued dialogue even where initial responses have not been received.

3.2.25 Where representations assert limited engagement, the Applicant notes that in a significant number of cases contact has been made by it but not reciprocated, or negotiations remain ongoing. The Applicant has nonetheless kept lines of communication open and remains available to meet affected parties at their convenience. Where affected parties have not responded to invitations to meet or to correspondence, the Applicant has continued to make reasonable efforts to contact them and ensure opportunities for engagement with the Project's lands team. This has included letter drops, follow-up correspondence by email and telephone where contact details are available, and, in harder to reach cases, door-knocking and the use of site notices.

3.2.26 In relation to alternatives and micro-siting, the Applicant recognises the importance of demonstrating to Interested Parties that their proposals have been taken seriously. Landowner suggestions and the Applicant's response are recorded through the project's land engagement processes, including negotiation records and the Detailed Land Rights Tracker. Where proposals lead to design or land take changes, these are reflected in updated plans, revised Heads of Terms or amended land rights schedules.

3.2.27 In addition, where agreement cannot be reached, the Applicant's consideration of alternatives is evidenced through Examination documents, including the Statement of Reasons, responses to Relevant Representations and summaries provided at compulsory acquisition hearings. This provides transparency to both landowners and the Examining Authority as to how landowner feedback has been considered and why particular land or rights remain necessary.

3.2.28 This process is ongoing. As negotiations continue and further detail becomes available, the Applicant continues to test whether compulsory acquisition and possession can be reduced or avoided, and whether micro siting or alternative arrangements can mitigate impacts on individual landholdings. Compulsory acquisition is therefore relied upon only where, having considered reasonable alternatives, it remains necessary to ensure delivery of the scheme

Human Rights and Equalities

European Convention of Human Rights (ECHR)

3.2.29 Article 1 of the first Protocol 1 (A1P1) of the ECHR (as enacted and given effect in UK legislation through the Human Rights Act 1998) is engaged in instances where the Project requires compulsory acquisition of land or rights, or temporary possession during construction and or for the purposes of ongoing maintenance that may affect a person's peaceful enjoyment of possessions (in this context primarily their land).

3.2.30 The Project involves limited acquisition of rural agricultural land and temporary construction access. The main form of interference is therefore one of 'control of use' for a specific purpose, rather than permanent deprivation.

3.2.31 The **7.14 Equality Impact Assessment – EqIA [APP-352]** confirms no known equality impacts arising from land acquisition, and the Project has sought to ensure throughout the route development phases (including responses to feedback received through both general and targeted engagement) that the minimum level of land is being sought for its construction, operation, maintenance and decommissioning.

3.2.32 Article 6 is engaged because the DCO process, through the acquisition of land and the potential to take power over land to deliver the project, interacts with established civil rights. The Planning Act 2008 provides a structured examination process with very clear requirements and obligations to ensure inclusive consultation, which requires the identification of groups or communities with protected characteristics or who require assistance in accessing consultation events or documentation and public access to documents.

3.2.33 Article 8 may be engaged due to temporary or permanent impacts on residents' private and family life arising from construction noise, changes to views, PRoW diversions, construction traffic, and localised effects on tranquillity or perceived health risk (e.g., EMF perception). Vulnerable groups which may experience differential sensitivity have been identified where possible, and further explanation of how this has been achieved is provided in **6.10 Environmental Statement Chapter 10 Health and Wellbeing [APP-192]** and its associated appendices. Such groups include, but are not necessarily limited to, older people, disabled people, young people, and those with sensory or neurodivergent conditions.

Public Sector Equality Duty (PSED) and Equality Act 2010

3.2.34 The Equality Act 2010 requires the Secretary of State to have due regard to eliminating discrimination, advancing equality of opportunity and fostering good relations. Although National Grid is not itself subject to the PSED when promoting a DCO, it has voluntarily adopted an approach consistent with PSED principles and has submitted a full EqIA to the Examining Authority.

3.2.35 The relevant documents in the DCO Application are as follows:

- The **7.14 Equality Impact Assessment [APP352]** describes how protected groups were considered throughout design evolution, option assessment, consultation and mitigation planning.
- The **6.10 Environmental Statement Chapter 10 Health and Wellbeing [APP-192]** sets out how vulnerable populations etc have been mapped to inform the engagement process.
- **6.3 Environmental Statement Chapter 3 Alternatives [APP-127]** and **6.4 Environmental Statement Chapter 4 Project Description [APP-130]** set out the consideration of alternatives, the routing design methodology followed and how design changes were implemented along the line of route.
- The details of the Consultation process are set out in the **5.1 Consultation Report [APP-066]** and the **5.1 Appendix E: Statement of Community Consultation [APP 071]**.

3.3 Applicant's comments on other matters raised by APs

3.3.1 The Applicant has provided an overarching response to many of the 'in principle' matters raised by APs regarding the Applicant's sought powers of compulsory acquisition. The table below therefore focuses on location-specific matters and other matters of detail regarding the Project, as raised by APs.

Table 3.1 Applicant's Comments on WRs submitted by Affected Parties

Examination Library ID	Name	Topic	Matter	NG Response
REP1-296	Anne S Day	Land and property	I still have not heard from National Grid with answers and confirmation regarding initial concerns when works in operation, although the proposal of underground cabling will be on the neighbouring property However, I have major concerns of possible destruction to Well water supplies, existing overhead electric, telephone/broadband and the water aquifers and land drainage. Reinstatement of ancient Parish Boundary to correct location with trees and bats, as a historic area and reinstatement of roadside hedgerow and oak trees on completion of works due to temporary possible usage of land for haul road and surface water drainage. I am still awaiting confirmation regarding usage of the stream for the project as it flows into the River Stour, to have verification that NO POLLUTANTS will enter the environmental water courses and into the River Stour causing water contamination as I am personally responsible for this and pay the Environmental Water Charges for all water flowing into the water courses, stream and finally into the River systems. On completion of project reinstatement of the ditches and stream which have been utilised. To return land area of haul road surface to existing field sown with grass seed if utilised for project. Unknown time expanded for works and installations with such vast swathes across the land and road systems causing inconvenience and costs for every person in the countryside, inevitably unable to access from the country routes Southbound and south west access to main routes for many years. From the B1068. For the last seventy years the property has been within a Protected Environmental Sensitive Conservation area within the Dedham Vale	All construction activities associated with the Project will be undertaken in full accordance with the **7.2 Outline Code of Construction Practice (CoCP) [Revision B]**. The final CoCP is secured and enforceable through Requirement 4 of the **3.1 Draft Development Consent Order [APP-056]**, ensuring that the measures it contains must be implemented during construction. The Outline CoCP sets out a comprehensive suite of environmental management controls, including specific measures relating to the protection of watercourse and reinstatement commitments. In particular, commitments W01–W20 address the protection of Main Rivers and outline the controls that will be applied to avoid, reduce, or mitigate potential impacts from construction activities in proximity to these features. As set out within these measures, the Applicant will work closely with the Environment Agency regarding any qualifying works within, or in proximity to, Main Rivers. This includes securing the necessary permits or consents and agreeing appropriate mitigation and construction methodologies to ensure that water environment receptors are protected. The Applicant considers that these secured measures provide an appropriate and robust framework to manage potential effects on Main Rivers and to ensure that construction is undertaken in a responsible and environmentally compliant manner.

Examination Library ID	Name	Topic	Matter	NG Response
			Stour Valley Landscapes with protected fauna and flora for the environment and all future generations. National Grid have been so vague with any definitive details for the Public and countryside land owners regarding this Norwich–Tilbury infrastructure project which is totally unjust and unfair for the people of East Anglia. Finally, I have great concerns that we live in a flight path regarding terrorism with a 24" mains Gas pipe in the vicinity of these proposed Pylons and underground electric cabling through Suffolk and Essex route of this electricity planning proposal.	
REP1-203	Basildon BESS Ltd	Land and property	Basildon BESS has been in contact with the Applicant directly in order to raise their concerns about the use of Class 3 rights over plots H-1/5 and H-1/11 and have been advised by the Applicant that no Class 3 rights are being sought. There has been no update to the Applicant's documentation to reflect this and Basildon BESS has been advised by the Applicant that this will instead be confirmed and agreed with them through a side agreement. Basildon BESS has also been advised that this side agreement would also detail and confirm that the Applicant's project would not impede on Basildon BESS' operations. Despite these assurances, nothing has yet been received from the Applicant. Without the removal of Class 3 rights over these plots and without the assurance in relation to its operations, the BESS project would need to be removed necessitating a very significant compensation claim. Consequently, Basildon BESS continues to strongly object to the Applicant's proposals in their current form.	The Applicant notes the concerns raised by Basildon BESS Ltd in relation to the reference to Class 3 compulsory acquisition of rights (underground cable system) over plots H 1/5 and H 1/11, as shown in the Book of Reference and Statement of Reasons. The Applicants position remains that the affected parties concerns will be addressed through a side agreement giving reassurance that the Project will not impede the affected parties operations. The Applicant will make contact with the affected party to progress this agreement in line with the examination timetable.
REP1-246	John Gaymer on behalf of Copyhold Farms	Alternatives	Pylon TB209 has been positioned close to a bend in the field boundary, creating an awkward layout that will sterilise a disproportionately large area of productive land. A modest shift of the pylon into the adjoining field corner would substantially reduce this loss and minimise disruption to field operations. This minor adjustment would achieve the same engineering function while delivering a clear reduction in agricultural harm and should therefore be properly considered.	The positioning of TB209 is influenced by a Public Right of Way along the field boundary. Movement wholly to the field to the north would have knock on effects for pylon TB208 and be likely to move that closer to residential property. Some adjustment within Limits of Deviation is likely to be possible to position the pylon closer to the boundary. This will be considered through detailed design and informed by site-specific discussions between the Great Grid Partnership (the Applicant's delivery partner) and the relevant landowner. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations.
REP1-454	Robert Moore	Land and property	We poured every spare penny we had into creating a wedding venue and glamping site on our farm — not because it was fashionable, but because it was necessary. We built a business around what makes Norfolk special: open skies, uninterrupted rolling hills, sweeping views across unspoilt countryside. That landscape is not a luxury for us — it is our livelihood Couples book their weddings with us because of that view. Guests choose to stay because of that sense of space and peace. Now we are being told that a line of large overground pylons may be placed along the very ridgeline that defines our setting.	The pylons closest to this location are at around 400 m to the east. The Applicant acknowledges the concerns raised regarding the potential effects of the Project on the setting of the wedding venue and glamping business and recognises the importance that the local landscape has for rural enterprises. The alignment of the overhead line has been developed following an extensive, multistage routeing and siting process, informed by environmental assessment, engineering constraints, land use considerations and consultation feedback. The Holford Rules were applied throughout this process as part of a balanced assessment rather than as absolute requirements. Compliance with individual

Examination Library ID	Name	Topic	Matter	NG Response
			Those pylons will not be small. They will dominate the skyline. They will industrialise a landscape that we rely upon — economically, emotionally, historically. You cannot market “romance under open Norfolk skies” with steel towers marching across the horizon. The damage to our wedding and glamping business would be irreversible. Once the view is gone, it is gone. Once bookings drop, they do not simply bounce back. Years of investment, risk and hard work will unravel overnight. And what makes this harder to accept is that we have not been unreasonable. If this infrastructure must come, we have asked for it to be placed underground. At the very least, we have asked that it follow the valley bottom rather than the highest, most visually sensitive ground. At least seven landowners agreed that if pylons have to exist, the valley route is the least harmful option. Yet the proposed route continues to place them along the top of the hills — the most exposed, most damaging alignment possible. The Holford Rules exist for a reason. They were created to protect landscapes like ours — to guide infrastructure away from skylines and prominent ridges. Yet here we are, facing proposals that appear to ignore those very principles. We feel unheard. We feel dismissed. We feel insulted. Meetings have taken place. Concerns have been raised. Alternatives have been suggested. But it feels as though decisions were made long ago, and consultation has been little more than a box-ticking exercise. Subtle changes to the original plan do not address the fundamental issue. After all these years, our own farm still does not even have electricity connected. And yet we are being asked to accept enormous transmission pylons towering over our land, carrying power elsewhere, while we receive little to no meaningful compensation for the permanent damage to our livelihood. We are not anti-progress. We are not saying there should be no infrastructure. We are asking for responsible infrastructure. Infrastructure that respects the landscape. Infrastructure that follows established guidance. I ask — respectfully but firmly — that this route be reconsidered. That the valley option be properly evaluated. That undergrounding be seriously explored. That the Holford principles be honoured.	Holford Rules can present conflicts, and routeing decisions require judgement to balance landscape, heritage, ecological, technical and deliverability considerations. The Applicant therefore does not agree that the Holford Rules have been ignored in this location. The way the Holford Rules informed the routeing of the Project is set out in the **7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]**, the Design Development Reports published during consultation **[APP-358 to APP-360]**, and the Design Development Report submitted with the application for development consent (**5.15 Design Development Report [APP-122]**). Alternative alignments, including routes following valley floors, were considered as part of the routeing appraisal. In this location, valley-based alignments would give rise to other significant effects, including increased environmental effects, engineering challenges, land use impacts and additional infrastructure requirements. It has to pass closer to a Grade II listed building than it does at present with routeing constrained by the County Wildlife Site that lies to the east. The preferred alignment represents the Applicant’s judgement as to the most appropriate balance of these considerations when assessed against reasonable alternatives. The Applicant has also considered the use of undergrounding in accordance with national policy and the Holford Rules. National Policy Statement (NPS) EN-5 (2024) establishes a strong starting presumption in favour of overhead lines for new high voltage transmission infrastructure, with undergrounding to be considered where the criteria in NPS EN-5 at paragraph 2.9.23 were met and after considering the mitigation hierarchy. Undergrounding over long distances would introduce additional environmental effects, including extensive ground disturbance, impacts on soils, hydrology and ecology, and significantly increased construction activity. For these reasons, undergrounding was not identified as a proportionate or preferable solution in this location when assessed against policy, technical feasibility and environmental effects. This has been reported in the consultation feedback reports (**5.1 Consultation Report [APP-066 – APP-079 and REP1-007]**). The Applicant notes the concerns raised regarding potential effects on the operation and viability of the business. Matters relating to financial loss, business disturbance or compensation do not form part of the planning merits of the application and are not matters for determination through the Development Consent Order process. Where development is authorised, the Planning Act 2008 and the statutory Compensation Code provide a separate legal framework through which landowners and occupiers may pursue compensation for qualifying losses arising from the exercise of compulsory acquisition powers or the construction and operation of the authorised development. Any such matters would therefore be considered independently of the Examination and decision on the application. The Applicant remains committed to continued engagement with affected landowners as the Project progresses through Examination and, if consented, into detailed design and construction. This

Examination Library ID	Name	Topic	Matter	NG Response
				engagement will include consideration of detailed siting, mitigation measures and construction management controls to minimise local effects were reasonably practicable. The Applicant notes the concerns raised regarding potential effects on the operation and viability of the business. Matters relating to financial loss, business disturbance or compensation do not form part of the planning merits of the application and are not matters for determination through the Development Consent Order process. Where development is authorised, the Planning Act 2008 and the statutory Compensation Code provide a separate legal framework through which landowners and occupiers may pursue compensation for qualifying losses arising from the exercise of compulsory acquisition powers or the construction and operation of the authorised development. Any such matters would therefore be considered independently of the Examination and decision on the application. The Applicant remains committed to continued engagement with affected landowners as the Project progresses through Examination and, if consented, into detailed design and construction. This engagement will include consideration of detailed siting, mitigation measures and construction management controls to minimise local effects were reasonably practicable.
REP1-299	Bianca Moller	Health and wellbeing	I would like to raise further concerns regarding the potential impact of the electromagnetic field produced by the pylons on the operation of the wedding venue. As the venue is located in a field without access to Wi-Fi, we rely heavily on mobile phone signal. DJs depend on phone data to download and stream music, we use mobile signal to process card payments at the bar, and guests rely on it to book taxis at the end of the evening or in the worst-case scenario, In case of emergency. I am concerned that the electromagnetic field produced by the installation of pylons so close could interfere with mobile phone reception, which would significantly affect our ability to operate the venue effectively. I also operate a shepherd's hut as an Airbnb property. Due to its remote location, it does not have Wi-Fi and is entirely dependent on a reliable mobile phone signal. Any disruption to this service would therefore have a direct impact on the business.	The proposed overhead line is designed to National Grid's technical specifications which include the requirements of BS 5049-3[4], along with other equipment-specific standards such as BS EN 60437[5] for the insulators on the pylons. 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. The electromagnetic performance of the transmission system has been certified by a competent body and designed using good engineering practices, detailed in Section 3 of 7.8 Electric and Magnetic Field Compliance Report [APP-330] and would present no issues with TV, Wi-Fi or mobile interference under normal operating conditions.
REP1-455	Robert Pearce	Land and property	We are against the Norwich to Tilbury pylon scheme and believe off shore or undergrounding would be a far option. Should the pylons go ahead it would have a seriously negative affect on our family farming business. The disruption caused during construction and the structures themselves would deem areas of the farm uneconomical to continue farming and possibly put the business as a whole in financial insecurity	The Applicant notes the concerns raised regarding potential disruption during construction and the longer-term effects of the authorised development on the farming business. While such matters do not form part of the planning merits of the application, the Planning Act 2008 and the statutory Compensation Code provide a clear and established framework through which landowners and occupiers may seek compensation for qualifying losses arising from the construction, operation and maintenance of the Project. This includes, where

[4] British Standards Institution (1994) *EN BS 5049-3: Radio interference characteristics of overhead power lines and high voltage equipment: Part 3- Code of practice for minimising the generation of radio frequency noise.* London: BSI

[5] British Standards Institution (1998) *BS EN 60437:1998 Radio interference test on high voltage insulators.* London: BSI

Examination Library ID	Name	Topic	Matter	NG Response
				applicable, compensation for disturbance, temporary loss of use, crop loss, and proven business losses attributable to the exercise of compulsory acquisition powers. In addition, the Applicant will continue to engage with affected parties to minimise disruption where reasonably practicable and to provide appropriate support during construction and delivery of the Project, with any compensation matters to be addressed separately and in accordance with the Compensation Code. The Applicant notes the concerns raised over the positioning of pylons TB91 to 93. This alignment has been developed taking into account a range of factors, including impacts on surrounding land use, woodland and trees, nearby properties, access and construction feasibility. The Applicant will continue to engage with affected landowners as the Project progresses to detailed design and construction to consider matters such as access arrangements, construction methodology and localised mitigation were reasonably practicable. Any matters relating to loss or compensation arising from the positioning of the pylons would be addressed separately under the statutory Compensation Code.
REP1-328, REP1-280, REP1-334	David Salmon T W Salmon & Co Douglas McTurk	Traffic & Transport	Since the initial objection there has been a 2nd proposed change to the EACN access road. The planned use of this access road and the wind farm temporary hall road is still un-clear, with contradicting explanations at different meetings and in published consultation literature making it very difficult for us to provide constructive feedback. Which road will be used for construction of the EACN? Currently there has been no mention of how National Grid will work with the wind farms to use/share there temporary haul road so we have to presume that National Grid will use the EACN permanent access road for the construction phase. This means we will actually have 2 haul roads dissecting our property with a significant cumulative detrimental effect. This will impact Hall Farm (100m from temporary haul road and 500m from ECAN access road) significantly with noise and dust pollution on what is currently a quite rural location. Also farm management will become significantly more difficult with multiple fields dissected and separated by 2 different projects at the same time, resulting in costly delays to harvesting and other farm activates, not to mention the interference with existing drainage and irrigation infrastructure being dissected. Has the cumulative effect of these multiple projects been taken into account as a whole rather than individually? It is to this point I suggest a site visit at Hall Farm, Church Road, Little Bromley, CO11 2PP to view the cumulative impact of the National Grid project	The Applicant notes the concern raised by the respondents with respect to the access arrangements at the proposed East Anglia Connection Node (EACN) Substation site. The proposed access approach is set out as follows: • The proposed access strategy for construction of the Proposed Development is for the use of specified access routes (referred to as Primary Access Routes, or PARs) to be utilised on the Local Road Network. This is set out in Section 5.4 of **7.3 Outline Construction Traffic Management Plan [APP-309]** • For the EACN specifically, the Applicant has identified a proposed PAR reference H17-A2, which is shown in **7.3 Outline Construction Traffic Management Plan – Appendix C – Indicative Highway Mitigation Plans – Section C [APP-315]** Sheets 14 and 15. This proposed access route allows for the proposed EACN Substation to be constructed independently of any third-party development • As set out in paragraph 5.7.10 of the **7.3 Outline Construction Traffic Management Plan [APP-309]**, an opportunity has been identified for potential collaboration with the North Falls and Five Estuaries Offshore Wind Farm Projects, which are separate developments being brought forward by others • Under the potential collaboration approach, construction traffic accessing the proposed EACN Substation would make use of the separate construction corridor being proposed by the North Falls and Five Estuaries Offshore Wind Farm Projects. This alignment is shown in **6.4.F1 Environmental Statement Figure 4.1 –**

Examination Library ID	Name	Topic	Matter	NG Response
				Proposed Project Design [APP-133] Section C Pages 33 and 34 under the key item 'Proposed EACN Customers Access' • It must be noted that this collaborative approach would be contingent upon suitable alignment of construction programme between the Applicant's proposals and those being developed by the North Falls and Five Estuaries Offshore Wind Farm Projects • As noted in Item 6.2b of **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**, the Applicant has entered into a cooperation agreement with the North Falls and Five Estuaries Offshore Wind Farm Projects which sets out this approach • Further to this, the Applicant additionally draws attention to the explanation in paragraph 5.7.10 of **7.3 Outline Construction Traffic Management Plan [APP-309]** that, even if not used for construction traffic, the works associated with PAR H17-A2 would still be required to provide a permanent access to the proposed EACN Substation. This arrangement is shown in **6.4.F2 Environmental Statement Figure 4.2 – Permanent Features [APP-134]** Section C Pages 33 and 34 The Applicant adds that an amendment to the proposed permanent access to the proposed EACN Substation has been brought forward following consultation. This is set out in **9.2 Notification of Proposed Change to DCO Application – Change Request 2 (Little Bromley) [AS-050]**. The Applicant will continue to engage with affected landowners as the Project progresses to detailed design and construction. Furthermore, with respect to the respondent's query in terms of cumulative impact, the Applicant confirms that anticipated construction traffic relating to third-party developments – including the North Falls and Five Estuaries Offshore Wind Farm Projects – has been accounted for under the Applicant's impact assessments. This approach is set out in **7.11 Transport Assessment [APP-333]**, and a full list of third-party Committed Developments which the Applicant has identified is set out in **7.11 Transport Assessment – Appendix D – Committed Developments [APP-337]**.
REP1-359	Gillian Parrish	Land and property	I'm writing to formally request a site visit and express my firm and unequivocal objection to the Norwich to Tilbury pylon project. This includes the proposal for pylons to run through my fields and the recently identified plans to reroute existing pylons behind my home before taking them underground in front of my property. Beyond the visual and landscape harm, there are serious and practical concerns regarding the construction phase. The road network surrounding my property and the scale of vehicle movements, plant machinery and ground works raises significant concerns including: • Structural damage to local roads • Increased flooding risk due to soil compaction, excavation and disruption of existing drainage systems	**7.3 Outline Construction Traffic Management Plan [APP-309]** states that the Applicant will undertake both pre and post construction surveys of the existing highway network where it is to be used by Abnormal Indivisible Loads (AILs) or HGVs. The scope of the surveys will be agreed with the relevant local highway authority. A record of condition will be made and used to inform any necessary reinstatement once construction has completed. Notwithstanding, structural surveys of the routes to be taken by AILs have been undertaken and the assessments are presented in the **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]**. Concerning flooding as a result of soil compaction the Applicant has undertaken detailed soil surveys which have informed the **7.2 Outline**

Examination Library ID	Name	Topic	Matter	NG Response
			• Mud, debris and surface water creating hazards for residents and road users • Long-term deterioration of infrastructure that the local community will be left to manage	**Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]**. The plan includes for a soil protection strategy and soil management measures which seek to prevent soil compaction. The potential for mud, debris and surface water to affect road users is addressed within **7.2 Outline Code of Construction Practice [Revision B]**. Commitment GG23 requires that vehicles and equipment are washed down in designated areas within the temporary construction compounds to avoid mud and debris leaving site. The wash water will be collected and prevented from passing untreated into neighbouring water courses, groundwater (and land). Both the **7.2 Outline Code of Construction Practice [Revision B]** and **7.3 Outline Construction Traffic Management Plan [APP-309]** are secured by Requirement 4 in the **3.1 Draft Development Consent Order [APP-056]**. Any physical infrastructure installed by the Applicant will be maintained by it over the lifetime of the proposed development. Whilst not considered infrastructure, landscape planting will be maintained for a period of five years.
REP1-359	Gillian Parrish	Land and property	Our livery yard — which has been the backbone of our livelihood — has already been affected by uncertainty surrounding this scheme. Further loss and disruption of grazing land, noise intrusion, ground instability and environmental change will compromise the welfare and safety of the horses and undermine the viability of the business. This threatens not only income but the sustainability of a long-standing rural enterprise as it is going to get 100 times worse for our horses who will no be able to even get across to their grazing when National Grid starts the project. There are also serious concerns regarding the impact on residential property values. The proximity of new overhead pylons and underground cable works to homes will inevitably reduce market desirability and long-term value. For those of us whose homes represent our principal asset and lifetime investment, this is a material and deeply concerning consequence. The ongoing uncertainty and cumulative pressure associated with these proposals has had a tangible impact on health and wellbeing. Living under the continued threat of intrusive development directly affecting one's home environment creates sustained stress and anxiety that cannot be dismissed. It was particularly troubling to learn at a late stage that existing pylons to the west of my farm are also proposed to be taken underground through my land. The absence of clear and transparent communication from National Grid and Fisher German has left me feeling disregarded and inadequately consulted.	The Applicant acknowledges the concerns raised by Gillian Parrish regarding the effects of the Project on the operation of the livery yard, including impacts on grazing land, noise, ground conditions and the welfare and safety of horses. The Applicant recognises that uncertainty during the development and consenting stages of a large infrastructure project can be difficult for affected landowners and businesses, particularly where livelihoods depend on land-based activities. The Applicant does not feel that the Project will render access to grazing land impossible or that impacts will be uncontrolled. Construction activities, access arrangements and working areas will be managed through the Code of Construction Practice and associated management plans. These provide the mechanism for controlling noise, traffic, ground works, access routes and construction phasing, with the objective of reducing disruption to land-based businesses and animal welfare where reasonably practicable. The Applicant acknowledges that construction activities may give rise to temporary disturbance and changes to land use. Where grazing land is temporarily affected, reinstatement will be required following construction, and where residual impacts on business operations cannot be avoided through reasonable mitigation, compensation is payable in accordance with the statutory Compensation Code. This provides the appropriate legal mechanism for addressing demonstrable loss or disturbance arising from the Project. The Applicant notes the concern regarding the proposed undergrounding of existing overhead lines to the west of the holding. Modifications to existing assets form part of the wider Project design and have been identified through ongoing design development. The Applicant will continue to engage with affected landowners to explain

Examination Library ID	Name	Topic	Matter	NG Response
				the scope and purpose of such works and their relationship to the overall scheme. The Applicant would like to reassure Ms Parrish that she has not been disregarded. The Applicant has undertaken statutory and non-statutory consultation and continues to offer engagement through its appointed land agents. The Applicant remains willing to continue dialogue to explain the proposals affecting the holding and to discuss how construction impacts may be managed as the Project progresses.
REP1-225	D & J Starling	Land and property	lack of engagement on accommodation works	The scope and detail of accommodation works are inherently dependent on the final construction methodology and detailed design. As such, accommodation works have been considered at a proportionate level during pre-application consultation, with further engagement intended as the Project progresses to detailed design and construction. This approach has been set out through consultation materials and the Project documentation, and the application has been accepted for Examination having regard to the adequacy of consultation undertaken. The Applicant remains committed to continued engagement with D & J Starling to discuss accommodation works in more detail at the appropriate stage, including consideration of reasonable and practicable measures to address site-specific circumstances. The Applicant's appointed land agent, Fisher German has been instructed to contact D & J Starling to arrange a further meeting to discuss accommodation works.
REP1-330	David Wass	Land and property	1. Late Disclosure of Proposed CPO Compound Land Since the Open Floor Hearing on 10 February 2026, I have received a plan dated 11 February 2026 identifying land in Ford Street, Aldham (CO6 3PL) as subject to a proposed Compulsory Purchase Order for a construction compound behind The Maltings. This was the first notification I received of this proposal. It was not transparently disclosed during consultation nor clearly presented in the documentation relied upon at the hearing.	The plan that is likely being referred to was part of a category 3 Land Interest Questionnaire issued to the affected landowner to confirm ownership of a property and other details. The Applicant is not proposing to purchase this land for a construction compound. The construction compound remains as proposed in the same location that was consulted on during the Applicant's statutory consultation in 2024.
REP1-330	David Wass	Water environment	The proposed compound site is subject to seasonal flooding and remains waterlogged for extended periods during winter months. This raises serious concerns regarding the suitability and resilience of the location for heavy construction use.	**7.9 Flood Risk Assessment [APP-331]** assesses surface water flood risk to the Project during its construction and identifies that some temporary work sites are at risk of flooding from this source. Based on mapped data the vast majority of this laydown compound is not subject to flooding. Nonetheless to mitigate risks, measure W09 in **7.2 Outline Code of Construction Practice [Revision B]** secures that prior to works commencing appropriate site drainage will be put in place to reduce the risk of standing water and avoid substantial delays to the construction programme, as well as to prevent off-site increases in surface water flood risk. In addition, these sites would operate in accordance with the protocols described in **7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307],** which would reduce risks to construction plant and personnel.

Examination Library ID	Name	Topic	Matter	NG Response
REP1-330	David Wass	Landscape and visual	The proposed pylons in the TB047–TB052 section are positioned on elevated ground directly affecting the setting of Ford Street, Aldham and Fordham. The scale and siting would dominate the skyline and cause permanent landscape and heritage harm.	The Applicant acknowledges the concerns raised regarding the potential effects of the Project on the setting of Fordham, Aldham and Fordstreet. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on landscape and visual receptors. The assessment is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The Project passes to the east of Fordham, Fordstreet and Aldham, crossing the Colne Valley between pylons TB047 and TB052. Effects on landscape character within the Colne Valley Slopes Landscape Character Area (LCA) and Colne River Valley Floor LCA are set out in **6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228]**. Significant adverse effects are identified within approximately 1.5 km of the Project during construction and operation. Effects on visual receptors within Visual Receptor Areas (VRA) D5 Fordham, D6 West Bergholt, Fordham Heath and Eight Ash Green and D7 Fordstreet and Aldham are set out **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Significant adverse effects are identified within approximately 1.5 km of the Project during construction and operation. 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 on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of designated assets falls within the Order Limits. The Applicant considers that the assessment of the historic environment has been proportionate and is appropriate within the framework of the DCO.
REP1-484	The Cole Family	Consultation	The Applicant's consultation has been inadequate and procedurally deficient. While isolated communications and a consultation meeting on 11 April 2025 occurred, the Applicant has consistently failed to provide timely, meaningful or reliable information. The Applicant's agent has been unable to answer fundamental questions about the nature, scale, duration and practical consequences of construction activity on the landholdings. Updated information has routinely been provided only shortly before deadlines, preventing a proper understanding of impacts or a fair opportunity to respond. The Applicant has not met the standards required for effective consultation under the Planning Act 2008.	The Applicant does not agree that consultation has been inadequate or procedurally deficient. The Project has been subject to extensive pre-application consultation in accordance with the requirements of the Planning Act 2008 and has included extensive one-to-one consultation with affected parties. Throughout the development of the Project, numerous meetings have taken place between representatives of the Cole Family, their appointed agent at BTF Partnership, and members of the Project team. These meetings have provided opportunities for open dialogue, allowing the Cole Family and their agent to raise questions, provide feedback, and discuss matters pertinent to their interests and the ongoing Project works. The feedback received during these meetings, as well as through the various stages of consultation, has been carefully considered by the

Examination Library ID	Name	Topic	Matter	NG Response
				Project team. Responses were provided to address concerns and clarify details, ensuring that the Cole Family's views were considered as the Project progressed. Following the issue of Heads of Terms, Fisher German has proactively contacted the appointed land agent to arrange a further meeting. The purpose of this meeting was to discuss the terms in detail and address other practical matters, including accommodation works and construction-related aspects. This continued engagement underscores the Project's commitment to collaboration and transparency with affected landowners. The Applicant's appointed land agent, Fisher German has been instructed to contact the Cole Family's appointed agent to arrange a further meeting to discuss any outstanding matters
REP1-484	The Cole Family	Alternatives	The Applicant invited a change request relating to the relocation of TB245, and the Cole Family submitted this request in good faith. No confirmation of its consideration has been provided and no justification for its rejection has been offered. This lack of transparency prevents an understanding of whether reasonable alternatives have been assessed and represents a further failure in engagement	The Applicant has included a commitment (GG34) within the **7.2 Outline Code of Construction Practice [Revision B]** to move pylon TB245 north as close to the field boundary as possible. This aims to reduce heritage effects and position the pylon to the edge or outside what are reported as the main views to the west. This response was included in **5.1 Consultation Report [APP-066]**, which includes responses to feedback submitted prior to the DCO submission.
REP1-484	The Cole Family	Land use	The Applicant has also failed to provide adequate detail on soil management, temporary and enabling works, utilities diversions and the rights it intends to seek.	The Applicant's approach to soil management, temporary and enabling works, utilities diversions and the land rights required for the Project is set out within the Environmental Statement and supporting application documents, including **7.2 Outline Code of Construction Practice [Revision B]** and the **2.2 Land Plans [AS-005 to AS-012]** and **4.3 Book of Reference [AS-018]**, which identify the nature and extent of the land and rights sought. These documents were publicly available as part of the Development Consent Order application. As is standard for nationally significant infrastructure projects, the level of detail presented at application reflects a proportionate, outline approach, with further land specific detail to be developed at the detailed design stage. The **3.1 Draft Development Consent Order [APP-056]** secures the submission and approval of detailed construction management plans, including measures for soil handling, storage and reinstatement, management of temporary works and coordination of utilities diversions, prior to the commencement of construction.
REP1-484	The Cole Family	Land use	The Applicant has not presented evidence-based soil management proposals. Without clear methodology for soil stripping, storage, handling and reinstatement, there is a significant risk of long-term loss of soil quality, compaction and drainage alteration. High-value crops are grown on land adjacent to the proposed construction areas. Dust, airborne contaminants and construction emissions pose a serious risk to crop quality and commercial contracts, potentially exposing the Cole Family to financial loss or regulatory consequences. The Applicant must provide suitable mitigation measures and indemnify the Cole Family against these risks.	The Applicant's approach to soil management is set out within **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]**, which 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, or as agreed with the landowner. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]** would be further developed into the final Soil Resource Plan by the Main Works Contractor(s) prior to the commencement of development, taking account of, for example, detailed construction approaches and Project programme, with more

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				site-specific soil measures and soil baseline information including soil profiles as required. **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). With regard to construction impacts on dust soiling, Section 7.2 of **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** discusses the results of the construction dust assessment. The assessment was undertaken in line with IAQM Construction Dust Assessment Guidance[6]. The assessment considers receptors and land holdings up to 250 m from the Order Limits. **6.7.F4 Environmental Statement Figure 7.4 - Air Quality Construction Dust Study Area (Final Issue A) [APP-154]** shows a 250 m boundary around the Order Limits and this overlaps with sections of landholdings associated with the Cole Family. The assessment concludes that with appropriate implementation of the mitigation measures specified in the **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]** there would be no likely significant effect from dust soiling due to construction within 250 m of the Order Limits.
REP1-484	The Cole Family	Biodiversity, ecology and nature conservation	The Applicant has proposed acquiring land to replace environmental mitigation lost from the Lower Thames Crossing Project. The Applicant has failed to show that such acquisition aligns with the same environmental principles or ensures habitat continuity.	The Applicant has undertaken a detailed review of the original site selection process undertaken by Lower Thames Crossing, for both the ancient woodland and nitrogen deposition compensation planting around Orsett Golf Course. The same site selection approach was followed by the Applicant, in order to identify suitable alternative environmental sites. The Applicant is actively engaging to agree the proposed approach and further delivery details. The alternative locations are also being discussed with Natural England who are integral to the decision-making process.
REP1-484	The Cole Family	Land use	The Project affects a substantial proportion of the Cole Family's agricultural land. The farming business relies on uninterrupted access to fields, efficient movement of machinery, stable soil conditions and clear drainage networks. Multi-season construction activity will disrupt cropping rotations, reduce productivity, introduce unnecessary operational risks and impair the long-term agricultural integrity of the land. These impacts have not been properly assessed by the Applicant.	**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 **7.2 Outline Code of Construction Practice [Revision B]**.

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

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				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). The Applicant will continue to engage with the Cole Family and their representatives as the design progresses and further detail is available.
REP1-484	The Cole Family	Land and Property	The Client the client has been approached by Fisher German LLP as agent on behalf of the Applicant to set out the Applicant's desire to enter into an Option Agreement for the grant of an Easement for the proposed development by voluntary agreement. BTF Partnership held a meeting with the Applicant's Agent on Monday 16th February 2026, during which the Agent stated that the Applicant will not offer any flexibility or negotiation on the terms of their voluntary agreement, favouring a 'take it or leave it' approach, and accounting for site specific accommodation works by way of a Landowner Commitments Register Therefore, the Applicant's slow and insufficient attempts to acquire rights by agreement and on reasonable terms demonstrates that powers of compulsory purchase are not required or justified. The absence of this information prevents the Cole Family from evaluating the implications of compulsory acquisition or voluntary agreements.	Voluntary agreements are offered on a consistent and transparent basis to ensure fairness and proportionality across affected landowners, while allowing for land specific matters to be addressed through ongoing engagement and, where appropriate, through the consideration of accommodation works and other Project-specific measures. The Landowner Commitments Register is intended to capture and manage such matters in a clear and auditable manner and does not preclude further discussion or refinement as the Project progresses. The Applicant does not accept that its attempts to acquire rights by agreement have been slow or insufficient, nor that this undermines the justification for compulsory acquisition powers. The nature and extent of the land and rights proposed to be acquired are set out in the application documents, including the **2.2 Land Plans [AS-005 to AS-012]** and **4.3 Book of Reference [AS-018]**, which enable affected parties to understand the implications of both voluntary agreements and compulsory acquisition. Matters relating to compensation and the exercise of powers would be dealt with separately in accordance with the Planning Act 2008 and the statutory Compensation Code. The Applicant remains open to continued engagement with the Cole Family with a view to progressing matters by agreement were reasonably practicable.
REP1-226	D.N. Grady & Sons Limited	Land and Property	The latest alignment directly affects our client's landholding through the installation of overhead cables and two pylons, one positioned centrally within a field and the other close to the boundary. The proposed arrangement will cause severe and lasting disruption to agricultural operations. Key impacts include: • Fragmentation of fields and reduced machinery efficiency • Loss of productive land • Interference with cropping rotation • Restrictions on access for large agricultural equipment • Increased operational time and costs • Disruption from haul roads, compounds, and utility diversions • Long term risks to drainage and soil structure • Permanent constraints on land management practices These impacts have not been properly assessed, justified, or explained in relation to this specific holding.	**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 **7.2 Outline Code of Construction Practice [Revision B]**. **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).

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REP1-226	D.N. Grady & Sons	Alternatives	Our client's principal concerns relate to the location of pylons, haul road, utility diversions, attenuation ponds, and construction compounds. In particular the need for the haul road to divert from the construction corridor. At an early stage, our client, together with adjoining landowners, expressed a clear preference for an alternative route designed to avoid conflict with a solar farm Option affecting land within the vicinity, including part of the subject holding. (see attached). This alternative does not appear to have been afforded meaningful consideration, and no response has been received providing a rationale or justification for its rejection.	The Applicant responded to this request in **5.1 Consultation Report [APP-066]** (10-22.46): *'National Grid notes the respondent's feedback. The suggested route would take the alignment across the edge of Hapton Common County Wildlife Site, would move the alignment closer to properties at Fundenhall and would also take the alignment closer to South Norfolk Model Flying Club reintroducing potential interactions. We are therefore not proposing a further change to the alignment between RG27 and RG35. We have positioned pylons as close to field boundaries as possible to reduce impacts to agricultural operations where technically feasible whilst ensuring constructability of the Project.'*
REP1-226	D.N. Grady & Sons	Land and property	More recently, our client has been directed to public website documents. Given the scale of disruption, matters of this nature require direct dialogue with affected landowners and not general references to extensive, complex documentation. A meeting was held with Fisher German on 24 February 2026, attended by myself. Limited additional detail on the project was provided. As this was the first meaningful contact, our client has not had a reasonable or fair opportunity to consider the proposals or respond in an informed manner.	The Applicant does not agree that engagement has been limited or that reliance has been placed solely on public website documentation. The Project has been subject to extensive non-statutory and statutory consultation, and the application documents, including the Environmental Statement, **2.2 Land Plans [AS-005 to AS-012]** and **4.3 Book of Reference [AS-018]**, were made publicly available to ensure transparency and allow all affected parties to understand the nature and effects of the proposals. Direct engagement has also taken place. A meeting was held between the Applicant's appointed agent, Fisher German, and the representative for D.N. Grady & Sons on 24 February 2026, at which the Project proposals and land specific matters were discussed. This meeting formed part of the Applicant's ongoing programme of engagement with affected landowners and their agents, and further meetings have been offered to the affected party and their appointed agent throughout the various stages of the Projects development. The Applicant does not accept that the provision of application documents, alongside direct dialogue, prevents landowners from engaging in an informed manner. For nationally significant infrastructure projects, it is standard practice for detailed technical information to be contained within application documentation, supported by meetings and correspondence to explain how the proposals affect individual holdings. The Applicant remains committed to continued engagement with D.N. Grady & Sons and their representatives to discuss land specific issues and to provide further clarification where reasonably practicable as the Project progresses through the Examination.
REP1-226	D.N. Grady & Sons	Alternatives	To properly understand the implications of the scheme and its long term impact on the agricultural holding, our client requires detailed and specific technical information. This includes, but is not limited to: 1. Soil Storage, Handling, Reinstatement and Aftercare 2. Field Drainage Strategy and Reinstatement 3. Location, Design and Restoration of Haul Roads 4. Access arrangements agreed with the landowner	With regard to items 1, 10, and 14 listed, **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, or as agreed with the landowner. Good practice mitigation measures to minimise disruption to farming operations are detailed within **7.2 Outline Code of Construction Practice [Revision B]**. These include maintaining or providing alternative access to affected land

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			5. Attenuation Ponds and Water Infrastructure 6. Flood Risk and Water Management 7. Water mitigation measures 8. Dust, Noise and Crop Quality 9. Noise management 10. Measures to protect crop quality and farm operations 11. Access routes to Order Limits 12. Restrictive Rights and Operational Constraints 13. Full clarity on permanent rights and easements 14. Assurance there are no unnecessary constraints on cultivation depth, drainage, future cropping or land use Furthermore, our client requires clarity on the proposed mitigation measures to: • Reduce loss of productive farmland • Manage short term and long term operational inefficiencies • Minimise disruption to farm management and viability To date, none of this information has been provided in sufficient detail.	parcels in communication with landowners and occupiers to allow for the continuation of surrounding farming operations. To reduce loss of productive farmland, 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]**. With regard to items 2, 5 and 6 listed, the Applicant has submitted further information at Deadline 1 comprising **8.2 Drainage Strategy [REP1-072]**. The strategy provides further details regarding how the Project's interactions with existing field drainage systems would be managed, specifying that where existing systems are affected by the temporary works and/or permanent works, field drainage must be correctly managed, liaising with the agricultural owner or manager of the agricultural land affected by the Project. The strategy also describes, with supporting calculations, the proposed features that would be constructed to capture, store, treat and attenuate rainfall runoff from temporary and permanent impermeable areas created by the Project. The **8.2 Drainage Strategy [REP1-072]** complements **7.9 Flood Risk Assessment [APP-331]**. The mitigation measures and controls set out in the **8.2 Drainage Strategy [REP1-072]** and the **7.9 Flood Risk Assessment [APP-331]** are secured through a range of measures, including AS05 and GG22 within **7.2 Outline Code of Construction Practice [Revision B]**. These measures would prevent disruption to drainage and mitigate the potential for increases in flood risk. With regard to item 7, **7.2 Outline Code of Construction Practice [Revision B]** also includes a range of commitments to the safeguarding of water environment receptors, including private water supplies. Item 8 Air quality – Dust Section 7.2 of the **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** discusses the results of the construction dust assessment. This assessment was undertaken in line with IAQM Construction Dust Assessment Guidance. The landholding is located within the area described as Section A. Prior to mitigation there is a High Risk of dust soiling from Earthworks, Construction and Trackout activities. Mitigation measures are to be implemented for High Risk dust activities and with mitigation in place the assessment concluded there would be no significant effect from dust soiling on sensitive receptors within 250 m of the Order Limits. **7.2 Outline Code of Construction Practice [Revision B]** 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 **3.1 Draft Development Consent Order [APP-056]** prior to commencement of development. This approval will take into account comments received through Examination. Item 9: Noise Management

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				With regards to construction noise, this is assessed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Construction noise and vibration will be managed via the commitments in **7.2 Outline Code of Construction Practice [Revision B]** and associated **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]**. These measures ensure that best practicable means (BPM) will be employed by the contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments will be undertaken by the contractor based on their specific methodologies. Specific mitigation measures will be identified during these assessments and incorporated in the final Noise and Vibration Management Plan .
REP1-226	D.N. Grady & Sons	Land and property	Heads of Terms were issued to our client by Fisher German on 31 October 2025. An initial meeting took place on 23 January 2026 to commence negotiations and discuss practical issues arising from the scheme. Despite that meeting, no feedback, clarification or substantive response has been received. As a result, negotiations remain stalled, and fundamental uncertainties persist. This continued absence of engagement is causing significant concern. For progress to be made, timely and meaningful communication is essential. We therefore request an urgent update addressing all outstanding matters in full.	Heads of Terms were issued by the Applicant's appointed agent, Fisher German, on 31 October 2025, and a meeting was subsequently held on 23 January 2026 to discuss and identify land specific and practical matters arising from the proposals. As is typical for nationally significant infrastructure projects, matters raised at such meetings require internal review and, where necessary, input from relevant technical disciplines to ensure that any response is accurate, proportionate and consistent across the Project. The Applicant does not accept that the period following the January meeting represents an absence of engagement, but rather reflects the time required to review the points raised and to coordinate an appropriate response within the context of the Examination timetable. Following a thorough review of the points raised during the previous meeting and in accordance with the process outlined for nationally significant infrastructure projects, the Applicant will shortly be reissuing the Heads of Terms to the affected party. This step ensures that all concerns and suggestions have been duly considered, and that the documentation accurately reflects the discussions to date. In addition, the Applicant will provide a further opportunity for the affected party to meet and discuss the revised terms. This meeting will also serve as a forum to address any other practical matters that may require attention, thereby maintain open communication and fostering constructive engagement throughout the ongoing process.
REP1-239	G W Webster & Son Ltd & Rex Webster	Land and property	New line impacts 6 dwellings and a range of farm buildings with development potential. Properties are impacted by overhead cable and 4 pylons. RG22 and RG21 have most severe impact RG 20 and RG23 will impact the horizon Significant impact on an important Listed Building and overall setting.	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 on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of designated assets falls within the Order Limits.

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				Although not specified, the Applicant assumes the respondent is referring to the Grade II* listed Flordon Hall. The Applicant considers that the assessment of permanent moderate adverse significance of effect (significant) (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**) and Mid Less Than Substantial Harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**) to this listed building is appropriate and reflects the harm to the value of this asset.
REP1-239	G W Webster & Son Ltd & Rex Webster	Transport and Traffic	*[Respondent proposes alternative haul road route for their land]* Proposed haul road (back hatch) is insensitively and poorly designed. The same facility can be achieved with a better thought-out design, as per the blue hatched route	The Applicant notes the respondents' proposed changes to the temporary haul road. The suggestion as supplied requires the haul road to cross beneath the proposed overhead line an additional four times that increases construction and programme risk. It is also less direct and requires more bends increasing the quantity of stone required and therefore additional vehicle trips. As it is temporary in nature the Applicant maintains that the more direct route is most appropriate. We will however continue to engage with landowners through detailed design to ensure access to land is maintained and will endeavour to tweak the designs where practicable.
REP1-239	G W Webster & Son Ltd & Rex Webster	Transport and Traffic	*[Respondent proposes alternative pylon and haul road route for their land]* The alternative route skirts the edge of two ownerships but largely remains on the respondent's property. There is significantly less impact on dwellings, the respondents farm is not bisected and the burden is still born fairly and proportionally between landowners. The alternative maintains a primarily straight route, offers pylon locations in field edges and well screened positions. It is considered that natural screening, terrain and distance from dwellings make it a more suitable route. The haul road for this option is shown as the yellow hatched pathway, which again can follow the periphery of fields and this holdings it crosses. It is the contention of the respondent that the alternative route suggested represents a more balanced and reasonable route than the one proposed As a development of the preferred alternative, this plan shows another option as the blue line with blue pylons marked at OPxxB etc. This option avoids interaction with the woods to the north and south of pylon OP19. The haul road could follow the same route as for the preferred option. 1. Proposed pylon line wall pass within 300m of Grad II* Listed Flordon Hall with associated GII listed buildings. 2. The nearest property of comparable historic value is Mergate Hall, which is 1.025 km from the proposed pylon line, which will be shielded by a wood. 3. The option being suggested by the respondent would put the pylon line 750m from GII* Flordon Hall and 650m from GII* Mergate Hall. This is a more balanced sharing of the impact of the pylon line on the local historic residences.	The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project. The alternatives provided by the respondent were considered and our response is detailed in paragraphs **5.1 Consultation Report [APP-066]** Ref no. 10-22.55 *'National Grid has considered the respondent's feedback and has assessed multiple alternative alignments to the north of Flordon Hall. Alternatives to the north would impact more woodland and would also increase the impact on a proposed solar farm development, alternatives would also be longer and require additional angle pylons and would be therefore less consistent with the Holford Rules (these can be found in Appendix I22 of this report). We are therefore not proposing a change to the alignment in this location. Further information on alternative routes can be found in the 2023 and 2024 Design Development Reports (available on the Project website) and the 2025 Design Development Report (document reference 5.15). We have undertaken an Environmental Impact Assessment (EIA) which has assessed the impact of the Project, including heritage impacts, and recommended mitigation where required.'* Paragraphs 4.2.3 and 4.2.4 of **5.15 Design Development Report [APP-122]** further detail our assessment of the alternatives in this location, including consideration of the impacts on Flordon Hall. The Applicant's position remains unchanged on this matter and please see previous response on the haul road.

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			4. Mergate Hall would still benefit from woodland shielding between it and the pylon line.	
REP1-281	Tritton Farming Partnership LLP	Land and Property	The Project will create substantial economic and environmental damage to TFP. TFP has significant concerns that it has not been listened to sufficiently, and National Grid has not sufficiently considered alternative routes put forward by TFP in the Mid Essex Area and has not budgeted for significant financial loss to TFP, which is a material percentage of the compensation amount of £180.2m budgeted by National Grid and thus increase the overall cost of the Project. TFP will be one of the most affected landowners along the whole route with approx. 11 pylons located on its land, in addition there is substantial additional land required for permanent wayleaves, the haul road and construction sites. The area affected is between pylons TB120 & TB131. The proposed pylon route cuts diagonally across the business, the worst possible outcome, and crosses 22 fields owned by the respondent. In addition, many other fields will be affected by the construction and traffic. The haul road and proposed road closures will make it extremely difficult to farm any of the land during the construction period. The pylon route passes directly over a very large and commercially attractive mineral site which together with a National aggregates operator has been put forward for mineral extraction and refill. A new garden village, near Chatham Green, has also been put forward to Chelmsford City Council for housing allocation. Both of these pre-dated the news on the pylon route and are of significant sizes and of substantial monetary values. TFP has not signed access leases as the compensation required across the large area of land for surveys will be significantly higher than the £500 offered, which is the standard compensation amount, irrelevant of whether the land affected is one square meter or a large farm and rural business. This was pointed out and accepted by National Grid as unfair	The Applicant recognises that Tritton Farming Partnership LLP ('TFP') is affected by the Project and acknowledges the potential scale of land interaction within the area between pylons TB120 and TB131, including the number of pylons, permanent rights, haul roads and construction areas required. The Applicant does not, however, agree that these matters have not been considered or that TFP's concerns have not been taken into account. The route has been developed through an iterative process informed by environmental, technical, constructability and land-use considerations, and has been subject to multiple rounds of consultation. Alternative routes, including those put forward by landowners, have been considered; however, not all alternatives can be adopted where they would give rise to greater environmental effects, engineering constraints, conflicts with other land interests, or the transfer of impacts onto other landowners. The Applicant is satisfied that the alignment represents an appropriate balance of competing considerations for a nationally significant infrastructure project. The Applicant notes the references to mineral extraction proposals and potential future development in the Chatham Green area. Widened Order Limits have been included to allow for response to the potential allocation within the minerals plan. An amended route alignment within those Order Limits has been shared with TFP and subsequently adjusted further and re-shared. This positions pylons to the edge and potentially outwith the area of potential minerals abstraction thus substantially reducing the level of interaction. The alignment has been assessed against known constraints and existing policy designations. Matters relating to future development potential, mineral interests and any resulting losses are compensation matters and would be addressed separately under the statutory Compensation Code, rather than through the Examination of the Development Consent Order. Also, note Article 33 (Compulsory acquisition of land - incorporation of the mineral code) in the **3.1 Draft Development Consent Order [APP-056]**, the effect of which is to exempt existing rights in minerals from the scope of compulsory acquisition powers and incorporate Parts 2 and 3 from the Acquisition of Land Act 1981 in order to cater for the situation where the owner of mines or minerals wishes to work them. The Applicant wishes to clarify the arrangements regarding access for surveys. The £500 payment mentioned is associated with standard, non-intrusive survey access and reflects a typical advance payment of compensation offered to landowners in such circumstances. This approach is designed to recognise and address the temporary inconvenience that may result from survey activities. In instances where landholdings are particularly extensive or where survey activities result in greater disruption to agricultural operations or other land uses, the Applicant acknowledges that the standard

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				compensation may not be sufficient. In such cases, the Applicant is open to discussions on a case-by-case basis to determine the appropriate level of compensation, ensuring that any additional impacts are fairly addressed. Where justified, further compensation can be agreed to reflect the nature and scale of the disruption experienced. The Applicant does not accept that the Project budget for compensation fails to account for impacts on TFP or that the existence of a global compensation allowance prejudges or constrains individual entitlements. Compensation is assessed on a land-by-land basis in accordance with the Planning Act 2008 and the statutory Compensation Code and is not determined through the Examination process. The Applicant remains committed to continued engagement with TFP and its representatives to discuss land-specific impacts, construction phasing and mitigation, and to seek to progress matters by voluntary agreement where reasonably practicable.
REP1-281	Tritton Farming Partnership LLP	Land and property	Area of Fuller Street, Great Leighs, Chatham Green, Waltham Area, Essex Pylons TB 120 to TB131 This area is almost exclusively owned and managed by TFP, where the pylon route diagonally crosses the land holding splitting it in two. The area is a substantial headache for National Grid as the North East side of TFP land ownership is an area of sensitive ecological, heritage and environment significance and the land to the South West of TFP land ownership of significant economic value. Several alternative routes have been proposed to National Grid with very little feedback except it is cheaper to have direct routes and few pylons changing angles. The only change National Grid has made is to increase the control area on TFP land.	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]** and 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**).
REP1-281	Tritton Farming Partnership LLP	Biodiversity, ecology and nature conservation	The proposed pylon route passes within 200m of the River Ter SSSI, and the distance from the control area to the SSSI is less than 200m. There are only 86 SSSI sites in Essex, protected by Natural England and 500m is usually considered the buffer to any development. The construction vibration study areas of 100m & 300m directly affect this sensitive area. The route crosses over Paulk Hall Lane a Grade 1 Protected Lane and within 200 metres of the Ford over Paulk Hall lane, a species rich area similar but smaller than Constables Haywain picture in Suffolk at Flatford	The River Ter Site of Special Scientific Interest (SSSI) is designated for its geological importance and is not designated for ecological reasons. The River Ter SSSI has therefore been scoped out of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The River Ter geological SSSI is located outside of the Order Limits of the Project with the closest activities comprising overhead line works. Ground disturbance at the site is not anticipated and therefore the assessment provided in **6.9 Environmental Statement Chapter 9 - Contaminated Land, Geology and Hydrogeology [APP-181]** has concluded that impacts on the SSSI are unlikely. As a low value asset, the setting of the Protected Lane was not considered. All non-designated heritage assets were assessed to determine their value in accordance with the **6.19 Scoping Report [APP-288 to APP-296]**, **6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects

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				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. Paulk Hall Protected Lane was considered in assessment in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, which concluded not significant adverse effects. The **7.4 Outline Landscape and Ecological Management Plan [Revision C]** includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of **7.2 Outline Code of Construction Practice [Revision B]** to be submitted at Deadline 2, which states: '*Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impacts to each Protected Lane (Essex) and Historic Lane (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected / Historic Lane, including associated banks and ditches. During construction, the contractor will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, compensatory design elements will be provided as appropriate (including hedgerows, fences, walls and earthworks).*'
REP1-281	Tritton Farming Partnership LLP	Landscape and Visual	The pylon route goes along the skyline from Fairstead to Paulk Hall Lane, a Grade 1 Protected Lane, crossing the Essex Way route, one of Essex's most important walking routes. and then across flat highly visible land from Goodmans lane to Chatham green. This will be visible across a large area and to the residents of Great Leighs and the large, planned expansion of the Northeast of Chelmsford. The pylons, TB120&121, pass next to the 92-acre wood, Mann Wood, a designated ancient semi-natural woodland, owned and managed by The Wilderness Trust, a charity working with 8,200 "vulnerable and disadvantaged children" for therapy programmes, to work and experience nature. This would be a disaster for the charity	The Applicant acknowledges the concerns raised regarding the potential effects of the Project between Fairstead and Chatham Green. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on landscape and visual receptors. The assessment is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Effects on visual receptors within Visual Receptor Areas (VRA) E5 Black Notley and White Notley, VRA E6 Terling and Witham, VRA F1 Great Leighs and VRA F2 Peverel's Farm are set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and**

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			to have pylons on their doorstep and may affect the health of these vulnerable children. Pylon Crowding - TB117 to TB120 causes excess pylon crowding, despite undergrounding at crossing points, three pylon lines will still be visible from Fairstead and Fuller Street in close proximity and on higher land.	**Assessment - Part 1 of 4 [APP-229]**. Significant adverse effects are identified within approximately 1.5 km of the Project during construction and operation. As noted in the assessment, there would be views towards the Project from the edge of Great Leighs, as represented by Viewpoint 6.01 Castle Cose, Great Leighs where moderate-major and significant (adverse) effects are identified. Further detail is provided in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232]**. The assessment was carried out against the existing baseline, as is a requirement of GLVIA3[7], and therefore potential future residents to the north-east of Chelmsford were not considered. Given the layout and form of the potential expansion, and hence the nature and location of receptors, is unknown, it would not be possible to accurately consider effects on these potential future receptors. However, as that development comes forward, the design process and Landscape and Visual Impact Assessment (LVIA) required for this, and any other future projects, will need to consider required mitigation, assess and set out potential cumulative effects. The cumulative effects arising from the Project and other developments to the north-east of Chelmsford are set out in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]**. Significant cumulative effects on landscape and visual receptors are identified in relation to the Project and Chelmsford Garden Community (CH24 and CH26) during construction and operation. Effects on the Essex Way are set out within Section 13.12 Assessment of Effects on Routes within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Effects on visual receptors on the Essex Way would range from major and significant (adverse) to minor and not significant (adverse). The Applicant agrees that the Project would be seen behind an existing 400 kV overhead line in views from Fairstead. This is illustrated by the photomontage at Viewpoint 5.08: Fairstead Hall Road, Fairstead, in **7.12 Visualisations - Part 6 of 9 [APP-348]**. Part of an existing 132 kV overhead line would be undergrounded to the west and north of Fuller Street, where it crosses the Project at TB122. This is illustrated by the photomontage at Viewpoint 6.02: Essex Way, west of Fuller Street, in **7.12 Visualisations - Part 6 of 9 [APP-348]**. The potential impacts and associated necessary mitigation for Mann/Parson's Wood ancient woodland, have been included within the **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**. Following the implementation of mitigation measures there will

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

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				be no residual significant effects on the integrity of the ancient woodland.
REP1-281	Tritton Farming Partnership LLP	Transport and Traffic	The proposed pylon route crosses over 4 protected lanes in this short area of 5 pylons, TB120 – TB126. All four of these roads/lanes are closed during the construction period making traffic impossible in the local area. These roads are considered unsuitable for HGVs by Chelmsford City. • Paulk Hall Lane – Grade 1 • Fuller Street – Grade 2 • Boreham Road – Grade 2 • Goodmans Lane – Grade 2 In addition, during construction there will be 1067 extra HGVs (45% increase) on the A131, which is already operating near full capacity, hence the proposed Chelmsford North East bypass, this will drive traffic down these protected lanes, where available, causing significant further damage to them and the residents who live on them.	Paulk Hall Lane, Fuller Street, Goodmans Lane and Boreham Road are not designated as Primary Access Routes, where construction vehicles are routed down in accordance with **7.3 Outline Construction Traffic Management Plan [APP-309]** for main works construction vehicles. A temporary crossover bellmouth is proposed to be installed on each these routes, to allow construction vehicles to continue on the internal, off-line haul road. No HGV construction traffic is proposed to use these crossover points to access the haul road from the public highway under typical operation, and vice versa. The traffic management for installing crossover points and the proposed operation of them during construction is detailed in Section 5.5 of **7.3 Outline Construction Management Plan [APP-309]**. Construction vehicles will give way to traffic using the public highway. As noted in Schedule 8 of **3.1 Draft Development Consent Order [APP-056]**, the four roads noted will be subject to short term temporary closure during construction. Diversion routes are identified and are displayed in Section F, Sheet 1 and 2 of **2.5 Access, Rights of Way and Public Navigation Plans – Section F [APP-038]**. The roads noted are also designated as temporary diversion routes for background (non-construction vehicle) traffic movements. The traffic management is anticipated to be managed through the Permit Schemes by the Local Authority, to help coordinate the required road closures and minimise overlapping impact where possible. As noted in **7.2 Outline Code of Construction Practice [Revision B]** commitment H06, a topographic survey will be undertaken in advance/impact to each Protected Lane within the Order Limits, where likely to be affected by physical works. The assessment of effects on driver delay and public transport delay to passengers along the A131 Great Notley Bypass/A131 Great Leighs Bypass/A131 Braintree Road (PAR 44) is presented within Table A16.4.2 Significance of effect driver and passenger delay within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. The estimated increase to total daily (07:00-19:00) traffic movements as a result of the Project and other committed developments would be 22% when compared to future baseline, and an increase of HGV movements of 67%. The findings of the assessment, that considered sensitive receptors and the road environment, identified that there would be slight adverse effects on driver delay and public transport delay to passengers. The findings of the assessment of effects would be temporary (over a short duration of one week) and are considered not significant when taking into consideration mitigation detailed within **7.3 Outline Construction Traffic Management Plan [APP-309]**. As presented within **7.11 Transport Assessment - Appendix E - LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338]**, there would be an increase of an

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				additional 150 movements on the A131 Great Notley Bypass, A131 Great Leighs Bypass/A131 Braintree Road (PAR 44) in both the AM and PM peak hours. This consists of 46 HGVs movements and 104 LGVs movements. Modelling results for junctions assessed on the A131 Great Notley Bypass/A131 Great Leighs Bypass/A131 Braintree Road (PAR 44) are presented in Section 7.11 of **7.11 Transport Assessment [APP-333]**. This includes Site 56 - A120 Braintree Bypass / A131 Great Notley Bypass roundabout, Site 58 A131 Great Notley Bypass / Main Rd roundabout, and Site 59 - A131 Braintree Rd/ B1008 Essex Regiment Way roundabout. The introduction of the Project would not affect capacity at Site 56 - A120 Braintree Bypass / A131 Great Notley Bypass roundabout. The introduction of the Project traffic at Site 58 and Site 59 has a marginal impact upon capacity when compared with the Future Base plus Committed Development scenario (both scenarios would operate over capacity). However, there would be an increased delay at these junctions. The proposed mitigation at these junctions is to provide temporary signage to warn general traffic of peak hour congestion and availability of suitable alternative routes. The aim of this would be to direct motorists away from using unsuitable roads and protected lanes. It should be noted that following the worst-case peak construction period (one week duration), the delay at the junction would be reduced but the junctions would remain to operate over capacity as in the Future Base plus Committed Development scenario.
REP1-281	Tritton Farming Partnership LLP	Transport and Traffic	PROW – A number will be closed down during the operation as stated by National Grid and the high density of footpaths near the A131 will be permanently less attractive to walkers who will need to walk under pylons.	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 the **7.6 Outline PRoW Management Plan [APP-329]**, is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate temporary diversions. As a result, no PRoW would be closed without a diversion in place and no severance of the overall network is anticipated. Where diversions of PRoWs are required, they have been proposed along the shortest identified suitable route, taking cognisance of existing land boundaries and features. Temporary PRoW diversions are expected to be largely unsurfaced, in line with existing PRoWs. In general diversions would be short term and would have negligible to minor significance of effects as the net change in distance travelled would be relatively low. For those PRoWs where a notable increase in journey distance is expected (net change in distance of over 500 m) and would occur for more than four weeks in any 12-month period, the significance of effects would be moderate or large adverse, and deemed significant. The assessment of those footpaths located near the A131 that will be temporarily diverted showed that a neutral or slight adverse impact is expected. The diversion of footpaths Great And Little Leighs 40 (Part of Essex Way), and Great Waltham 76 (Part of Little Waltham and Broomfield Circular and Pleshey and Great Waltham Loop) that form

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				part of long distance trails, recreational circular routes or Local Planning Authority promoted routes will follow a similar alignment to the existing footpath. Other PRoWs include Great And Little Leighs 45, Little Waltham 8, Little Waltham 13 and Little Waltham adverse impact, with an increase in journey times less than five minutes, and therefore are not considered significant. Details of this assessment are presented within Table A16.4.3 Significance of effect pedestrian, cyclist and horse-rider delay within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. Effects on users of PRoW are considered within the assessment of effects within Visual Receptor Areas (VRA) E5 Black Notley and White Notley, VRA E6 Terling and Witham, VRA F1 Great Leighs and VRA F2 Peverel's Farm, as set out in **13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Significant adverse effects are identified within approximately 1.5 km of the Project during construction and operation. Effects on the Essex Way are set out within Section 13.12 Assessment of Effects on Routes in **13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Effects on visual receptors on the Essex Way will range from major and significant (adverse) to minor and not significant (adverse).
REP1-281	Tritton Farming Partnership LLP	Transport and Traffic	Great Waltham Pinch Point - The route across TFP land results in needing to cross the A131 at an unsuitable point of archaeological significance, a neolithic village. There is significant resistance to the route here.	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 [REP1-010 to REP1-032 and REP1-036])**. The geophysical survey and archaeological trial trenching undertaken to the east of the A131 is reported in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and the relevant appendices, which did not reveal evidence of highly significant archaeology. However, the Applicant fully recognises the importance of safeguarding archaeological remains, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
REP1-281	Tritton Farming Partnership LLP	Land and property	The present position of the pylons from Goodmans Lane to Chatham Green crosses an area of extremely high commercial value to TFP as a result of a proposed significant mineral site and a proposed large housing development. Both sites were proposed to the Essex County Council and Chelmsford City Council BEFORE National Grid's Norwich to Tilbury project was announced, back then as East Anglia Green Project. It is proposed that the pylon route in this area is diverted to avoid this area to avoid substantial compensation. It is believed this	Alternative routes that reduce effects on TFP's interest, including those put forward by landowners, have been considered; however, not all alternatives can be adopted where they would give rise to greater environmental effects, engineering constraints, conflicts with other land interests, or the transfer of impacts onto other landowners. The Applicant is satisfied that the alignment represents an appropriate balance of competing considerations for a nationally significant infrastructure project.

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			compensation will be amongst the largest National Grid will have to pay. This information has already been raised in consultations and shared with National Grid on a number of occasions and alternative realistic routes have been proposed by TFP. The feedback has been almost silent.	Widened Order Limits have been included to allow for response to the potential allocation within the minerals plan. An amended route alignment within those Order Limits has been shared with TFP and subsequently adjusted further and re-shared. This places pylons to the edge of and potentially outwith, the area of potential minerals abstraction thus substantially reducing the level of interaction. Engagement is ongoing to finalise the details. We note that the housing site has not to date been confirmed and therefore, being consistent with other sites that are not within planning, and in view of the potential to develop housing close to overhead lines, no adjustments have been made. Further information on the housing is noted below from the same representation.
REP1-281	Tritton Farming Partnership LLP	Land Use	Minerals Extraction and Refill – TB126- TB130. TFP has large mineral sand and gravel deposits totalling 16 million tons of which 9 million tons, lying to the West of Lyons Hall Wood, has been subject to extensive geological investigations and is the most attractive part of this resource threatened by the Project. The location of the pylons here will dramatically affect the commercialisation of this site. The depth of the sight is over 20m which makes working around pylons extremely difficult if not impossible. TFP has been working with Brett Aggregates (Brett), a national operator, since a tender in 2018, to commercially extract and refill this area which is of substantial value to Brett and TFP. Essex has a deficit of minerals in its delayed Mineral Plan, and this is one of the largest and deepest sites in Essex. The location is excellent, for the area has significant development and infrastructure projects due to its proximity to London, Chelmsford and Braintree. The site has been promoted for immediate working in response to a 'call for sites' exercise by Essex County Council as mineral planning authority The locations appeal for working is enhanced due to its proximity to Bulls Lodge quarry, the county's biggest producer of sand and gravel. Bulls Lodge quarry is expected to be fully depleted of aggregates within the next few years. The Lowley's Farm site, unlike others promoted for working has experienced little to no local opposition. Confidence is high that it will be allocated. The monetary value of minerals and refill to TFP is of a substantial amount but the whole extraction site is potentially threatened due to the deepest parts being too close to the pylon route. This would give rise to a very substantial claim from TFP and Bretts.	**6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure assessment [APP-183]** provides an assessment of existing minerals infrastructure, candidate sites and minerals safeguarded areas. The assessment recognises this candidate site A59 Lowleys Farm which was put forward in 2023 as part of the Review of Essex Minerals Local Plan 2014. The review has not currently concluded which of the candidate sites will be included in the final plan and the guidance provided by Essex County Council describes that allocation in the final plan does not mean that planning permission for mineral extraction will be granted. Therefore, candidate sites have a lower sensitivity than existing sites. The Applicant has consulted with the promoter of the site and the Order Limits within this area have been widened to allow flexibility for an alternative alignment should the site be allocated. Widened Order Limits have been included to allow for response to the potential allocation within the minerals plan. An amended route alignment within those Order Limits has been shared with TFP and subsequently adjusted further and re-shared. This places pylons to the edge of and potentially outwith, the area of potential minerals abstraction thus substantially reducing the level of interaction. Engagement is ongoing to continue to develop the details and capture within an agreed SOCG..
REP1-281	Tritton Farming Partnership LLP	Alternatives	Housing Development and Economic Development – TB125-TB132 In 2018 TFP put forward plans in the Chelmsford City Council Call for Sites to create a new garden village near Chatham Green. This has evolved into a 1500 housing proposal between the A131 and Lyons Hall wood near Chatham Green but has the capacity to increase to 4,500 new homes. The proposed new village also included, primary and secretary schools, playing pitches and	The Applicant is aware that land between pylons TB125 to TB132 has been promoted as part of the Chelmsford City Council Local Plan review. The Applicant notes that the site identified by Tritton Farming Partnership LLP was discounted by Chelmsford City Council as a potential allocation. The reasons for rejection of the options identified in the Integrated Impact Assessment prepared to accompany the

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			associated services. Savills have been the promoting agent with Chelmsford City Council since 2018 and were responsible for plans and relationships with the Council. National Grid is aware of this from the Chelmsford City reply to consultation in 2023 where it mentioned Great Leighs proposed development of 1,000 homes The development site is diagonally crossed by the proposed pylon route, which threatens its existence and many houses for Chelmsford City as it grows. National Grid have repeatedly ignored this potential development as they say, "houses can be built anywhere", which is not true in Chelmsford City as evidenced by the City now being in shortage of a 5-year land supply for housing, caused by recent Government required increases in housing supply. This is in direct conflict with Holford Rule 7, which states that a new highvoltage 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'. Furthermore, 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. There have been no attempts to do this in the Chatham Green area, and it has been completely ignored by National Grid. This area is clearly land ripe for development.	Chelmsford Local Plan Pre-Submission (Regulation 19) Document included: • *'Chatham Green is relatively isolated from the strategic highway network and new railway station, with limited sustainable accessibility or opportunity for solutions.* • *Its relative isolation from existing services and facilities which would lead to higher reliance on the use of the private car.* • *Landscape capacity and sensitivity concerns.* • *There is limited wastewater capacity to accommodate this development.* • *Employment opportunities would be less accessible to the wider population.'* The Chelmsford Local Plan Review: Pre-submission (Regulation 19) Local Plan Consultation Document: Integrated Impact Assessment Feedback Report (2025) noted that '*there was no compelling evidence that the Chatham Green Site performs any better than the preferred allocations in respect of matters such as self-containment through mixed use development, relationship to established transport infrastructure and certainty of delivery.*' The Applicant notes that the Chatham Green site was not included in the emerging Chelmsford Local Plan. The Applicant notes that there are no extant planning permissions pertaining to the development of a garden village between pylons TB125 to TB132. Whilst Tritton Farming Partnership LLP is seeking to promote this site for housing development the Applicant notes that the site has no current status in planning.
REP1-281	Tritton Farming Partnership LLP	Land Use	i. Farming operations during construction: 1. The proposed pylon construction phase including substantial areas needed for construction, works and storage. It directly affects 22 fields owned by TFP and indirectly affects a much larger number of fields. Several hundred acres are affected during construction and the whole viability of the farm is affected during the construction period as road closures of Goodmans Lane, Boreham Road, Fuller Street and Paulk Hall lane combined with the inability to cross the haul road for Health & Safety reasons will make access to most of the remaining fields extremely difficult if at all. Indeed, Lowleys Farm, the farming operational centre, will become isolated, trapped between the A131, the haul road and the closed Goodmans Lane and only able to operate five fields out of 50+ fields on the farm and potentially unable to provide contracting services to its client in Little Leighs and other farms. 2. During construction it Is likely that TFP and Lowleys will be unable to operate over a commercial area and will thus consider closing its farming operation until the construction phase is complete.	**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 **7.2 Outline Code of Construction Practice [Revision B]**. **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** notes that all land required temporarily (including for haul roads) 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). All soil handling activities would be undertaken in line with the strategy, guidance and methodology detailed in the **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource**

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			3. The haulage road will require massive numbers of lorries and importation of materials, all of which must be certified. This involves stripping soil off and bunding it. The result of this will be to damage drainage, hedgerows, trees. ii. Farming Operations Post construction – these will be permanently hampered by the existence of the pylons: 1. The farm operates at scale and utilises a 30metre drill system, so areas affected are much greater than the actual pylon line. It is possible if a pylon fails to fit in the farming "tram lines" it will cause a loss of up to 60 meters of width along the entire 10 pylons route on the farm. Corner management will further reduce available land. This will reduce the acres farmed and threatens the viability of farming at a very difficult time for the industry. 2. Soil quality will be worse due to compaction of the haul road, weed infestation in the bunds. This will lower long term yields and income. 3. The pylons will make it harder to attract and retain farming talent, threatening the business as beauty is important to farm workers and talent is in short supply.	**Plan [APP-303]**. Following the key soil mitigation measures required to protect soil resources ensures the land can be restored to its previous condition, or as agreed with the landowner. To reduce loss of productive farmland (in response to ii), 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]**.
REP1-281	Tritton Farming Partnership LLP	Land and property	i. TFP is a large mainly single block of a rural estate, whose value will be reduced considerably by the pylons as large single blocks of land are rare and their attraction is their entirety. The estate will be diagonally chopped in half by the proposed pylon route. Land values are much greater than agricultural values in this area.	The Applicant notes the assertion that land values in this area exceed agricultural values. Matters relating to land value, severance, injurious affection and any diminution in the value of retained land are compensation matters and would be assessed and addressed separately under the statutory Compensation Code. These matters are not determinative of route selection and are not resolved through the Examination of the Development Consent Order. The Applicant remains committed to continued engagement with TFP to discuss land-specific impacts, construction phasing, access arrangements and mitigation where reasonably practicable, and to seeking to progress matters by voluntary agreement where possible. It should be noted that the precise levels of compensation will become clearer as the detailed design phase advances, allowing for a more accurate assessment of the extent and nature of impacts on land and interests. This approach ensures that compensation matters are considered in alignment with the evolving details of the Project.
REP1-281	Tritton Farming Partnership LLP	Land and property	ii. TFP and members own 15 properties, including 5 listed properties lived in by family, farm workers and tenants. In addition, there are large farm buildings, which are used for agricultural machinery and storage. The value of these houses, buildings and their rents will all fall and will require substantial compensation. There will be significant injurious affects as the pylon line will be visible from all parts of TFP land and their knock-on effects.	Matters relating to property value, rental income, injurious affection, severance and any diminution in the value of retained land or buildings are compensation matters. These would be assessed and addressed separately on a property-by-property basis in accordance with the Planning Act 2008 and the statutory Compensation Code and are not matters to be determined through the Examination of the Development Consent Order. The effects of the Project on residential properties, heritage assets and their settings, including potential landscape and visual effects, have been assessed within the Environmental Statement and informed the development of the Project's alignment and design,

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				together with the identification of mitigation where reasonably practicable.
REP1-281	Tritton Farming Partnership LLP	Health and Wellbeing	iii. The mental health of employees, tenants and family members will suffer.	An assessment of how the Project could potentially affect the mental health and wellbeing of local residents is contained in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. The assessment notes that, during the construction phase, there may be heightened levels of stress and anxiety experienced by people as a result of potential environmental impacts in their local area (for example, noise, dust, traffic and visual impacts). A variety of measures have been identified to mitigate these impacts (for example use of best practicable means (BPM) to reduce noise impacts and dust management measures to reduce air quality impacts) as outlined in **7.2 Outline Code of Construction Practice [Revision B]**. The approach to managing construction traffic is set out in **7.3 Outline Construction Traffic Management Plan [APP-309]**. The Applicant understands that community mental health and wellbeing can be impacted by changes to existing views and landscapes as a result of the permanent visual changes the Project would bring. Embedded mitigation that forms part of the Project design is described in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and includes sensitive routeing and siting of the alignment and Order Limits, as well as landscape plans and planting schedules as outlined in **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. A Residential Visual Amenity Assessment (RVAA) has been completed for the Project (**6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]**), which describes the change in views likely to be experienced by residents at the closest residential properties to the Project (within approximately 200 m). The RVAA finds 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 where appropriate. The Applicant has sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents and stakeholders. The Project team would continue to engage with people potentially affected during the progress of the Project through regular communication including letters, phone calls and meetings, where necessary, 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 in line with commitment GG30 of **7.2 Outline Code of Construction Practice [Revision B]**.

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REP1-281	Tritton Farming Partnership LLP	Transport and Traffic	iv. Security of the land will be affected especially with the haul road, and the farm already has experiences of illegal entry.	The Applicant notes the concern raised by the respondent, though reiterates that security measures have been appropriately incorporated into the Project proposals. **7.2 Outline Code of Construction Practice [Revision B]** commitment GG29 states that all working areas will be appropriately fenced, and **7.3 Outline Construction Traffic Management Plan [APP-309]** Section 5.5 further sets out specific requirements for fencing and gating at locations where the proposed haul road meets the Public Highway. An illustrative detail for this arrangement is included in **2.6.3 Design and Layout Plans – Traffic and Transport [APP-043]** Sheet 1 ('Illustrative Haul Road Cross Section'). Within the area referenced within this Representation – encompassing proposed Overhead Line Pylons TB120 to 130 south of Great Leighs, Essex, shown in **6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [APP-133]** – there are proposed Crossover Bellmouths where the proposed construction haul road crosses Fairstead Lodge Road, Fuller Street, Boreham Road / Cole Hill, Paulk Hall Lane, and Goodmans Lane. Outline designs have been developed for each of these locations. The Applicant has engaged with Essex County Council as the Local Highway Authority in the development of these proposals.
REP1-281	Tritton Farming Partnership LLP	Socio-economics, recreation and tourism	v. TFP operates a shoot which will be directly affected by the pylons as a number of "drives" will be affected. It will simply not be possible to shoot in these areas. The shoot is therefore likely to have to close if the pylons are routed through the farm as there aren't enough suitable other areas. A typical day usually involves about 40 people enjoying the countryside and its beauty. This will be bad for the environment, woodland management and mental health.	The Applicant's approach is to work with affected landowners, through ongoing engagement to minimise disruption, where reasonably practicable. This includes engagement on construction phasing, access arrangements and timing, with the objective of reducing impacts on the shooting business, where this can be achieved without prejudicing safe and efficient delivery of the Project. Where residual impacts on commercial operations cannot be avoided through reasonable mitigation, the Applicant confirms that affected landowners are entitled to compensation in accordance with the Compensation Code. Please note that compensation negotiations are a matter that fall beyond the DCO Examination.
REP1-281	Tritton Farming Partnership LLP	Socio-economics, recreation and tourism	vi. Hole Farm Barn, CM3 1 QL, can be used as an events space up to 28 days a year. However, in 2021 a planning application for change of use, attached, was sent to Chelmsford City Council as an events barn for commercial events and community use due to its beautiful location and old converted barns. it is understood that the change of use of the barn would be acceptable, subject to parking restrictions. Covid has delayed these plans, but it is intended to increase usage and commercial value of the Hole Farm Barns. The classic event/wedding photos would be over the pond with a view of pylons in the background. Pylons will seriously detract from the venues attractiveness and reduce the economics of the venue.	The Applicant recognises the concern about the proposed planning application for the future conversion of a former agricultural barn and land to an events venue. Based on the 19/02103/FUL planning application site boundary, Hole Farm Barn is located approximately 70 m east of the Order Limits. No land take or direct access disruption is anticipated from the Project. Regarding potential visual impacts on the proposed business, this will be discussed on a case-by-case basis and are not resolved through the Examination of the development consent application. The Applicant's approach is to work with affected landowners, through ongoing engagement to minimise disruption where reasonably practicable.
REP1-281	Tritton Farming Partnership LLP	Land and Property	vii. TFP sublets land to an equestrian operation on Boreham Road, who ride under the pylons and will be prevented from doing so in the construction phase by the haul road. Post construction the	The Applicant recognises the concern that the presence of temporary construction infrastructure, including the haul road, may restrict equestrian movements during the construction phase.

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			riding of the equestrian operation will be less attractive and operates on very fine margins, so their survival is at risk.	Temporary disruption during construction is an anticipated effect of the Project and has been assessed within the Environmental Statement. Construction activities, including the use of haul roads, would be temporary in nature and managed through the Code of Construction Practise (CoCP) and associated traffic and access management measures to minimise disruption where reasonably practicable. Following construction, the overhead line would be designed and operated in accordance with statutory safety clearances. The presence of the overhead line would not necessarily preclude equestrian use of land beneath or adjacent to the alignment, noting that equestrian activities commonly operate in proximity to existing overhead lines elsewhere. Any loss arising from temporary disruption during construction, or any claim relating to business impacts, would be a matter for compensation to be assessed separately in accordance with the Planning Act 2008 and the statutory Compensation Code. Such matters are not determinative of the acceptability of the Project alignment and are not resolved through the Examination of the application for development consent.
REP1-281	Tritton Farming Partnership LLP	Land and Property	viii. Commercial willows are being grown under the pylon route where it crosses the River Ter, and each tree will have a commercial value of up to £1500 which will be reduced	The Applicant notes that commercial willow trees are grown beneath the proposed overhead line where the route crosses the River Ter and acknowledges the concern that the presence of the Project may affect the commercial value of those trees. Any loss arising from damage to crops, reduced yields, or any claim relating to injurious affection would be a matter for compensation to be assessed separately on a case-by-case basis in accordance with the Planning Act 2008 and the statutory Compensation Code.
REP1-281	Tritton Farming Partnership LLP	Land and Property	ix. Permanent wayleaves to National Grid are large, undesirable and could be reduced in size.	The extent of permanent rights has been defined to ensure the safe construction, operation, inspection, maintenance, repair and renewal of the overhead line in accordance with statutory safety requirements and industry standards, and to provide certainty for both the Project and affected landowners. The Applicant has sought to minimise the extent of permanent rights where reasonably practicable and to limit permanent acquisition to what is necessary to deliver and operate the Project safely. The rights sought are clearly identified in the **2.2 Land Plans [AS-005 to AS-012]** and **4.3 Book of Reference [AS-018]** and are consistent with the approach adopted for similar nationally significant infrastructure projects.
REP1-281	Tritton Farming Partnership LLP	Land and Property	TFP note that the whole compensation estimated by National Grid is £180.2m, according to National Grid Volume 4: Compulsory Acquisition information document of August 2025. It is highly unlikely that National Grid has made a specific charge for TFP compensation, despite being informed on several occasions of the quantity. However, it Is a significant percentage of their total compensation estimate.	The estimate contained in the Funding Statement helps t orecord the commitment to ensure the funding required to enable the compulsory acquisition within the statutory period following the making of the Order. Although the estimate is adjusted as required from time to time during the life of any project, the commitment to provide the necessary funding as required by the guidance is constant (See paragraph 1.2.2 of the **4.2 Funding Statement [REP 1-004])**

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REP1-281	Tritton Farming Partnership LLP	Alternatives	National Grid should demonstrate more alternative routes in Mid Essex. They have shown virtually no alternative routes in Mid Essex and there have been no costs published for any. Now National Grid has more detailed information and it should re-evaluate the routes suggested below: There are a few suggested and obvious Essex Routes for which TFP has seen no analysis. These should be reviewed before progressing the Project. 3.1 South of Colchester the route could join up with the disused Bradwell B nuclear power station with existing pylon route to Rayleigh. This route is already in existence but unutilised so compensation will be considerably less. It has been promoted by people including the landowner. 3.2 Alternatively South of Colchester the route can go to Bradwell B Nuclear site and go offshore to Tilbury. This avoids the highest compensation area of Mid to South Essex. The route is also more direct. 3.3 Follow the existing pylon route from North Essex, East of Chelmsford, to Tilbury. The reason given against is these pylons are at they are at capacity, but technologies such as HVDC cables enable much higher power to be transported. Cheaper and virtually no extra environmental damage.	3.1 In respect of alternative 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 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 Consultation Report [APP-066]** – response code 9-2.756 and **7.20 2023 - Design Development Report for the Project [APP-358]** – Section 5.5.2-5.2.4. 3.2 The suggestion to go offshore at Bradwell for the connection through to Tilbury may be theoretically possible, but as with the suggestion to connect from Norwich by an offshore route to Tilbury will necessitate the use of HVDC for the offshore element with three convertor stations at each end. Landing at Tilbury is becoming more constrained, including by the recently approved Tilbury 3 development and given cost differentials, including for the necessary tunnel to cross the Blackwater Estuary (with its multiple designations), the Applicant's position is that it is a less preferred option. This should also be set in the context of the Applicant being required to develop its 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

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				Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. 3.3. There may be some misunderstanding here, as the additional capacity cannot simply be met by adding more conductors to the existing line or pushing more power through a line that is at capacity. HVDC systems require convertor stations at each end and requires three HVDC projects (three of 2Gw each) to achieve the additional capability to meet the need case. Regardless of technology (overhead line or underground AC or DC cables) there is insufficient space at some locations to achieve the routeing of an additional connection so the Applicant's position is that it is not technically possible to make the connection in this way. (Also see paragraph 2.5.24 onwards of the **5.15 Design Development Report [APP-122]**).
REP1-281	Tritton Farming Partnership LLP	Alternatives	It should be noted that TFP held a meeting with National Grid on the 14th of November, after plans had been submitted to Planning Inspectorate, to discuss Minerals especially with TFP & Brett, despite issues being highlighted over the last two years. Housing development was also discussed. How can National Grid still be doing consultations after filing? The following alternative routes will mitigate these concerns and reduce compensation costs for National Grid, making them cheaper to deliver. TFP has offered up alternative land to National Grid for alternative routes for Routes 2,3 & 4, utilizing other land belonging to TFP, but not exclusively. *[Respondent encloses alternative route suggestions]* <u>Route 1 – East of Chelmsford</u> Leaving existing Route South of Kelvedon, through rural area to Boreham and then along present infrastructure of roads and railways and rejoining around, Near Ingatestone. This is a major route adjustment but is shorter, more direct, cheaper, (Holford Rule 3). It also has less environmental effect as rural and blighted landscapes on South sections. <u>Route 2 – National Grid's own Great Waltham Alternative</u> This route is on Page 58 of the National Grid Design Development June 2023 paper and enclosed here. This route, according to National Grid design statement reduces the impact on heritage and conservation effects of Great Waltham and Langleys but is 2.5km longer and thus more expensive. However, this no longer applies due to the increased cost of compensation on TFP land. The alternative route is cheaper, affects less residential houses, less heritage (including Grade 1 at Great Waltham) and avoids the difficult pinch point entering Great Waltham with its great archaeological significance. It should be noted that this alternative route still goes over TFP land, but over less sensitive areas. This route should be re-investigated as a more suitable alternative route, as on the surface it would appear so. <u>Route 3 - North West of Great Waltham & West of Chatham Green</u>	The Applicant has considered a wide range of alternatives put forward by the respondent and others in this area, including all of the four routes mentioned in this representation. The reasons for not taking them forward vary, but share common principles. They relate to greater level of effects arising from the alternatives when there was limited certainty over the development. In line with the approach taken with other landowners, feedback was via responses published within the subsequently issued **5.1 Consultation Report [APP-066]** and **5.15 Design Development Report [APP-122]**. We note in particular the housing options had not been successful previously in being shortlisted. In respect of the potential minerals allocation we had responded to the available information by allowing for wider Order Limits to modify arrangements at the mineral site should it move forwards. This was an approach also discussed with the Essex Minerals and waste planning team to ensure their awareness. Given that the site has no firm commitment of its approval this was a proportionate and appropriate position. We have subsequently consulted with the promoter of the site and developed and presented to TFP an alternative route alignment within those wider Order Limits that reduces the implications on minerals. Following feedback from that engagement a further amendment to the route alignment has been prepared and shared with TFP. This latest design arrangement places pylons to the edge of and potentially outwith, the area of potential minerals abstraction thus substantially reducing the level of interaction. Engagement is ongoing to finalise the details and progress a statement of common ground.

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			This is very similar to Route 2 above, the Great Waltham Alternative Route but starts two pylons further East. It is straighter and thus cheaper and the only difference to The Great Waltham Alternative Route is all on TFP land, so no other party is affected beyond Route 2 above. All the benefits listed above apply to Route 3. Leaving the existing route at TB121, on TFP land across Boreham Road, Great Leighs, crosses Deres roundabout where TFP land finishes, then onto Great Waltham Alternative going West of Chatham Green, North of Great Waltham and rejoining at Chignal. <u>Route 4 – East of Sandy Wood</u> Route 4 leaves the existing proposed route around TB113, Fairstead Station, turning South West, past East of Sandy Wood, across the unbuilt Longfield Solar Farm (Secretary of State approved) to above Noakes Farm and turn west onto TFP land, South of Lyons Hall Wood, crossing A131, end of TFP land and rejoining around TB132, Great Waltham. Route 4 avoids the economic and environmental areas on TFP land and passes over a different area of TFP land. This route travels straighter with only one angled turn, less than the present proposed route. It affects less housing (rural land). It crosses the Longfield Solar Farm, an area already determined by the Secretary of State as suitable for Green Energy infrastructure. The only argument used by National Grid in a meeting was this route travelled near ancient woodland, Sandy Wood. However, this is also true of the existing route, which passes not one but two ancient woodlands, Mann Wood and Lyons Hall Wood. In fact, the latest meeting with National Grid in November 2025, where they considered a change on TFP Land brings it even closer to ancient woodland. This is worsened as Route 4 is less commercially and environmentally sensitive and doesn't pass a SSSI or affect so many heritage assets and will be cheaper due to compensation claims. It is more complaint with Holford Rule 3. Clearly insufficient comparisons have been made by National Grid and their consultation with TFP at too late a stage, after plans were submitted to The Planning Inspectorate, this makes their proposal un-sound.	
REP1-281	Tritton Farming Partnership LLP	Cost	TFP objects to the whole Project as it believes that the project has almost exclusively been justified on pure economic cost, which TFP believes to be inaccurate as evidenced below. In addition, insufficient focus has been made of the non-economic costs such as maintenance costs and the scale of the damage to East Anglian communities, caused by environmental, heritage, cultural, visual and social costs. These should be added to economic costs to create "Total Cost". Total cost can then be utilized on comparisons of alternative routes, which has not been done. National Grid's costs cannot be relied upon. It estimates that it will cost £895m using 2020/21 base pricing. This number can be challenged via a number of methodologies. a. Inflation has been substantial since 2020/21 so why has National Grid not calculated updated costings as we are now 5 years on?	**Issue a.** The funding statement has been amended as follows to raise the estimate to 2025–2026 cost base as set out below. Paragraph 3.2.16 page 10 of **4.2 Funding Statement [REP1-004]** has updated the Project cost estimate. 3.2.16 The updated estimated cost of implementing the Project is approximately £1,200 million (2025–2026 cost base). This is revised from paragraph 3.2.16 page 10 of the **4.2 Funding Statement [REP1-004]**. 3.2.16 The estimated cost of implementing the Project is approximately £895 million (2020-2021 cost base). **Issue b.**

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			Inflation has probably increased by 50%. Let's not repeat previous large infrastructure projects with inaccurate costs. b. Norwich to Tilbury is 180km, 6x the distance of the Essex Bramford to Twinstead Upgrade Project, 30km, at a cost of £700m. If the cost was comparable Norwich to Tilbury would cost approx. £3.5bn (£700mx6) or 4x present estimate. c. National Grid in August 2025 Funding Statement introduction and Section 4.1.5. "Addresses the acquisition of land and rights required for the Proposed Project, with a total estimated cost of £180.2 million for land acquisition and compensation (2024/2025 figures)." This number is clearly too low and inaccurate as evidenced below: i. Private loss was estimated in a consultation meeting with, Simon Pepper of National Grid, at £1bn, yet in an official document it is £180.2m. ii. National Grid claimed that only 2,900 homes would be affected, yet leaflets were dropped to 77,000 homes that would be affected. The original Duntons proposal in South Essex was 4,500 new homes alone. iii. Let's assume that 77,000 homes are affected as leafletted by National Grid, the compensation per home would be £180m / 77,000 which equals £2,337 per home, which is less than the Government proposal to give £250 to affected households for 10 years in cheaper energy. This ignores all the compensation for landowners, including during construction, loss of commercial compensation and all the environmental damage. iv. The compensation arrangement is at present limited only to persons with "Title", i.e. "online". This has already been challenged by The Government and will clearly change and result in higher compensation costs to the project. v. The reality is that opposition and legal challenges from environmental groups, protesters, residents and businesses will be substantial, and this will lead to delays and increased costs. vi. The costs of Biodiversity Net Gains are increasing and are thus underrepresented in the National Grid proposal, especially as environmental damage is enormous and even higher if the haul road is included.	A full and transparent cost model is provided in both **7.19 2023 – Strategic Options Backcheck and Review [APP-357]** and **7.17 Strategic Options Backcheck and Review [APP-355]** (Appendix D Economic Appraisal pages D1-D14). 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: Review of Strategic Options Report June 2011 **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 Resolving East Anglia Transmission Boundary and Negative Phase Sequence Currents: 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 £50.3 million or £1.7 million/km in 2011. The final project included significant amounts of cable and other impacts that developed in the detailed design and construction phases. Appendix B of the **7.17 Strategic Options Backcheck and Review [APP-355]** evaluates overhead line elements of £3.98 million/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. **Issue c.** The total estimated cost for compensation has been considered by experienced professionals advising the Company. The assumptions informing the comment that the valuation is '*…too low and inaccurate...*' are not accepted by those experienced professionals. Even if they were correct, the funding required to enable the compulsory acquisition within the statutory period following the making of the Order would be adjusted so that the adequate funding

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				as required remained available, as required by the guidance (see paragraph 1.2.2 of the **4.2 Funding Statement [REP1-004]**).
REP1-281	Tritton Farming Partnership LLP	Alternatives	TFP would consider withdrawing their objection, subject to their proposed changes being adopted. These would include: 2. One of the alternatives set out in section 5 are adopted, including National Grid's own "Great Waltham Alternative Route". If not, we would need to understand why they would be more cost effective than the currently proposed route considering the "total cost". 3. All routes affecting TFP land utilise undergrounded cables to minimise impact and compensation. This is clearly difficult in the mineral area but can be resolved with a minor route change over TFP land. 4. If pylons are to be used. Then T pylons should be used on TFP land, not outdated lattice pylons in this area.	In respect of items 1 and 3, the Applicant is keen to continue the recent positive engagement and is of the view that the most recently shared modified alignment within the Order Limits also offers a route to agreement. The Applicant's position is that alternative routes are less preferred (and this has been explained for the reasons set out above). Its position is also that T-pylons do not provide a better performing option than lattice pylons. Indeed, the T-pylon has a more limited angle of direction change which makes it more difficult to route around the constraints of minerals resources. We have also noted elsewhere in our submission material (**5.15 Design Development Report [APP-122]**) the consideration of T-pylon is made as part of the mitigation hierarchy and only when the use of lattice pylons would lead to an unacceptable level of effects. This is not the case in landscape and visual terms nor the case in terms of its ability to resolve the interface with the minerals extraction. For item 2. National Policy Statement (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 is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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.
REP1-476	Stephen March	Alternatives	We farm land in the Fordham Valley where pylons are planned to be erected. This would impact our land and during construction destroy medieval ridge and furrow water meadows. The pylons would be visible from many listed buildings and from the Dedham Vale AONB through the valley to Bluebell Wood, West Bergholt. We also have some of our land in the underground section but despite offering National Grid an alternative route to mitigate the above they are not open to change which would cause less destruction to the	Alternative alignments to both east and west of the Project alignment have been considered but considered less preferred. Routes to the east offer some benefits in part by routeing on slightly lower ground. However, the coalescence of other utilities, existing homes and built development do not allow a route any further east and the increased length of connection and level of effects lead to the Applicant's position that eastern alternatives are not preferred. Western alternatives were also considered but substantially transfer effects to other similar receptors or introduce additional effects. As this

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			landscape, wildlife and residents yet would have minimal impact on the cost.	alternative would also be a slightly longer connection the Applicant determined to continue with the proposed alignment. We note the respondents preference and assessment of cost differential but have made the decision based on our assessment of the effects. 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 designated 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 on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of designated assets falls within the Order Limits. The Applicant considers that the assessment of the historic environment has been proportionate and is appropriate within the framework of the DCO. Note: without further location information for the ridge and furrow or listed buildings it is not possible to comment more specifically on the respondent's concern. The Applicant acknowledges the concerns raised regarding the potential effects of the Project on the landscape and people's views between Dedham Vale National Landscape and West Bergholt. 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.
REP1-391	John Briggs	Land and Property	In respect to our property it would seem that all such guidelines have been ignored. We have entertained representatives from Fischer German to hold and onsite review of our property, during the meeting our concerns were not considered, we were advised the route was diverted to pass close to our property as the only other option was to pass by a church. The church was discussed an it was considered to be listed building as well but no persons resided in the church and was not regularly used, they advised they would pass these points fwd for consideration but we have not received any feedback. We requested minutes of the minutes were supplied and provided so we had a record of the discussion, these were never provided.	The Applicant has always been consistent that it would provide feedback primarily through the **5.1 Consultation Report [APP-066]** and the Design Development Reports (the most recent being **5.15 Design Development Report [APP-122]** with earlier requests covered in **APP-358** to **APP-360**) to ensure consistency of information. Different alternatives have been carefully considered but the Applicant's position is they are less preferred for the reasons set out above. We note the respondent's perspective on the occupancy of buildings but would highlight this is not necessarily the only basis for comparison and we must consider the intrinsic qualities of the building in reaching a balanced conclusion.
REP1-391	John Briggs	Land and Property	We understand that NG wish to gain access to our property to relocate installations and to widen roads to gain access for civil works. By our own actions and those of our land agent NG has refused to provide any information on timings or the scope of any of these works. On our land we have several horses, this has been	The Applicant acknowledges the concerns raised regarding access, the scope and timing of proposed works, and the potential implications for the welfare of horses kept at the property. The Applicant recognises that the property accommodates horses and that continued, safe access to fields, stables, tack rooms and hay

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			advised to NG and Fischer German, one of the areas they have indicated of interest will deny us access to the fields, stables, tack rooms and hay barns which we need to gain access for the well being and welfare of these animals. There are no other points of access to these buildings there is no understanding how the matter of access will be addressed as NG and their representatives refuse to acknowledge our representations. The widening of the single track road outside our property is the only access we have, NG have not provided any indication as to the scope of works they will require to support the civil works they plan to undertake.	barns is essential for animal welfare. The Applicant's construction approach is to maintain reasonable access to retained land and buildings wherever practicable. Where temporary disruption to access is unavoidable, alternative access arrangements or appropriate mitigation would be discussed and agreed with the landowner in advance of works commencing. No works would be undertaken that knowingly compromise animal welfare. It is the Applicant's understanding that access to the fields, stables, tack rooms and hay barns will not be restricted by the required works and that suitable mitigation can be agreed to facilitate this. The Applicant would welcome further engagement with Mr Briggs and would be happy to attend site to explain how their landholding may be affected.
REP1-391	John Briggs	Land and Property	The compulsory acquisition hearing had questions put forward by the planning inspectorate to NG indicating that 6000 parcels of land were under a compulsory acquisition we have no idea if any parcels of our land fall within this remit as any approaches have been turned away. Our land agent has advised us that in their opinion there is a need for better evidence of meaningful engagement with landowners, updates on reduction of white land, clarity on alternative alignments and whether compulsory acquisition requests are accurate, ensuring only necessary land is included (neither too much or to little), interactions with other major schemes such as UKPN, Gas, BT, Solar.	The Applicant acknowledges the concerns raised by John Briggs regarding compulsory acquisition, engagement with landowners and clarity on land requirements. The Applicant would welcome further engagement with Mr Briggs and would be happy to attend site to explain how their landholding may be affected. The reference made during the Compulsory Acquisition Hearing to a large number of land parcels relates to the total number of individual plots and interests identified across the full length of the Project, reflecting its scale and linear nature. Inclusion within that overall figure does not mean that all parcels are subject to permanent acquisition; many are affected only by temporary possession or restrictive rights rather than compulsory acquisition of the land itself. The specific land and rights sought in respect of each holding are clearly defined in the **2.2 Land Plans [AS-005 to AS-012]** and **4.3 Book of Reference [AS-018]**, which identify whether land is required permanently, temporarily or subject to rights only, and remain the definitive source of information on whether any parcel is affected. In relation to 'white land', the Applicant has sought to minimise land take throughout the design process and to remove land from the Order Limits where it is no longer required. The final land sought reflects the minimum necessary to construct, operate and maintain the Project safely, taking account of engineering, environmental and access requirements. The Applicant keeps land requirements under review as design develops, but the Order Limits and land interests shown in the application represent the position at submission.
REP1-391	John Briggs	Health and wellbeing	The project has not taken into consideration the psychological impact of this project on individuals and communities. The stress which this project has caused on myself and family is immense which is further compounded by my recovery from cancer treatment. It is unclear if during or after the project we shall find the civil works and the overwhelming pylons too much to bear, if we wished to relocate the value of our property would be substantially impacted. Our property within our location is substantially greater than the average value of property in the area by a factor of x3- x4 the mean, with a 50m pylon buzzing away less than 100m from our home will have a substantial impact on the value and will limit our options to	An assessment of how the Project could potentially affect the mental health and wellbeing of local residents is contained in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. Health effects are considered at a population, rather than an individual level, as appropriate for a project of this scale and nature (following good practice guidance associated with health impact assessment and assessments completed for other nationally significant infrastructure projects). The assessment notes that, during the construction phase, there may be heightened levels of stress and anxiety experienced by people as a result of potential environmental impacts in their local area (for

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			replace what we have lost. As we are retired on limited income our ability to finance the shortfall to replace what we have is impossible, some of the offers for compensation being derisory, £2000 spread over 5 years of free electricity. Our property has solar panels and batteries we use an electric car for transport, we export more than £2000 pa to the NG via our solar system, in reality do you believe that £2000 of electricity paid in compensation has any meaningful value when the presence of such installations will reduce the value of our property by hundreds of thousands of pounds.	example, noise, dust, traffic and visual impacts). A variety of measures have been identified to mitigate these impacts (for example use of best practicable means (BPM) to reduce noise impacts and dust management measures to reduce air quality impacts) as outlined in **7.2 Outline Code of Construction Practice [Revision B]**. The approach to managing construction traffic is set out in **7.3 Outline Construction Traffic Management Plan [APP-309]**. The Applicant understands that community mental health and wellbeing can be impacted by changes to existing views and landscapes as a result of the permanent visual changes the Project would bring. Embedded mitigation that forms part of the Project design is described in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and includes sensitive routeing and siting of the alignment and Order Limits, as well as landscape plans and planting schedules as outlined in **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. A Residential Visual Amenity Assessment (RVAA) has been completed for the Project (**6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]**), which describes the change in views likely to be experienced by residents at the closest residential properties to the Project (within approximately 200 m). The RVAA finds 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 where appropriate. 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 (people potentially affected during the progress of the Project) through regular communication including letters, phone calls and meetings, where necessary, in line with Commitment GG30 of **7.2 Outline Code of Construction Practice [Revision B]**. The Applicant notes the reference made to £2,000 compensation spread over a five-year period. This is taken to be in relation to the government announcement 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.
REP1-273	Richard Marriage & RPM Farming Ltd	Draft DCO	It was argued in the Acquind DCO case that unless alternative available options were properly considered there could be no proper assessment of the balance between private loss and public benefits in support of any proposal. In the absence of such an assessment in	The Project has undertaken a full assessment of alternatives. All viable options have been considered. The assessment material, including the consultations and publishing of material on that assessment, can be found in **7.17 Strategic Options Backcheck and Review [APP-355]**, **6.3 Environmental Statement Chapter 3 -**

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			this case, the justification for the project is unclear, unsubstantiated, and cannot be considered robust	**Alternatives [APP-127]**, **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]**. This material, together with the Applicant's submissions made during the Examination and the examination of the topic on Alternatives at ISH1 (see **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**), provides the decision maker with substantial, full and robust information to carry out the balanced consideration between private loss and public benefits in support of the proposal.
REP1-435	Paul Lanham		The Fishing Lake – A Business Built Over Years The fishing lake was not an accident of landscape. It was planned, created and developed as part of diversifying the farm to secure its future. It is a viable commercial asset. I have written confirmation of rental interest in the region of £22,000–£25,000 per annum (Appendix B). The proposed overhead lines would pass directly over the lake. This would: • Make the lake commercially unattractive • Create perceived safety concerns for anglers • Undermine the value of the business entirely In practical terms, it would wipe out a functioning income stream.	The Applicant notes that the fishing lake has been deliberately created and operated as a commercial diversification of the farm business and acknowledges the concern that the proposed overhead line would pass over the lake. The Applicant recognises that Mr Lanham considers this would affect the commercial attractiveness of the facility and the perceived experience of users. The Applicant acknowledges concerns regarding the impact of the proposed overhead line on the usability and ongoing operation of the fishing lake. It is recognised that the presence of such infrastructure may influence the commercial viability and user experience associated with the facility. While overhead electricity lines are commonly found near various recreational and commercial sites, it should be noted that the Project will be designed and managed in strict accordance with statutory safety requirements. This approach is intended to mitigate potential risks and maintain compliance with relevant safety standards. The extent of any restrictions or operational limitations imposed on the fishing lake will depend upon the final, permanent location of the overhead line within the established Limits of Deviation. These specific implications will be determined once the route is confirmed. The Applicant notes the reference to rental interest and projected income. Matters relating to loss of business income, perceived safety concerns, injurious affection or diminution in value are compensation matters. Such matters would be assessed separately, on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code, and are not matters to be determined through the Examination of the Development Consent Order.
REP1-435	Paul Lanham		Seven-Year Trunk Road – Loss of Half My Grazing The proposal includes a hardcore construction trunk road across approximately half of my grazing land for up to seven years. Seven years is not temporary disruption. It is a significant portion of the productive life of the land.	The Applicant notes the concern that a temporary construction access route would be required across part of the holding and that this is perceived to affect grazing land for an extended period. The Applicant recognises that such temporary works may give rise to disruption to agricultural operations during construction. Temporary possession of land for construction purposes is an established and necessary component of delivering nationally significant infrastructure projects and has been assessed within the

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			This would: • Remove roughly half of my usable pasture • Reduce stocking capacity • Increase feed costs • Disrupt grazing rotation • Cause compaction and soil damage Although removal is suggested after construction, there is no detailed reinstatement methodology provided. Without proper soil restoration, drainage repair, and long-term monitoring, there is no guarantee the land will ever return to its current condition	Environmental Statement. While construction activities may extend over several years in a particular locality, the use of temporary access routes and compounds is not permanent and does not represent a permanent loss of land. The Applicant does not agree that the duration of temporary use alters its temporary nature for the purposes of land rights or justification. The Applicant will only take possession of land for the minimum required period and seek to return reinstated land to the landowner at the earliest opportunity. The Applicant's submission, includes detailed construction and reinstatement methodologies, including measures relating to soil handling, compaction avoidance, drainage repair and restoration of land following the completion of works. These measures are intended to ensure that land is returned to an appropriate condition following construction, having regard to its pre-existing use. Any loss arising from temporary possession, including effects on grazing capacity, stocking levels, increased costs or soil condition, would be a matter for compensation to be assessed separately in accordance with the Planning Act 2008 and the statutory Compensation Code.
REP1-435	Paul Lanham	Land Drainage and Flood Risk, Biodiversity, ecology and nature conservation	Pollution Risk to the Lake The trunk road runs only a few metres from the fishing lake (Appendix C). There is no clear, detailed pollution mitigation plan covering: • Surface water run-off • Fuel spill containment • Sediment control • Drainage protection Heavy construction vehicles operating in close proximity to a commercial water body presents obvious contamination risks	There are several commitments within **7.2 Outline Code of Construction Practice [Revision B]** that address preventing pollution of the water environment including: GG21, GG22, GG32, B03, GH05, W02 and W13. As per commitment W05, '*In the event of a spill during construction, a response would be triggered in accordance with approved site procedures*'. Site procedures will be confirmed by the Main Works Contractor(s). Potential impacts on water bodies from construction activities (including vehicles) have been assessed in **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]**.
REP1-435	Paul Lanham	Land and property	Loss of Turkey Enterprise – Biosecurity Impact I operate a turkey enterprise under contract with Kelly's. I have written confirmation that if the proposed access arrangements proceed, biosecurity standards could not be guaranteed and the contract would be withdrawn (Appendix D). The proposal introduces: • Permanent third-party access through the farmyard • Vehicles entering from unknown agricultural sites • Construction activity near livestock Modern poultry contracts operate under strict biosecurity controls. These are not optional. If the contract is lost, that is another key income stream removed from a farm that has been carefully built up over decades	The Applicant notes that Mr Lanham operates a turkey enterprise under contract and recognises the concern that construction access arrangements are perceived to give rise to biosecurity risks which, it is asserted, could affect the continuation of that contract. The Applicant takes biosecurity matters seriously and recognises that modern poultry operations operate under strict controls. Construction activities would be managed through the Code of Construction Practice (CoCP) and associated biosecurity, access and traffic management measures to minimise the risk of contamination and to manage vehicle movements, including cleaning protocols and restrictions on access where required. The Applicant is confident that, provided appropriate mitigation measures are identified, agreed and implemented, the risk of withdrawal from a commercial contract can be avoided. This reflects the Applicant's commitment to ensuring that biosecurity and access arrangements are managed to prevent undue risk to ongoing farming operations.

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				Should any temporary disruptions occur during the construction phase, these will be carefully managed and mitigated wherever reasonably practicable. The Applicant emphasises that construction access arrangements are intended to be temporary and will not be a permanent feature affecting the enterprise. The focus remains on maintaining operational continuity and minimising impacts on commercial contracts throughout the construction process. Any loss arising from disruption to a farming or livestock enterprise, including biosecurity related impacts or loss of income, would be a compensation matter to be assessed separately on a case-by-case basis in accordance with the Planning Act 2008 and the statutory Compensation Code. Such matters are not resolved through the Examination of the Development Consent Order.
REP1-435	Paul Lanham	Land and property	Permanent Access Within Three Metres of My Home The proposed permanent access route uses my private driveway. It enters through my front gate and passes within approximately three metres of the walls of my house, including both front and rear doors (see Appendix A). This is not a remote field access. This is my home. For over 45 years, this has been a family driveway. It would now become a permanent service corridor for infrastructure. That would mean: • Ongoing disturbance • Loss of privacy • Security concerns • Safeguarding risks when grandchildren are present	The Applicant notes the concern that a proposed permanent access route would utilise an existing private driveway and pass in close proximity to the dwelling, and acknowledges the sensitivity of access arrangements in the vicinity of a residential property. Permanent access routes are required to enable the safe inspection, maintenance and operation of the electricity transmission infrastructure and are an established feature of overhead line projects. The alignment and access arrangements have been developed to minimise additional land take and to make use of existing routes where reasonably practicable. Permanent accesses would be used infrequently, primarily for inspection and maintenance purposes, and would not involve continuous or regular traffic. Any works would be undertaken in accordance with agreed procedures to manage safety, security and amenity impacts. Concerns relating to privacy, security and safeguarding are recognised and would be considered as part of detailed access management and engagement with the landowner. The Applicant remains open to discussing land-specific measures where reasonably practicable to manage the use of access routes in proximity to residential properties. Any claim relating to the impact of permanent access on residential amenity or property value would be a compensation matter to be addressed separately in accordance with the Planning Act 2008 and the statutory Compensation Code.
REP1-435	Paul Lanham	Land and property	Cumulative Impact The proposal would: • Place permanent transmission infrastructure on my land • Destroy a viable fishing enterprise • Remove half my grazing land for seven years • Threaten the long-term productivity of my soil • Cause the loss of my turkey contract • Introduce permanent third-party access within metres of my house	The Applicant acknowledges that Mr Lanham has raised a number of concerns relating to the combined effects of the Project on his land, business activities and residential amenity, and recognises that, taken together, these impacts are perceived as significant. The Project has been assessed within the Environmental Statement, including consideration of cumulative effects across land use, agriculture, businesses, residential amenity and construction impacts. These assessments informed the development of the Project design, construction methodology and the mitigation measures secured through the **3.1 Draft Development Consent Order [APP-056]**.

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			Individually these are serious. Combined, they are overwhelming	The Applicant notes that several of the matters identified such as temporary loss of land during construction, effects on farming operations or businesses, perceived impacts on amenity, and the presence of permanent infrastructure are typical of nationally significant infrastructure projects of this nature. Where such effects arise, they are addressed through a combination of design refinement, construction management, reinstatement requirements and, where impacts cannot be avoided, through compensation. Temporary construction impacts would be managed and mitigated where reasonably practicable, permanent infrastructure would be operated safely and infrequently accessed, and reinstatement of temporarily used land would be secured through the DCO. Any residual effects on land value, business operations or amenity would be compensation matters to be assessed separately on a case-by-case basis in accordance with the Planning Act 2008 and the statutory Compensation Code.
REP1-435	Paul Lanham	Alternatives	I respectfully request that: • The alignment be reconsidered to avoid the fishing lake • The trunk road alignment be revised to reduce grazing loss • A detailed and enforceable reinstatement and pollution strategy be provided • An alternative access route avoiding my residential driveway be properly assessed	The routeing in this location is very constrained and has to consider the high pressure gas pipeline that runs north / south to the west side of the lake as well as some work to modify existing 132 kV connections and a number of consented housing development proposals (Dunton Hills Garden Village (DHGV) to the west) along with land due for allocation for housing (site H11) to the east of the pipeline. The Applicant has considered whether alternatives exist that can avoid the restrictions on fishing having to be imposed for safety reasons. However, there are no available routeing alternatives to the east or west of the DHGV site. Localised variations have also been considered but all lead to a direct interface with areas of proposed built development and on balance a restriction on fishing activity (which is compensateable) is considered to be the appropriate response. The Applicant notes the concern that a proposed permanent access route would utilise an existing private driveway and pass in close proximity to the dwelling, and acknowledges the sensitivity of access arrangements in the vicinity of a residential property. Permanent access routes are required to enable the safe inspection, maintenance and operation of the electricity transmission infrastructure and are an established feature of overhead line projects. The alignment and access arrangements have been developed to minimise additional land take and to make use of existing routes where reasonably practicable. Permanent accesses would be used infrequently, primarily for inspection and maintenance purposes, and would not involve continuous or regular traffic. Any works would be undertaken in accordance with agreed procedures to manage safety, security and amenity impacts. Concerns relating to privacy, security and safeguarding are recognised and would be considered as part of detailed access management and engagement with the landowner. The Applicant remains open to discussing land specific measures where reasonably

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				practicable to manage the use of access routes in proximity to residential properties. Any claim relating to the impact of permanent access on residential amenity or property value would be a compensation matter to be addressed separately in accordance with the Planning Act 2008 and the statutory Compensation Code.
REP1-442	Peter Hitchcock	Land and property	There needs to be more meaningful engagement with landowners reflecting your wish, mentioned in a number of your communications, to proceed by agreement. There needs to be updates relating to white land. Clarity on alternative alignments which have been considered and potential for Compulsory Acquisition. Clarity on whether necessary land is realistic as to its extent. Interaction with other major schemes involving utilities for example where existing cables cross the proposed route and special consideration is required.	The Applicant recognises the importance of meaningful engagement with landowners and has consistently stated its intention to acquire land and rights by agreement wherever reasonably practicable. Land required for the Project is defined by the Order Limits shown on the **2.2 Land Plans [AS-005 to AS-012]** and described in the **4.3 Book of Reference [AS-018]**. These reflect the reasonable worst-case extent required to construct, operate and maintain the Project. As design refinement continues, the Applicant will review land requirements and, where appropriate, seek to reduce or remove land from the Order Limits through the relevant statutory processes. Landowners will continue to be engaged as this process evolves. A range of alternative alignments and design options have been considered and assessed, as documented within the Environmental Statement and supporting technical reports, including the assessment of rejected options. The selected alignment represents a balance of technical feasibility, environmental considerations, engineering constraints and stakeholder feedback. Compulsory acquisition powers are sought only where necessary to ensure delivery of the Project in the public interest and do not preclude the continued pursuit of voluntary agreements. The Applicant acknowledges interactions with existing utilities and, in some locations, other major infrastructure schemes. Engagement with statutory undertakers and utility providers has been undertaken to identify crossings, constraints and requirements for protection, diversion or special measures.
REP1-276	Stacey Farms Ltd	Land and property	The current payments do not reflect the true economic impact of granting easements, including diminished land productivity, restrictions on land use, or the visual and amenity impacts of pylons. It is not clear whether the ongoing reduction(s) in land productivity have been considered by National Grid as part of the general cost-benefit analysis, noting that such reductions in productivity are perpetual/perennial.	The Applicant notes the affected party's concerns that the payments currently offered do not reflect the full economic impact of granting easements, including effects on land productivity, land use restrictions, and visual and amenity considerations. 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. 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

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				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. In relation to the Project's wider cost benefit assessment, the Applicant confirms that land acquisition and compensation costs form part of the overall scheme cost.
REP1-379, REP1-422	James Robert Samuel Blyth Mr James Robert Blyth and Mrs Roseanna Forshaw	Land and property	My Property lies within an area of significant sand and gravel interest. This is evidenced by the fact that I previously owned the land south of Wick Lane, which was sold to S.R.C.Group, who subsequently established Crown Quarry. More recently, SRC has been promoting land north of Wick Lane as an extension to Crown Quarry. The area extends to approximately 23.19 hectares and is proposed for the extraction of around 1 million tonnes of sand and gravel, with processing and distribution from the adjacent Crown Quarry processing plant. I will shortly be entering into an Option Agreement with SRC to acquire the site, subject to planning permission, and SRC has already undertaken ground investigation surveys. I have been open and transparent with the Applicant and its agent throughout consultation meetings and have referenced the potential change-of-use opportunities on the Property in non-statutory consultation responses. This opportunity is of considerable importance; however, the Applicant's proposal shows the pylon line constructed overground and dissecting the proposed quarry site. Despite repeated requests for the pylon line to be moved to the north of the Property, there has been no meaningful engagement on this issue. The Applicant has now submitted a planning application that continues to show the proposed pylon route running through the centre of my potential quarry site. I respectfully request, as a matter of priority and urgency, that the pylon route is moved as far north as possible so that I can still realise the commercial opportunity associated with the land north of (redacted).	The Applicant is aware of the proposed allocation of this site and has considered a wide range of alternatives to seek to reduce the interface with the minerals proposals, none of which have been identified to be preferred. We have also considered the suggestion to move the pylon route to the north. The Applicant's position is that moving the pylons towards the northern boundary is counter-productive due to the space that is required to be retained to the north of the pylons to facilitate conductor installation. This would result in both pylons being positioned within the abstraction which restricts a greater area (partly because both become angle pylons) than is restricted by the submitted scheme where TB17 is to the edge of the development and TB18 is a suspension which minimises the restriction. Excavation can occur but an area extending out 30 m from the pylon should be retained as unaffected by excavation. We would anticipate that excavation could be completed below the overhead lines and that similarly agreement could be reached on sensitive siting of the haul road. Appropriate mechanisms would be expected to be followed to establish if, and the level of any compensation that may be due.
REP1-245	J and C Rayner Farms Ltd	Land and property	We still don't have answers to specific questions about major problems that we can see arising, including main farm access, drainage, managing field operations, and how we will operate our farming business. We need to know so we can plan ahead. This is not a consultation: it is deliberate withholding of information. The pylon route cuts right through the centre of our farm and approx. 70 acres will be unfarmable. NG have still not explained to us how tractors will cross the haul road. We need to know so we can plan. Again, this shows that National Grid is has no interest in genuine consultation. Repeatedly we have asked about how road access will be maintained to the farm.	The Applicant acknowledges the concerns raised regarding access, drainage, field operations and the ability to continue farming operations during construction. The Applicant does not accept that information has been deliberately withheld but recognises that further clarity is sought to assist forward planning. The Applicant notes the concern that the pylon route passes through the farm holding and that a substantial area of land may be affected during construction. The Applicant does not accept that land will be permanently 'unfarmable' beyond the areas required for permanent infrastructure and rights. Temporary land used for haul roads or construction access would be reinstated following completion of works, in accordance with the DCO requirements and agreed reinstatement standards.

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				In relation to the crossing of haul roads by agricultural machinery, the Applicant confirms that maintaining reasonable access for farming operations is a core principle of the construction approach. Where haul roads intersect existing field access routes, the provision of appropriate temporary or permanent crossing arrangements will be agreed and installed. These arrangements are typically agreed in advance with the landowner and implemented prior to construction works affecting access. The Applicant's appointed land agent, Fisher German would be happy to meet with affected parties on site and agree where accommodation works, like crossing points may be required. The Applicant further recognises the importance of maintaining safe and practical access to the farm holding, including during construction. The Applicant does not intend to permanently sever access to agricultural land or farm buildings. Any temporary disruption to access would be managed through agreed access management measures, with alternative routes or arrangements put in place where necessary. The Applicant acknowledges the sensitivity of agricultural drainage systems and confirms that drainage impacts are a material consideration within the Project. Detailed drainage design, protection of existing systems and any necessary temporary or permanent drainage works would be addressed through the relevant drainage management plans, in consultation with the landowner and, where applicable, the relevant drainage authorities. The Applicant remains committed to ongoing engagement with J and C Rayner Farms Ltd and its appointed representatives and would welcome a meeting to discuss their concerns and progress matters.
REP1-245	J and C Rayner Farms Ltd	Alternatives	We have objected to the siting of a large compound on Pit Field. We wanted it moved to the other side of that field. We have now been told, after 2 years, that they will not change the site because of two nearby residential properties. However these properties will still be harmed by the same number of vehicle movements using the junction that will be created to access it from the Tey Road. If we could talk to the NG person who make this decision we would point out that these houses are further away than the two houses in the farmyard.	The compound is approximately mid way between properties, but also positioned to reduce interference with farming to the extent possible. Whilst noting the issue raised about traffic past the properties, we are concerned that there is other activity and movement at compounds that would exacerbate this if the compound was moved as requested to be just across the road from the properties. The Applicant continues to prefer the more central position.
REP1-245	J and C Rayner Farms Ltd	Biodiversity, ecology and nature conservation	We will lose 2025 metres of hedging- either grubbed out or cut down. We will lose trees, including a row of Hybrid Elms planted in the 80's. These losses are irreplaceable. Hedges and trees provide, as you know, a valuable nature resource which over a few working days will be gone. Our farm has more trees and hedges, planted by me over my lifetime here, than any other farm in the area. It will never be restored in my lifetime, if ever at all. The project so far has been presented as "put up with it- we're not going to change". This is not a consultation as there is no two way discussion	**6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** 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 trees and hedgerows will be minimised as far as practicable. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and **7.2 Outline Code of Construction Practice [Revision B]** both include commitments to ensure the mitigation hierarchy is applied,

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				with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species. This has been agreed with Natural England and Local Planning Authorities as shown within the relevant **Draft Statements of Common Ground [REP1-010 to REP1-034]**. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (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. The Applicant 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 the Planning Inspectorate in accordance with the Gunning Principles. 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. 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**).
REP1-196	2 Agriculture Growing Limited	Land and property	A meeting was held with Fisher German on 24 February 2026, attended by myself, at which limited additional detail on the project was provided. However, as this was the first meaningful contact, our client has not had a reasonable or fair opportunity to consider the proposals or to respond in an informed manner.	The Applicant does not agree that the meeting that took place on 24 February 2026 was the first meaningful engagement with the affected party, but does accept further engagement is required to address their concerns and set out how their landholding may or may not be affected by the Project. Meetings have been offered to the affected party in advance of the meeting that took place on 24 February 2026.
REP1-196	2 Agriculture Growing Limited	Land Use	Biosecurity Risks to Poultry Operations Poultry units operate under strict and legally mandated biosecurity regimes due to the persistent and significant threat of Avian Influenza. Any uncontrolled activity adjacent to the site materially increases the risk of disease introduction. The consequences of an Avian Influenza outbreak could include: • Mandatory depopulation • Severe business interruption • Loss of employment • Longterm movement and disease control restrictions • Reputational damage • Significant economic loss	The Applicant recognises the seriousness of biosecurity risks associated with poultry operations and acknowledges that avian influenza presents a significant and ongoing threat to flock health, business continuity and employment within the sector. The Applicant does not underestimate the potential consequences of a disease outbreak. The Project includes embedded biosecurity measures as part of its approach to agricultural and land management activities. The Applicant's environmental management framework confirms that biosecurity procedures are standard practice and are intended to minimise the risk of spreading animal diseases, including avian influenza. These measures include controls on personnel and vehicle movements, cleaning and disinfection protocols, and avoidance of

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			The scale and severity of these risks cannot be overstated. Lack of Engagement Until 24 February 2026, neither National Grid nor their agents had made any contact with our client. This lack of early engagement is unacceptable. It has prevented our client from: understanding the proposals, assessing the potential operational impacts, and identifying necessary mitigation. The absence of timely communication has already placed the project on a difficult footing and has caused considerable concern. Our client cannot support any activity in the vicinity of the poultry unit unless and until National Grid provides a detailed, robust and enforceable biosecurity plan, covering: • Personnel management and protocols • Vehicle access, control and decontamination • Separation distances and exclusion zones • Construction sequencing • Contamination control measures • Emergency response arrangements Without such a plan, our client cannot accept any risk that could compromise flock health or business continuity.	direct interaction with livestock and captive birds, informed by Defra guidance. At this stage, the Applicant has not produced a location specific, enforceable biosecurity plan for individual holdings. Detailed construction and operational controls, including site specific biosecurity arrangements, are intentionally secured through Development Consent Order requirements, including the Code of Construction Practice (CoCP). These plans must be prepared by the appointed contractor and approved by the relevant authority prior to works commencing and can include tailored measures where sensitive receptors, such as poultry units, are present. The Applicant notes the concern raised regarding the timing of engagement. While the Applicant does not accept that engagement has been deliberately delayed, it acknowledges that early engagement is particularly important where high-risk biosecurity receptors exist. The Applicant is committed to continued engagement with 2 Agriculture Growing Limited to understand the specific operational sensitivities of the poultry unit and to ensure that appropriate biosecurity measures are considered as part of the detailed planning of works.
REP1-196	2 Agriculture Growing Limited	Land Use	Our client requires urgent, direct and coordinated engagement from National Grid to address the unresolved issues and to ensure that any works can be undertaken without compromising the operation of this sensitive agricultural site. It is essential that National Grid: • Provides full details of all proposed works; • Demonstrates how construction and operational phases will interact with a live poultry facility; • Produces credible mitigation proposals for all identified risks; and • Treats biosecurity as a primary design and operational constraint, not an afterthought.	The Applicant and their appointed agent Fisher German remain committed to engagement with 2 Agriculture Growing Limited and their appointed agent and will reach out to arrange a further meeting to discuss how the landholding may be impacted by the works and what biosecurity may need to be considered.
REP1-457	Roydon Malcolm Burridge	Alternatives	The current route of the pylons goes right across our field which is also on top of a hill. We are requesting that the route be slightly altered to follow the edge of our field which is also along the bottom of the valley to reduce the height of the Pylons to avoid collision with aircraft and help hide the pylons from view on the horizon. There has been a group of us landowners trying to be heard with no response.	The Applicant responded to this request in **5.1 Consultation Report [APP-066]** (10-22.46): '*National Grid notes the respondent's feedback. The suggested route would take the alignment across the edge of Hapton Common County Wildlife Site, would move the alignment closer to properties at Fundenhall and would also take the alignment closer to South Norfolk Model Flying Club reintroducing potential interactions. We are therefore not proposing a further change to the alignment between RG27 and RG35. We have positioned pylons as close to field boundaries as possible to reduce impacts to agricultural operations where technically feasible whilst ensuring constructability of the Project.*'

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REP1-305	Caroline Homewood	Land and property	Since the Open Floor Hearing on 10 February 2026, I have received a plan dated 11 February 2026 identifying land in Ford Street, Aldham (CO6 3PL) as subject to a proposed Compulsory Purchase Order for a construction compound behind The Maltings. This was the first notification I received of this proposal. It was not transparently disclosed during consultation nor clearly presented in any documentation relied upon at the hearing.	The plan that is likely being referred to was part of a category 3 Land Interest Questionnaire issued to the affected landowner to confirm ownership of a property and other details. The Applicant is not proposing to purchase this land for a construction compound. The construction compound remains as proposed in the same location that was consulted on during the Applicant's statutory consultation in 2024.
REP1-305	Caroline Homewood	Water environment	Flood Risk and Site Suitability The proposed compound site is subject to seasonal flooding and remains waterlogged for extended periods during winter months. This raises serious concerns regarding the suitability and resilience of the location for heavy construction use.	It is acknowledged that areas within the Order Limits are susceptible to flooding in **7.9 Flood Risk Assessment [APP-331].** Works in these areas would be programmed to avoid periods of flooding. **7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]** sets out flood emergency arrangements during the construction phase. Further, commitment GG28 of **7.2 Outline Code of Construction Practice [Revision B]** secures that, '*Where necessary, temporary appropriate technology / material will be installed in areas where heavy equipment, such as cranes and piling rigs, are to be used to provide stable working areas and reduce disturbance to the ground by spreading loads and reducing soil compaction*'.
REP1-305	Caroline Homewood	Landscape and visual	The proposed pylons in the TB047–TB052 section are positioned on elevated ground directly affecting the setting of Ford Street, Aldham and Fordham. The scale and siting would dominate the skyline and cause permanent landscape and heritage harm.	The Applicant acknowledges the concerns raised regarding the potential effects of the Project on the setting of Fordham, Aldham and Fordstreet. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on landscape and visual receptors. The assessment is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The Project passes to the east of Fordham, Fordstreet and Aldham, crossing the Colne Valley between pylons TB047 and TB052. Effects on landscape character within the Colne Valley Slopes Landscape Character Area (LCA) and Colne River Valley Floor LCA are set out in **6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228]**. Significant adverse effects are identified within approximately 1.5 km of the Project during construction and operation. Effects on visual receptors within Visual Receptor Areas (VRA) D5 Fordham, D6 West Bergholt, Fordham Heath and Eight Ash Green and D7 Fordstreet and Aldham are set out **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Significant adverse effects are identified within approximately 1.5 km of the Project during construction and operation. 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

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				level of harm on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of designated assets falls within the Order Limits. The Applicant considers that the assessment of the historic environment has been proportionate and is appropriate within the framework of the DCO.
REP1-219	CJH Farming & CJH Holdings	Land use	The fields with proposed TB154 - TB157 form part of a much larger option agreement for a major DCO solar development. The proposed pylons would cross the site, reducing the available area for solar panels, causing shading, and introducing further constraints, potentially rendering the solar farm unviable in this location. The site is also the location of the annual Essex Young Farmers Show which is an event highly valued by the local community. Construction of pylons across the site would hugely impact the event. We understand that National Grid requires future access to its assets. However, imposing a fixed route is unfair to landowners, as it sterilises the land and prevents any future use or development, as well as negatively affecting its future saleability	The Applicant acknowledges the concerns raised by the affected party in relation to pylons TB154 – TB157 but also notes that it has taken forwards an approach which responds to projects within the planning system (this is defined in **5.15 Design Development Report [APP-122]** in Section 2.6.1) but only gives weight to projects that are allocated sites, have an EIA screening or scoping request submitted or a planning application submitted. This does not give weight to option agreements which are considered to have too much uncertainty over whether they will progress. When developing the Project, routeing and siting has been informed by principles which seek, as far as reasonably practicable, to minimise effects on existing land uses and known development interests. The Applicant does not accept that the presence of overhead line infrastructure would automatically render a solar scheme unviable; interactions between transmission infrastructure and solar development can be addressed through detailed layout design, appropriate easement provisions and ongoing engagement, which the Applicant continues to undertake within the Limits of Deviation. The Applicant recognises the importance of the Essex Young Farmers Show to the local community and will continue to engage with the landowner and event organisers to manage construction activities so as to minimise disruption where reasonably practicable, with controls secured through the **7.2 Outline Code of Construction Practice [Revision B]** and subsequent Construction Environmental Management Plans. The Project requires defined access to assets for inspection, maintenance and safety purposes in order to ensure the safe and reliable operation of nationally significant electricity infrastructure. The inclusion of access rights does not sterilise land but secures necessary operational requirements, with landowners compensated in accordance with the statutory compensation code for any loss or disturbance arising from the acquisition or use of rights.
REP1-219	CJH Farming & CJH Holdings	Land use	Towers TB154 – TB157 are located on fields adjacent to a former mineral quarry site. These fields are safeguarded in the Essex County Council Minerals Plan due to their significant potential for future extraction of sand and gravel. However, the proposed pylons pose a serious risk of rendering a substantial portion of this valuable extraction area unusable	The Applicant acknowledges that pylons TB154–TB157 are located on land adjacent to a former mineral quarry and that these fields are identified as safeguarded within the Essex County Council Minerals Plan due to their potential for future sand and gravel extraction. In developing the Project, the Applicant has had regard to mineral safeguarding policies; however, mineral safeguarding does not in itself preclude other forms of development, nor does it give certainty that extraction will come forward. The presence of the proposed overhead line infrastructure would not necessarily render the safeguarded area unusable for future mineral extraction. Detailed design has sought to minimise land take and to

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				retain flexibility for other land uses where reasonably practicable. The interaction between electricity transmission infrastructure and potential mineral extraction is a matter that would be addressed through future detailed design, method statements and engagement with relevant parties should mineral working proposals come forward. Any demonstrable loss arising from the acquisition of land or rights, or from restrictions on land use associated with the Project, would be a matter for compensation to be assessed in accordance with the statutory compensation code and does not, of itself, justify amendment to the Project alignment.
REP1-346, REP1-474, REP1-332, REP1-353	Francesca, Stephen, Donna, and Georgia Chantry [identical, but separate submissions]	Land and property / Health & Well-Being / Compensation / Heritage	Concerns about cancer risks arising from close proximity to such installations only further our anxieties. Our property is a listed building and the land is included in the curtilage of it. Recent visit from estate agents have estimated a depreciation in value by 30-40 percent. Having invested our time, hard efforts and personal finances into our homes this revelation is deeply upsetting. We have received a plan from NG proposing that a corner of our land/paddocks lie within the shaded green area identified as the zone for permanent assets. Within that zone stands ancient oaks and stables for our horses. These oak trees are keystone in the local ecosystem. Their removal would cause disproportionate harm to local biodiversity. They are centuries old and cannot be meanfully replaced within a reasonable timeframe. They also contribute signficantly to the amenity value of the land. Also within the affected area are stables, during construction the stables would likely need to be relocated to insure adequate distance from works. This would cause stress to he horses and to address safety concerns. • TB208 50 pylon is the the front of the property • TB207 50 metre pylon at the side of our property • TB206 50 metre Pylon at the back of the property To surround one property with three of these is unreasonable and unfair.	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. a perceived fall in property value due to proximity or visual impact). 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 electric and magnetic fields (EMFs), which are incorporated into the decision-making process for development consent in National Policy Statement (NPS) 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 and evidence of compliance is available in the **7.8 Electric and Magnetic Field Compliance Report [APP-330]**. One oak tree (T1064) is recorded as veteran in the **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** to the north of TB208. The tree is anticipated to be affected / managed as indicated in the Arboricultural Impacts Plan, Annex D of the **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA Figure A13.6.1 [REP1-065]**, not removed. No other ancient or veteran trees were recorded in proximity to TB206, TB207 or TB208. The management of the veteran tree will follow the mitigation hierarchy as set out in the **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**.
REP1-347	Isabella Chantry	Land and property / Health & Well-Being / Compensation / Heritage	Adding insult to injury, the government's offer of £250 per year as compensation for living under the shadow of these pylons is nothing short of an insult. This token payment cannot undo the harm being done. It cannot recover the 30-40% loss in property value that estate agents have already warned us about. It cannot replace the	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

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			sense of security and peace that my family has lost. Under the Human Rights Act 1998, we have the right to peaceful enjoyment of our home (Article 1, Protocol 1), and this project is set to violate that right in ways that cannot be ignored. As a custodian of a Grade II listed farmhouse, I have always been proud to be part of Brentwood's heritage. But that pride has turned into heartbreak. How can I protect the legacy of my home when the view, the landscape, and the very essence of what makes it special are being destroyed? National Grid's disregard for the historical and cultural significance of this land is disgraceful. But beyond the loss of property and heritage, the greatest tragedy of all is the toll this is taking on my mother's health. This project is not just affecting our home—it is destroying her well-being. Every letter from National Grid, every wooden stake placed outside our house is another blow to her mental state. Since the proposal was announced, she has suffered crippling anxiety, panic attacks, and emotional distress that has led to multiple emergency calls to paramedics. Four times, she has collapsed, unconscious, overwhelmed by the fear of what is coming. She is now on medication, attending therapy, and struggling to cope with a reality that should never have been forced upon her. No one should have to watch a loved one go through this. I have seen my mother become consumed by stress, and there is nothing I can do to take it away. National Grid has not only put our home at risk—it has stolen our peace of mind, our security, and, most importantly, my mother's health.	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. The respondent is encouraged to contact the Project team should they have any questions or concerns. The government's intention to develop a bill discount scheme for households located within 500 metres of new transmission infrastructure 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. 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. a perceived fall in property value due to proximity or visual impact). The Applicant believes that our proposals have been developed in line with the Human Rights Act and the European Convention on Human Rights (ECHR), including Article 8 and Article 1 of Protocol 1 of the ECHR.
REP1-295	Andrew Bullock	Alternatives	There are three questions which we have asked on numerous occasions and N.G have failed to answer. 1. Why, when the existing 400KV line and the proposed new line come so close together (within a few hundred metres) on our land are they not going to be parallelled? No other country in Europe would take the view that it is quicker and easier to put another massive visual scar across the natural landscape. Additionally on our land there are four sets of electric power lines (three 11kv and one 33kv) which will have to be undergrounded where the new oversail will be. When we ask where these smaller lines will be diverted to, we are told by N.G that it is not their responsibility and we will have to ask UKPN. All these smaller lines have already been undergrounded on the existing line. 2. Why the pylons cannot be placed along field boundaries. This would cause the least disruption to farming operations and minimise damage to field drainage.	1. The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project. This alternative provided by the respondent was considered and our response is detailed in **5.1 Consultation Report [APP-066]** Ref no. 9-4.151 and Ref no. 9-4.213**.** Paragraphs 5.3.4 to 5.3.12 of **5.15 Design Development Report [APP-122]** provide further detail on our assessment of the alternatives in this location. The Applicant's position remains unchanged on this matter. The existing 11 kV and 33 kV wood pole assets crossed by the new 400 kV overhead line are intended to be removed and diverted underground. Geographic details of these can be found 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 [APP-134].** Additional descriptions of the type of work involved can be found in paragraphs 4.8.99 to 4.8.103 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. 2. As per our response to **5.1 Consultation Report [APP-066]** Ref no. 9-4.213 *'The alignment in this location cannot readily follow field boundaries as this would require increased tree removal. That said we have sought to reposition some pylons close to field boundaries and repositioned the haul road as well as the route of*

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				any underground lower voltage cables around field edges where possible (e.g. RG138). In some cases, the alternative route suggested in feedback for access reduces efficiency through the introduction of multiple dead ends and is less preferred, or in other cases alternative pylon positions would place the pylons much closer to residential properties.' The Applicant maintains our position that where practical pylons have been moved closer to field boundaries, but it is not possible across the whole section of overhead line affected, noting technical requirements and impacts on other receptors.
REP1-295	Andrew Bullock	Transport and Traffic	3. Why is it necessary to construct a haul road along the whole length of the line when along our stretch of proposed route there is already an existing track. Alternatively, the pylon locations could be accessed from the public road which all construction traffic will have to cross anyway! The haul road construction which is being proposed across our heavy clay soil will create irreparable damage for mine and my son's lifetimes.	The proposal for the haul road adjustment to the existing track (Byway Open to All Traffic (BOAT)) was evaluated by the Applicant during the change control process. The Applicant has removed the haul road from the field for a short section and re-aligned the haul road to the follow track (Elmden's Lane). The BOAT has been diverted into the neighbouring field and does not cross the haul road. The haul road re-joins the field at the north-western corner. **6.4.F1 Environmental Statement Figure 4.1 Proposed Project Design [APP-133]** Section B, Sheet 17 and 18 indicate the proposal at Elmden's Lane. The Applicant has developed a construction routeing access strategy detailed in **7.3 Outline Construction Traffic Management Plan [APP-309]**. The construction strategy has been developed in line with National Policy Statement EN-1 (2024) requirements, for the consideration and mitigation of transport impacts. The haul road arrangement is considered a favourable solution for access as it allows materials and workforce to be moved along the construction corridor minimising the use of public highways and avoiding (where possible) sensitive areas. The strategy reduces the number of construction-related vehicles impacting the public highway network in the vicinity of the construction corridor.
REP1-338	E B Gowing and N & J Gowing	Alternatives	[Respondent submitted alternative pylon route called 'Purple Option' with their WR and a second alternative route (unnamed) depicted with blue lines and dots]	The Applicant has carefully reviewed the requested changes. In respect of RG8 to RG12. Whilst appreciating the reduced effects to the landowner, a straightened alignment with pylons moved to field boundaries would directly impact an area of woodland and a consented solar farm and presents increased technical risk to deliverability with imbalanced spans and additional construction and maintenance risk due to the revised stringing positions. Given other constraints to stringing this change cannot be accepted. WE also considered the blue lined route, but ruled it out due to it transferring effects to more properties including closer to Mulbarton and encircling multiple properties between the existing 4YM OHL and the proposed new RG OHL. We continue to consider the route to be appropriate. The Applicant also reviewed access including alternative bellmouths. We consider the existing crossover bellmouth located further east along Church Lane as most suitable, so construction traffic cross the public highway only. From RG11 to RG15 the haul road is again dictated by the position of the crossover bellmouth on Brickkiln Lane, the existing and proposed solar farms and the requirement to

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				maintain a direct route between the new pylons. Therefore, the Applicant retains its position that the haul road is suitable as designed
REP1-338	E B Gowing and N & J Gowing	Landscape and visual	The proposed overhead cable line will run parallel to the 4YM line and bring the same landscape dominance we currently experience to a position that is much closer to our home. The visual intrusion of an overhead transmission line just 150m from our house will be significantly greater than that which is already suffered with 4YM, and the combination of the two transmission lines will create an unreasonable burden on the landscape to the East. The proposed pylon (RG12) is shown in a location that is approximately 150m from our house and appears to be on a similar sight line to the closest pylon on the 4YM scheme. A pylon being located so close to our historic (Grade 2 Listed) house and associated traditional farmyard buildings will create a significant visual imposition. This imposition is exacerbated by the fact that the 4YM pylon will be in the background to RG12. The proposed wires and structures will be highly visible, resulting in a loss of visual amenity and a significant degradation to the open and rural outlook.	Impacts on Residential Visual Amenity have been assessed in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] which consider where permanent changes to residential visual amenity may affect living conditions to such an extent that the Residential Visual Amenity Threshold (RVAT), as outlined in Technical Guidance Note 2/19 Residential Visual Amenity Assessment (RVAA)8, could be breached. It is reported that the Project does not breach the RVAT at this property.
REP1-338	E B Gowing and N & J Gowing	Noise and vibration	It is well known that overhead transmission lines and the associated pylons generate a persistent humming or crackling noise, particularly in wet weather. There has been a noticeable increase in audible intrusion from the 4YM line since the circuitry was increased and the wires and insulators renewed in 2024 and 2025. This raises significant concerns about increased disturbance from the proposed overhead cables and pylon which will be 21Sm closer to our home than 4YM is. This problem will be especially bad during evenings and early mornings when ambient noise levels are low.	The Applicant has committed to using a low noise 'triple araucaria' conductor type. Due to its geometrical configuration, the triple Araucaria design is the least electrically stressed conductor system that National Grid uses. It is the best design for reducing the effects of line crackle (corona discharge) and would reduce the generation of noise from the proposed overhead lines during operation. By using this conductor system, adverse effects from operational noise are not expected, even directly underneath the line. This includes during wet conditions when corona discharge, and therefore noise generation, would typically occur. On this basis, operational noise from overhead lines was scoped out of the Environmental Statement. Despite this, information regarding noise from overhead lines, including an assessment justifying scoping out, is provided in 6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from **Overhead Lines Informative [APP-261]**.
REP1-338	E B Gowing and N & J Gowing	Land and property	The works will however have a significant impact on our diversified equestrian livery business which is home to 16 horses and their respective owners. We offer secure livery facilities with high quality stables, grazing, a menage and more importantly employment. We have recently invested circa £42,000 on improving our commercial offering, including a new stable block, feed storage shed, concrete pads & an upgraded horse menage. The totally inconsiderate design of the proposed scheme will put a haul road straight through our main paddocks at the farmstead, with no consideration given to the fact that the loss of these paddocks will require the reduction of numbers of horses we can keep at livery. This has three impacts, firstly loss of income to our business, secondly some livery customers will need to find alternative	The Applicant recognises that equestrian operations are sensitive to land availability, continuity of access and the configuration of paddocks and facilities. The location of the construction haul roads and working areas reflects a reasonable worst-case scenario required to safely construct the Project. Detailed construction methodologies, including the final alignment, duration and phasing of haul roads, have not yet been fixed and will be developed following consent through the Code of Construction Practice (CoCP) and associated management plans. The Applicant remains committed to ongoing engagement with E B Gowing and N & J Gowing to discuss access arrangements, construction phasing and mitigation measures as the Project progresses towards detailed design. The Applicant will continue to

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

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			accommodation for their horses & finally our livery manager may find it unviable to continue. Furthermore, we have planning permission on four barn conversions within our farmyard. Who will want to buy or rent these with unsightly pylons so close by?	seek to minimise disruption to existing businesses and agree mitigation and compensation to support affected parties through the construction phase of the Project. In relation to the consented barn conversions, the Applicant acknowledges concerns about the proximity of proposed infrastructure and perceived effects on attractiveness or marketability. The planning status of those developments and any effects arising from the Project are matters to be considered within the statutory planning framework. Any claim for depreciation in value or injurious affection arising from the authorised development would fall to be assessed under the Compensation Code.
REP1-492	Wendy J. Stacey	Transport and Traffic	My road is narrow, a lane with a weight restriction on it, not suitable for heavy or large traffic. Phone lines for broadband etc on low lines which also cross this road. This road is narrow if a bin lorry is collecting no other vehicle can pass. Two blind bends, council have had to put in recently bollards to prevent traffic using our banks outside the houses for driving on. The narrow lane outside will not take the heavy traffic without damage to our property.	The construction routeing strategy is detailed in 7.3 Outline Construction Traffic Management Plan [APP-309]. Construction HGVs are prescribed to utilise the Primary Access Routes, routeing vehicles from the Major Road and Strategic Road Network to the Site Access Points. Each Primary Access Route has been assessed for two-way HGV vehicles, and associated mitigation is proposed in 7.3 Outline Construction Traffic Management Plan - Appendix C Indicative Highway Mitigation Plans [APP-312 to APP-316]. The Applicant is unable to provide additional information as the location of the road is unknown.
REP1-491	Trisha and Gary Gooding	Land use	The residential property Tanga is less than 200 metres from TB023 and TB024, and Langham Lodge 270 metres from TB023. Planning permission for the conversion of an agricultural barn to residential use, adjacent to Tanga, has recently been granted. The close proximity of the works to these three properties raises significant concerns regarding the impact on residential amenity. Similarly, the rural business park, just 150 metres from TB023, faces significant risks from the proposed pylons. My clients' farm benefits from a strategic location near Colchester, the A12, and A120, making it attractive for future residential and commercial development. While they have chosen to continue farming for now, they had planned to review these opportunities in the future. The proposed pylons will prevent such development	The potential effects on residential amenity, including visual effects and living conditions, have been assessed within the Environmental Statement (ES) on the basis of a reasonable worst-case scenario. The siting of pylons and associated infrastructure has been informed by iterative design development, taking account of environmental, technical and land use constraints. In relation to the consented barn conversion adjacent to Tanga, the Applicant acknowledges that planning permission has been granted and that this is a material consideration. The presence of existing or consented development has been taken into account as part of the design and assessment process. However, the Applicant does not accept that the proximity of the Project would necessarily render such development unacceptable in planning terms, nor that it would preclude its implementation. With regard to the rural business park located approximately 150 metres from TB023, the Applicant recognises concerns about potential effects on the operation and attractiveness of the site. The ES includes assessment of impacts on businesses and employment, and the Applicant's approach during construction would be to minimise disruption through construction management measures and at this stage dose not envisage any disruption to the business park.
REP1-491	Trisha and Gary Gooding	Consultation	My client has repeatedly provided feedback to National Grid during the consultation periods, highlighting the concerns and suggesting specific measures to reduce impacts and losses. However, there has been no response from National Grid, nor any reference to these suggestions in the Design Development Reports (DDR), indicating that they have not been properly considered	The Applicant 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

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				developed by government and the Planning Inspectorate in accordance with the Gunning Principles). 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. 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]**.
REP1-291	Alexander Micklem	Land and property	This decision affects my property and land	The Applicant notes the comment from the respondent.
REP1-317, REP1-385	Clare Lanham and Dick Lanham, Jeannette Lanham	Land and property	The proposed access would bring contractor vehicles through our main residential gateway and directly through our front garden, passing within approximately four metres of our front door. This would result in constant disturbance, loss of privacy, safeguarding concerns, and safety risks in the immediate area where our children live and play. The proposal would also create serious operational and biosecurity risks to our farming activities. Independent confirmation has been provided that the introduction of uncontrolled third-party vehicles and personnel would prevent our farm from meeting mandatory poultry biosecurity standards, which would result in the loss of our turkey enterprise. It would also reduce grazing land and interfere with safe livestock management, undermining the long-term sustainability of our farm. My submission includes supporting photographic evidence, professional correspondence, and a clearly identified alternative access route shown	The Applicant notes the concern that a proposed permanent access route would utilise an existing private driveway and pass in close proximity to the dwelling, and acknowledges the sensitivity of access arrangements in the vicinity of a residential property. Permanent access routes are required to enable the safe inspection, maintenance and operation of the electricity transmission infrastructure and are an established feature of overhead line projects. The alignment and access arrangements have been developed to minimise additional land take and to make use of existing routes where reasonably practicable. Permanent accesses would be used infrequently, primarily for inspection and maintenance purposes, and would not involve continuous or regular traffic. Any works would be undertaken in accordance with agreed procedures to manage safety, security and amenity impacts. Concerns relating to privacy, security and safeguarding are recognised and would be considered as part of detailed access management and engagement with the landowner. The Applicant remains open to discussing land-specific measures where reasonably practicable to manage the use of access routes in proximity to residential properties. Any claim relating to the impact of permanent access on residential amenity or property value would be a compensation matter to be addressed separately in accordance with the Planning Act 2008 and the statutory Compensation Code.
REP1-317, REP1-385	Clare Lanham and Dick Lanham, Jeannette Lanham	Land and property	1. Access Through Residential and Operational Areas The proposed access route would enter through our main residential gateway and pass directly into the core of our home and farm environment. From this entrance, the track would run immediately alongside our house and continue through the working farmyard and operational land.	The Applicant notes the concern that a proposed permanent access route would utilise an existing private driveway and pass in close proximity to the dwelling, and acknowledges the sensitivity of access arrangements in the vicinity of a residential property. Permanent access routes are required to enable the safe inspection, maintenance and operation of the electricity transmission infrastructure and are an established feature of overhead line projects. The alignment and access arrangements have been developed to minimise additional land take and to make use of existing routes where reasonably practicable.

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				Permanent accesses would be used infrequently, primarily for inspection and maintenance purposes, and would not involve continuous or regular traffic. Any works would be undertaken in accordance with agreed procedures to manage safety, security and amenity impacts. Concerns relating to privacy, security and safeguarding are recognised and would be considered as part of detailed access management and engagement with the landowner. The Applicant remains open to discussing land-specific measures where reasonably practicable to manage the use of access routes in proximity to residential properties. Any claim relating to the impact of permanent access on residential amenity or property value would be a compensation matter to be addressed separately in accordance with the Planning Act 2008 and the statutory Compensation Code.
REP1-317, REP1-385	Clare Lanham and Dick Lanham, Jeannette Lanham	Land and property	2. Residential Impact on My Family The proposed access route would pass through our residential entrance and within only a few metres of our front door, directly alongside areas where my children live and play. As both a homeowner and a father, I consider it wholly unreasonable that unknown contractors and vehicles could routinely pass immediately beside our home environment. Regardless of any assurances that might be offered, the presence of external personnel so close to our house would fundamentally change how we are able to live, use our property, and feel secure within it. No reasonable person would expect a family home to function as an access corridor for industrial infrastructure.	The Applicant notes the concern that a proposed permanent access route would utilise an existing private driveway and pass in close proximity to the dwelling, and acknowledges the sensitivity of access arrangements in the vicinity of a residential property. Permanent access routes are required to enable the safe inspection, maintenance and operation of the electricity transmission infrastructure and are an established feature of overhead line projects. The alignment and access arrangements have been developed to minimise additional land take and to make use of existing routes where reasonably practicable. Permanent accesses would be used infrequently, primarily for inspection and maintenance purposes, and would not involve continuous or regular traffic. Any works would be undertaken in accordance with agreed procedures to manage safety, security and amenity impacts. Concerns relating to privacy, security and safeguarding are recognised and would be considered as part of detailed access management and engagement with the landowner. The Applicant remains open to discussing land-specific measures where reasonably practicable to manage the use of access routes in proximity to residential properties. Any claim relating to the impact of permanent access on residential amenity or property value would be a compensation matter to be addressed separately in accordance with the Planning Act 2008 and the statutory Compensation Code.
REP1-317, REP1-385	Clare Lanham and Dick Lanham, Jeannette Lanham	Land and property	3. Biosecurity Risk and Loss of Poultry Enterprise Our farm operates a poultry enterprise that must comply with strict biosecurity standards. Written confirmation has been provided by our contractor that if unrestricted third-party access through the farm is imposed, the holding would no longer meet required biosecurity conditions	The Applicant notes that the affected party operates a turkey enterprise under contract and recognises the concern that construction access arrangements are perceived to give rise to biosecurity risks which, it is asserted, could affect the continuation of that contract. The Applicant takes biosecurity matters seriously and recognises that modern poultry operations operate under strict controls. Construction activities would be managed through the Code of Construction

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			and our contract would be withdrawn. This is not speculative. It is a confirmed and direct consequence of the proposed access arrangements. External contractors and vehicles travelling between sites represent a recognised disease transmission risk within the poultry industry. Allowing routine access through operational farm areas would therefore create conditions incompatible with maintaining poultry production. Loss of this contract would remove a key agricultural enterprise forming part of the farm's business and income.	Practice (CoCP)and associated biosecurity, access and traffic management measures to minimise the risk of contamination and to manage vehicle movements, including cleaning protocols and restrictions on access where required. The Applicant is confident that, provided appropriate mitigation measures are identified, agreed and implemented, the risk of withdrawal from a commercial contract can be avoided. This reflects the Applicant's commitment to ensuring that biosecurity and access arrangements are managed to prevent undue risk to ongoing farming operations. Should any temporary disruptions occur during the construction phase, these will be carefully managed and mitigated wherever reasonably practicable. The Applicant emphasises that construction access arrangements are intended to be temporary and will not be a permanent feature affecting the enterprise. The focus remains on maintaining operational continuity and minimising impacts on commercial contracts throughout the construction process. Any loss arising from disruption to a farming or livestock enterprise, including biosecurity-related impacts or loss of income, would be a compensation matter to be assessed separately on a case-by-case basis in accordance with the Planning Act 2008 and the statutory Compensation Code. Such matters are not resolved through the Examination of the Development Consent Order.
REP1-317, REP1-385	Clare Lanham and Dick Lanham, Jeannette Lanham	Land and property	4. Impact on Livestock Management The proposed access route would interfere with safe livestock management and create additional risks including: • disturbance to cattle • reduced grazing flexibility • increased stress to animals • conflict between livestock and vehicle movements • restricted access to fields • increased labour requirements • increased operational costs Safe livestock handling depends on controlled movement and predictable environments. Regular third-party access through working areas undermines this and creates avoidable safety hazards.	The Applicant recognises that safe livestock handling relies on predictable environments, controlled movement and appropriate separation between animals and vehicles. Where construction access is required through or adjacent to agricultural land, the Applicant's approach is to manage vehicle movements, access routes and working practices to minimise interaction with livestock. Measures may include defined access corridors, temporary segregation, controlled timing of movements and liaison with the landowner to avoid sensitive periods, subject to detailed design and approval through the construction management plans. The Applicant notes concern regarding reduced grazing flexibility, restricted access to fields, increased labour requirements and operational costs. Temporary disruption to agricultural operations is recognised as a potential effect of construction; however, the Applicant does not accept that such impacts would be unmanaged or permanent beyond the areas required for permanent infrastructure and rights. Temporary works would be removed and land reinstated in accordance with approved standards, and any demonstrable losses arising directly from the Project would be addressed through the statutory compensation. The Applicant further acknowledges the concern that vehicle movements could cause stress or disturbance to livestock. Construction activities are required to be undertaken in accordance with approved management plans that set out working practices,

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				access controls and site management measures, providing enforceable safeguards to reduce risks to animal welfare.
REP1-317, REP1-385	Clare Lanham and Dick Lanham, Jeannette Lanham	Land and property	5. Impact on Farm Viability The cumulative effect of the proposed access would significantly affect the sustainability of the farm as a working agricultural business. The combined consequences include: • potential loss of the poultry enterprise • disruption to livestock operations • operational restrictions • loss of productive land use • increased costs • reduced flexibility Taken together, these impacts represent a material threat to the long-term viability of the farm business	The Applicant recognises that agricultural businesses often comprise interdependent enterprises and that temporary disruption can give rise to operational challenges. However, the Applicant does not accept that the Project would render the farm unviable as a working agricultural business. The Project has been designed to minimise permanent land take, with the majority of land required for construction being temporary in nature and subject to reinstatement following completion of works. Permanent land and rights are limited to those necessary for the operation and maintenance of the authorised development. Detailed construction arrangements, including access management, phasing and measures to reduce interaction with farming operations, are not fixed at this stage and will be controlled through Development Consent Order requirements, including the Code of Construction Practice (CoCP) and related management plans. These provide the mechanism to tailor mitigation to site-specific circumstances and to manage cumulative effects during construction. The Applicant also notes concerns regarding increased operational costs and reduced flexibility. While some temporary impacts may occur during construction, the Applicant does not believe that these effects would be unmanaged or permanent. Reinstatement of land following temporary works is a core principle of the Project, and ongoing engagement with landowners is intended to minimise disruption where reasonably practicable.
REP1-317, REP1-385	Clare Lanham and Dick Lanham, Jeannette Lanham	Land and property	6. Financial and Land Value Impact Evidence has been received demonstrating that the land has substantial market value, including a written offer from a developer proposing an option agreement at a minimum value of £400,000 per acre. The introduction of permanent infrastructure access and associated constraints would be likely to reduce or sterilise this value and remove future opportunities for responsible land use. This represents a measurable financial impact, not a hypothetical one	The Applicant notes that land may attract development interest or that option agreements may be offered by third parties. However, the existence of a private offer or indicative option value does not, of itself, establish an implemented planning consent or a guaranteed future development outcome. The presence of permanent infrastructure or associated access would not automatically sterilise the land from future use or development. Transmission infrastructure does not preclude development in principle, although it may be a material consideration to be weighed by a planning authority in the event that an application for development is brought forward. Any reduction in land value, loss of development value, or injurious affection arising from the construction, operation or maintenance of the authorised development is a matter addressed through the statutory compensation regime, not through the planning merits of the DCO. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are attributable to the Project, including claims relating to depreciation in value or the loss of development potential, assessed on a case-by-case basis. The Applicant further notes that the Project has been designed to minimise permanent land take and constraints so far as reasonably practicable, with permanent land and rights limited to those necessary

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				to operate and maintain the infrastructure. Temporary construction impacts would be removed and land reinstated in accordance with approved standards.
REP1-317, REP1-385	Clare Lanham and Dick Lanham, Jeannette Lanham	Land and property	7. Availability of a Less Harmful Alternative An alternative access route exists that would allow access to the relevant land without passing through our residential entrance, home environment, or operational farmyard. I respectfully request that the proposed access through our residential gateway and farmyard be removed from the scheme and that a less harmful alternative route be adopted.	The Applicant notes the concern that a proposed permanent access route would utilise an existing private driveway and pass in close proximity to the dwelling, and acknowledges the sensitivity of access arrangements in the vicinity of a residential property. Permanent access routes are required to enable the safe inspection, maintenance and operation of the electricity transmission infrastructure and are an established feature of overhead line projects. The alignment and access arrangements have been developed to minimise additional land take and to make use of existing routes where reasonably practicable. Permanent accesses would be used infrequently, primarily for inspection and maintenance purposes, and would not involve continuous or regular traffic. Any works would be undertaken in accordance with agreed procedures to manage safety, security and amenity impacts. Concerns relating to privacy, security and safeguarding are recognised and would be considered as part of detailed access management and engagement with the landowner. The Applicant remains open to discussing land specific measures where reasonably practicable to manage the use of access routes in proximity to residential properties. Any claim relating to the impact of permanent access on residential amenity or property value would be a compensation matter to be addressed separately in accordance with the Planning Act 2008 and the statutory Compensation Code.
REP1-421	Miss Rosemary Sarah Lee	Land and property	On 22nd September 2025 our client and myself met with National Grid's agent, a graduate surveyor from Fisher German. We were advised the proposed underground cable was required by UK Power Networks (UKPN) to alter the current infrastructure to accommodate the National Grid Project. Our client maintains that it is neither necessary nor appropriate for the underground cable route to traverse their productive arable land as a viable and more suitable alternative exists within the adjoining field. This adjoining field is already encumbered by the wider project infrastructure and is owned by a landowner who we have been advised is amenable to the proposal for the underground cables to traverse his land. Use of that adjoining parcel would avoid imposing new and avoidable burdens on our client's agricultural operations. It remains unclear why this alternative route has not been properly assessed, or why no response has ever been provided to our client's representations submitted to Fisher German when there was a meeting with them.	The Applicant acknowledges the concerns raised regarding the required UK Power Networks works that need to take place to facilitate the Norwich to Tilbury Project. These concerns will be passed directly to UK Power Networks for consideration and response. Where third-party works are required to facilitate the delivery of the authorised development such as works undertaken by UK Power Networks these are addressed within the DCO framework through protective provisions and third-party agreements. National Grid retains overall responsibility for promoting the DCO and for ensuring that land and rights required for the Project are secured in a coordinated and lawful manner. National Grid remains the DCO Applicant and is responsible for the overall coordination of land rights required for the Project. Fisher German act as National Grid's appointed land agents. UK Power Networks is responsible for delivering certain statutory undertaker works and may appoint its own agents to negotiate land rights specific to those works, but this does not sit outside the National Grid DCO framework.

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				All engagement, consultation and acquisition of land or rights for works authorised by the DCO whether undertaken directly by National Grid or by UK Power Networks as a third party are governed by the DCO and associated statutory processes. The Applicant confirms that the landowner's representations have been received and are being considered. The Applicant accepts that clearer communication on this point should be provided. The Applicant confirms that the landowner will have a further opportunity to engage directly with the Applicant, in addition to any engagement with UK Power Networks' appointed agents, to ensure transparency and accountability.
REP1-421	Miss Rosemary Sarah Lee	Land and property	Template Heads of Terms were issued to our client by Fisher German under cover of a letter dated 30 July 2025, naming National Grid as the Grantee. However, we understand from our meeting on 22nd September 2025 with Fisher German that the party actually intended to take the grant is UKPN. We subsequently held an initial meeting with Fisher German on 23 January 2026 to formally commence negotiations. At that meeting, Fisher German advised that UKPN would be appointing their own agents (anticipated to be Dalcour Maclaren) who would act separately from both Fisher German and National Grid. However, they were unable to clarify the mechanism through which negotiations would proceed, nor explain how UKPN's involvement as a third party integrates with a project otherwise being promoted under a National Grid Development Consent Order (DCO). Given that the relevant works fall within the scope of a National Grid DCO, our client reasonably expected that engagement and consultation, route alignment discussions, and all compensation and land rights negotiations would be coordinated through a single, consistent, and accountable framework. Despite our efforts to establish clarity, progress has stalled. Dalcour Maclaren confirmed on 10 February 2026 that they had been instructed, although no personnel had yet been assigned. Our client has received no communication from UKPN or their representatives. The prolonged absence of a designated point of contact has prevented any meaningful progression of discussions or resolution of substantive issues. This situation has left our client without a clear negotiation pathway. Our client seeks confirmation on: • Defined responsibilities among National Grid, UKPN, Fisher German, and Dalcour Maclaren; • Assurance that the engagement process aligns with the National Grid DCO framework; • An indication when their representations will be acknowledged or addressed. • When they will have a formal opportunity to engage with the Applicant.	The Applicant recognises that this distinction, and the involvement of separate agents, has given rise to uncertainty regarding responsibilities and the appropriate route for engagement. The Applicant confirms that the works in question fall within the scope of the Norwich to Tilbury Development Consent Order, which is being promoted by National Grid as the Applicant. Where third-party works are required to facilitate the delivery of the authorised development such as works undertaken by UK Power Networks these are addressed within the DCO framework through protective provisions and third-party agreements. National Grid retains overall responsibility for promoting the DCO and for ensuring that land and rights required for the Project are secured in a coordinated and lawful manner. The Applicant remains the DCO Applicant and is responsible for the overall coordination of land rights required for the Project. Fisher German act as National Grid's appointed land agents. UK Power Networks is responsible for delivering certain statutory undertaker works and may appoint its own agents to negotiate land rights specific to those works, but this does not sit outside the National Grid DCO framework. All engagement, consultation and acquisition of land or rights for works authorised by the DCO whether undertaken directly by National Grid or by UK Power Networks as a third party are governed by the DCO and associated statutory processes. The Applicant confirms that the landowner's representations have been received and are being considered. The Applicant accepts that clearer communication on this point should be provided. The Applicant confirms that the landowner will have a further opportunity to engage directly with the Applicant, in addition to any engagement with UK Power Networks' appointed agents, to ensure transparency and accountability.

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			• When meaningful discussions will take place so our client can protect their interests and contribute to achieving the best possible outcome.	
REP1-421	Miss Rosemary Sarah Lee	Land and property	If the route is not removed from their landholding, our client requires assurance that all landowner specific concerns, particularly those affecting agricultural operations, route location, soil handling, and reinstatement, will be addressed before any route is agreed. The details needed are (list is not exhaustive): a. Cable Depth Sufficient burial depth is required to avoid long term constraints on cultivations, drainage maintenance, and soil infrastructure. b. Jointing Bays and Link Boxes These should not be located in productive arable fields; land sterilisation must be minimised. c. Field Drainage Full drainage survey, protection and reinstatement are required, with accountability for future failures attributable to construction. d. Soil Handling, Reinstatement and Aftercare A detailed soil management plan is required covering stripping, handling, storage, reinstatement, and aftercare to restore full productivity. e. Flood Risk and Water Management All compounds, haul roads, and storage areas must not increase runoff or alter local hydrology. f. Dust, Irrigation and Crop Quality Dust control measures, protection of irrigation systems, and compensation for crop losses must be secured. g. Access Routes to the Order Limits All construction access must be agreed with the landowner to avoid undue compaction, disturbance, or loss of productive area. h. Access to Land Safe uninterrupted agricultural access must be maintained at all stages. i. Restrictive Rights and Operational Constraints Any easement must not impose unnecessary long term restrictions on agricultural activities, drainage, cultivation depth, or future land use. The proposed route, in its current form, presents significant risks to our client's farming business, infrastructure, and long term productivity.	The Applicant ensures underground cables are installed to industry standards and depths that minimise long-term impact on agriculture. Detailed design and burial depth will be finalised at a later stage. Jointing bays and link boxes aim to avoid productive arable land wherever possible, with locations confirmed through further design and landowner consultation. Existing agricultural drainage systems are considered; surveys and protection measures are included in management plans; and compensation is available if Project works cause future drainage failures. Soil management measures oversee stripping, storage, reinstatement, and aftercare to restore land for agriculture. Temporary works, like compounds and haul roads, are designed to prevent increased flood risk or adverse water management. Dust control, irrigation protection, and crop mitigation are handled through construction management, with compensation for direct crop losses. Construction access routes will be refined and agreed with landowners to minimise disruption. Safe, uninterrupted agricultural access is maintained, with temporary arrangements as needed. Permanent rights sought are limited to those necessary for Project operation and maintenance, avoiding unnecessary restrictions on agriculture and land use. The Applicant remains committed to continuing discussions with the landowner to ensure that these matters are considered and addressed prior to construction, and to progressing land and rights by agreement.
REP1-459	Russell Matthews	Land and property	The purchase of The Gables, a prominent Grade II listed property located in the centre of Roydon village and set within approximately 10 acres of land, has reinforced that concern. Whatever National Grid's reasons for acquiring that property,	The Applicant acknowledges the reference to the Applicant's purchase of Gables Farm and wishes to provide clarification regarding the rationale for this acquisition. It is confirmed that Gables Farm was not acquired because it is required for the Norwich to

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			the impact on neighbouring residents is real. The purchase has increased uncertainty, changed the local context, and raised questions about how such decisions are made and how their wider effects are considered. No clear explanation has been provided as to whether the impact on adjacent properties was assessed or how that impact has been taken into account	Tilbury Project. The property itself will not be directly affected by the proposed Project, and no works associated with the Project are planned for the house or immediate grounds. However, it is noted that certain fields associated with Gables Farm are affected by the Project, as depicted on the 2.2 Land Plans [AS-005 to AS-012]. The impact on these fields will be limited to temporary works necessary for the installation of the overhead line, and permanent infrastructure in the form of the oversail of the conductors between towers RG81 and RG82. The Applicant confirms that the property is not required for access, compounds or any other element of the Norwich to Tilbury Project, and for this reason it does not appear within the Project's consultation or land plans. The purchase was unrelated to the heritage status of the property, and there are no proposals to change the use of the building or surrounding land in connection with the Project. Following acquisition of the property, the Applicant has undertaken surveys and necessary maintenance works and intends to dispose of the property on the open market in due course, once it is in a suitable condition for sale.
REP1-459	Russell Matthews	Land and property	On 5 February 2026 I received correspondence from Fisher German, acting for National Grid, asserting rights of access via the historic track that runs directly through my home at Roydon. This access is stated to be required for intrusive surveys on land to the rear of my property — land now owned by National Grid following its purchase of The Gables Farm, Roydon, in January 2024. When National Grid purchased The Gables Farm in 2024, I asked whether the acquisition was connected to the Norwich–Tilbury project. In its letter of 6 August 2025, the Project Director stated that they were "not able to provide details" and that the purchase was unrelated to the building's heritage or the project. However, the same letter also confirms that the land lies within the redline boundary and that the project team was already assessing haul road alignment options across it. The meeting confirmation of 20 August 2025 further records that National Grid walked the land with me, discussed alternative alignments, and were aware of the protected veteran oak trees located within The Gables Farm landholding. The new email of 5 February 2026 now asserts formal access rights through my home to reach that same land for intrusive surveys. Taken together, these documents show that the land acquisition, the intended use of the historic track through my home, and the haul road planning were all connected to the project from the outset — despite earlier statements to the contrary. This new information directly affects the context in which the routing at this location must be understood.	When the Applicant purchased Gables Farm, the acquisition included approximately five acres of land situated to the west of the property. Access to these fields is provided via land owned by a third party. The Applicant holds established legal rights permitting passage over this third party's land to reach the fields associated with Gables Farm. The Applicant has supplied written confirmation to the third party, stating that this access will be utilised solely for the purpose of conducting survey works on the land pertaining to Gables Farm. There is no intention for this access route to be incorporated into the design of the Project, and it will not be used for construction activities or any other form of access apart from survey works and routine maintenance of the land. Upon disposal of Gables Farm and its associated land, the rights of access will transfer with the property title to the new owner. This process will mirror the manner in which access rights were conveyed to the Applicant upon their original purchase of the property. The Applicant will continue to engage with Mr Matthews' appointed agent when survey access is required and notice will be given.
REP1-459	Russell Matthews	Alternatives	The relevance of RG081 and the routing through the Waveney Valley	The Applicant responded to this request in 5.1 Consultation Report [APP-066] Ref no. 9-3.196 'National Grid has considered the

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			The land in question sits immediately adjacent to the proposed alignment and includes the area through which the haul road is intended to pass. It also contains several protected veteran oak trees, some several hundred years old, forming part of the historic landscape setting of The Gables Farm and the wider Waveney Valley. The directional change at RG081, the haul road through land now owned by National Grid at The Gables Farm, and the proximity of RG082 and RG083 to homes are not separate issues. They are all consequences of the same routing decision. Given the concentrated impact at this location, it is important that the Examination is satisfied that the routing was determined on environmental and technical grounds, and not influenced by the availability of land now under the Applicant's control.	respondent's feedback highlighting a preference for an alternative moved away from Roydon and concern about impacts on Roydon. In the absence of an alternative route proposed, we have considered this feedback by following the guidance in the Holford Rules in developing the alignment. Guidelines on overhead line routeing are known as the "Holford Rules" which remain a valuable tool in selecting and assessing potential overhead line route options as part of the options appraisal process. A summary of the Holford Rules is provided within Appendix I22 of this report. We have therefore not proposed a change to the location of RG81 to RG83. Impacts to the environment have been assessed and are published in the Environmental Impact Assessment (EIA). A Landscape and Visual Impact Assessment (LVIA) was undertaken as part of the EIA and is presented in Chapter 13: Landscape and Visual (document reference 6.13) of the Environmental Statement (ES). Visual effects are presented in ES Appendix 13.3: Visual Baseline and Assessment (document reference 6.13.A3). Pylons RG81-83 are located between Bressingham and Snow Street, on the boundary of Visual Receptor Areas (VRA) A9 Shelfanger, and VRA A10 Burston. The settlement of Roydon is within VRA 11 Roydon and Diss. Significant visual effects are recorded within these VRAs.' Additionally, paragraphs 4.6.8 to 4.6.12 of 5.15 Design Development Report [APP-122] provide further details of the alternative overhead line routes considered in the Waveney Valley area. Two veteran oak trees are recorded in the 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] in the proximity of RG81 – RG83. The first is a veteran oak (ref. T182), north of RG80 and RG81 on Darrow Lane and is not anticipated to be affected as indicated in the Arboricultural Impacts Plan in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA Figure A13.6.1 [REP1-065]**. The tree is recorded in the Ancient Tree Inventory with tree ID. 52879. The second is a veteran field maple north of RG82 (ref. T195). This tree is anticipated to be affected / managed as indicated in the Arboricultural Impacts Plan, not removed. The management of veteran trees follows the mitigation hierarchy detailed in the **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]**.
REP1-459	Russell Matthews	Alternatives	Environmental and procedural matters requiring clarification In light of the new information, I respectfully ask the Examining Authority to consider whether: • The protected veteran oak trees at The Gables Farm have been specifically identified and assessed within the Environmental Statement; Alternatives to RG081 were considered • The proximity of RG082 and RG083 to residential properties has been minimised as far as reasonably practicable; • The acquisition of The Gables Farm and the asserted access rights through my home are relied upon for scheme delivery;	The schedule of trees subject to a tree preservation order listed in Schedule 14 of **3.3 Draft DCO - Validation Report for DCO [APP-058]** does not list any trees at Gables Farm. A tree preservation order will not prevent the management or removal of the tree should it be deemed necessary to do so for the reasons listed in Section 52 of **3.3 Draft DCO - Validation Report for DCO [APP-058]**. This is also extended to any tree preservation orders made after 24 June 2025. The Applicant has considered the effects that are expected to arise, but cannot identify any interface with what the respondent identifies as 'protected oak trees at the Gables Farm'. Whilst trying to maintain as straight an alignment as possible, the routeing has aimed to be approximately midway between properties but this is influenced by

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			• The cumulative impacts at this location — including haul road alignment, land acquisition, access arrangements, and residential proximity — have been proportionately assessed.	the presence of other features and constraints. A wide range of alternatives have been considered for routeing including both overhead line and underground cable options further to the west as well as to the east of Diss. All present a different balance of combination of effects which are less preferred by the Applicant. An intra-project cumulative effects assessment has been undertaken in accordance with **6.19 Scoping Report [APP-288 to APP-296]** and **6.20 Scoping Opinion [APP-297]**. For intra-project effects, common receptors were identified and assessed within **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**.
REP1-229	E S Cole and Sons Limited	Alternatives	one of the most heavily burdened landowners on the entire route with currently 9 pylons planned on their holding This accounts for nearly 10% of Pylons along the route in Norfolk alone, yet their requests to move pylons to the east (not even off their ownership) have been disregarded without any real justification other than concerns over impacting neighbouring residential property (which appears extremely limited). This argument seems quite perverse in that (very few) homeowners who are not having the burden of pylons sited on their own land are considered more important than a landowner that is required to take 10% of the counties planned pylons. E S Cole anticipate that the relocation of pylons (RG061-RG069) would save NG costs in compensation due which can only be considered a positive when cost appears to be the primary driver for overhead lines in the first instance, in contrast to underground or offshore alternatives.	The Applicant has considered the respondent's feedback, to move RG61 toRG69 further to the east. The Applicant does not make decisions based on the burden perceived by individual landowners but seeks to apply consistent decision making throughout. Whilst noting the respondent's perspective, the change requested would move from a broadly midway position between residential properties to one where the alignment is much closer to properties to the east but also affecting more ecological resources whilst only partly achieving the changes sought. It would also require additional angle pylons and on balance the submission alignment has been preferred. **The Applicant has submitted an Environmental Statement (ES) [APP-123 to APP-287]** which 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 and operation of the Project and recommends appropriate mitigation to reduce effects. This was reported in the 7.20 2023 - **Design Development Report for the Project [APP-358]**.
REP1-229	E S Cole and Sons Limited	Alternatives	S Cole were astonished to note the weight that has been given to economic and social benefits of aerodromes which we understand to be the driver for an entire shift of the pylon locations further south along the route moving pylons east towards the village of Palgrave (and a large number of residential dwellings). From our research it is a local airstrip that appears to be a privately owned, infrequently used personal aerodrome that from what we can tell offers no community or social benefit. We find it very difficult to understand that NG have relocated pylons a significant way from this airstrip to allow continued use which appears to benefit nobody other than the owners of the airstrip. This approach is clearly to the detriment of numerous neighbouring residential properties and appears a direct contradiction as to why the Coles request to move the pylons marginally east on their holding could not be accepted by NG. E S Cole's farm is enjoyed by the residents of Winfarthing offering walks and footpaths throughout the holding. It delivers far greater social/ community benefit than a private airstrip, notwithstanding the landowners are to be burdened by up to 9 pylons. Our enquiries suggest that Brook Airfield were originally to have no pylons, it was just an issue of clearance	The changes to the proposals have responded to a wide range of factors and feedback. It is acknowledged that some of the change has been to respond to national policy requirements on the Applicant to consider the impacts of the Project on aviation safety, operations and capability (as well as social and economic factors), and include appropriate mitigation measures in the design to minimise adverse effects (see paragraphs 5.5.5, 5.5.43, and 5.5.50 of National Policy Statement EN-1 (2024). 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] describes the Applicant's approach to aviation impact assessments and provides explanation regarding Project design changes implemented to allow the continued safe use of Brook Farm aerodrome (see paragraphs 15.4.2 to 15.4.3). **5.15 Design Development Report [APP-122]** further describes the Applicant's consideration of aviation impacts for Brook Farm (see paragraph 5.1.3), as well as other feedback and survey findings. This feedback has included reducing the magnitude of change in landscape and visual terms by replacing the existing 132 kV overhead line with underground cable and adopting its alignment for the 400 kV infrastructure.

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			between the runway and the overhead lines that resulted in the route realignment. We would be interested to know why NG have tolerated such a significant route adjustment in some instances but will not accept a marginal repositioning of pylons to the east of ES Cole's farm to utilise natural screening and reduce the agronomic impact by siting them in field boundaries and corners.	
REP1-229	E S Cole and Sons Limited	Biodiversity, ecology and nature conservation	my client has concerns over the validity of the non intrusive ecology surveys carried out. Specifically in regard to the bat surveys, we are aware that cameras were installed at the most southerly point of my clients holding. This is bizarre as the obvious location would be nearer to the farm buildings in the centre of the holding where bats are known to roost. When my client asked the ecologist why they had picked such a location they confirmed that NG told them where to put them. Clearly the ecologist should not be dictated to by NG as to where to install monitoring equipment on the route and it should be down to their expertise and judgement. This makes us wonder if the surveys are valid and we would like a formal response to this concern which has yet to be received on this issue or the route amendment requests in general.	The Applicant can confirm that the bat survey scope has been developed by competent professional ecologists and agreed with Natural England in **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**, as the statutory authority for bats, in advance of surveys being undertaken. 6.8.A10 Environmental Statement Appendix 8.10 Bat Activity Report [AS-036] includes the survey scope and methodology for automatic static detector surveys. Static detectors were strategically placed on hedgerows/tree lines and woodland bands where potential effects on bats were anticipated because of severance/fragmentation of habitat, temporary/permanent removal of vegetation and/or indirect effects arising from light and noise of temporary construction (i.e. haul roads, access tracks, temporary construction compounds) and/or operational use of permanent assets (i.e. substations, Cable Sealing End (CSE) compounds, permanent access roads for substations/CSE compounds). 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. No buildings or other man-made structures have been identified that would be removed by the Project and so there has been no assessment for roosting bats on structures.
REP1-229	E S Cole and Sons Limited	Consultation	Despite ES Cole being a landowner heavily impacted by the scheme, they do not receive any prior notification of route amendments or adjustments or whether their requests have been considered and the results of such requests. Instead they are only notified when the information becomes available in a public forum. Given the scale of the scheme falling on this landowner, we expect improved dialogue on landowner specific matters.	The Applicant notes the concern raised regarding the timing and manner in which information on route amendments and design adjustments has been communicated to E S Cole and Sons Limited, including the perception that landowner specific requests and outcomes have not been directly notified in advance of information being placed in the public domain. Following the close of statutory consultation in 2024, the Applicant undertook a structured change control process, all requests were considered and some were accepted into the design. Each accepted change was then considered to determine whether it constituted a change that would trigger a requirement for further targeted consultation, in accordance with the Planning Act 2008 and associated government guidance. Where changes were not considered to require further consultation, information was incorporated into the application documents made publicly available, in accordance with guidance. Given the size of the Project, and the several thousand responses received at each consultation, the Applicant noted that it had taken an approach of not responding directly to every individual response.

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				However, feedback on individual requests was provided to instructed land agents and reported in various documents. The Applicant does not feel that this approach represents a failure of consultation. It recognises that landowners with significant interactions with the Project may reasonably expect clear and direct dialogue on landowner specific matters. Engagement with landowners has continued through correspondence, meetings and discussions with the Applicant's land agents, and remains an ongoing process as the Project progresses through Examination.
REP1-228	E R Ling & Sons Limited	Consultation	The revised route and positioning of the pylons came as a substantial shock to E R Ling & Sons Limited as their land was well east of the initial preferred route. The business was not even informed of the drastic realignment towards Palgrave until it was made available in the public domain, which is totally unacceptable given the scale of the impact and burden that National Grid (NG) are now proposing to place on the land and business that operates over it.	The Applicant acknowledges the concerns raised by E R Ling & Sons Limited regarding the evolution of the route alignment and the timing of information becoming available. The Project has been subject to an iterative design development process informed by multiple phases of non-statutory, statutory and targeted consultation, during which changes to the alignment were considered and refined in response to technical, environmental and community constraints. Details of the route evolution and the reasons for alignment amendments, including constraints associated with residential properties and other receptors, are set out in the **5.1 Consultation Report [APP-066]** and the **Design Development Reports [APP-122, APP-358, APP-359 and APP-360]**. The Applicant recognises that changes to the alignment can have implications for affected parties and businesses and will continue to engage with E R Ling & Sons Limited to understand site-specific concerns and to seek, where reasonably practicable, to minimise impacts through detailed design, construction planning and appropriate mitigation. Matters relating to the effects of the Project on land and business operations, including any loss or disturbance arising from the acquisition or use of land or rights, are matters for consideration under the statutory compensation code.
REP1-228	E R Ling & Sons Limited	Alternatives	We have reviewed the route amendment justifications as defined in the Design Development Record which states that deviations to the west were constrained by the extent of residential property in Wortham. But NG do not appear to be concerned about the effect on the village of Palgrave. In para 5.4.63, NG refer to the effects being transferred to East Cottage and The Grange, but they fail to recognise the other 5 properties in the immediate vicinity that will also be blighted by the amended route. At paragraphs 5.4.60, 5.4.61 and 5.4.62 of the Design Development Record my client was astonished to note the weight that has been given to economic and social benefits of aerodromes. We would be very interested to know what flight information NG have been given for this small airstrip. As far as we are aware, there have been very few if any in the last 12 months, so how this can bear such significance on a major infrastructure project is concerning.	The Residential Visual Amenity Assessment (6.13.A4 Environmental Statement Appendix 13.4 - **Residential Visual Amenity Assessment [APP-233 and APP-234]**) considers impacts on visual amenity for residents located within 200 m of the proposed overhead lines and pylons. The purpose of this assessment has been to determine if the Project is likely to give rise to any breaches to the Residential Visual Amenity Threshold (RVAT), as described in the Technical Guidance Note 2/19 Residential Visual Amenity Assessment9. Whilst it is recognised that properties outside this study area may experience visual impacts as a result of the Project, properties beyond 200 m of the overhead line are not expected to experience visual change of a magnitude so high that it which would breach the RVAT. The Grange falls outside the 200 m study area; however an assessment has been carried out for East Cottage, which concludes that a medium magnitude of effect to visual amenity is anticipated at

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

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				this location, when considered in the round, but the RVAT is not expected to be breached. As per paragraph 5.4.60 of 7.21 2024 – **Design Development Report [APP-359]** and in accordance with National Policy Statement EN-1 (2024), the Applicant has considered the impacts of the Project on aviation safety, operations and capability (as well as social and economic factors), and included appropriate mitigation measures in the design to minimise adverse effects (see paragraphs 5.5.5, 5.5.43, and 5.5.50 of EN-1 (2024). 6.15.A2 Environmental Statement Appendix 15.2 - **Review of Aviation Impact [APP-267]** describes the Applicant's approach to aviation impact assessments and provides information regarding Brook Farm aerodrome and its operations, as well as Project design changes implemented to allow its continued safe use (see paragraphs 15.4.2 to 15.4.3). **5.15 Design Development Report [APP-122]** further describes the Applicant's consideration of aviation impacts for Brook Farm (see paragraph 5.1.3).
REP1-228	E R Ling & Sons Limited	Land use	The revised route comes very close to the farm yard at Grange Farm and their camp site which has planning permission located in the wood to the west side of East Cottage. This was an action of endeavour to diversify and de-risk/ future proof the farming business on the back of reducing farm subsidies and financial pressure facing the industry. The venture now looks very much at risk given the proximity of the proposed pylons. This new route is going to have an huge impact on the farm and how it can operate both agronomically and economically. It will also restrict the businesses ability to expand to meet the changing farming needs in the future as pylons run through the area earmarked for agricultural building expansion (with permission for a straw shed already granted).	The Applicant recognises the importance of diversification and future-proofing measures for farming businesses, particularly in the context of changes to agricultural subsidies and wider industry pressures. The Applicant does not feel that the presence of the proposed overhead line would necessarily prevent the continued operation of the farming enterprise or associated diversification uses. Detailed design has sought to minimise land take and severance, and opportunities remain through detailed design and construction planning to reduce impacts on day-to-day agricultural operations where reasonably practicable. The Applicant notes the concern regarding future expansion of the farm, including areas identified for potential agricultural buildings. The Project does not preclude lawful future development; however, the alignment must secure sufficient land and rights to ensure the safe construction, operation and maintenance of nationally significant electricity infrastructure. Any restrictions on land use arising from the acquisition or use of land or rights are matters to be addressed through the statutory compensation code, rather than through route selection alone. The Applicant will continue to engage with E R Ling & Sons Limited to understand site specific operational concerns and to seek, where reasonably practicable, to minimise impacts through detailed design, construction management and mitigation secured through the 7.2 Outline Code of Construction Practice [Revision B].
REP1-228	E R Ling & Sons Limited	Alternatives	If, and only if there is no other option, then we must insist that the cables go underground until they pass the A143 but it seems abundantly clear to us that the correct option is to move the pylons back to the initial preferred route to the west. Proposed route amendments- ignored to date RG093 - move West to field boundary and to avoid solar scheme now under construction	National Policy Statement (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

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			RG094 - Move North into meadow- into smaller less productive field with improved natural screening. RG095 move west to field boundary to avoid interruption to arable farming operations and to avoid blighting site for farmnyard expansion	not displaced, and it is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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. Regarding the other proposed route amendments, these were responded to in 5.1 Consultation Report [APP-066] Ref no. 9-3.70 in relation to the previous west route alignment at the non-statutory consultation in 2023. The alignment in this location was moved to the east to partly take the alignment of the existing 132 kV overhead line, reduce impacts to a solar farm development and avoid impacts to Brook Farm aerodrome. 5.1 Consultation Report [APP-066] Ref no. 9-3.195 and Ref no. 9-4.128 respond to the further pylon specific requests. In summary: • RG92 (formerly RG093 as per the respondent's suggestion) is positioned as close to the field boundary as possible while allowing for space for construction. We therefore did not propose a change to the location of this pylon • In order to move RG93 (formerly RG94) north, RG92 (formerly RG93), RG93 (formerly RG94) and RG94 (formerly RG95) would have to increase in height due to increased span lengths and in order to ensure the required electrical clearances over the road. This would increase the visual impacts of these pylons and would also increase impacts to Brook Farm aerodrome as well as ecological impacts on the meadow. We therefore did not propose a change to the location of pylon RG93 (formerly RG94) • As RG94 (formerly RG95) is an angle pylon, space is required around the pylon for stringing the overhead lines conductors. We are therefore not able to move it west to the field boundary without requiring the removal of the woodland to the west. We therefore did not propose a change to the location of this pylon. The Applicant has carefully considered all feedback that has been submitted about these particular elements of the Project and our position remains unchanged on these matters.
REP1-204	Berkeley Strategic Land Limited (*there are appendices)_	Land and property	Berkeley holds an option agreement over land north of Raleigh Road, Hutton extending to 120 acres of land. Berkeley submitted the land to Brentwood Borough Council's call for sites in early 2024. The current Local Development Scheme	UK Power Networks is a third-party statutory undertaker whose apparatus is affected by elements of the Project. The Applicant is working collaboratively with UK Power Networks to identify, coordinate and, where necessary, agree the relocation, protection or modification of existing apparatus. This engagement is ongoing and proportionate to the level of impact and design certainty at each stage

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			timetable for the local plan review is for a regulation 18 consultation (preferred options) in Q2 2026, regulation 19 consultation (submission version) in Q2 2027 with submission of the plan to the Secretary of State in Q1 2028. Given the significant local housing need and lack of previously developed land in Brentwood, Berkeley continues to promote the land for residential use and considers that the site should feature as a housing allocation in the new local plan. The land may also be considered as 'grey belt' which would mean it is suitable for residential development in any case. Berkeley has responded to two previous rounds of National Grid consultations, and I refer specifically to our response letters dated 13.06.2022 and 26.03.2025 which are attached with these representations for reference. In our response to the 2022 consultation, we highlighted some additional constraints and suggested that the route of the National Grid pylons was moved to the east of Bridleway 90. Subsequent design changes by the applicant adopted this approach which is welcomed. A targeted consultation was held in February 2025 and in our response, we highlighted that the latest proposals contained secondary works to UKPN's 132kV infrastructure. These works are shown as Work No.32 under the applicant's current plans. The work includes introducing a new 132kV termination tower on the option land located between UKPN pylons PUB47 and PUB48. Berkeley has concerns that this would sterilise some of the land and will negatively impact upon the development capacity of the land. In our response, we suggested that the location of the termination tower was reconsidered and moved further north towards Cock Wood. In the current application documents, the termination tower remains in its original location and therefore our concerns remain. Berkeley requests that the termination tower location is reviewed to ensure that future residential and infrastructure development needs can be met without prejudice to one another.	of the Project. Where landowners or third parties are affected by UK Power Networks works, the Applicant is seeking to ensure that roles and responsibilities are clearly defined and that appropriate engagement and statutory processes are followed. Engagement will continue to be progressed as the design develops and as detailed delivery arrangements are confirmed. The Applicant reviewed the terminal pylon location change requested by the respondent but was unable to facilitate the requested design change due to the ancient woodland designation of Cock Wood and the associated works that would then need to be carried within the ancient woodland.
REP1-393	John Frederick Strutt	Land and property	Please see the attached map (below) provided to me by National Grid of the area of my land that will be affected. I would like the construction route (red) closer pushed to the field boundary. During construction, the land in the northern corner will not be accessible. I would like to be compensated for lost income from cropping this corner of land as well as the land you are occupying for construction. No compulsory purchase is required on any of my wayleaves should be sufficient as in other locations on my land.	The Applicant notes the respondent's feedback on the access route south-west of pylon TB109. To clarify, the access route shown is a permanent access route for future surveys and maintenance if required and will not be used for construction (the construction haul road runs south-east to north-west along the overhead line alignment in this location). We are not proposing to construct anything for this permanent access route; existing tracks, routes and roads are being used where possible. The permanent access route would only be used by 4x4 vehicles and vehicles similar to the current use. Ahead of future maintenance or survey access the Applicant's lands, the

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				Project team will liaise with and agree access arrangements at the time to reduce impacts where practicable. The Applicant acknowledges the concern that land in the northern corner of the holding would be temporarily inaccessible during construction and that this would result in a loss of cropping income, both in that area and in land required for construction activities. The Applicant confirms that where land is taken temporarily out of agricultural production as a direct result of the construction of the Project, compensation for qualifying losses, including temporary loss of use and crop loss, is payable in accordance with the statutory Compensation Code. Such matters are assessed on a case-by-case basis, having regard to the nature and duration of the impact. In relation to the form of land rights required, the Applicant notes the view that compulsory purchase is not necessary and that wayleaves should be sufficient. The Applicant's approach is to seek to acquire land and rights by voluntary agreement wherever reasonably practicable, including the use of easements where these are sufficient to deliver and operate the Project. However, the Development Consent Order seeks compulsory acquisition and temporary possession powers as a contingency to ensure the Project can be delivered in the public interest should agreement not be reached, or where the scope or duration of rights required goes beyond what can reasonably be secured through wayleaves alone.
REP1-498	Tamasyn Holland	Land and property	The Norwich to Tilbury pylons will cause huge disruption to our farm business and take land out of production for the three to four year construction period and thereafter, where pylons are sited. The haul road, even when removed, will result in soil structure being destroyed and lower yields in the future. We have not been given assurance about the risks associated with operating high farm machinery under 400kV cables. The possibility of electricity arcing from cables as machinery passes beneath is a real one. The high voltage lines also pose an unnecessary risk to birds flying to and from the area, particularly the Blackwater Valley with its wetland habitats. These include, in particular, underground HVDC cables installed using cable ploughing technology. With cable ploughing instead of open trenching associated with the undergrounding that National Grid proposes in the Dedham Vale, a cut is made in the ground, the cable laid and the ground immediately resealed. No haul road is required. Entire sections of hedgerows can be lifted and replaced 24 hours later. Options like this must be examined in detail by the Planning Inspectorate and we add to the calls made during the first week of hearings for an Issue Specific Hearing which looks in greater detail at options like HVDC, cable ploughing, offshore coordination and high capacity conductors.	The Applicant recognises that construction activities would take place over several years and that land would be temporarily taken out of production during that period. The Project has been designed to minimise permanent land take, with the majority of land required for construction being temporary in nature. Permanent land loss is limited to pylon footprints, permanent access where required, and associated rights necessary for operation and maintenance. Temporary construction areas, including haul roads, would be removed following completion of works and land reinstated in accordance with approved standards and returned to agricultural use. The Applicant acknowledges concerns that haul roads and repeated vehicle movements may affect soil structure. The management of soils, including stripping, storage, protection and reinstatement, will be addressed through agricultural and soils management mitigation measures, as detailed in **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]**. These measures are intended to minimise compaction and protect long-term soil productivity and reduce the risk of long-term soil damage and reduced yields. Where long-term losses arise that are directly attributable to the Project, such matters would be considered under the compensation code. The Applicant notes the concern regarding the safe operation of high agricultural machinery beneath overhead conductors and the perceived risk of electrical arcing. The design and operation of 400 kV overhead lines are subject to statutory safety clearances and industry standards that provide for agricultural activity beneath the conductors.

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				These clearances are designed to prevent arcing under normal operating conditions, including the passage of appropriately sized agricultural machinery. More information on working around overhead lines can be found in the National Grid's 'Third party guidance for working near NGET equipment' document.
REP1-388	Jeremy Fisher	Land use	The Faulkbourne Estate is one of the most affected land holdings by the proposed pylon line: we have 11 new proposed and one underground tunnel with haul roads designed to pass down the middle of fields so prevent efficient farming.	The Applicant acknowledges the concern that the Faulkbourne Estate would be affected by the Project, and in particular concerns raised over the associated construction access and haul roads. The Applicant recognises that agricultural efficiency is sensitive to the location of temporary construction access and that haul roads passing through the centre of fields may disrupt farming operations during construction. The Project has been designed to a level appropriate for a Development Consent Order application, and the location of construction access routes reflects a reasonable worst-case scenario required to deliver the works safely. Detailed construction methodologies, including the final alignment, phasing and duration of haul roads, have not yet been fixed and will be developed following consent. These matters are intentionally controlled through Development Consent Order requirements, including the Code of Construction Practice (CoCP) and associated access and traffic management plans. These plans provide the mechanism to refine haul road alignments, manage movements, and reduce interference with agricultural operations where reasonably practicable, informed by engagement with affected landowners. Where temporary disruption to farming operations gives rise to demonstrable loss, such matters are addressed through the statutory compensation framework. The Applicant adheres to the Compensation Code and will compensate for qualifying losses, including temporary loss of use and proven business impacts, assessed on a case-by-case basis. The Applicant does not intend to install any underground tunnels on the Estate, and the works will consist of predominantly of overhead line works and the underground of existing UK Power Networks lines. The Applicant remains committed to ongoing engagement with the Estate to discuss construction access, phasing and mitigation measures as the Project progresses towards detailed design, with the objective of minimising disruption to the estate.
REP1-388	Jeremy Fisher	Alternatives	Submission on 24th July 2025 was for site specific small alterations and ameliorations to allow the farm to continue both during and after the works. This was a detailed document showing specific changes that would assist both the contractors, the villagers and the farm. Fisher German were given a tour with the suggestions so they could understand the rationale. Every single one was ignored without explanation.	The Applicant has carefully considered all feedback that has been submitted about particular elements of the Project. 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).
REP1-448	R D & J Burridge	Alternatives	object to the repositioning of pylon RG32 further into their field.	Pylon RG32 was repositioned due to the Norfolk 2 change. The overhead line alignment was repositioned to the west (including pylon

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			The decision to move the pylon to the position RG32 creates a significant intrusion to the field resulting in disruption to the use, management and drainage of the land. The respondent seeks to understand why the proposed pylon location was changed and has, as yet, not had a reasoned explanation.	RG32) to align midway between properties, respond where possible to landowner requests and achieve greater separation from a Model Flying club as detailed in Table ES1 Extensive Changes of 5.15 Design Development Report [APP-122]; further details, and details of other alternatives considered can be found in paragraphs 4.3.1 to 4.3.5 of the same document. A response in regard to the positioning of RG32 was included in 5.1 Consultation Report [APP-066]: 'Chapter 6: Agriculture and Soils (document reference 6.6) of the Environmental Statement (ES) assesses the impacts of permanent land lost as a result of the Project (i.e., pylon footprints) on agricultural land, agricultural landholdings and soil resources. The Norfolk 2 change positions Pylon RG32 towards the centre of an arable field. The pylon footing covers a relatively small area of land proportional to the field size; therefore, the impacts on farming activities and agricultural yields should be small.'
REP1-253	Newlands Partnership / Messrs Watkinson, Whitley & Steward	Alternatives	The respondent seeks to understand the Applicants Justification for the ongoing inclusion of the white area, shown as the 'Redundant Leg', in the order limits and wishes to challenge the ongoing inclusion with a wish to see the order limits revised accordingly. The Respondent does not understand why this part of the Order Limits is required for the installation of cables and pylons and contends that it appears to have been 'left in' the scheme after being dismissed at an earlier stage as a possible alternative. The Applicant states that the scheme is fully designed and shows the cable line coming out of Mangreen main via RG03, RG04, RG05, RG06 to the west of the Redundant leg. It can be seen that the fully consented battery storage site lies in the path of the subject area. The Respondent does not consider it possible to deliver both schemes over the same land. It is understood that the Applicant chose the adopted route because of the battery site, therefore there seems no sense in keeping it within the order limits. The current owners desire to not advance this project does not mean that the reserves should not be preserved for future use. Pylons RG03, RG04 and RG05 should be moved closer to the edge of parcel to minimise the volume of minerals their construction will sterilise	As outlined in design scenario 1 in Table 4.4 of 6.4 Environmental Statement Chapter 4 – Project Description [APP-130], the Limits of Deviation (LoD) were widened to the east to allow flexibility to change the overhead line alignment to run parallel to the existing 400 kV overhead line south out of Norwich Main Substation, should planning consent not be granted for the battery storage proposal. Consent for the battery storage proposals has been granted and the Applicant is progressing further resolution of detailed design interactions between the different projects to confirm the corridor. This requires further engagement to reach mutually acceptable agreement for all parties building on the progress made to date. We expect to find a resolution by Deadline 4. As set out in Section 2.8 and Table 2.1 in the 4.3 Book of Reference [AS-018], the Applicant has made provision for a 'Class 8' designation to operate in respect of land within the Order Limits where no powers of compulsory acquisition or temporary possession will be sought. The land to which Class 8 relates is left unshaded on the 2.2 Land Plans [AS-005 – AS-012] and, hence, is informally characterised as 'white land'. It is not unusual for a DCO to be made whilst containing land in respect of which no powers of compulsory acquisition or temporary possession are sought. Indeed, it is noteworthy that the 3.1 Draft Development Consent Order [APP-056] includes, at Article 2(1), a definition of 'Order land' (meaning 'the land shown on the land plans and described in the book of reference') which is separate to the definition of 'Order limits' (meaning 'the limits shown on the works plans within which the authorised development may be carried out'). On a practical level, it is noted that the principal powers of compulsory acquisition (Articles 24 and 25) and temporary possession (Articles 27 and 28) within the 3.1 Draft Development Consent Order [APP-056] are each constrained by reference to the 'Order land'. Therefore, and in circumstances where the Applicant is in a position to commit to avoiding recourse to reliance upon compulsory acquisition or temporary possession powers, it is the Applicant's intention to apply a Class 8 'white land' designation to the affected

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				plot(s), both on the 2.2 Land Plans [AS-005 to AS-012] and in the appropriate columns within Part 1 of the 4.3 Book of Reference [AS-018]. The Applicant is exploring amendments to the Detailed Land Rights Tracker (and/or other interim submissions) to potentially accommodate further commitments to avoiding recourse to reliance upon compulsory acquisition or temporary possession powers that may arise throughout the Examination, by applying a Class 8 'white land' designation to the affected plot(s), and identifying these within the Detailed Land Rights Tracker at each Deadline, where appropriate. It is currently anticipated that a full suite of formal updated Land Plans and an updated Book of Reference will be submitted at an appropriate interim Deadline, and again at Deadline 7 (21 July).
REP1-465	Sarah Elizabeth Frances Beevers	Biodiversity, ecology and nature conservation	They will be recorded as part of the Ancient Tree Inventory. Their significance is that they are established mature healthy old trees, with several displaying veteran features, including insect bore holes, hollowing in trunks and the beginning stages of canopy retrenchment, adding to the biodiversity of the area. Tree numbers 1 – 6 all make up a traditional tree lined woodland track leading to the Cottage Barn. At the end of the avenue of trees, as illustrated above there is an owl box which is in use and situated in an old twin ash tree. Traditionally oak trees have been pollarded for management of the tree and their timber, which has been used in the construction of buildings and ships. The Grade II farm house and farm buildings all have oak timbers, which could have been from this very tree. Phoenix oaks can be seen growing from fallen branches. Bore holes are signs of beetle activity. This tree was used for bat surveys by the NG ecologists, but no one was able to confirm whether there had been any bat activity. Bats are a regular sight on the farm feeding off the insects at dusk. This tree line will also disappear under the bulldozers to make way for the pylons, along with the beautifully natural shaped oak that is in the distance. There is also a traditional thick hedge, seen below. It is approximately 2.5 m high and a metre deep, with a diverse range of species such as field maple, blackthorn, oaks, dog rose and old apple trees that will also be lost. The wild bird cover will be destroyed and replaced with a ?50m pylon. In the fields are skylark plots, which has successfully seen an increase of this species. Close by is a pond containing great crested newts. Hares take advantage of these fields. Badgers also enjoy feeding off the apples, as well as the corn and whatever else they can scavenge.	6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] sets out the assessment of ecological effects, supported by extensive desktop and field surveys undertaken between 2022 and 2025, including terrestrial invertebrates, bats, birds, badgers and hares. The presence of a barn owl box within the tree avenue has been recorded during surveys. A pre-construction check for nesting/roosting barn owl, including trees and existing boxes, will be undertaken by a licensed barn owl ecologist. Following the nesting/roosting check appropriate mitigation will be undertaken as outlined in the 7.4 Outline Landscape and Ecological Management Plan [Revision C] based on its use. 6.8.A10 Environmental Statement Appendix 8.10 Bat Activity Report [AS-036] includes the survey scope and methodology for automatic static detector surveys, which were undertaken in this location. It was found that this location had the high activity levels of common pipistrelle, and therefore a bat flyway has been proposed in this location as shown on **7.4 Outline Landscape and Ecological Management Plan Appendix E - Bat Flyway Locations [AS-048]**. While ground level tree assessments identified trees with potential bat roosting features in this area, no confirmed bats roosts have currently been identified. Further pre-construction surveys will be undertaken to confirm roost presence/absence. Should a bat roost be identified, mitigation will be undertaken under a bat licence from Natural England and appropriate mitigation put in place. A draft bat licence at been prepared and is with Natural England for review, this includes a range of appropriate mitigation solutions dependent on the roost type. Impacts to great crested newts are to be mitigated for under District Level Licensing. A Great Crested Newt Impact Assessment and Conservation Payment Certificate has been obtained and counter signed by Natural England. With reference to skylark plots the land will be fully reinstated on completion, consistent with the existing field use. Although this does not recreate skylark plots in their exact former locations, the reinstated cropland will allow the landowner to manage areas for

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				skylark in the same way as previously. Given the very small permanent footprint for the overhead line sections and the temporary nature of wider disturbance, reinstatement of open cropland provides sufficient mitigation, and effects on skylark at the local level are assessed as not significant. One veteran tree (ref. T390) has been recorded in the group of trees south-east of RG194 in the 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]. This tree is referenced as Tree 3 in the written representation. This is anticipated to be affected / managed as indicated in Arboricultural Impacts Plan in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 [REP1-065]. The management of veteran trees follows the mitigation hierarchy detailed in the 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]. The remaining trees have not been recorded as veteran, and are not present in the Ancient Woodland Inventory, with the exclusion of Tree 1 in written representation which is assigned the status of notable (Tree ID. 279915).
REP1-465	Sarah Elizabeth Frances Beevers	Traffic and Transport	7. Construction Traffic The increase in construction traffic would endanger humans and the biodiversity of the area, on roads that were built for a horse cart and certainly not lorries and construction vehicles.	The Applicant has developed a construction routeing strategy, detailed in **7.3 Outline Construction Traffic Management Plan [APP-309]**. Construction traffic will use the Strategic Road Network (SRN) and Major Road Network (MRN) to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes to the site access points. From these site access points, construction traffic will be routed along the off-line haul road. Each Primary Access Route has been assessed for suitability of two-way HGV movements, and any proposed mitigation is detailed in **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 to APP-320]**. The Applicant is not proposing a Primary Access Route on Offton Road, the closest road to RG194. The Applicant is proposing construction traffic to cross Offton Road at a crossover point to continue travelling on the off-line haul road. The crossover points are proposed to be installed to allow construction vehicles to cross the public highway and continue along the off-line haul road. Construction traffic on crossover points is expected to ‘give way’ to vehicles travelling on the public highway. No HGV construction traffic is proposed to use these crossover points to access the haul road from the public highway under typical operation, and vice versa, unless in a scenario detailed in Section 5.5 of **7.3 Outline Construction Traffic Management Plan [APP-309]**.
REP1-465	Sarah Elizabeth Frances Beevers	Traffic and Transport	Hill Farm Specific Concerns: 1. The access to our farm is via single lane roads with passingle places, with a warning of "unsuitable for HGVs". Please see attached "Hill Farm Access" 2. Haul road potential dividing our farm into 2. I understand a haul road would be an alternative to using the public highway. This access	As detailed above, the construction vehicles are proposed to travel along an off-line haul road to access RG194. For the overhead line construction, the haul road has been designed to a typical width of 6 m, with passing places widening to 8 m at typical intervals of 200 m. The frequency of passing places is to be determined by site-specific conditions at the detailed design stage and the forward visibility along the temporary haul roads. The detailed design will ensure the suitability of the haul road for HGV movements.

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			road would be 4- 6 m wide. This would potentially carve up our farm and make it into 2. It is unlikely that we would be able to access all of the farm which is only 80 acres. There would be the possibility of compensation on the inaccessible land, but that will not compensate the wildlife that will fall victim to it, even if it compensated the farmers. It could make the farm uneconomical to continue the business. Arable land being subjected to hardcore or whatever put down for	The haul roads are proposed to be used for construction movements and will generally be removed once the construction phase has been completed. The Applicant will make a record of condition (in line with commitment GG06 in 7.3 Outline Construction Traffic Management Plan [APP-309]) of the land that may be affected by the construction activities, including trees and hedgerows. This record will be available for comparison following reinstatement after the works has been completed to ensure the standard of reinstatement at least meets that recorded in the pre-condition survey. The haul road has been designed to be close to the works it is facilitating (i.e. the overhead line) and as direct as possible between relevant primary access points (bellmouths). Temporary land used for haul roads or construction access would be reinstated following completion of works, in accordance with the DCO requirements and agreed reinstatement standards. In relation to the crossing of haul roads by agricultural machinery, the Applicant confirms that maintaining reasonable access for farming operations is a core principle of the construction approach. Where haul roads intersect existing field access routes, the provision of appropriate temporary or permanent crossing arrangements will be agreed and installed. These arrangements are typically agreed in advance with the landowner and implemented prior to construction works affecting access. The Applicant's appointed land agent, Fisher German would be happy to meet with affected parties on site and agree where accommodation works, like crossing points may be required. The Applicant further recognises the importance of maintaining safe and practical access to the farm holding, including during construction. The Applicant does not intend to permanently sever access to agricultural land or farm buildings. Any temporary disruption to access would be managed through agreed access management measures, with alternative routes or arrangements put in place where necessary. The proposed haul road will not prevent a significant fragmentation impact to the movement of wildlife. Measures to ensure ecological connectivity during construction, have been included within the 7.2 Outline Code of Construction Practice [Revision B] and 7.4 Outline Landscape and Ecological Management Plan [Revision C], along with details on replacement planting to be undertaken on completion of works.
REP1-350	Gareth Pressley	Land and Property	My property is not a farm, it is a private small holding which is going to be destroyed as the project uses all of the property boundary to boundary. I request NG purchase the property but they refuse leaving us 10's of thousands out of pocket. Life savings in fact. It also severely impacts our day to day lives as 65% of our food comes from this small holding and our live stock.	The Applicant acknowledges the concerns raised by Gareth Pressley regarding the impact of the Project on his property and recognises that the holding is described as a private smallholding rather than a commercial farm. The Applicant understands that the Project may have a temporary effect on the use and enjoyment of the land, including impacts on food production and livestock. The Applicant's position is that compulsory acquisition powers, where sought, must be limited to the land and rights that are reasonably required to construct, operate and maintain the Project. The

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				Development Consent Order does not provide a general power or obligation to acquire entire properties where only part of the land or specific rights are required, and the Applicant is therefore not in a position to commit to the purchase of the whole holding unless this is demonstrably necessary to deliver the Project. The Applicant's strong preference remains to secure land and rights by voluntary agreement wherever reasonably practicable, and engagement through the Applicant's appointed land agents remains ongoing. Where acquisition of the whole property is not justified on delivery grounds, the appropriate mechanism for addressing financial loss or disturbance arising from the Project is through compensation, assessed in accordance with the statutory Compensation Code. Compensation may include payment for the land or rights acquired, disturbance during construction, and any demonstrable losses arising as a direct consequence of the Project. The Applicant is committed to maintaining open and constructive dialogue with Mr Pressley and his representatives throughout the development of the Project. To this end, the Applicant will continue to engage with the parties involved to provide clear explanations regarding the necessity and extent of land requirements associated with the Project. As part of this engagement, the Applicant will actively consider whether it is possible to mitigate any potential impacts on Mr Pressley's land through careful design or by implementing specific construction measures. For example, efforts will be made to minimise the duration for which certain areas of the land are required for temporary works, such as the erection of scaffolding. Additionally, measures will be explored to reduce the frequency and volume of traffic movements associated with the Project, thereby lessening disruption to the property. Through this ongoing process, the Applicant aims to ensure that the needs and concerns of Mr Pressley are appropriately addressed wherever reasonably practicable, while also ensuring that the Project can be delivered efficiently and effectively.
REP1-350	Gareth Pressley	Noise and Vibration	Day to day lives within the 3 counties will be hugely disrupted with construction work vehicles both on and off public roads. Fumes, dust, noise pollution and so much more will be so negative.	**6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** provides an assessment of construction traffic, which includes other committed developments within the three counties. The assessment concludes that in general with mitigation in place, there would be no significant effect as a result of construction traffic and transport. **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]** provides an assessment of dust and emissions from construction traffic within the three counties. The assessment concludes that with mitigation in place, there would be no significant effects. **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** provides an assessment of noise from construction and construction traffic within the three counties. The assessment concludes that with mitigation in place, there would be no significant

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				effect on sensitive noise receptors, with the exception of Jasmine Cottage.
REP1-444	Phil and Laura Cottey	Transport and Traffic	The proposed haul road crosses my client's main access road, which is used 24 hours a day, 365 days a year for both domestic and business purposes. There is a significant risk that construction traffic and haul road operations will obstruct or impede this essential access. National Grid has not engaged with the landowners on how this crossing will function or how uninterrupted access will be maintained at all times.	The haul road has been designed to be close to the works it is facilitating (i.e. the overhead line) and as direct as possible between relevant primary access points (bellmouths). Temporary land used for haul roads or construction access would be reinstated following completion of works, in accordance with the DCO requirements and agreed reinstatement standards. In relation to the crossing of haul roads by agricultural machinery, the Applicant confirms that maintaining reasonable access for farming operations is a core principle of the construction approach. Where haul roads intersect existing field access routes, the provision of appropriate temporary or permanent crossing arrangements will be agreed and installed. These arrangements are typically agreed in advance with the landowner and implemented prior to construction works affecting access. The Applicant's appointed land agent, Fisher German would be happy to meet with affected parties on site and agree where accommodation works, like crossing points may be required. The Applicant further recognises the importance of maintaining safe and practical access to the farm holding, including during construction. The Applicant does not intend to permanently sever access to agricultural land or farm buildings. Any temporary disruption to access would be managed through agreed access management measures, with alternative routes or arrangements put in place where necessary.
REP1-444	Phil and Laura Cottey	Land Use	The National Grid works would render farming of the entire field under existing cropping practices unviable. The extent of the land required for construction will severely restrict machinery movements, disrupt established field layouts, and prevent efficient cultivation	The Applicant acknowledges the concerns raised by Phil and Laura Cottey regarding the potential impact of the Project on agricultural operations, including restrictions on machinery movements, disruption to established field layouts and the perceived effect on the continued viability of existing cropping practices. The Applicant recognises that construction activities, including temporary land take, access routes and working areas, can affect how agricultural land is operated during the construction phase. The Project has been designed to minimise permanent land take wherever reasonably practicable, with the majority of agricultural land affected on a temporary basis only, and with land expected to be reinstated following construction in accordance with the 7.2 Outline Code of Construction Practice [Revision B] and associated management plans. Construction methods and layouts will continue to be refined as the Project progresses, and the Applicant will work with affected landowners to seek, where reasonably practicable, to maintain access, accommodate machinery movements and reduce disruption to agricultural operations during construction. This includes consideration of haul routes, access points, phasing of works and reinstatement measures, recognising that detailed arrangements are secured post-consent through the DCO Requirements.

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				Where, despite reasonable mitigation, agricultural operations are adversely affected during construction or as a result of the rights sought, the Applicant confirms that compensation is payable in accordance with the Compensation Code. This includes compensation for temporary disturbance and any demonstrable losses arising directly from the Project. The Applicant will continue to engage with Mr and Mrs Cottey, through its appointed land agents, to understand the specific operational constraints of the holding and to consider how impacts can be reduced or managed as the detailed construction proposals are developed.
REP1-247	Lord Rayleigh's Farms Ltd	Consultation	We, along with our agent, have given significant landowner engagement with National Grid (NG) and Fisher German (FG) as NG's agent. We recently reviewed the changed plans and submitted our responses as part of the Landowner Consultation. We have still not received a response to our points (submitted on 29th of July 2025 following an extension due to an incorrect supply of mapping), of which we took time to review and formulate, as well as meeting with FG (and our agent) to discuss this and the planned trenching works. We are still awaiting a response to our Consultation points (all of which were simple and manageable requests to allow the Estate to carry on functioning), we have been told this will only be addressed in the DCO – what was the point in all of the landowner engagement to date?	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]**). The Applicant does not feel that this approach represents a failure of consultation. It recognises that landowners with significant interactions with the Project may reasonably expect clear and direct dialogue on landowner specific matters. Engagement with landowners has continued through correspondence, meetings and discussions with the Applicant's land agents, and remains an ongoing process as the Project progresses through Examination.
REP1-247	Lord Rayleigh's Farms Ltd	Socio-economics, recreation and tourism	– the proposed works will cause upheaval to the farming operations (during and after construction), and we wish for our representation to be registered in the hope of minimising the farming practices where possible.	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 during construction 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 7.2 Outline Code of Construction Practice [Revision B]. 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).
REP1-247	Lord Rayleigh's Farms Ltd	Land use	Land drainage – we have briefly discussed land drainage with FG, we wish for the land drains to be left intact, as per the drainage maps we have provided. • Compaction – we are concerned of the ground compaction and 'mess' the construction works will make. Will this permanently damage the fields? The farming business will	With regard to the Project's interactions with existing land drainage systems, Section 5.7 of **8.2 Drainage Strategy [REP1-072]** acknowledges that field drainage systems must be correctly managed with the agricultural owners or managers of the agricultural land affected by the Project. Secured commitments to managing field

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			likely be affected for years to come, with yields reducing as a result. Cable Depth – we suggest a minimum soil cover of 1.2m	drainage systems are detailed in 7.2 Outline Code of Construction Practice [Revision B], commitments AS05 and W14. 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. The reinstatement of land drains forms commitment AS05 within 7.2 Outline Code of Construction Practice [Revision B]. 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303] details good practice soil handling mitigation measures, including conditions such as soil plasticity testing, to minimise soil damage by compaction. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] notes that all land required temporarily for construction would be reinstated, to its former agricultural use / condition or a use / condition as discussed with the landowner.
REP1-247	Lord Rayleigh's Farms Ltd	Socio-economics, recreation and tourism	Management of farm during construction – numerous staff members will/have been required to deliver this scheme to date on the ground. Negotiations, provision of access, farming the surrounding area etc - all of which are labour intensive and time consuming on top of 'normal' day to day activities, and are expected only to get worse in terms of time provisions.	The Applicant acknowledges the concern raised by Lord Raleigh's Farms Ltd regarding the management burden and staff time required to support engagement with the Project, including negotiations, access arrangements and the continued operation of the estate alongside Project activities. The Applicant recognises that engagement and construction activities associated with a project of this scale can require additional input from landowners and estate staff beyond day-to-day operations. The Applicant's approach is to work with affected landowners, through its appointed land agents, to coordinate access, and communications in a way that seeks to reduce unnecessary disruption and repeated demands on estate management time were reasonably practicable. Detailed construction arrangements, including access protocols, phasing and site management, will be controlled post consent through the 7.2 Outline Code of Construction Practice [Revision B] and associated management plans. These provide the mechanism for structured liaison during construction, with the aim of reducing avoidable impacts on farming operations and estate management. Where additional management time or labour costs are unavoidably incurred as a direct consequence of the Project, the Applicant confirms that these matters will be addressed through compensation in accordance with the statutory Compensation Code. This provides the appropriate legal mechanism for dealing with demonstrable losses or additional costs arising from construction and related activities. The Applicant will continue to engage with Lord Raleigh's Farms Ltd to understand estate-specific operational requirements and to seek, where reasonably practicable, to manage construction interfaces in a way that minimises the ongoing management burden during delivery of the Project.

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REP1-247	Lord Rayleigh's Farms Ltd	Land and property	Heads of Terms – not yet in a position to negotiate, we are awaiting instruction from our agent. The need for a properly designed scheme and suitable HoTs is highly significant.	Heads of Terms (HoTs) have been distributed to all parties affected by the Project, as well as to their appointed agents. Following the distribution of the HoTs, the Applicant's land agents, Fisher German, have undertaken meetings with the appointed agents and, in some instances, directly with the affected parties. These discussions focused on the terms set out within the HoTs, providing an opportunity for stakeholders to raise concerns and offer feedback. The feedback received from these engagements has been carefully evaluated by the Applicant. As a result, amendments have been made to the original HoTs, reflecting the views and concerns of those affected. The updated document, incorporating the agreed changes, has now been shared with the land agents representing the affected parties. A route-wide reissue of the revised Heads of Terms will take place shortly, ensuring all stakeholders have access to the most current terms.
REP1-247	Lord Rayleigh's Farms Ltd	Alternatives	Pylon Locations : • It is requested that TB116 be moved as far east as possible, up to the hedged boundary to reduce the impact on farming operations. • It is requested that pylon TB117 be locate at least 40m from the southern field boundary to allow sufficient space for a sprayer to pass through	The Applicant responded to this request in **5.1 Consultation Report [APP-066]**: 'National Grid notes the preference from landowners for pylons to be situated close to hedge lines where possible to reduce the impact on agricultural activities and reduce land take. We have assessed requests from landowners on an individual basis and have moved pylons to the edges of fields where this can be achieved. We have reviewed the pylons TB116 and TB117 remain along the field boundary as far as practicable. TB116 cannot be placed on a field boundary to the west due to required span lengths and the need to keep the alignment as straight as possible to be consistent with the Holford Rules.' It may be possible to relocate TB117 along the alignment within the Limits of Deviation. Any refinement to the siting of individual pylons would be considered through detailed design and informed by site-specific discussions between the Great Grid Partnership (the Applicant's delivery partner) and the relevant landowner. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations
REP1-247	Lord Rayleigh's Farms Ltd	Transport and Traffic	Permanent Access Routes – Change Request: • Plan 1275 – Permanent access route to follow field boundaries, rather than into the field as planned.	The permanent access routes as shown in the application materials are not proposed to be use for construction. The access routes use existing tracks where possible. Noting for potential change in land use over time, ahead of future maintenance or survey access the Applicant's lands team will liaise and agree access arrangements with landowners at the time to reduce impacts where practicable.
REP1-247	Lord Rayleigh's Farms Ltd	Biodiversity, ecology and nature conservation	BNG : • We would like to request that the woodland identified for BNG on plan 1275 is removed from the order limits as the estate has no intention or desire to sell the woodland for BNG to National Grid. • The woodland is used as part of the estate's commercial shoot and is a fundamental drive associated with such.	The Applicant can confirm that although the woodland in question has been included within the Fairstead Environmental Area, no enhancement of the woodland habitat has currently been relied upon within the Biodiversity Net Gain (BNG) assessment, as presented within 7.1 Biodiversity Net Gain Report [APP-299]. The woodland has been included within the Order Limits for retention only and along with the newly adjacent proposed planting, will provide necessary

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				screening of the Cable Sealing End compound and ecological connectivity to the wider landscape.
REP1-247	Lord Rayleigh's Farms Ltd	Land and property	Solar DCO : • As you are aware however for the avoidance of doubt, there is an approved DCO for Longfield Solar Farm on the land owned. • There are therefore third-party rights over such and it is therefore critical we have early engagement between National Grid, LRF & Longfield Solar Farm to minimise the impact on the development	The Applicant notes the proposed interaction between Norwich to Tilbury and the Longfield Solar Farm. The Applicant will engage with both parties to seek to agree the nature of the interactions and protections required by the respondent to mitigate the impacts across both construction and operational interactions.
REP1-247	Lord Rayleigh's Farms Ltd	Socio-economics, recreations and tourism	Shooting & Farms Operations: • The estate runs a commercial shoot whereby the proposals would effect two of the main drives on such, making them potentially unviable. • It is therefore requested that National Grid, undertake to work with the estate so to avoid the shooting seasons during construction and to minimise the impact on such. This will be to the benefit of both National Grid and the Estate. • Should this not be undertaken then this will cost National Grid in compensation to the estate for the loss of multiple seasons of shooting over such. • It should also be undertaken to work with the estate to minimise the impact on the commercial farming operations	The Applicant's approach is to work with affected landowners, through ongoing engagement to minimise disruption where reasonably practicable. This includes engagement on construction phasing, access arrangements and timing, with the objective of reducing impacts on established estate operations, including farming activities and seasonal recreational uses, where this can be achieved without prejudicing safe and efficient delivery of the Project. Given the scale and linear nature of the Project, it is not possible to commit at this stage to absolute avoidance of particular seasons or estate activities across all locations. Construction methods and programme will be refined post-consent and controlled through the 7.2 Outline Code of Construction Practice [Revision B] and associated management plans, which provide the mechanism for ongoing liaison and reasonable mitigation of impacts during delivery. Where residual impacts on commercial operations cannot be avoided through reasonable mitigation, the Applicant confirms that affected landowners are entitled to compensation in accordance with the Compensation Code. This includes compensation for demonstrable loss arising from construction activities, whether those losses relate to agricultural production or other lawful commercial estate operations.
REP1-220	Clarke and Simpson Chartered Surveyors on behalf of Andrew D'Angibau, Maria Hitchcock, DebraMarie Cook, Danny Cook, Angela Mary Wilson D'Angibau	Land and Property	The first point refers to National Grid's response to your questioning in that they confirmed to you they had responded to every land agent's enquiry and that information had been fed back to us. You will have noted a number of landowners at the open floor hearing also raised this as an issue. In fact, information has not been fed back to us and we are still waiting for further information and clarification on various points. We have raised the same concerns on numerous occasions and whilst the concerns have been acknowledged, no response has been received. No discussions have taken place regarding the heads of terms; we had one meeting with National Grid's agents on 15th January 2026. At that meeting National Grid's agents listened to the comments we had on the heads of terms. Fisher German had not been given any instructions to talk about any specific points that we have raised on the heads of terms. We have not received any feedback from that meeting or any negotiations over the heads of terms for voluntary acquisition.	The Applicant recognises that some landowners and their representatives have not yet received the information they are expecting. Following a meeting on 15 January 2026, the Applicant has held a meeting with the group of agents within the 'Agents forum'. This has resulted in a revised set of Heads of Terms which are due to be circulated shortly. The Applicant understands the importance of progressing discussions on the Heads of Terms for voluntary acquisition. The Applicant's agents will seek to arrange a meeting with the landowner once they have had the opportunity to digest the revised terms, so that meaningful engagement can continue.
REP1-220	Clarke and Simpson Chartered Surveyors on behalf of Andrew	Land and property	One of our main concerns at this stage of the process is that a number of our clients have third party assets such as UKPN or BT assets over their land which need to be placed underground as part of this project. We have made specific enquiries as to what those	National Grid, in tandem with third-party party asset owners carrying out works to their apparatus as part of the DCO, will engage directly with affected landowners to convey proposed methodologies for third-party works.

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	D'Angibau, Maria Hitchcock, DebraMarie Cook, Danny Cook, Angela Mary Wilson D'Angibau		works will entail and the methodology. We have been informed that they are not part of Fisher German's remit as they are UKPN or BT assets and that those authorities will be in touch with us in 'due course'. We have heard nothing at all from UKPN or BT's appointed agents (whoever they may be) with regard to those works, which is unacceptable as the DCO has been submitted and application hearings are underway. The interaction of these services will have long term implications to the land.	
REP1-220	Clarke and Simpson Chartered Surveyors on behalf of Andrew D'Angibau, Maria Hitchcock, DebraMarie Cook, Danny Cook, Angela Mary Wilson D'Angibau	Land Use	In a recent discussion the thought of a soil stabilisation product injected into the soil for the haul road was mooted. However, we have major concerns over this and have refused it on other projects because of the unknown long-term possible soil damage it could cause and the uncertainty of it entering the food chain through the crops grown for years after its use.	The Applicant is still considering soil stabilisation; however, paragraph 1.2.5 of 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] states 'Subsoil stabilisation would only be adopted where it would result in no materially different effects to those assessed in the Environmental Statement (ES) (Volume 6 of the DCO application). The Soil Scientist would develop an appropriate testing schedule to confirm the suitability of any soil stabilisation approach'.
REP1-313	Charlotte Louise Randall Banks	Land and Property	This grade 2 house with a manorial history dates back to the doomsday book. It will be flanked on the east side and at the entrance by Pylons RG127, RG128, RG129, RG130 and RG131. The grid proposal will take £200,000 off the market price of the house. The house has been on the market since July and we have had two viewings - both were unserious buyers.	The Applicant acknowledges the comments and responds as follows. The Applicant understands the Land Interest is within the 4.3 Book of Reference [AS-018] as a Category 2 landowner. The land interest has access rights over an access track to their residential property. The access track is included within the Order Limits as a permanent access route to the overhead line, for maintenance purposes. The access track itself is owned by another Category 1 interest. Matters relating to loss of business income, perceived safety concerns, injurious affection or diminution in value are compensation matters. Such matters would be assessed separately, on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code, and are not matters to be determined through the Examination of the Development Consent Order. The Applicant would recommend the land interest appoints an agent to act on their behalf and who will be able to advise and assist you in the process in respect of any claim for compensation which the land interest may be entitled to bring.
REP1-313	Charlotte Louise Randall Banks	Transport and Traffic	National Grid decided that haul roads (later explained as access roads) be built down our private drive. As the drive is the property of [redacted text] our neighbour, they decided not to contact us about the "access roads" going past our property as we had no legal right to the drive. This is a mistake. We have a financial interest in the upkeep of the drive and have legal right of way over the drive. This is just another example of National Grid not doing their homework properly.	The proposed access route as shown in the application materials is for permanent access for surveys and maintenance of pylons RG129 and RG130. It is not proposed as a construction access route, which instead in this location is facilitated by the haul road that runs north to south along the route of the proposed RG overhead line.
REP1-313	Charlotte Louise Randall Banks	Historic Environment	After much communication with both Suffolk County Council and National Grid, they have said that they will only walk down the drive,	The Applicant will liaise with the affected party to discuss a suitable place to park their vehicles and will use appropriate public footpaths and right of ways where suitable.

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			not drive. I ask the question, where are they going to park their vehicles? The road leading up to the drive is single track with no carparking space. Why do they need to walk down the drive when there is a parallel public right of way	
REP1-313	Charlotte Louise Randall Banks	Historic Environment	Under the Historic Environment Good Practice Guide to planning it is noted that settings and experiences of heritage assets should be protected as well as the assets themselves - and there is a reason for this. The Hall will lose its historic character when haul roads are built and far higher than usual pylons seen within 400m.	6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] provides an assessment of the Project's impact on the Grade II listed Hempnalls Hall (1180451). The assessment has considered how change in the setting of the asset would affect its value, in accordance with 6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068], which aligns with relevant heritage guidance. The assessment, presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], concluded a minor adverse significance of effect during construction and a negligible adverse significance of effect during operation (and maintenance). The impact is also assessed in terms of harm and this concluded lower less than substantial harm during construction and operation (and maintenance) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]).
REP1-313	Charlotte Louise Randall Banks	Land and property	We will not get any compensation of any kind as the pylons are on neighbouring land but blight us as if they were on our own.	Matters relating to loss of business income, perceived safety concerns, injurious affection or diminution in value are compensation matters. Such matters would be assessed separately, on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code, and are not matters to be determined through the Examination of the Development Consent Order. The Applicant would recommend that the affected party appoints an agent to represent them and who would be able to advise and assist you in the process in respect of any claim for compensation which the land interest may or may not be entitled to bring.
REP1-313	Charlotte Louise Randall Banks	Historic Environment	Historic England are doing a report on this house which I enclose and The Gardens Trust will also review the report and submit for application for registration of the areas outside the garden of the house as they are of significance according to Historic England. I submit a report by on behalf of Historic England	The included report concludes the Project would result in less than substantial harm to Hempnalls Hall (1180451), which aligns with the conclusions of the Project's assessment. There is agreement that the Project would not result in substantial harm this designated heritage asset. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in the Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, 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 National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]

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				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 critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
REP1-372	Holly E Mountfort	Design Route / Economic Impact / Health & Well-being / Property	The road is a dead end, and the proposed placement of the haul road is hugely detrimental to our future plans for the farm and our living and income and the safety of ourselves, our children, our elderly relatives, our pets, and our animals. The two fields north of this field are available to use. We note that NGET have incorrectly sited the farmhouse on their mapping. We note that NGET have planned their haul road over a 500-year-old oak tree. We note that NGET will cause huge delays to all our tenants and will cause delays and danger to everyone human and animal.	The Applicant has been engaging with the landowner on this matter, including a meeting which took place on 27 February 2026 between both parties. The Applicant's reasoning behind the location of the haul road and compound proposals were discussed at the meeting, with the Applicant's agent gathering the land interest's feedback. The Applicant is committed to reviewing the latest requests from the engagement with the landowner and will revert in due course. The tree of concern is not anticipated to be affected by the Project as indicated in the Arboricultural Impacts Plan in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [REP1-065]. The haul road is proposed north of the tree its construction will adhere to the embedded, standard and additional measures of mitigation detailed in the 7.2 Outline Code of Construction Practice [Revision B].
REP1-395	Jonathan McDonald	Land and property	I am Jonathan McDonald of [redacted text], the address of which is located opposite the Remus Horse Sanctuary accessed and serviced via a narrow private track to which National Grid wish to obtain Rights upon as part of their proposal. The negative affect upon Animals & Wildlife. Located within the surrounding areas is: o Remus Horse Sanctuary – A home for distressed and abused horses, ponies, donkeys, goats, sheep and cats who have all been victims of physical and mental abuse o A Sheep Farm o Wild Animals including for Hares, Foxes, Birds, Rabbits, Newts, Bats and Owls to name a few. o Domestic Animals. The proposals tabled by National Grid are not detailed nor fully considered and as such to give permission at this stage, without adequate knowledge of what plans are of the applicant I see as dangerous to all. The likely affect is that disruption, noise, dust, and	Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on 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 [Revision C] and 7.2 Outline Code of Construction Practice [Revision B] contain a list of relevant good practice measures to avoid or reduce impacts on protected species and additional mitigation measures, as appropriate. Following the implementation of mitigation, no significant residual effects on ecology receptors have been identified as a result of construction or operation (and maintenance) of the Project.

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			vibration, to name a few, will be experienced which in turn will form huge risks to the health and welfare of all animals and wildlife, of whom many are fragile already whilst been cared for, access for medical attendance for known sick animals, distress and the creation of a potential life threatening atmospheres.	The access route shown at Remus Animal Sanctuary is for future surveys and maintenance if required and will not be used for construction. We are not proposing to construct anything for this permanent access route; existing tracks and roads are being used where possible. The track would only be used by 4x4 vehicles and cars similar to the current use. Ahead of future maintenance or survey access the Applicant's lands team will liaise with and agree access arrangements at the time to reduce impacts where practicable.
REP1-395	Jonathan McDonald	Land and property	The proposals provides for National Grid to have access rights to areas which I and my surrounding neighbours rely upon solely to access our Homes. In obtaining these rights, their powers will include the ability to restrict our rights which would result in our inability to access and egress our properties by vehicle. This permission cannot be freely given to allow this company to take our rights of freedom away. The route of this also includes for the transportation and provision of electricity and BT to our properties. Due to our location, we do not enjoy the provision of gas and therefore any restriction in these supplies would leave our Homes, powerless. If such permission is given to National Grid, we would also be at risk of non access for Emergency Vehicles, therefore posing substantial Health & Safety risks and in the event of an emergency, a greater risk of Death! The 'Track' is a narrow potholed and fragile stone and mud path and not a public road. By its very nature, it is characteristic of the countryside and a nature that we should all work to protect. Again, it is not known what National Grids intention is and as such it cannot be given powers to affect our countryside without control and limitations, to which approval of this would do. • To access the 'Track' you need to travel along Buttsbury, a public highway between Buttsbury Church, a 14th Century historic building and the Buttsbury Ford, again a historic crossing point. During winter months this road becomes challenging to access due to regular flooding.	The Applicant acknowledges the comments about access to the properties and comments as follows: The Applicant understands the Land Interest is within the 4.3 Book of Reference [AS-018] as a Category 2 and 3 land interest. The land interest's main residence falls outside of the main Project's Order Limits. The land interest has access rights over a private track to Little Farm off Buttsbury Road that provides access to the land interest's main residence (as shown by Plot G-2/57 within the 2.2 Land Plans [AS-005 to AS-012]). The access route shown at Plot G-2/57 is for future surveys and maintenance if required and will not be used for construction. We are not proposing to construct anything for this permanent access route; existing tracks and roads are being used where possible. The track would only be used by 4x4 vehicles and cars similar to the current use. Ahead of future maintenance or survey access the Applicant's lands team will liaise with and agree access arrangements at the time to reduce impacts where practicable. The Applicant will undertake extensive surveys and searches for pre-existing services in areas of the Project in the development of the submitted DCO application. The Applicant is in contact with the asset operator and will work with them to divert the existing power line away from areas required from the Project.
REP1-395	Jonathan McDonald	Historic Environment	Buttsbury Church is a 14th Century Church and forms part of our history and heritage. These proposals massively impact the status of the Church, to which we should not allow our English Heritage to be affected.	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 on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] where land that forms part of the setting of designated assets falls within the Order Limits. The Applicant considers that the assessment of permanent moderate adverse significance of effect (significant) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Mid Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to

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				Designated Heritage Assets [APP-215]) is appropriate and reflects the harm to the value of this listed building.
REP1-395	Jonathan McDonald	Land and property	I also wish to register my interest to areas of land referenced 'Plot Nrs G-2/59 and G-2/62'. There is rights over these areas of land for access plus the location of a water treatment plant which serves the properties, 1 and 2 Little Farm Cottages.	The Applicant notes that Jonathan McDonald is not currently registered as having rights over Plots G-2/59 and G-2/62. The Applicant has recorded the interest in these areas of land and will review the information and contact you if any further details or documentation are required.
REP1-370	Henry Ruffle	Land Use	The installation of large transmission pylons and associated infrastructure across productive agricultural land will cause permanent disruption to farm operations. The presence of pylons will restrict machinery access, complicate field layouts, reduce workable acreage, and create ongoing inefficiencies in cultivation, spraying, and harvesting. Construction works will also cause soil compaction, drainage damage, and long-term degradation of soil structure, which are particularly concerning for a working farm dependent on maintaining high-quality, productive land.	The Applicant understand that the land interest is a Category 1 landowner (as shown in Section B, Sheet 16). The land interest has three pylons on his land – RG182, RG183 and RG184. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are attributable to the Project, including claims relating to depreciation in value or the loss of development potential, assessed on a case-by-case basis. The Applicant remains keen to explore appropriate and proportionate options to mitigate the effect of temporary severance of land, including the farming operations. The Applicant will not be able to settle the precise measures with the land interest until the detail design stage of the Project where the more detailed construction methodology, land areas and timescales are known. The Applicant's approach to soil management, temporary and enabling works, utilities diversions and the land rights required for the Project is set out within the Environmental Statement and supporting application documents, including the 7.2 Outline Code of Construction Practice [Revision B] and the 2.2 Land Plans [AS-005 to AS-012] and 4.3 Book of Reference [AS-018], which identify the nature and extent of the land and rights sought. These documents were publicly available as part of the Development Consent Order application. 7.2 Outline Code of Construction Practice [Revision B] 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 3.1 Draft Development Consent Order [APP-056] prior to commencement of development. This approval will take into account comments received through Examination. 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 to 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, as detailed 7.2 Outline Code of Construction Practice [Revision B].

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				Soil management measures to be implemented during construction, to protect the soil resource, are detailed in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. 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 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.
REP1-370	Henry Ruffle	Biodiversity, ecology and nature conservation	Of equal concern, is the likely harm to wildlife. My farm supports established wild populations of grey partridge and skylark, both of which are farmland bird species of high conservation concern. Both species depend on open, uninterrupted arable landscapes for successful nesting and feeding. Skylarks are particularly sensitive to vertical structures within otherwise open farmland, and evidence shows breeding density declines in proximity to tall infrastructure. The erection of pylons and overhead lines would introduce prominent vertical features into established breeding territories, likely reducing productivity and displacing nesting pairs. Grey partridges rely heavily on well-managed field margins, beetle banks, and undisturbed cover — habitats that have been established and maintained through long-term stewardship. Construction disturbance, habitat fragmentation, heavy vehicle access, and ongoing maintenance activity would undermine years of environmental management effort and increase predation risk by providing additional perching and vantage points for corvids and raptors. This is especially concerning in the context of current Environmental Land Management (ELM) schemes promoted by the Department for Environment, Food & Rural Affairs, which incentivise farmers to restore biodiversity and support farmland bird recovery. The proposed infrastructure risks directly conflicting with these nationally supported objectives and reversing measurable conservation gains achieved over decades of responsible farming.	The Applicant can confirm that potential effects on farmland birds (including skylark and grey partridge) have been fully assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], which concluded any effects on farmland birds to not be significant. The majority of impacts on farmland bird habitat are small in scale and temporary in nature. The only permanent land take in the overhead line corridor relates to the small footprint required for pylon bases, with all other arable land remaining available for nesting and foraging farmland birds. Habitats temporarily affected during the works will be reinstated in accordance with the 7.4 Outline Landscape and Environmental Management Plan [Revision C]. While overhead lines can introduce new perching opportunities for predators, both skylark and grey partridge are known to be highly adaptable to changes within the farmed landscape and continue to breed successfully in areas containing agricultural structures, machinery, and other vertical features associated with modern farming. A recent study (Klaus et al. 202510) has suggested habitat quality is the primary factor in territory occurrence of skylark and states 'distance from powerlines and pylons were not significant predictors' [of skylark territory location] and 'we conclude that powerlines are unlikely to lead to significant habitat reduction for the Skylark that would impact local populations.' These species are well adapted to avoiding predation through the use of dense vegetation, tall crops and field margins. Construction activity is temporary and has been reduced to a small an area as practicable; therefore, habitat favoured habitat of these species will be retained and remain available for bird use wherever possible. Any habitats disturbed during within the working area will be reinstated following construction. On this basis, the Project does not expect the overhead line to undermine long-term farmland bird management or conflict with ongoing environmental stewardship and ELM scheme objectives, given the temporary nature of the disturbance and the reinstatement and management commitments secured through the DCO.
REP1-370	Henry Ruffle	Landscape and Visual	The proposal will have a significant visual and landscape impact. The rural character of this area — carefully managed by the same family for over seventy years — will be fundamentally altered by the	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant notes the concerns raised regarding the potential effects of the Project around Ringshall Stocks.

[10] Klaus S, Liew JH, Müller C, Jechow B (2025) *Collateral damage of the energy transition? Investigating the avoidance of powerlines by the Eurasian Skylark Alauda arvensis in a German agricultural landscape.* Bird Conservation International, 35, e6, 1–7

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			introduction of large-scale industrial infrastructure, affecting not only my property but also the wider community and countryside. There are also serious concerns regarding property value, business continuity, and long-term land viability. The presence of high-voltage overhead lines can reduce land value and create uncertainty for future agricultural investment and succession planning, particularly for a multi-generational family farm.	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]. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Significant effects are identified up to a distance of approximately 1.5 km for landscape receptors, and up to a distance of approximately 2 km for visual receptors. Matters relating to loss of business income, injurious affection or diminution in value are compensation matters. Such matters would be assessed separately, on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code, and are not matters to be determined through the Examination of the Development Consent Order. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are attributable to the Project, including claims relating to depreciation in value or the loss of development potential, assessed on a case-by-case basis.
REP1-370	Henry Ruffle	Consultation	I request: 1. full and transparent assessment of alternative routes and technologies. 2. A detailed agricultural impact assessment specific to my holding. 3. A comprehensive ecological impact assessment addressing farmland bird populations, including grey partridge and skylark breeding territories. 4. Demonstration of compliance with national biodiversity policy and Environmental Land Management objectives. 5. Clear information regarding compensation, long-term access rights, and reinstatement standards. 6. Meaningful engagement with directly affected landowners before any decisions are finalised.	In response to Question 1. The preferred strategic option for the Project is an AC onshore connection. This is the preferred strategic option because it best aligns with National Grid's statutory obligations under Section 9 of the Electricity Act 1989, and is supported by national government policies, including National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024). National Grid's starting position for new onshore electricity transmission infrastructure is then informed by NPS EN-5 which, for areas outside nationally designated landscapes, identifies the general acceptability of the use of overhead lines. This has been set out in the 7.17 Strategic Options Backcheck and Review [APP-355]. There is no requirement for the Applicant to present information at a comparable level of detailed assessment as this is not proportionate. The Applicant has, however, presented information at a comparable level at different stages of the Project development to explain the reasons for its decision making. In response to Question 2: A comprehensive assessment of farmland birds has been undertaken and is presented in 6.8.A7 Environmental Statement Appendix 8.7 - Breeding Bird Report [AS-032], which includes the survey methodology and site selection for farmland birds. The report also includes results of territory mapping for key red listed species, including grey partridge and skylark (where identified), with territories mapped in relation to the works. In response to Question 3:

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				An ecological impact assessment including impacts on farmland birds has been carried out. This assessment is outlined in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], which concludes that, with embedded avoidance and mitigation measures, no significant effects on farmland birds are predicted. The majority of impacts on farmland bird habitat are small in scale and temporary in nature. The only permanent land take in the overhead line corridor relates to the small footprint required for pylon bases, with all other arable land remaining available for nesting and foraging farmland birds. Habitats temporarily affected during the works will be reinstated in accordance with the 7.4 Outline Landscape and Environmental Management Plan [Revision C]. While overhead lines can introduce new perching opportunities for predators, both skylark and grey partridge are known to be highly adaptable to changes within the farmed landscape and continue to breed successfully in areas containing agricultural structures, machinery, and other vertical features associated with modern farming. A recent study (Klaus et al. 2025) has suggested habitat quality is the primary factor in territory occurrence of skylark and states 'distance from powerlines and pylons were not significant predictors' [of skylark territory location] and 'we conclude that powerlines are unlikely to lead to significant habitat reduction for the Skylark that would impact local populations.' These species are well adapted to avoiding predation through the use of dense vegetation, tall crops and field margins. Construction activity is temporary and has been reduced to a small an area as practicable; therefore, habitat favoured habitat of these species will be retained and remain available for bird use wherever possible. Any habitats disturbed during within the working area will be reinstated following construction. On this basis, the Project does not expect the overhead line to impact farmland bird communities, given the temporary nature of the disturbance and the reinstatement and management commitments secured through the DCO. In response to Question 4: 5.6 Planning Statement [APP-085] and 5.7 Planning Compliance Document [APP-086] include an assessment of the Project against Planning Policy, including those relevant to Ecology and Biodiversity. Paragraphs 7.3.45 to 7.3.69 (inclusive) of the 5.6 Planning Statement [APP-085] set out relevant National and Local Planning Policy. Paragraphs 7.3.84 to 7.3.86 (inclusive) set out policies of relevance to Habitats Regulations. Paragraphs 7.3.98 to 7.3.100 (inclusive) identify National and Local Policies of relevant to Ancient Woodland, Ancient Trees, Veteran Trees and other Irreplaceable Habitats. Paragraphs 7.3.117 to 7.3.122 (inclusive) identify policies relevant to the protection and enhancement of habitats and species. The **5.6 Planning Statement [APP-085]** sets out how the Project accords with these policies noting that 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] concludes that following the application of mitigation measures there will be no residual significant adverse effects during construction and operation

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				on international, national, local (statutory and non-statutory) sites of biodiversity importance. Furthermore, no significant residual effects were identified for Habitats of Principal Importance. No significant residual impacts have been assessed on protected species / species of conservation concern (including, aquatic macro-invertebrates, terrestrial invertebrates, fish, reptiles, birds (general, Schedule 1 birds and wintering / passage), bats (both foraging and commuting and roosting), hazel dormouse, otter, water vole, badger, species of principal importance and great crested newt). The avoidance of residual significance effects has been achieved through the application of the mitigation hierarchy to avoid significant harm to biodiversity in compliance with National Policy Statements EN-1 (2024) and EN-5 (2024). The Project is also considered to be in accordance with the National Planning Policy Framework11 and relevant local planning policies. In response to Question 5: The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are attributable to the Project, including claims relating to depreciation in value or the loss of development potential, assessed on a case-by-case basis. The Applicant's approach to soil management, temporary and enabling works, utilities diversions and the land rights required for the Project is set out within the Environmental Statement and supporting application documents, including the 7.2 Outline Code of Construction Practice [Revision B] and the 2.2 Land Plans [AS-005 to AS-012] and 4.3 Book of Reference [AS-018], which identify the nature and extent of the land and rights sought. These documents were publicly available as part of the Development Consent Order application. 7.2 Outline Code of Construction Practice [Revision B] 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 3.1 Draft Development Consent Order [APP-056] prior to commencement of development. This approval will take into account comments received through Examination. In response to Question 6: The Applicant remains committed to ongoing engagement with Henry Ruffle and their appointed representatives and would welcome a meeting to discuss their concerns and progress matters. The Applicant's approach is to work with affected landowners, through ongoing engagement to minimise disruption where reasonably practicable. This includes engagement on construction phasing, access arrangements and timing, with the objective of reducing impacts on established estate operations, including farming activities and seasonal recreational uses, where this can be achieved without prejudicing safe and efficient delivery of the Project.

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

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REP1-453	Richard Prentice	Consultation	Our clients are impacted directly by the scheme in that pylons are being built on their land or indirectly by the construction of the scheme close to their homes and businesses. These changes have largely been to move pylons small distances to field corners or on boundaries to mitigate the on-going impact of the project. To date we have not received any direct responses to these requests. There has categorically been no explanations as to why a request could or could not be facilitated. Finally most of my clients are not only impacted by the installation of the new pylons and cables but also by the re-routing of existing infrastructure, in particular UKPN wires and poles. We have at the date of writing had no engagement with UKPN at all. This leaves landowners in the un-enviable position of having no idea what is planned for their land or when. We are told that UKPN have appointed their own agents and that in time they will be in touch. This is completely un-acceptable given an intended start date of 2027 with much of the UKPN work needing to be carried out in advance.	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). National Grid, in tandem with third-party asset owners carrying out works to their apparatus as part of the DCO, will engage directly with affected landowners to convey proposed methodologies for third-party works taking into account landowner feedback seeking to mitigate impacts.
REP1-241	Griffin Farms Ltd	Alternatives	The Respondent seeks the removal of the white area, noted as Redundant Area [image included in WR], from the Order Limits. The Applicant included two options over this land and that to the North at the early stages of design and has since settled on the western route, as shown on all application documents. The Respondent considers the ongoing inclusion of the Redundant Area to be an unnecessary blight and burden on their property and seeks to understand why the Applicant has retained it within the Order Limits.	The Applicant notes the respondent's feedback. As per the Design Scenarios Table within 8.6.1 Deadline 1 Cover Letter [REP1-141] the decision to remove Scenario B is still 'pending further resolution of detailed design interactions between the different projects. This requires further engagement to reach mutually acceptable agreement for all parties building on the progress made to date. We expect to find a resolution by deadline 4.' The Applicant will continue to engage with all affected parties when a decision is made with regards Scenario B, the western alternative referred to in representation. As set out in Section 2.8 and Table 2.1 in the 4.3 Book of Reference [AS-018], the Applicant has made provision for a 'Class 8' designation to operate in respect of land within the Order Limits where no powers of compulsory acquisition or temporary possession will be sought. The land to which Class 8 relates is left unshaded on the 2.2 Land Plans [AS-005 – AS-012] and, hence, is informally characterised as 'white land'. It is not unusual for a DCO to be made whilst containing land in respect of which no powers of compulsory acquisition or temporary possession are sought. Indeed, it is noteworthy that the 3.1 Draft Development Consent Order [APP-056] includes, at Article 2(1), a definition of 'Order land' (meaning 'the land shown on the land plans and described in the book of reference') which is separate to the definition of 'Order limits' (meaning 'the limits shown on the works plans within which the authorised development may be carried out'). On a practical level, it is noted that the principal powers of compulsory acquisition (Articles 24 and 25) and temporary possession (Articles 27 and 28) within the 3.1 Draft Development Consent Order [APP-056] are each constrained by reference to the 'Order land'. Therefore, and in circumstances where the Applicant is in a position to commit to avoiding recourse to reliance upon compulsory acquisition or temporary possession powers, it is the Applicant's

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				intention to apply a Class 8 ‘white land’ designation to the affected plot(s), both on the 2.2 Land Plans [AS-005 to AS-012] and in the appropriate columns within Part 1 of the 4.3 Book of Reference [AS-018]. The Applicant is exploring amendments to the Detailed Land Rights Tracker (and/or other interim submissions) to potentially accommodate further commitments to avoiding recourse to reliance upon compulsory acquisition or temporary possession powers that may arise throughout the Examination, by applying a Class 8 ‘white land’ designation to the affected plot(s), and identifying these within the Detailed Land Rights Tracker at each Deadline, where appropriate. It is currently anticipated that a full suite of formal updated Land Plans and an updated Book of Reference will be submitted at an appropriate interim Deadline, and again at Deadline 7 (21 July).
REP1-241	Griffin Farms Ltd	Alternatives	The Respondent seeks the repositioning of Pylon RG07 to a location approximately 30m further south, as shown by point GF07 [image included in WR]. The position of RG07 will impede future use of the field for agriculture and result in ‘dead ground’. Whilst understanding that this is inevitable in some cases, the distance to the field boundary to the south is so modest that it seems unreasonable not to make a better attempt to position the pylon on said boundary.	The Applicant notes the respondent’s feedback. Because RG7 and the span to RG8 is adjacent to the existing 4YM 400 kV overhead line, appropriate space is required around the pylon to enable the pulling of the conductors through it but also to maintain relevant crane falling distance when working between the two overhead lines. Placing RG7 on the boundary brings it approximately 20 m closer to the existing overhead line which is less preferred on construction, operation and maintenance safety grounds. Additional placement on the boundary is avoided to minimise permanent ecological impacts on the hedgerow. There is the potential for refinement to the siting of individual pylons to be considered through detailed design and informed by site-specific discussions between the Great Grid Partnership (the Applicant’s delivery partner) and the relevant landowner. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations.
REP1-452	Richard Langton	Health and wellbeing Land use	It is an all arable enterprise and the proposed pylon route will cut the farm in half, especially during the construction phase. The 50 m pylons will eventually be visible from the main property altering the character of our landscape beyond repair. The construction phase will be highly disruptive to the operation of the business with significant damage to soil structure, drainage systems and restrict our ability to manage crops in the affected areas. Beyond construction the long term impact of these pylons will also restrict our use of modern agriculture machinery in the fields affected. Any reduction in our ability to farm effectively threatens not only our income but the viability of the farm as a whole. I wish to be candid with the planning authority about the personal toll this proposal is already taking on myself and the family. Farming is already a mentally demanding occupation in the present economic and weather patterns. Uncertainty, financial pressure and the loss of control over one’s land are well documented triggers of severe mental health difficulties among farming communities. The	The Applicant recognises the disruption to farming operations during the construction phase. Good practice measures to mitigate disruption are set out within 7.2 Outline Code of Construction Practice [Revision B], forming commitments AS03, AS04, and AS05.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. 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). All soil handling activities would be undertaken in line with the strategy, guidance and methodology detailed in 7.2 Outline Code of

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			knowledge that this vast project could be imposed on us against our objections is causing considerable anxiety, sleep disruption and distress. I don't think there has been enough impact assessment on how this project will impact all businesses and property owners on this route, especially during the construction phase. The compensation package being offered bears no relation to the true scale of the loss we face. It fails to account for the full diminution in the productive and commercial value of our landscape beyond repair, loss of earnings and business disruption during the construction phase. The compensation per pylon is also derisory considering we will have to look and work round them for generations to come.	Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Following the key soil mitigation measures required to protect soil resources would prevent risk of damage to soil structure. An assessment of the potential impacts of the Project on physical and mental health has been provided in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment of mental health and wellbeing during the construction phase considers the impacts of the Project on four protective factors of mental health as set out in the Mental Health and Wellbeing Toolkit. In terms of the level of control people feel they have over their physical environment, findings from consultation have highlighted the stress and anxiety experienced by people as a result of potential impacts of the Project on their local area (notably visual impacts). Construction phase mitigation has been identified and is included in 7.2 Outline Code of Construction Practice [Revision B] in relation to aspects such as air quality, landscape and visual impacts, and noise and vibration. With regard to views of the pylons from the property, an assessment of effects on residential visual amenity for properties within 200 m of the Project centreline is provided in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]. Due to the redaction, we are unable to comment on residential visual amenity in detail for this specific property, but can provide further comment if the location is provided.
REP1-294	Alison Mary Hayward	Land Use	In the initial non statutory consultation and the later statutory consultation I made written responses setting out my farm's needs in this regard: The provision of temporary grazing adjacent to the farm so that we do not need to reduce stock numbers. We will lose 30 acres for the duration of the occupation by the Applicant. 30 acres equates to grazing and preserved forage for 60 sheep, a third of our flock. We have found the required land on a neighbouring farm. Our neighbour is willing to let it. He is surprised and frustrated that he has not received any approach from the Applicant, to let this land to the Applicant so it can make it available to us.	The Applicant acknowledges the landowner's concerns regarding the temporary loss of approximately 30 acres of grazing land and the resulting impact on the viability of their livestock operations. The Applicant confirms that it is currently reviewing all mitigation options relating to temporary land requirements and agricultural impacts. The Applicant remains committed to working with the landowner to minimise disruption to their agricultural operations and to explore appropriate measures to maintain livestock capacity during the construction period.
REP1-294	Alison Mary Hayward	Land Use	A commitment to redrain the three fields worst affected by the works. They are relatively small fields and patching up the existing system we are advised is impracticable. The cheapest and best solution is to put in a new land drainage system upon completion of reinstatement.	As detailed in Section 5.7 of 8.2 Drainage Strategy [REP1-072], where the existing field drainage is affected by the temporary works and permanent works, the field drainage must be correctly managed with the agricultural owner or manager of the agricultural land affected. Commitments AS05 and W14 in 7.2 Outline Code of Construction Practice [Revision B] secure that replacement drainage schemes will be installed where appropriate, as advised by a specialised drainage contractor(s) who will work with landowners/tenants to determine site specific solutions.
REP1-294	Alison Mary Hayward	Alternatives	Move a proposed permanent access easement slightly West to provide a more direct line of access for the Applicant and remove the access from a field otherwise unaffected by permanent rights.	The Applicant has identified a proposed permanent right of access which provides a 'guaranteed' means of access. However normal practice, when access is required, is for the relevant operatives to liaise with the landowner to secure voluntary agreement to a specific route relevant to the specific seasonal and cropping circumstances.

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				Given this variability and flexibility the Applicant does not consider that a change is required.
REP1-244	J A Brooks Holdings Ltd	Land Use	We have been told that the area of land within our title [18/2] is to be included to act as a working buffer around the existing BT pole located on the boundary of the property, within plot 18/4. We understand that the pole (not on our property) is to be taken down and the cables to the pole run underground, all on land beyond our ownership. We have flagged to the project team that their plans do not recognise that there is now a building over much of the land within 18/2 and we have questioned whether this means that the area cannot be used as a working buffer and should therefore be removed from the Draft Order Limits. We are yet to receive a set of heads of terms but we will be seeking assurance that there is no impact on the operational use of our property, to include confirmation that there will be • No restricted access for HGVs and delivery vehicles • No disruption to 24-hour operations and workshop productivity • No compromised site security from shared or external access • No risk to on-site equipment, materials, and stored assets • No health and safety implications due to overlapping construction and workshop activity	The Applicant understands the land interest is a Category 1 landowner, located within Section C (Plot Reference C-18/2). The Applicant understands there is currently a BT pole located within a hedge row boundary that will be undergrounded as part of the wider Project works. Due to the nature of the works and to allow some flexibility, a small working width buffer has been included around the apparatus. These works will be undertaken by BT and a representative from BT will be engaging with the land interest to discuss the onsite requirements. It is the Applicant's understanding that the works will be able to be carried out without restricting the affected party's operational site.
REP1-300	Brian Knock	Land Use	The scale of land loss and restriction is significant. Approximately one third of the farm would fall within the pylon corridor, resulting in substantial disruption during construction and permanent limitations on land use thereafter. This will severely affect the onward farming of the land, as manoeuvring machinery and managing crops around large permanent structures will be considerably more difficult. The construction process itself will damage soils, crops, and existing infrastructure. Access to fields for routine crop maintenance will be restricted, leading to lost yields and revenue on a farm already operating under financial pressure. There is no clear right of way provided to access three affected fields, which further compromises their viability. As a mixed farm, this also removes the ability to grow straw for the dairy operation, directly affecting the economics of livestock production by increasing reliance on purchased feed and bedding. An additional cost which is currently not needed. The fields contain established land drainage systems. Any damage to these during construction risks rendering drainage ineffective on either side of the pylons, with long-term consequences for soil quality, crop productivity, and farm viability. There are also serious environmental and ecological concerns. The proposed route follows a known ancient deer corridor between Gipping and Thornham Woods and passes through an area supporting buzzards, red kites, and owls. In addition, several mature oak trees present since at least 1885 and historically significant	The Applicant understands the land interests are Category 1 landowners, being impacted by two proposed pylons within Section B (RG131 and RG132). These pylons have a combined sterilised area of 800 sq m (0.19 acres) which represents a small proportion of the farm. The pylons are located within the centre of the fields, thereby allowing manoeuvrability around them. The Applicant acknowledges that there will be some disruption during construction. The Applicant confirms that it is currently reviewing all mitigation options relating to temporary land requirements and agricultural impacts. The Applicant remains committed to working with the landowner to minimise disruption to their agricultural operations and to explore appropriate measures during the construction period. The Applicant's approach to soil management, temporary and enabling works, utilities diversions and the land rights required for the Project is set out within the Environmental Statement and supporting application documents, including the 7.2 Outline Code of Construction Practice [Revision B] and the 2.2 Land Plans [AS-005 to AS-012] and 4.3 Book of Reference [AS-018], which identify the nature and extent of the land and rights sought. These documents were publicly available as part of the Development Consent Order application. 7.2 Outline Code of Construction Practice [Revision B] 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 3.1 Draft Development Consent Order [APP-

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			enough to be recorded on early maps are threatened by the development.	056] prior to commencement of development. This approval will take into account comments received through Examination. Further information field/land drainage proposals and the mitigation measures that will be in place with respect to land drainage and surface water management are included within 8.2 Drainage Strategy [REP1-072]. The mitigation measures described in the strategy are secured through commitments within 7.2 Outline Code of Construction Practice [Revision B], notably W14 and AS05, which secured that once the Project has been constructed working areas will be removed and replacement drainage schemes will be installed where appropriate. The 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] has assessed impacts on a range of ecological receptors, including woodlands, trees and birds. It has also included an assessment of potential fragmentation/severance for a range of protected species and the assessment concluded no residual significant effects following the implementation of mitigation. While deer are not specifically pulled out as a key ecological receptor within the assessment as they are not classified as protected species, this assessment of no fragmentation impact would also apply. Extensive optioneering has been undertaken to follow the mitigation hierarchy and avoid woodland wherever practicable. This embedded mitigation has reduced potential impacts on species which may nest in woodlands such as buzzards, red kites and owls. The alignment has also been developed to avoid mature trees where possible, ensuring ecological effects are minimised as far as reasonably practicable. 7.4 Outline Landscape and Ecological Management Plan [Revision C] sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) as agreed with Natural England and Local Planning Authorities in the relevant Draft Statements of Common Ground [REP1-010 to REP1-034]. In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (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. To reduce loss of productive farmland, 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]. The Applicant recognises the disruption to farming operations during the construction phase. Good practice measures to mitigate disruption are set out within the 7.2 Outline Code of Construction Practice [Revision B], forming commitments AS03, AS04, and AS05.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

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				within the Order Limits. 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). All soil handling activities would be undertaken in line with the strategy, guidance and methodology detailed in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. Following these key soil mitigation measures ensures the protection of soil resources and prevention of soil damage. The trees recorded in arboricultural surveys were typical of the agricultural setting and although mature, do not meet the criteria to be considered veteran. One oak tree (ref. T304) was recorded in the 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) [APP-236] as of moderate value and is anticipated to be affected, not removed. The impact to trees indicated as affected or managed in the Arboricultural Impacts Plan (Annex D of the AIA) will be mitigated in accordance with the embedded, standard and additional measures as detailed within the 7.2 Outline Code of Construction Practice [Revision B].
REP1-300	Brian Knock	Transport and Traffic	Public access will be adversely affected. The farm contains a number of well-used public footpaths, and their closure or diversion during construction will disrupt walkers and the local community for an extended period, reducing opportunities for outdoor exercise and negatively affecting the physical health and mental wellbeing of those who rely on these routes.	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 the 7.6 Outline PRoW Management Plan [APP-329], is to maintain access along PRoWs at all times during construction, either through managed access on their existing alignment, or through provision of appropriate temporary diversions. As a result, no PRoW would be closed without a diversion in place and no severance of the overall network is anticipated. Where diversions of PRoWs are required, they have been proposed along the shortest suitable route, taking cognisance of existing land boundaries and features. Temporary PRoW diversions are expected to be largely unsurfaced, in line with existing PRoWs. In general diversions would be short term and would have negligible to minor significance of effects as the net change in distance travelled would be relatively low. For those PRoWs where a notable increase in journey distance is expected (net change in distance of over 500 m) and would occur for more than four weeks in any 12-month period, the significance of effects would be moderate or large adverse, and deemed significant. Details of this assessment are presented within Table A16.4.3 Significance of effect pedestrian, cyclist and horse-rider delay within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. The assessment of pedestrian, cyclist and horse-rider delay showed that, with the mitigation and controls set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329], in general only neutral or slight adverse effects would occur for those PRoWs that are planned to be diverted.

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				An assessment has been completed of the potential impacts of the Project on physical activity during the construction phase in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment identified that the duration of effects that may potentially affect people's ability to be physically active (e.g. closures of PRoWs) are generally short-term, with rapid reversal / diversions in place. It is noted that a relatively small minority of the population would be affected in wards along the Project route and that alternative routes and provision of recreational areas are generally available for use for the period over which effects are predicted to last. Although physical activity is a local public health priority and there is established evidence connecting the benefits of physical activity to both physical and mental health, the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures. As such, no significant effects have been identified.
REP1-300	Brian Knock	Land and Property	The financial compensation proposed does not reflect the reality of the losses incurred. A one-off payment of approximately £8,000 per pylon does not correspond to the lifetime loss of productive farmland, reduced flexibility, and ongoing operational costs imposed on the business.	The Applicant understands the land interests are Category 1 landowners, being impacted by two proposed pylons within Section B (RG131 and RG132). The Applicant understands the land is used for arable purposes. The Applicant notes the affected party's concerns that the payments currently offered do not reflect the full economic impact of granting easements, including effects on land productivity, land use restrictions, and visual and amenity considerations. 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. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are attributable to the Project, including claims relating to depreciation in value or the loss of development potential, assessed on a case-by-case basis.
REP1-300	Brian Knock	Landscape and Visual	Beyond the farm itself, the visual impact of the pylons is severe and will negatively affecting the rural landscape, local house prices, and quality of life. There are also ongoing concerns within the community regarding potential health impacts of living near high-voltage infrastructure.	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant notes the concerns raised regarding the potential effects of the Project. Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the Landscape and Visual Impct Assessment (LVIA) study area, as illustrated on 6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the

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				Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. Significant effects are identified up to a distance of approximately 1.5 km for landscape receptors, and up to a distance of approximately 2 km for visual receptors. Changes in overall property values can be due to several different local, national and global factors affecting the housing market. These are constantly changing. It is difficult to single out any one factor alone which could determine house prices. We do, however, recognise that the visual impact of any new overhead line is likely to be a significant concern for many local communities, so as mentioned we always try to avoid communities and individual properties in balance with our other duties. These include the need to be economic and efficient and keep costs down in the interest of bill-paying customers. 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 (NPS) 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 electric and magnetic fields (EMFs) and health there are no established health effects below the exposure limits. All of the infrastructure proposed as part of this project complies with the requirements of NPS EN-5 and evidence of compliance is available in the 7.8 Electric and Magnetic Field Compliance Report [APP-330].
REP1-300	Brian Knock	Transport and Traffic	The route further affects local transport, as it crosses key routes used by residents to access doctors, services, and amenities, creating additional disruption during construction.	7.3 Outline Construction Traffic Management Plan [APP-309] details the Applicant's proposals for reducing disruption from construction activities to existing users on the highway network. The construction routeing strategy is detailed in 7.3 Outline Construction Traffic Management Plan [APP-309]. Construction traffic will use the Major Road and Strategic Road Network to access the region, then route along a Primary Access Routes (PAR) to the site access points. From these site access points, traffic will be routed off the public highway along haul roads to access the construction sites. The haul road has several crossover points, where the haul road meets the public highway. Crossover points are detailed in 7.3 Outline Construction Traffic Management Plan [APP-309]. Traffic management will vary depending on the specific location. Traffic management is proposed to be managed through the Permit Schemes, managed and coordinated by the Local Highway Authorities. All traffic management is to be agreed with the Local Highway Authority, to reduce the disruption to the public where possible.

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				The Applicant has assessed driver delay and public transport delay to passengers, pedestrian, cyclist and horse-rider delay, severance, amenity and fear and intimidation in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] for all PARs. This assessment considered sensitive areas and receptors (such as schools, community centres, hospitals / doctors) and the road environment. Where required, mitigation has been provided as detailed within Section 5.9 Highway Mitigation Measures of the 7.3 Outline Construction Traffic Management Plan [APP-309]. The 7.11 Transport Assessment [APP-333] provides the assessment of the junctions along the PARs. Where required, mitigation measures have been provided to reduce any severe residual cumulative impacts as detailed within Section 5.9 Highway Mitigation Measures of the 7.3 Outline Construction Traffic Management Plan [APP-309].
REP1-300	Brian Knock	Consultation	Finally, communication around this project has been poor. Engagement has focused narrowly on seeking consent rather than transparently explaining the wider impacts, timelines, and long-term consequences for those affecting. Taken together, these issues represent a substantial and lasting negative impact on the farm, the environment, and the wider community. I respectfully ask that these concerns are given serious consideration and that alternative routing or solutions are explored.	The Applicant 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 the Planning Inspectorate in accordance with the Gunning Principles). Engagement focused on providing information on each stage of development. This has included presenting information about construction impacts, and on what infrastructure would look like once in place. At consultation, information was presented in a publicly accessible format in the Project Background Document and on the Project website. A timeline has been shared at each stage of consultation and is available on the Project website.
REP1-436	Paul Scott	Alternatives	I sadly have still not had a reason why these solar farms cannot be built around the M25. Loads of wasted land around that area with no lovely views or countryside. In fact it is very bland in this area. It would also save all the forever blot on the landscape pilons and cut costs. I still have not heard why these power cables cannot connect to the south via the railway network of cables. Already in position.	Firstly, the siting of solar farms is not within the Applicant's control and is a matter for individual solar farm developers to identify and bring forward sites for solar energy. We have responded on the suggestion regarding railway cables within the 5.1 Consultation Report [APP-066]. Whilst understanding the logic behind the idea the plain fact is that the railway operates at a lower voltage for its overhead lines and would not be capable of carrying the levels of power that might flow. The Applicant cannot take such an option forward as it does not meet the need.
REP1-301	The Brice Family	Consultation	Engagement with the Applicant, National Grid Electricity Transmission (NGET), dates back to meetings including a public event held at Witham Public Hall on 14 May 2024. During these discussions, concerns were raised regarding the solar Option Area. NGET initially indicated that no tower bases would be located within the Option Area. However, upon reviewing the submitted DCO documents, the Client has identified that Tower Base TB94 is now located squarely within that area. This represents a substantial and unexplained change, one did not communicate directly to either the Client or their appointed agent.	The Applicant continues to engage with the solar developer regards the potential to move TB94 to the west outside of the site. Through the detailed design process an opportunity to move this pylon west outside of the solar panel area has been identified. The change is within the movement allowed within the limits of deviation and is captured within a Statement of Common Ground with the developer and as such this is reflected in the addition of a new commitment in the updated 7.2 Outline Code of Construction Practice [Revision B] submitted at Deadline 2. Please see commitment reference GG34: 'a design that positions TB94 to the west outside of the footprint of consented solar panels (Parkgate Solar Farm) is to be implemented

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				subject to normal potential for change regards any unidentified factors (within Limits of Deviation).'
REP1-301	The Brice Family	Land and property	The Brice landholdings subject to the DCO comprise the following: - 1. The freehold land owned by Mr Oliver Brice held as registered title under Title EX381995 and extending to approximately 265.43 hectares, is actively managed Grade 2 farmland integral to the ongoing viability of the farming business and is unaffected by third-party development rights. 2. The land property owned freehold by ORB Projects Limited and forming part of Title AA68365, extends to approximately 31.02 hectares and is subject in its entirety to a 2025 Solar Option Agreement and draft Lease in favour of Parkgate Farm Solar Ltd. This land benefits from planning permission granted on appeal on 15 December 2023 (APP/Z1510/W/23/3325681), and construction of the solar scheme is scheduled to begin in 2026. In addition, mineral rights are owned by Hanson Aggregates (Heidelberg Materials) across both aforementioned Titles and where the estimated resource is between 7.9 and 24 million tonnes of sand and gravel. The DCO materially affects surface land above these minerals and is detrimental to any future ability to win these minerals	The Applicant acknowledges the Brice Family landholdings are owned under Title EX381995. The Applicant acknowledges that ORB Projects Limited owns Title AA68365, which is subject to an option and lease with Parkgate Farm Solar Ltd. The Applicant has been attempting to engage with the Brice family and their representatives on this matter since January 2024. 6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure assessment [APP-183] provides an assessment of existing minerals infrastructure, candidate sites and minerals safeguarded areas. This has been informed by information from Essex County Council (in whose area the landholdings are located) regarding sites that are currently being worked, and that have been put forward for allocation as part of the Review of Essex Minerals Local Plan 2014. The land described does not appear in either the current Minerals Local Plan, or as a candidate site in the review.
REP1-301	The Brice Family	Land and property	The 2025 Solar Option Agreement imposes extensive rights and obligations upon the landowner. These include exclusive rights for the solar developer to enter the land and undertake surveys, the right to take a 40-year lease, defined access rights, solar irradiation protection requirements, rights to construct cable corridors and new access roads, and various prohibitions on activities or grants of rights that may affect or interfere with the delivery of the solar scheme. These obligations also include prohibitions on granting any rights to third parties that may conflict with the solar development and restrictions preventing the landowner from undertaking activities that could interfere with the project. The DCO, in its current form, would place the landowner in immediate breach of multiple contractual obligations within the Option Agreement. The central objection arises from the positioning of Tower Base TB94 within the consented solar Option Area. This fundamentally conflicts with the consented solar development by sterilising land essential to its construction and operation. It risks rendering the solar scheme unviable, forces the landowner into breach of binding contractual obligations, contradicts national planning policy which seeks to accelerate renewable energy deployment, and directly conflicts with previous assurances from NGET that no such base would be located within this area.	The Applicant continues to engage with the solar developer regards the potential to move TB94 to the west outside of the site. Through the detailed design process an opportunity to move this pylon west outside of the solar panel area has been identified. The change is within the movement allowed within the limits of deviation and is captured within a Statement of Common Ground with the developer and as such this is reflected in the addition of a new commitment in the updated 7.2 Outline Code of Construction Practice [Revision B] submitted at Deadline 2. Please see commitment reference GG34: 'a design that positions TB94 to the west outside of the footprint of consented solar panels (Parkgate Solar Farm) is to be implemented subject to normal potential for change regards any unidentified factors (within Limits of Deviation).'
REP1-301	The Brice Family		Further objections arise from the Applicant's failure to consider existing legal and contractual commitments. The Environmental Statement and Land Plans do not assess the Option Agreement, the planned solar site layout, access corridors, cable routes, or sterilised land buffers. This omission invalidates the land rights assessment and fails to account for commitments that have legal effect. In addition, Hanson Aggregates, the mineral owner beneath AA68365, has not been consulted despite the significant potential	The Rivenhall area is subject to a variety of constraints, and the reasoning behind choice of the proposed route is covered within paragraph 6.4.116 of the 2023 Design Development Report [APP-358]; in paragraph 5.4.167 of the 2024 Report [APP-359] and paragraph 8.2.1 of the 2025 Report [APP-122]. The Applicant's position is that solar panels and overhead lines can coexist together. With regards to TB94, the Applicant has committed

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			sterilisation of mineral resources and associated financial and legal consequences. This raises concerns regarding the adequacy of the Book of Reference and the fairness of the consultation process.	in principle to relocate the pylon to an area outside of the proposed solar panel area, but within the existing Limits of Deviation. The Applicant understands Hanson Quarry Products Europe Limited are the Freehold owner of the mines and minerals under the land in question. The Applicant understands Hanson Aggregates is a related party to Hanson Quarry Products Europe Limited; however, they are not currently within the 4.3 Book of Reference [AS-018]. The Applicant welcomes a discussion with the land interest's agent, Paul Walker, to establish any further interest that should be included within the Book of Reference and to progress conversations regarding the Heads of Terms.
REP1-301	The Brice Family	Land and property	The Client also remains concerned about the absence of soil management proposals. These include a lack of methodology for soil handling, inadequate assessment of subsoil compaction risks, and no appraisal of potential drainage disruption that could significantly impact farming operations. Similar concerns arise from the Applicant's failure to provide detailed rights sought, having instead issued only generic Heads of Terms with no clarity regarding easement widths, access routes, construction requirements, enabling works or utilities diversions. This lack of detail prevents the Client from meaningfully evaluating the proposal or understanding the full implications of compulsory acquisition or temporary possession.	7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303] will be evolved and subsequently further developed into the final Soil Resource Plan (SRP) by the Main Works Contractor(s) prior to the commencement of development, taking account of, for example, detailed construction approaches and Project programme, with more site-specific soil measures and soil baseline information including soil profiles as required. 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303] (and subsequent final SRP) details good practice soil handling mitigation measures, including conditions such as soil plasticity testing, to minimise soil damage by compaction. 7.2 Outline Code of Construction Practice [Revision B] states in commitment AS05 that any land drains affected by the Project within the Order Limits would be reinstated to their former condition, where agreed with the landowner.
REP1-301	The Brice Family	Land and property	I draw the Examiners attention to the site specific reference to TB94 below, in which the Client has not been made aware of whether the Applicant can mitigate its impact on the affected land, or any explanation as to why either may be the case. Earlier engagement suggested the solar Option Area would not contain a tower base. However, following submission of the DCO, TB94 was discovered to be located inside the Option Area, contrary to what had been understood. This constitutes consultation on an incorrect basis, rendering earlier engagement ineffective. There have also been ongoing communication failures from the Applicant. NGET has repeatedly failed to engage adequately with the Client's appointed agent, resulting in fragmented communications, increased risk of misunderstanding, and an overall failure to achieve meaningful engagement. This has materially affected the Client's ability to participate effectively in the process.	The Applicant acknowledges the concerns raised regarding the pylon micro-siting and comments as follows: The Land Interest is a Category 1 and their landholding can be found on Sheet 3 and Sheet 4 of Section E. 2.2 Land Plans [AS-005 to AS-012]. The Applicant disputes the claim that early engagement was ineffective. The Applicant has considered the land interest's request to re-locate TB94. Please see comments above. The Applicant continues to engage with the solar developer regards the potential to move TB94 to the west outside of the site. Through the detailed design process an opportunity to move this pylon west outside of the solar panel area has been identified. The change is within the movement allowed within the limits of deviation and is captured within a Statement of Common Ground with the developer and as such this is reflected in the addition of a new commitment in the updated 7.2 Outline Code of Construction Practice [Revision B] submitted at Deadline 2. Please see commitment reference GG34: 'a design that positions TB94 to the west outside of the footprint of consented solar panels (Parkgate Solar Farm) is to be implemented subject to normal potential for change regards any unidentified factors (within Limits of Deviation).'

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REP1-301	The Brice Family	Land Use	The agricultural implications also remain insufficiently assessed. The farming enterprise relies on continuing access to, and use of, the land. Multi-season construction activity, soil compaction, drainage modifications, and loss of access would impose long-term impacts on agricultural productivity. These have not been appropriately considered. Site-specific impacts arise across all three land categories. The proposed development would cause access severance, construction disturbance, drainage disruption, loss of productive acreage, and operational constraints. TB94 would also obstruct the solar development, interfere with contractual access routes, overlap with cable corridors, compromise the buffer areas required under the solar consent and lease, and expose the landowner to breaches of contract.	The Land Interest is a Category 1 landowner and their landholding can be found on Sheet 3 and Sheet 4 within Section E of the 2.2 Land Plans [AS-005 to AS-012]. The Applicant acknowledges that TB94 intersects with the proposals for the Solar Farm. Disruption to 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 7.2 Outline Code of Construction Practice [Revision B]. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] notes that all land required temporarily for construction would be reinstated, to its former agricultural use / condition or a use / condition as discussed with the landowner.
REP1-485	The Executors of James Blyth	Land and Property	This is evidenced by the fact that historically, my Client owned the land south of Wick Lane which was sold to SRC and who established Crown Quarry. More recently, SRC has been promoting the land north of Wick Lane as an extension to Crown Quarry. The area is approximately 23.19 hectares and is proposed for 1 million tons of sand and gravel extraction, with processing and distribution from the adjacent Crown Quarry processing plant. Despite persistent requests to move the pylon line to the north of the Property, there has been no engagement whatsoever on this and we are now in a position where the Applicant has submitted a planning application which continues to show the proposed pylon route going through the middle of my Client's potential quarry site. We request as a matter of priority and urgency that the route of the pylons is moved as far north as possible so my client can still realise the commercial opportunity of the land north of Wick Farm.	The Applicant acknowledges the concerns raised regarding the pylon micro-siting and mineral extraction and comments as follows: The Land Interest is a Category 1 and their landholding can be found on Sheet 17 and Sheet 18 within 2.2 Land Plans - Section C [AS-007]. The Applicant has been aware that parts of the land have been subject to mineral-related interests; however, at the time the route was selected, no extant planning permission was in place for mineral extraction on the land north of Wick Lane. The Applicant acknowledges the concerns raised regarding the positioning of the pylons in relation to the potential quarry extension. The Applicant reviewed and considered the feedback from the landowner for the re-siting of TB17 and TB18. The amendments were not possible due to technical requirements and existing constraints, including an Anglian Water pipe. The Applicant will seek to arrange a meeting with the land interest to provide further feedback on this matter.
REP1-361	Glyn Cullen	Land and property	As the proposals include compulsory acquisition powers, the Secretary of State would need to accept that there is a compelling case in the public interest to justify the proposed interference with private land rights and that the public benefits associated with the proposal outweigh any private loss. There is no evidence that the public benefits clearly outweigh private losses, which include reductions in property values, impact on business operation and viability, crop losses, costs of reinstatement, professional fees, lost development potential, loss of mineral extraction, and other significant detriments all of which represents an unacceptable interference with landowners' management of and enjoyment of their own property	The Applicant has provided a summary of the compelling case in the public interest in Section 4 of this document and as also set out in the first Compulsory Acquisition Hearing – please see 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138].
REP1-433	PG Rix	Land and property	National Grid have failed to demonstrate how the public need outweighs the detrimental impacts on the affected parties.	The Applicant has provided a summary of the compelling case in the public interest in Section 4 of this document and as also set out in the first Compulsory Acquisition Hearing – please see 8.5.2 Applicant's

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			They must demonstrate how they aim to engage adequately with these parties.	Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138].
REP1-433	PG Rix	Land and property	I own and occupy land within the proposed order limits. I am directly affected by underground cables. National Grid must consider the environmental and ecological impacts and take into account the full impact on private losses.	The Applicant acknowledges this WR. An assessment of the environmental and ecological effects of the Project is set out in the Environmental Statement submitted with the application for development consent. The Applicant has provided a summary of the compelling case in the public interest in Section 4 of this document and as also set out in the first Compulsory Acquisition Hearing – please see 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138].
REP1-409	Lyn Simmons	Land & Property	I am also appalled at the lack of organisation with this project, half my neighbours have not received any correspondence at all; whilst I've had 4 letters, maps etc all saying the same thing. I have, not only sent the first amended map of my property back I also completed it online. The further 3 maps I have received have not been updated to reflect my amendment (it showed my neighbours garden as being mine). They then sent 2 gentleman to knock on my door who asked the same questions. The neighbour whose garden was showing as mine has never had any correspondence. How many other people are completely unaware? I've asked about pylon height for my area but have had no reply. I'm pleased to see that the board has asked for this information to be supplied but do wonder why this wasn't included in the original application.	The Applicant acknowledges the concerns raised regarding communication and the accuracy of land interest information and responds as follows. The Applicant understands the Land Interest is within the 4.3 Book of Reference [AS-018] as a Category 3 landowner. The land interest's ownership therefore falls outside of the main Order Limits. 5.1 Consultation Report - Appendix J: Land referencing methodology [APP-076] summarises the methodology applied. The Applicant will re-visit internal records in respect of historic documents sent to the land interest and seek to update any internal records in response to the author's feedback, where appropriate. In the event the Applicant identifies information suggesting a change in land ownership/ land interests, the Applicant will communicate with the relevant parties, as required. The Applicant understands the land interest is located on Sheet 1 of the 2.2 Land Plans [AS-005 to AS-012]. The nearest pylons to where the land interest lives are RG7 (54.8 m) and RG8 (54.5 m).
REP1-198	Alcemi Storage Developments	Land and property	Alcemi Position on the Proposals for Compulsory Acquisition of Land and Rights impacting on the Alcemi Option Without an agreed position being reached with NGET, the plots which would impact on the Alcemi Option, and therefore the Brunfort BESS, are: Class 1 Compulsory Acquisition of Land (Brown): 20/218 Class 2 Compulsory Acquisition of Rights – Overhead Line (OHL) (Green): 20/231, 20/240, 20/254, 20/261, 20/262, 20/263, 20/264, 20/268, 21/94 Class 3 Compulsory Acquisition of Rights – Underground Cable (UGC) (Orange): 20/241, 20/251, 20/270 Class 4 Compulsory Acquisition of Rights – OHL / UGC (Grey):	The Applicant notes the impact of the Project on Alcemi and for the proposed Brunfort BESS and is seeking to minimise these as far as possible. The parties are continuing discussions with the intention that a legal agreement will be reached to secure a range of matters that include principles relating to the siting of apparatus and the ongoing cooperation of the parties. A revised draft of the previously circulated legal agreement will be provided to Alcemi in due course, and the Applicant is hopeful that the final legal agreement will resolve each of the points raised in Alcemi's written representation.

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			20/269 (part only) Class 5 Compulsory Acquisition of Rights – Access (Blue): 20/224, 20/248, 21/100 Class 6 Compulsory Acquisition of Rights – Drainage (Purple): 20/255, 20/271 Class 9 Temporary Use (Yellow): 20/219, 20/255, 20/238, 20/245, 20/265, 20/266 It should be noted that minor updates have been made to the above list to that provided in Alcemi's relevant representation. In terms of the compulsory acquisition of land, Alcemi are still seeking to understand from NGET what the intention is for the permanent acquisition of plot 20/218 which overlaps with the Brunfort BESS redline area. In terms of the compulsory acquisition of rights, Alcemi require confirmation that these rights, once exercised by NGET, will sit alongside existing rights in the land and will not sterilise those areas from future development. In particular, Alcemi are looking for assurances that the acquisition of the intended rights will not impede the exercise of the Alcemi Option, nor prevent the delivery of the Brunfort BESS. This is particularly important for rights in relation to OHL or UGC, where Alcemi intend to install infrastructure below or above NGET's infrastructure (e.g. plots 20/240 and 20/268, among others). As noted previously, details of the Alcemi Option Land are not included in the Book of Reference, and it is therefore understood that there is no intention to extinguish any of the rights which the Alcemi Option secures. Godbold / Thornbush Energy Limited Position As mentioned above, Alcemi currently hold an Option for Lease, dated 18 March 2025 with Thornbush Energy Limited, over land around the existing National Grid Bramford substation for the delivery of the Brunfort BESS. They are not involved in the separate representations being made on behalf of the Thornbush Energy Limited (and on behalf of the Godbold family for the wider landholdings around Bramford substation) Alcemi's interests are separate from those of the owners, and are concerned with the ability to deliver the Brunfort BESS and the preservation of their Option, alongside seeking a voluntary agreement (via the Interface Position Statement and draft Deed of Undertaking) with NGET to ensure they retain all of the rights required for the Brunfort BESS and the ability to collaborate on their respective proposals. Alcemi Position on wider Proposals for Compulsory Acquisition of Land and Rights Separate to the Alcemi Option Land (all plots on Land Plan Sheet 20), Alcemi are noted in the Book of Reference as category 2 and 3 persons for the following plots – B21/1, B-21/7, B-21/25, B-21/31, B21/47, B-21/58 (all plots on Land Plan Sheet 21).	

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			Whilst B21/1 is marked as 'Class 9 Temporary Use' (Yellow), the remaining plots are within the Bullen Lane access road and all marked as 'Class 1 Compulsory Acquisition of Land'. All of these plots are shown as owned by R Jackson (East Anglia) Limited and covered by Unilateral Notice to take a lease as contained in an Option Agreement to Alcemi dated 28 March 2024. These plots are all noted as easements / other private rights proposed to be extinguished, suspended or interfered with. Alcemi are looking to NGET to provide detail on how their own rights of access along this road will be preserved and to cover this in the proposed Deed of Undertaking.	
REP1-238	Fieldfisher LLP submission on behalf of British Pipeline Agency Limited as agents for United Kingdom Oil Pipelines Limited	N/A		The Applicant has reviewed the WR from the BPA, which does not raise any materially new points compared to its Relevant Representation, to which the Applicant responded in detail in Appendix G of 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] and is therefore not replicated here. In that document, the Applicant also set out a substantial update on engagement with BPA and the related DCO change application.
REP1-223	Cullum Agri Ltd.	Land and Property	During the meeting, we discussed several elements of the scheme. To properly understand the implications of the scheme and its long term impact on the agricultural holding, our client requires detailed and specific technical information. This includes, but is not limited to: Soil Storage, Handling, Reinstatement and Aftercare Field Drainage Strategy and Reinstatement Location, Design and Restoration of Haul Roads Access arrangements agreed with the landowner Attenuation Ponds and Water Infrastructure Flood Risk and Water Management Water mitigation measures Dust, Noise and Crop Quality Noise management Measures to protect crop quality and farm operations Access routes to Order Limits Restrictive Rights and Operational Constraints Full clarity on permanent rights and easements Assurance that they do not impose unnecessary constraints on cultivation depth, drainage, future cropping or land use Furthermore our client needs to understand the mitigation measures: To reduce loss of productive land To manage operational inefficiencies For both short and long term disruption	The Applicant has acknowledged all of the points raised at the meeting with the affected party and has confirmed that further information on many of the points raised can be found and addressed through the 7.2 Outline Code of Construction Practice [Revision B] The Applicant has also confirmed that matters such as reinstatement, drainage, soil management and permeant location of apparatus will develop as the Project progresses through detailed design. The Applicant will continue to engage with the affected party to address all points raised to reassure the affected party

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REP1-473	Stephen Andrew Baker	N/A	N/A	This document was labelled as an WR on the Planning Inspectorate's website at Deadline 1 but is in fact a request for site visit locations and to speak at future hearings. It is therefore responded to via 8.4.5 Applicant's Draft Itinerary for Accompanied Site Inspection [Revision A].
REP1-200	ARU Writtle	N/A	N/A	The Applicant acknowledges the matters raised in the Written Representation and appreciates the detailed submissions provided in support of those points. Attention is given to the sensitivity of the Equine Facility, which operates within a further and higher education environment. The Applicant recognises the issues highlighted regarding safeguarding obligations, health and safety, equine welfare, construction access arrangements, and the interaction between the Proposed Development and the ongoing use of the site. The Applicant confirms that the concerns outlined in the Written Representation, as well as those discussed during the site meeting held on 4 March 2026, are under active review. Further work is being undertaken to examine the detailed points raised, including matters relating to construction methodology, access arrangements, and the development of appropriate mitigation and management measures. Where appropriate, a more detailed and substantive response will be provided in a subsequent submission during the Examination process. The Applicant remains confident that all of Anglia Ruskin University's (ARU) concerns can be addressed through ongoing engagement. This includes fostering a better understanding of the Applicant's requirements during construction and future maintenance and agreeing suitable mitigation measures. The Applicant is committed to working collaboratively to ensure that any adverse impacts are effectively managed. The Applicant also confirms its ongoing commitment to continued engagement with ARU and its representatives. This will involve discussions to deepen understanding of operational requirements and to explore proportionate and appropriate measures to manage effects during both the construction and operational phases of the Project. Engagement efforts will continue alongside the Examination process, informing the Applicant's responses and, where relevant the refinement of mitigation and management proposals. To progress these matters constructively, the Applicant will shortly contact ARU's appointed representatives to provide further feedback and to arrange a further meeting.
REP1-312	Charlie Warburton	Land and property	The DCO, if confirmed, will confer significant powers to compulsorily acquire land and create new rights which will permanently affect landowners' property rights. However, no discretionary compensation scheme has been proposed. Without such a discretionary purchase scheme, affected landowners (within the Scheme Order limits) have no mechanism to recover losses beyond the statutory minimum. This is particularly significant where statutory compensation fails to capture the full extent of private losses, including reductions in land value, loss of future development opportunities, or business impacts.	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. 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.

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REP1-312	Charlie Warburton	Consultation	The consultation was inadequate and fails the Gunning Principles; alternative routes and undergrounding were, or have been, were not presented for consideration and appear to have been prematurely dismissed. Consultation with communities and statutory bodies has been poor and incomplete. Landowners were repeatedly invited to provide feedback during consultation periods without then receiving responses to their feedback.	This Project comprises a proposed overhead line connection over 2 km in length, above 132 kV and is therefore classified as a Nationally Significant Infrastructure Project (NSIP). The Project would therefore require consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into Examination having regard to the adequacy of pre-application consultation. A detailed response with regard to our application of the Gunning Principles can be found in 5.1 Consultation Report - Appendix N: Legal Opinions [APP-080].
REP1-356	Gillian Ann Whittle	Land and Property	My husband and I live in a Grade 2 listed property on the outskirts of Ardleigh. National Grid has referred to our property in its Volume 6 Environmental Statement, 14.7 Operational Noise Assessment, p9 of 22. In this it refers to our home as “the worse affected receptor.” My husband and I live in a Grade 2 listed building on the boundary of the parish of Ardleigh. What would happen to our home if National Grid were allowed to start building these substations so close to our house? Parts of our house do not have foundations as was characteristic of houses built in the 16th century. At best the house will be in danger of severe large cracks and at worst it will be in danger of falling down. What compensation will we be offered for this callous disregard of our home? We met with a representative from National Grid and one from Fisher German, together with our agent, on 19th June 2024. We asked them to confirm the distance from the edge of our property to the edge of National Grid’s proposed site, across a narrow country lane. They confirmed the distance of 10 metres, as indicated by the tape measure. To this date, 20 months later, we have heard nothing. National Grid has failed to consult and communicate. National Grid is also clearly unable to recognise a small distance of 10 metres!	Operational noise from the proposed substation, is assessed in Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259]. The assessment also includes consideration of the cumulative effects of the proposed North Falls and Five Estuaries substations. The reference to ‘the worst affected receptor’ is in relation to presenting a worst-case assessment in the ES, rather than presenting individual assessments for all properties where the impact is lower. However, it is accepted that this wording could be better. The assessment concludes that the impact of operational noise is not significant at this property. Construction noise and vibration, is assessed in 6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]. Construction noise and vibration would be managed via commitments in 7.2 Outline Code of Construction Practice [Revision B] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. These measures ensure that best practicable means (BPM) would be implemented by the Main Works Contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments will be undertaken by the contractor based on their specific methodologies and works locations. Specific mitigation measures would be identified during these assessments and incorporated in the final NVMP. Potential building damage due to vibration, is assessed as part of the construction vibration assessment to identify locations with potential risk. Mitigation measures in 7.2 Outline Code of Construction Practice [Revision B] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. ensure that this is reassessed by the Main Works Contractor(s), and suitable mitigation measures and monitoring are put in place should a risk of potential damage be identified. Where a person’s land is not acquired and no land rights are taken, but they consider that their property may be adversely affected by the construction or operation of the Project, they may fall within what is commonly referred to as a Category 3 (Cat 3) claim interest. A relevant claim may arise where physical factors attributable to the Project such as noise, vibration, lighting or other measurable effects

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				can be demonstrated to have caused a compensable loss. Claims based solely on generalised blight, perceived loss of value, or concern about proximity to the Project are not compensable under the statutory framework. The Applicant cannot confirm in advance whether a person will be entitled to make a Category 3 claim, nor whether any claim would result in compensation. All claims are assessed on a case by case basis, having regard to the specific circumstances and the statutory tests that apply. The Applicant believes the reference to 10 metres references to feedback provided at part of the 2025 targeted consultation on Essex 2. The feedback provided was responded to within 5.1 Consultation Report [APP-066] submitted as part of the DCO application.
REP1-325	David Andrew Chapman	Cumulative impacts	I object to National Grid's proposed pylon overhead electricity transmission line alignment through the Chelmer Valley at Little Waltham and Great Waltham between pylon TB138 at Chatham Hall Lane and pylon TB147 south of Partridge Green Farm ('Chelmer Valley Crossing'), because the significant cumulative permanent negative effects at this location make the project impossible to deliver in accordance with policy.	The Applicant is guided by National Planning Policy and in this area which is not subject to a National Landscape Designation the relevant test is set out in NPS EN-5 (2024) at paragraph 2.9.23. Informing this a Landscape and Visual Impact Assessment (LVIA), included in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], has been undertaken which assesses the likely significant landscape and visual effects from the Project. Whilst this assessment concludes that the introduction of an overhead line would give rise to significant adverse effects (in environmental impact terms), the Applicant does not consider the Project at the Chelmer Valley / Little Waltham / Great Waltham would meet the thresholds established by paragraphs 2.9.14 and 2.9.23 of Policy EN-5 (2024). The assessment has not identified a high potential for widespread and significant adverse effects. The Project has also assessed the potential impact on designated and non-designated heritage assets in accordance with 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 [AS-068], 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. On this basis the Applicant remains settled on its preference for the Project as submitted (and amended at Deadline 1 by the change from three low height pylons to two standard pylons to the south of the River Chelmer).
REP1-325	David Andrew Chapman	Alternatives	The choice of this location for an overhead transmission line is worthy of close examination since National Grid's Preliminary Environmental Information Report, April 2024 identified Section F (which includes the Chelmer Valley Crossing) as the only location along the Project route where the potential negative residual effects from construction, operation and maintenance are likely to be significant on the landscape, and the visual and historic environment, in particular:	The Project has been carefully designed with sensitive routeing and siting to avoid and minimise impacts on heritage assets and their rural setting in Section F. During both construction and operation phases, the settings of designated heritage assets such as the Great and Little Waltham Conservation Areas, the Registered Park and Garden at Langleys, the Scheduled Monument at Little Waltham, and associated listed buildings, have been thoroughly assessed. This has been carried out in accordance with the methodology set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 6.19 Scoping

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			a. 70 permanent negative effects - by far the most of any of the eight Sections comprising the Project route b. 16 of those 70 permanent negative effects will be significant which is the second greatest number of permanent significant negative effects of any of the eight Sections comprising the Project route c. The Conservation Areas at Great Waltham and Little Waltham will be the only Conservation Areas to be permanently negatively impacted by the Project d. The Registered Park and Garden at Langleys, Great Waltham will be the only Registered Park and Garden to be permanently negatively impacted by the Project e. The Scheduled Monument at Little Waltham will be one of just five Scheduled Monuments to suffer temporary negative effects during the construction stage – likely permanent because pylon TB140 has since been relocated closer to the Scheduled Monument and within the estimated boundaries of the Pre-Belgic Iron Age Settlement f. Grade 1 Listed Langleys House at Great Waltham is the closest Grade 1 domestic Listed building to the transmission line g. Great Waltham is the only location where two Grade 1 Listed buildings (Langleys House and the Church of SS Mary and Lawrence) are situated within 1 km of the pylon line	Report [APP-288 - APP-296] and 6.20 Scoping Opinion [APP-297], and in line with professional guidance, including 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)'. The Applicant recognises that Section F is particularly sensitive, and that a number of permanent adverse effects (some of which are significant) are predicted for the historic environment in this area. This includes the potential for less than substantial harm to designated heritage assets. However, the assessment has not identified any instances of substantial harm to designated heritage assets, and the assessment conclusions reflect the unavoidable impacts of nationally significant linear infrastructure in a complex historic environment. Paragraph 7.2.57 of 5.6 Planning Statement [APP-085] addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, 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 National Policy Statements (NPSs). Given that 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction 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 critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP Infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. For comments relating to landscape and visual matters please refer to the comment given in REP1-325 Cumulative above.
REP1-325	David Andrew Chapman	Historic Environment	National Grid treat the narrow valley landscape and flood plain of the River Chelmer between the villages of Great Waltham and Little Waltham as a pathway opportunity to avoid a route through more open country to the north and west of Great Waltham without regard to the fact that this location forms part of one historic environment encompassing both villages which trace their shared lineage to the	The Project has been carefully designed with sensitive routeing and siting to avoid and minimise impacts on heritage assets and their rural setting. 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

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			Pre-Belgic Iron Age settlement here. The valley is a vitally important matrix for the historic, cultural and social identity of the Walthams.	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. 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.
REP1-325	David Andrew Chapman	Historic Environment	Whilst simultaneously destroying both the shared historic setting and the sense of shared community the proposed development also manages to undermine the separate parish identities of Great Waltham and Little Waltham which are linked to the open landscape at this location, the importance of which is highlighted by the Great Waltham Village Design Statement produced and endorsed by residents and published in 2002 with the support of Great Waltham Parish Council and Chelmsford Borough Council which states: “It is considered essential that the parish retain its separate identity, notably that the “Strategic Gap” of land between Great Waltham, Broomfield and Little Waltham is retained and not developed.”	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 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. 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. 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 critical national priority presumption in favour of the Project applies to the planning balance and outweighs such residual effects.
REP1-325	David Andrew Chapman		National Grid made a number of alterations to relocate the transmission line slightly further away from Langleys House, gardens, woodland and deer park, reducing the number of pylons between Chatham Hall Lane and Chelmsford Road from three to two and changing their pylon style to the lower bulkier lattice type. This attempted amelioration created even more detriment:	a/ Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment including scheduled monuments. During the construction phase, this asset is assessed to experience a temporary minor adverse significance of effect, and during operation phase, a permanent minor adverse significance of effect (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment

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			a. Pylon TB140 was relocated to Flood Zone 3 and within the estimated limit of the PreBelgic Iron Age Settlement marked by the Scheduled Monument; b. the number of pylons running parallel to Larks Lane (a designated Protected Lane) was increased from two to three (TB141, TB142 and TB143) significantly reducing the distance between pylons and increasing their domination of the Protected Lane; c. lower bulkier lattice pylon TB141 was relocated immediately adjacent to The Windmill, Chelmsford Road within Great Waltham Conservation Area destroying the amenity of that dwelling and making a mockery of the Conservation Area designation; 3 2026.02.25 Representations of F d. The Windmill is a non-designated heritage dwelling, for more than two hundred years The Windmill Inn, sitting high on the southern slope of the Chelmer Valley along the historic coaching route from Chelmsford to Cambridge and a prominent feature in the landscape and focal point for views from the north across the Chelmer Valley, highly visible for users of the B1008 (Braintree Road and Blasford Hill) as well as Chelmsford Road. This signature feature in the rural landscape will now be replaced by a bulky pylon. e. pylon TB141, was relocated to the Chelmsford Road entrance to Great Waltham village close to the Village Welcome sign and will become the defining threshold feature for visitors instead of The Windmill.	Assessment Tables [APP-070]). For both phases, the asset is assessed to undergo a Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage [APP-215]). 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 Overall, The Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on designated assets, including changes to their setting. b/ Potential physical impacts to Larks Lane (6604) are assessed in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-070], which concluded a minor adverse significance of effect during construction and a neutral significance of effect during operation. 7.4 Outline Landscape and Ecological Management Plan [Revision C] includes measures to retain and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of 7.2 Outline Code of Construction Practice [Revision B]. c/ Windmill House is located in Great Waltham conservation area (CA55). This building is not identified as a non-designated heritage asset in any of the sources on the list of agreed sources as noted in 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297], 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]; therefore it has not been considered individually in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] or 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. For more details regarding this please refer to the Local Impact Report response to Chelmsford City Council paragraphs 8.209 – 8.210. The Applicant has reviewed this building and concludes it would be of low value. . Regarding Great Waltham conservation area, during construction phase this is assessed to experience a temporary minor adverse significance of effect, and during operation phase, a direct, permanent minor adverse significance of effect (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables - Clean Version [APP-070]). For both phases, the asset is assessed to undergo a Lower Less Than Substantial Harm (6.11.A7

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				Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). 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. d/ The Windmill Inn is adjacent to the non-designated heritage asset roundhouse of a post mill (6147). This asset has been assessed low value and will not experience any physical impact from the Project. All non-designated heritage assets were assessed to determine their value in accordance with 6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297] and the methodology set out in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. National Policy Statement (NPS) 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 NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets. e/ The Applicant as per the Design Scenarios Table as per 8.6.1 Deadline 1 Cover [REP1-140] has confirmed a decision to progress with Scenario B only in this location, with standard height pylons (not low height pylons) proposed to the south of the River Chelmer. In making this change one of the low height pylons can be removed and the pylon proposed closest to Chelmsford Road (TB141) can be moved approximately 70 m further west away from the road (subject detailed design and limits of deviation).
REP1-325	David Andrew Chapman	Alternatives	The sheer number and concentration of designated and heritage assets at the Chelmer Valley Crossing, its historic environment and rural setting make it a remarkable choice for a transmission line of bulky lattice pylons where alternatives are available in line with	For comments relating to landscape and visual matters please refer to the response given in REP1-325 Cumulative above. This sets out that whilst the ES reports major significant adverse effects within 0.5 km of the Project, widespread significant landscape and visual effects are not anticipated at this location.

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			policy. National Grid has failed to properly investigate, cost and evaluate: a. An alternative route avoiding the Chelmer Valley at the Walthams. National Grid glanced at the possibility of a route north and west of Great Waltham but wrongly dismissed it as contrary to policy because the route is slightly longer notwithstanding it would involve far fewer negative effects and avoid the significant cumulative negative effects at the Chelmer Valley Crossing thereby fully complying with Holford Rule 2, National Policy Statement EN-5 para 2.9.14 and the Electricity Act s9; b. undergrounding at the Chelmer Valley Crossing in accordance with National Policy Statement EN-5 para 2.9.14; c. alternatives to lattice pylon designs.	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 critical national priority presumption in favour of the Project applies to the planning balance and outweighs such residual effects.
REP1-325	David Andrew Chapman	Alternatives	The transmission line crosses both principal vehicular routes from Great Waltham to Chelmsford at Chelmsford Road to the east and at Chignal Road to the south west. It also crosses the rural footpath to Broomfield Hospital. Going north to Braintree the transmission line also crosses the A131. I and other residents of Great Waltham will be well and truly barricaded. The pylons will be an ever-visible presence from my house in the village and Great Waltham Conservation Area, as well as neighbouring fields, footpaths and lanes. The rural character of the area and the wellbeing of residents will be irreparably harmed by this development	The Applicant notes the concerns raised regarding the location of the Project in relation to vehicular routes and footpaths and acknowledges that significant landscape and visual effects have been reported in the area. Effects on visual receptors, which include people using the road and footpath network, are assessed as part of the landscape and visual assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] For further information relating to landscape and visual matters, including effects on visual receptors moving in and around the area, please refer to the response given in REP1-325 Cumulative above. An assessment of effects on residential visual amenity for properties within 200m of the Project centreline is provided in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]. Due to the redaction, we are unable to comment on residential visual amenity in detail for the specific property mentioned but can provide further comment if the location is provided.
REP1-292	Alexandra Macadam	Historic Environment	[The Applicant has] not even marked on their heritage route map one of the most important heritage sites in the UK, Little Wenham Castle plus 7 associated listed buildings, which will be affected by the Norwich to Tilbury line. The cluster includes a scheduled monument, the Castle, a Grade 1 Listed Church, a Grade 2 star tithe barn, and 5 Grade 2 buildings or monuments. These buildings are also wrongly classified by National Grid in their Additional Submissions AS068/083, which omits the Grade 2 star tithe barn completely.	The cluster of designated assets at Little Wenham has been assessed in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. Amongst the designated assets of this cluster, only the setting of Wenham Castle scheduled monument (1003759) and Little Wenham Castle listed building (1003759) has been considered to extend to the Order Limits. According to the methodology explained within 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], assets where settings do not extend to the Order Limits, are not included in the assessment in this chapter, as there would be no potential for effects resulting from the Project. The Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on these designated assets, including changes to their setting.

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REP1-292	Alexandra Macadam	Historic Environment	It is important to note the setting because National Grid have assessed individual buildings without realising that what makes Little Wenham unique is the combination of important buildings, 3 of which are high value, led by the Castle which is a building in regular use.	The Applicant has assessed the cluster of Little Wenham as a group and has determined that the setting of these designated assets makes a considerable contribution to their value. The baseline (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]) is organised by periods, this is why the Scheduled monument (1003759), the castle (1003759) and the church (1033410) are assessed within the medieval period, while the other assets are assessed within the post-medieval one. The Applicant is confident that the assessment is robust and proportionate, and that the methodology which has been discussed with Historic England and relevant Local Planning Authorities heritage advisors, has given appropriate weight to the potential impacts of the Project on these designated assets.
REP1-292	Alexandra Macadam	Good Design	The 2025 consultation route has moved the line from the 2023 consultation route to 0.9 mile from Little Wenham Castle but the Suffolk farm land is very flat and National Grid have ignored the Holford and Horlock Rules so the Castle still has a view to the north and north west of pylons including the J 27 angle tower and the J 35 cable sealing end.	Neither the Applicant or the Holford or Horlock Rules define a set distance from designated features as the basis to define the extent of separation from the Project infrastructure. The approach adopted responds to the specific circumstances of each location and is therefore guided by the nature of the feature, existing screening by landform or vegetation rather than a predefined standard. The alignment is at around 1.4 km distance from the buildings identified at Little Wenham and given intervening screening from various woodland and buildings, we do not consider the visual impact or effects on heritage to be at a level that requires further mitigation in order to be consistent with the Holford Rules and relevant policy. On this basis no change is proposed. We have completed a Landscape and Visual Impact Assessment (LVIA) which includes an assessment of impacts at Little Wenham. The LVIA is presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].
REP1-292	Alexandra Macadam	Alternatives	We have submitted through Savills land agents, an alternative line from J 35 northward which recognises the Holford rules, uses Brimlin Wood to mitigate the effect and does away with the angle tower at J 27 by straightening the line.	The Applicant has considered a wide range of alternatives for routeing in this location including routeing to the north of Brimlin Wood but starts by establishing if there is a policy-based imperative for a change. With the pylon separation having been previously increased to around 1.4 km it is not considered that any remaining effects on the heritage assets around Little Wenham justify the transfer of effects to other receptors. In particular routeing to the north of Brimlin Woods would move the alignment to require routeing between for example Charit Farm and The Birches where there is around a 150 m gap between properties, additionally the alignment would instead be angled to the north of the wood instead of the south of the wood, thus wouldn't be a straight line into the proposed cable sealing end compound. The Applicant's position remains therefore unchanged on this matter.
REP1-292	Alexandra Macadam	Historic Environment	The current proposed pylon line will be harmful to every one of the historic buildings: 5 pylons can be seen from the towers of the church and castle ramparts and 2-3 pylons visible across the mail footpath near the church. The undeveloped nature of the farmland within a secluded, rural setting, contributes to the significance of the hamlet. Archaeological surveys identified in the area of the proposed CSE span a range of Romano British periods.	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment. In 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068], it has been assessed that, with the exception of Wenham Castle Scheduled Monument (1003759) and Little Wenham Castle Listed Building (1003759), the setting of the listed buildings within this hamlet does not extend to the Order Limits; therefore, no effects on their setting from the Project are anticipated.

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				During construction phase, Wenham Castle Scheduled Monument (1003759) and Little Wenham Castle Listed Building (1003759) are assessed to experience a temporary minor adverse significance of effect, and during operation phase, a permanent minor adverse significance of effect (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-070]). For both phases, the two assets are assessed to undergo a Lower Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). 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. Also, the Applicant fully recognises the importance of safeguarding archaeological remains, and our approach is aligned with this principle. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for a range of evaluation and mitigation strategies, including preservation in situ, should highly significant remains be identified. 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- Overview (Final Issue A), 5.9.1-5.9.12 and 5.914) [APP-088 to APP-100 and APP-102]. Overall, the Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on the historic environment. The Applicant is also committed to ensuring that all necessary mitigation measures in this area will be appropriate and effective, informed by ongoing assessment and in consultation with Historic England and relevant Local Planning Authorities heritage advisors. This will ensure the protection and recording of archaeological remains throughout the Project.
REP1-314	Christopher Brook	Landscape and visual	Loss of privacy and impact on private family space The proposals indicate construction activity, infrastructure works, and associated access and operational areas in close. Our private garden, which is currently secluded and integral to the character of the house, is likely to become overlooked by construction activity, plant, workers, and potentially elevated infrastructure.	An assessment of effects on residential visual amenity for properties within 200m of the Project centreline is provided in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 & APP-234]. Due to the redaction, we are unable to comment on residential visual amenity in detail for this specific property but can provide further comment if the location is provided.

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			In addition, a private swimming pool sits within the area likely to experience visual and noise effects from the works. This space is used regularly by our family and is designed to provide privacy and tranquillity. The prospect of prolonged construction presence, overlooking, noise, lighting, and movement fundamentally changes how this space can be used. The planning documentation tends to treat visual effects as temporary or moderate changes. In practice, the introduction of industrial activity into what is currently a quiet and private domestic setting represents a profound change to family life and enjoyment of the property.	
REP1-314	Christopher Brook	Noise and Vibration	Construction impacts on a Grade II* listed home As a historic structure, the barn is inherently sensitive. Construction activities associated with pylons, haul routes, heavy vehicles, and ground works raise concerns regarding vibration, dust, and prolonged disturbance. The project documentation contains extensive numerical assessment and modelling. However, averages and thresholds inevitably dilute the experience of those closest to the works. The impacts may be small statistically, but they are unavoidably large when you are the statistic.	Potential building and heritage asset damage due to vibration, is assessed as part of the construction vibration assessment in 6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256] which identifies locations with potential risk. Mitigation measures in 7.2 Outline Code of Construction Practice [Revision B] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306] ensure that this is reassessed by the Main Works Contractor(s), and suitable mitigation measures and monitoring are put in place should a risk of potential damage be identified. The Applicant will be happy to provide more detailed information regarding the historic environment assessment once the details about the Grade II* listed building are provided.
REP1-482	Terrence Nichols	Land and Property	As currently proposed, the overhead lines connected to pylon TB224 will run directly across my garden. This will significantly affect not only the enjoyment and use of my property, but also its value and overall environment. The visual intrusion and proximity of such infrastructure to a residential space is deeply concerning. What I am requesting is both reasonable and minimal: that pylon TB224 is repositioned approximately 10 metres along, so that the lines pass over the adjacent lay-by rather than across my garden, and continue to connect to pylon TB225 from there.	The Applicant responded to this request in 5.1 Consultation Report [APP-066] Ref no. 9-8.115 ‘Routeing in this location is constrained by numerous features as well as homes. The presence of a gas pipeline provides some limitation as do other residential properties and the presence of areas of woodland, which include some areas classified as ancient woodland. Having identified the residential occupancy of a previously commercial use building, we have repositioned the overhead line as far west as possible (moving it west by 25 m) but without requiring removal of trees or compromising gas pipeline integrity. Pylon positioning previously positioned the property at approximately mid-span and no change is therefore proposed.’ The Applicant’s position remains unchanged on this matter with an entry noted in the COCP as GG34 in APP-300.
REP1-403	Laura Austin	Alternatives	I would like to understand: a. The business case which supports the contention that the pylon must be situated 47m from my rear boundary when there is a vast area to the rear and the side where the pylon could be placed thus less visible and interfering with the enjoyment of my land. b. What consideration has been given to alternative sites in pursuance of a) above. c. The business case for the vehicle yrs m being sited so close to my boundary.	The Applicant considered various alignment and technology alternatives around Ardleigh, details of which can be found in 5.15 Design Development Report [APP-122] paragraphs 6.5.22 to 6.5.47. Additionally, site specific responses to previous feedback can be found in 5.1 Consultation Report [APP-066] notably Ref No.s 9-5.196, 9-5.318, 9-5.349 and 9-5.394. In summary with regards specifically to the position of pylon TB13 located south of the property identified, the overhead line positioning is restricted to the existing gap between properties along Dedham Road. This combined with other residential properties, the reservoir and water pipelines has restricted the

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			d. The alternatives to c) above bearing in mind the noise and the disruption that would inevitably be caused to my land, being mindful that I house a dog, 3 cats and numerous chickens. e. Have NG considered that the movement of HGVs in such close proximity may cause subsidence, are they going to pay for a surveyor to check the risk of this in advance of said works, otherwise do they undertake to accept liability and remunerate us in full for any negligence and damage arising as a consequence of the proposed works.	position of pylon TB13 without transferring effects elsewhere. Alternatives were considered to avoid oversail of the reservoir which in turn would slightly alter the position of TB13 but this could only be achieved by a series of five angle pylons (including at TB13) and an additional pylon. On balance, the Applicant considers that maintaining a straighter alignment with fewer angles is more consistent with the Holford Rules. e) The Applicant has developed a construction routeing strategy detailed in 7.3 Outline Construction Traffic Management Plan [APP-309], which sets out how construction vehicles will use Primary Access Routes (PARs) to connect to Site Access Points (SAPs) from the Strategic and Major Road Network. There is no proposed PAR on Dedham Road, there is a crossing point. The crossing point enables HGVs to continue along the off-line haul road, which serves TB13. Construction noise and vibration is assessed in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. Construction noise and vibration would be managed via commitments in 7.2 Outline Code of Construction Practice [Revision B] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. These measures ensure that best practicable means (BPM) would be implemented by the Main Works Contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments would be undertaken by the Main Works Contractor(s) based on their specific methodologies. Specific mitigation measures would be identified during these assessments and incorporated in the final Noise and Vibration Management Plan. With regards to this specific property, it has been identified as a construction noise and vibration 'hot-spot' where specific mitigation measures would be implemented to avoid potential significant adverse effects.
REP1-323, REP1-471	Daniel Bickford, Stephanie Bickford	Transport and traffic	This submission focuses specifically on the proposed temporary construction compound, Plot G-4/53, located along the A129 adjacent to our home at [redacted], and the surrounding road layout. We object to the siting of the proposed compound at its currently identified location at Plot G-4/53 on the following grounds: • Highway safety risks • Unsuitable and constrained road layout • Proximity to residential properties • Proximity to sensitive receptors and households with protected characteristics • Significant level differences and topographical constraints • Lack of clarity regarding the compound's exact use • Absence of evidence demonstrating that this location is necessary • Potential for unacceptable hours of operation (including 24-hour working) Road Layout and Highway Safety The proposed compound is located along the A129 immediately alongside our home, garden, and garden room (which sits along the side/rear boundary of our property). Our property sits within a looped road configuration: • The A129 runs along our side and rear boundaries. • A narrow rural lane runs along the front of our property. This lane was not designed to	The Applicant notes the respondent's concerns with respect to the proposed usage of Plot G-4/53, which is shown in 2.2 Land Plans – Section G [APP-015]. However, the Applicant emphasises that the Project does not include any proposals for a compound in this location, and on this basis considers that the impacts suggested by the respondent are not consistent with the Applicant's proposals. Section 4.8 of 6.4 Environmental Statement Chapter 4 – Project Description [APP-130] provides information relating to the proposed approach to compounds for the construction of the Project, and locations of these are shown in 6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [APP-133]. The Applicant seeks to further clarify that the proposed usage of Plot G-4/53 relates to the nearby proposed Site Access Point denoted as H33-A1 Bellmouth (TB-B124), as shown in 7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section G [APP-319], Sheet 2. As set out in 4.3 Book of Reference [AS-018], Plot G-4/53 comprises public adopted highway, and the extents included within the proposed Order Limits in the vicinity of the respondent's property have been specified on the basis

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			accommodate sustained or diverted through-traffic. It is: • Narrow and constrained • Insufficient in width for safe two-way flow • Bordered by blind bends at both ends • On an incline due to level changes • Without adequate forward visibility When congestion or disruption occurs on the A129, vehicles divert down this lane. Even where temporary traffic management is introduced, drivers frequently: • Ignore signal controls • Travel at excessive speed • Attempt unsafe passing manoeuvres This creates hazardous entry and exit conditions at both ends of the lane and at our property access. We hold photographic and video evidence demonstrating the unsafe conditions that arise during even short-term disruption of the A129. A recent partial carriageway closure during a relatively quiet half-term week resulted in significant congestion, unsafe manoeuvres and disturbance to such an extent that we temporarily vacated the property until the road was reopened. The introduction of sustained construction traffic, including HGV movements associated with a compound at this location, would materially intensify these existing safety concerns. 2. Topography and Level Differences There is an approximate 1.5–2 metres (5–6 feet) level difference between sections of the road and adjacent residential land, retained in part by a raised garden planter boundary. This level change: • Amplifies noise propagation • Alters light spill effects • Increases visual dominance • Intensifies the perceived scale of activity The compound's proximity to the retained raised boundary planter (not clearly identifiable on the submitted plans) may have implications for subsoil stability and ground loading. Given the dwelling's close proximity to this boundary, any change in ground conditions, vibration, or sustained loading could introduce additional risk which has not been assessed within the submitted documentation. The compound would not sit neutrally within the landscape but would occupy elevated and visually prominent ground in immediate proximity to dwellings. 3. Proximity to Sensitive Receptors The compound would operate in immediate proximity to residential properties, including our own household. Members of our household have protected characteristics under the Equality Act 2010. The Examining Authority is under a Public Sector Equality Duty to have due regard to the need to eliminate discrimination and advance equality of opportunity. Our household includes individuals who are particularly sensitive to noise, vibration, flashing lights, and sustained environmental disturbance. There are no periods during the day when the property is regularly unoccupied. In planning terms, our home constitutes a sensitive receptor. The intensity of compound activity, including but not limited to, HGV arrivals, engine idling, reversing alarms, lighting towers, plant operation and potential 24-hour working, would have a disproportionate and harmful effect on our household circumstances. 4. Lack of Clarity Regarding Compound Use and Hours We have not been provided with sufficient clarity regarding: • The precise	of the Applicant's requirement to provide and maintain suitable visibility for the proposed Site Access Point referenced above. The proposed Site Access Point has been designed in line with the principles set out in Section 5.5 of **7.3 Outline Construction Traffic Management Plan [APP-309]**. As with all other Site Access Points, this location has also been subject to a Road Safety Audit per the approach defined in 7.11 Transport Assessment – Appendix A – Norwich to Tilbury RSA Strategy [APP-334], overseen by Essex County Council as the Local Highway Authority. Hence, the Applicant considers the proposed inclusion of Plot G-4/53 to be suitable and appropriate for the Project. The Applicant can confirm that this property is considered a noise and vibration sensitive receptor (NSR) in the noise and vibration assessment presented in in 6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256].

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			function of this compound • The operational scale • Storage activities • Lighting specifications • Noise-generating plant • Confirmed hours of operation We understand that works may be authorised on a 7-day, 24-hour basis. Such operational flexibility would be wholly inappropriate in this constrained residential setting. 5. Alternative Site Assessment We have not seen evidence demonstrating: • That alternative compound locations were robustly assessed; • That less harmful options were discounted for sound planning reasons; • That this precise location is necessary. We respectfully request clear evidence of: • The site selection methodology used; • Alternative sites considered; • Criteria applied in site comparison; • Justification for selecting this specific location adjacent to residential properties. There appear to be other sections of the A129 corridor and surrounding land parcels that may offer safer and less harmful siting opportunities away from sensitive receptors.	
REP1-345	Frances Brook	Landscape and Visual	We write as the owners and regular occupier of [redacted text], Colchester, a Grade II* listed home whose significance derives not only from its historic fabric but also from its quiet rural setting and privacy. The proposals indicate construction activity, infrastructure works, and associated access and operational areas in close proximity to the property. Our private garden, which is currently secluded and integral to the character of the house, is likely to become overlooked by construction activity, plant, workers, and potentially elevated infrastructure. The prospect of prolonged construction presence, overlooking, noise, lighting, and movement fundamentally changes how this space can be used. The planning documentation tends to treat visual effects as temporary or moderate changes. In practice, the introduction of industrial activity into what is currently a quiet and private domestic setting represents a profound change to family life and enjoyment of the property.	Construction noise and vibration, is assessed in 6.14 Environmental Statement Chapter 14: Noise and Vibration[APP-256]. Construction noise and vibration would be managed via commitments in 7.2 Outline Code of Construction Practice [Revision B] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. These measures ensure that best practicable means (BPM) will be employed by the contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments would be undertaken by the Main Works Contractor(s) based on their specific methodologies. Specific mitigation measures would be identified during these assessments and incorporated in the final NVMP. An assessment of effects on residential visual amenity for properties within 200m of the Project centreline is provided in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]. Due to the redaction, we are unable to comment on residential visual amenity in detail for this specific property, but can provide further comment if the location is provided.
REP1-345	Frances Brook	Cumulative Effects	Construction activities associated with pylons, haul routes, heavy vehicles, and ground works raise concerns regarding vibration, dust, and prolonged disturbance. The impacts described in the project documents are presented individually, however for residents they occur simultaneously. Noise, traffic, visual intrusion, loss of privacy, and disruption do not arrive separately, they combine to create a sustained change to everyday living conditions.	Intra-project and inter project cumulative effects are assessed in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] in accordance with 6.19 Scoping Report [APP-288 – 296] and 6.20 Scoping Opinion [APP-297] which looked at effects on vibration and dust. A summary of all significant cumulative effects identified are presented in 6.18 Environmental Statement Chapter 18 – Summary [APP-287]. Construction noise and vibration is assessed in 6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]. Construction noise and vibration will be managed via the commitments in 7.2 Outline Code of Construction Practice [Revision B] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. These measures ensure that best practicable means (BPM) will be employed by the contractor(s)

Examination Library ID	Name	Topic	Matter	NG Response
				to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments will be undertaken by the contractor based on their specific methodologies. Specific mitigation measures will be identified during these assessments and incorporated in the final NVMP. Potential building damage due to vibration is assessed as part of the construction vibration assessment which identifies locations with potential risk. Mitigation measures in 7.2 Outline Code of Construction Practice [Revision B] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. would ensure that risks are reassessed by the Main Works Contractor(s), and suitable mitigation measures and monitoring are put in place should a risk of potential damage be identified. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has considered the impact of other construction projects on health and wellbeing, particularly as they relate to environmental change (including noise, air quality, and landscape and visual effects). Paragraph 17.5.47 states that, with the implementation of best practicable means (BPM) and other mitigation measures as part of other developments, there would be no adverse effects from environmental change in relation to these topics It is noted that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases.
REP1-345	Frances Brook	Transport and Traffic	Great Tey Road and surrounding lanes are quiet rural routes. Increased construction traffic would introduce noise, safety concerns, and a loss of the calm character that defines this location. This is not an abstract amenity issue but one that affects arrival at and departure from our home, outdoor use of the property, and the overall sense of refuge that currently exists.	The construction routeing strategy is detailed in Section 5.4 of 7.3 Outline Construction Traffic Management Plan [APP-309]. Construction traffic will use the Strategic Road Network and Major Road Network to access the region. From the MRN and SRN, construction traffic will be routed along Primary Access Routes (PARs) to the site access points. Great Tey Road has been identified as a Primary Access Route (PAR 39). This is displayed on 7.11 Transport Assessment – Appendix I – Figures (Figure 1 – Transport Assessment – Traffic and Transport Study Area Page 20 of 30) [APP-342]. Construction traffic is proposed to access Great Tey Road from the A120 Coggeshall Road and therefore construction traffic will not use the surrounding rural roads. Within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] a summary of the impact assessment for Great Tey Road (PAR 39) is presented in Table A16.4.8. Summary of impact assessment. The findings of the assessment, which considered sensitive receptors and the road environment, identified that there would be slight adverse effects on driver / public transport user delay, and pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation. The findings of the assessment of effects are that effects would be temporary (worst case peak construction would occur over a short three week period) and are considered not significant when taking into consideration

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				mitigation detailed within 7.3 Outline Construction Traffic Management Plan [APP-309] which includes a driver information pack for all staff and operatives working on the Project which will provide information on nearby pedestrian crossings and locations where pedestrians or equestrians may be in the highway, alongside the appropriate actions to take. These measures will help ensure the safety of all road users on Great Tey Road (PAR 39) during the construction of the Project. As noted in 7.11 Appendix E LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338], the Applicant is proposing to add an additional 20 vehicle movements (6 LGV and 14 HGV movements) along Great Tey Road (PAR 39) in both the AM and PM peak hours. This is an 8% increase in vehicle movements from the future baseline during the worst case peak construction period, which would occur over a short duration of three weeks. Modelling results for Site 47 - A120 Coggeshall Rd / Great Tey Rd Priority Junction, which connects PAR 39 to the strategic road network are presented in Section 7.11 of 7.11 Transport Assessment [APP-333]. The future base with committed development scenario shows that that the junction would operate over capacity in the AM peak hour. In the PM peak hour, the junction would operate within capacity but with some delay. It was found that the introduction of the Project construction traffic at the junction would have a minor impact on capacity (i.e. it would continue to operate over practical capacity). In both scenarios there would be an increased delay on the Great Tey Road (PAR 39) approach, most notably in the AM peak. The Applicant is currently engaging with Essex County Council and National Highways to ensure suitable mitigation measures are proposed at the junction to reduce delay where possible. It should be noted that following the worst case peak construction period (three week duration), the delay at the junction would be reduced. Detailed in 7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans Section D [APP-316], the Applicant has identified approximately 0.9 km of Great Tey Road which is narrow width for the design vehicle movements. The suggested mitigation is to cut back vegetation to increase visibility. Short-term closures of Brook Road/Great Tey Road are proposed during the construction of the site access points and for netting activities to enable overhead line stringing. . A diversion is proposed in Section D, Plan C of 2.5 Access, Rights of Way and Public Rights of Navigation Plans.
REP1-345	Frances Brook	Safety and Security	I respectfully request that the Examining Authority require: • stronger, location specific controls on construction activity near the property, • measures to protect privacy and reduce overlooking during construction, • strict limits on construction lighting, noise, and working hours, • vibration monitoring and pre construction condition surveys for the listed structure,	7.2 Outline Code of Construction Practice [Revision B] states that mitigation measures are presented 'with reference to relevant Project Sections, ensuring that commitments and controls are reported in relation to their specific locations' (1.3.6). 7.2 Outline Code of Construction Practice [Revision B] includes a number of commitments to mitigate the effects of construction activity upon occupiers of property. Commitment GG17 states that any activity carried out or equipment located within a temporary construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration, and

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			• clear and enforceable construction traffic routing and timing controls, • and consideration of whether micro siting or refinement of nearby works could materially reduce harm to this heritage asset and its residential setting.	lighting, will be located away from such sensitive locations where practicable. Measures to protect privacy and reduce overlooking during construction are covered in GG18 which states commits to designing and locating site offices and welfare facilities to prevent the overlooking of residential properties except where otherwise agreed with the owner of the impacted property. Commitments to control construction lighting, noise and working hours are covered throughout the OCoCP. Core working hours are clearly defined, with restrictions on noisy activities, HGV movements and night working, except where limited and justified exceptions apply. OCoCP commitment NV04 states that where there is potential for works to generate vibration at levels which may affect a building which may be particularly sensitive (such as an historic building), pre and post work condition surveys will be conducted. Any damage (cosmetic or otherwise) deemed to be caused by the works will be rectified. OCoCP commitment GG26 requires that construction lighting will be minimised, directional and of the lowest practicable intensity to reduce intrusion into nearby properties. Construction traffic routeing and timing is addressed through 7.2 Outline Code of Construction Practice [Revision B], and within 7.3 Outline Construction Traffic Management Plan [APP-309]. Construction vehicle movements are subject to defined delivery hours and must adhere to designated construction routes, with measures in place to manage traffic effects on local roads and nearby receptors (Commitments T01; T03;). 7.3 Outline Construction Traffic Management Plan [APP-309] provides for the consideration of micrositing and refinement of construction works where this could reduce harm to heritage assets and their settings. Commitment GG34 in 7.2 Outline Code of Construction Practice [Revision B] seeks to restrict movement of infrastructure where required to protect heritage significance in specified locations.

4. Applicant's Comments on WRs submitted by Developers

4.1 Overview

4.1.1 The Applicant's comments on WRs submitted by developers are provided in Table 4.1.

Table 4.1 The Applicant's comments on WRs submitted by Developers

Examination Library ID	Name	Topic	Matter	NG Response
REP1-212	Brickkiln Solar Farm	N/A		The Applicant refers to its Deadline 1 submission, **8.3.16 Draft Statement of Common Ground - Brick Kiln Solar Farm [REP1-086]** which summarises the latest position with Brick Kiln Solar Farm and reflects the points raised in their WR. An updated SoCG will be provided at a future deadline.
REP1-218	Cadent Gas Limited	N/A		The Applicant refers to its Deadline 1 submission, **8.3.26 Draft Statement of Common Ground - Cadent Gas [REP1-095]** which summarises the latest position with Cadent Gas Limited and reflects the points raised in their WR. The Applicant and Cadent have now substantially agreed the wording of bespoke Protective Provisions for the benefit of Cadent along with having substantially agreed the terms of a Side Agreement between the Parties, which is proposed to be entered into between the parties in due course and bespoke Protective Provisions included into the Order at a subsequent deadline. An updated SoCG will be provided at a future deadline.
REP1-243	Innova Renewables Limited	N/A		The Applicant refers to its Deadline 1 submission, **8.3.18 Draft Statement of Common Ground - Innova Renewables [REP1-088]** which summarises the latest position with Innova Renewables and reflects the points raised in their WR. An updated SoCG will be provided at a future deadline. The Applicant has been in discussion with Innova Renewables in relation to the interactions between the Project and the Innova Renewables site. The Applicant and Innova Renewables are in the process of negotiating principles which will underline a bespoke Side Agreement between the parties, which is proposed to be entered into between the parties"
REP1-206	Bloor Homes	N/A		The Applicant refers to its Deadline 1 submission**, 8.3.13 Draft Statement of Common Ground - Bloor Homes [REP1-083]** which summarises the latest position with Bloor Homes and reflects the points raised in their WR. An updated SoCG will be provided at a future deadline.
REP1-251	MSP Fairwinds	N/A		The Applicant refers to its Deadline 1 submission, **5.9.31 Draft Statement of Common Ground - MSP Fairwind Limited [REP1-058**] which summarises the latest position with MSP Fairwind Limited and reflects the points raised in their WR. An updated SoCG will be provided at a future deadline.

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REP1-263	Orsett Golf Club	N/A		The Applicant refers to its Deadline 1 submission, **8.3.8 Draft Statement of Common Ground - Orsett Golf Club [REP1-079]** which summarises the latest position with Orsett Golf Club and reflects the points raised in their WR. An updated SoCG will be provided at a future deadline. The Applicant is currently engaged in discussions with the affected party regarding the Heads of Terms. Alongside the Heads of Terms, the Applicant is working towards reaching a financial settlement with the affected party. Both parties are actively involved in these discussions, which remain constructive and positive throughout.
REP1-277	Blackwater Aggregates	N/A		The Applicant refers to its Deadline 1 submission, **8.3.27 Draft Statement of Common Ground - Bradwell Quarry (Blackwater Aggregates) [REP1-096]** which summarises the latest position with Blackwater Aggregates and reflects the points raised in their WR. An updated SoCG will be provided at a future deadline.
REP1-242	Ingrebourne Valley	N/A		The Applicant refers to its Deadline 1 submission, **8.3.30 Draft Statement of Common Ground - Ingrebourne Valley Limited [REP1-099]** which summarises the latest position with Ingrebourne Valley and reflects the points raised in their WR. An updated SoCG will be provided at a future deadline.
REP1-264	Pace NANO (Grange Farm Solar Development)	N/A		The Applicant refers to its Deadline 1 submission, **8.3.23 Draft Statement of Common Ground - Grange Farm Solar Development [REP1-093]** which summarises the latest position with Pace NANO / Grange Farm and reflects the points raised in their WR. An updated SoCG will be provided at a future deadline.
REP1-271	Ralos Solar Farm (Richard Long Limited)	N/A		The Applicant refers to its Deadline 1 submission, **8.3.17 Draft Statement of Common Ground - Ralos Projects Ltd [REP1-087]** which summarises the latest position with Ralos Solar Farm and reflects the points raised in their WR. An updated SoCG will be provided at a future deadline.
REP1-231	Equinor New Energy Limited acting for Sheringham Shoal and Dudgeon Extensions ProjCo Limited (SSDEPL)	Draft DCO	SSDEPL has made a relevant representation in this matter concerning the overlaps between the projects and SSDEPL's need for protective provisions to be included in the draft Norwich to Tilbury DCO for the benefit of SSDEPL (see RR-3369 for full details) SSDEPL's position remains as set out within RR-3369; however, by way of update, the parties have continued to engage and are hopeful that an agreement on this can be reached. SSDEPL shared their preferred protective provisions and heads of terms for a commercial agreement with NGET on 18 February. SSDEPL welcomes the opportunity to meet with NGET to progress discussions and to seek resolution of SSDEPL's concerns. NGET provided a draft Statement of Common Ground to SSDEPL on 15 February. SSDEPL returned comment to NGET on 18 February and will continue to engage with NGET on this throughout Examination.	The Applicant acknowledges that SSDEPL has no additional points to raise beyond those in its Relevant Representation and as reflected in **8.3.10 Draft Statement of Common Ground – Equinor [REP1-081]** submitted at Deadline 1. The Applicant continues to engage positively with SSDEPL and intends to provide an updated SoCG at a future deadline.

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			SSDEPL will continue to object to the proposed Norwich to Tilbury DCO until its concerns are resolved. In light of the positive steps taken to date, we believe that a resolution can be achieved.	
REP1-208	Boxford (Suffolk) Holdings Ltd	Land and Property	The Applicant has included land within the Order Limits that is not designated for any particular use and BSHL is of the opinion that the width of the construction area, given the land use is excessive. Furthermore land has been included to allow for the diversion of 11Kv and 33Kv apparatus, owned and operated by South Eastern Power Networks, yet no detail has been provided in respect of these works, thus how can the ExA be content that this land is actually required.	All the land within the Order Limits sought is, subject to the Main Works Contractors detailed design, potentially required for the construction, operation and maintenance of the authorised development. Some adjustments may be possible as identified at the response to item 1.4 below but is responsive to a range of factors related to detail design. Within this section of the Project the Order Limits will appear larger than elsewhere as there are two connections to be routed in this area, one as a 400 kV overhead line and one as a 400 kV underground cable. Additionally, to enable construction of the Project assets multiple existing 11 kV and 33 kV overhead lines need to be dismantled and diverted underground. Geographic details of the proposed 400 kV works and existing 11 kV and 33 kV proposed diversionary works can be found in **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]**. Additionally, a description of the 11 kV and 33 kV works can be found in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** paragraphs 4.8.99 to 4.8.103.
REP1-208	Boxford (Suffolk) Holdings Ltd	Land and Property	The LRS has been compiled by the Applicant to cover new transmission assets, however in this particular case, the installation of underground and overhead assets in a single location highlights the discrepancy between the two approaches to compensation and the fact that the mechanism relating to the overhead assets is fundamentally inequitable when compared with that relating to the underground assets. Looking at the land to be affected by the proposed route, the topography, productivity of the land and valuation thereof is not taken into account by the LRS in respect of the overhead line and a “one size fits all” policy is not appropriate. It is based on the incorrect principle of a single payment per pylon, rather than the easement area, over which rights are sought.	The Applicant confirms that the Land Rights Strategy has been developed to provide a consistent, transparent and proportionate framework for the acquisition of land and rights required for the Project. The Strategy distinguishes between different asset types, including overhead lines and underground cables, to reflect the different nature, extent and permanence of the rights required in each case. The Applicant does not accept that the compensation mechanisms for overhead and underground assets are directly comparable or that they should be treated identically. Underground cables typically require the acquisition of a defined easement corridor with restrictions across a continuous area of land, whereas overhead line infrastructure generally requires discrete tower footprints, over sail rights and associated restrictive covenants. The differing valuation approaches reflect these fundamental differences in land take and rights burden, rather than an inequitable treatment of landowners. In respect of overhead line infrastructure, the Applicant does not accept that the LRS is based on an “incorrect principle” of a single payment per pylon. The approach recognises the nature of the rights acquired, including tower footprints, over sail, access and restrictive rights, and provides for compensation accordingly. In addition, the statutory Compulsory Purchase Compensation Code remains available to address any injurious affection or other qualifying losses which cannot be appropriately reflected through standard payments alone.

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REP1-208	Boxford (Suffolk) Holdings Ltd	Alternatives	The intention and requests made throughout the consultation meetings were that all of the infrastructure was moved to the south of Little Bromley Road, therefore largely avoiding any areas used for the intensive horticultural production. Instead the infrastructure was switched, with the safeguarding of minerals being used as justification, yet in BSHL's view little work has been done to assess the socio-economic impact of this change.	There are two connections to be routed in this area, one as an overhead line and one as an underground cable. The Order Limits provide for some flexibility. The Applicant has recognised the differing outcomes that arise from matters outside its control and based its decisions in the context of policy, the extent to which restoration is possible and the cost implications in line with its duties. Further detail is provided in document **5.15 Design Development Report [APP-122]** from paragraph 6.5.43. The extent of mineral sterilisation is potentially substantial, if the cable circuits are routed to the south of the road, for a resource that is scarce regionally and carries some weight in planning terms to seek to avoid or minimise effects. Additionally, there is some flexibility in design arrangements within the horticultural area that can be exploited to reduce / mitigate the area affected and duration. Any refinement to the working arrangements for cable installation or siting of individual pylons would be considered through detailed design and informed by site specific discussions between the Great Grid Partnership (the Applicant's delivery partner) and the relevant landowner. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations. In this case aspects that may be able to be considered include: aligning the cable swathe close to the southern boundary; sequencing of trench excavation and storage of soils to reduce the construction working width; positioning of net supports in areas between cables without installation depth limitations. Positioning of TB4 and TB5 within Limits of Deviation to southeastern edge as far as possible. On balance, therefore, whilst acknowledging the effect the Applicant's position is clear.
REP1-208	Boxford (Suffolk) Holdings Ltd	Transport and Traffic	We are extremely concerned about the long lasting effects of the haul road and heavy trafficking over productive farmland. The land in question, is extremely fertile land with characteristics that are suitable for the growing of blueberry plants, which is easily damaged by compaction and waterlogging, especially when the duration of the works are considered. The proposed haul road runs in close proximity of the farms reservoir that is used to irrigate the whole holding and glass houses So far no detail has been given as to how excess water is to be managed, which is of a particular concern. Contamination of the reservoir or the changing of water levels could be catastrophic for the business. In addition there are two methodologies currently being explored for the installation of the haul road, the first being excavation of top soil and the laying of 'Type 1' stone. The second is that of ground stabilisation, essentially the mixing of cement based substances with the soil. Neither proposal is satisfactory and poses a huge risk to the long term fertility of the soil.	The Applicant is aware of the importance of the agricultural land crossed by the project and has provided details on how it would look to protect this important asset within the outline Soil Resource Plan (SRP) (**7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303])** which would be developed into the final SRP prior to the commencement of development. In order to protect the topsoil from the construction activities proposed, including the installation of temporary haul roads and trenching works for cables and temporary drainage, the topsoil will be stripped from the construction site and stockpiled in line with best practice guidance and the final SRP requirements. Measures within the final SRP will include but not be limited to the following: • Details of the soil resources present • How topsoil and subsoil will be stripped and stockpiled based on their specific characteristics • Suitable conditions for when handling soil will be undertaken and climatic STOP conditions • Principles to determine suitable soil storage locations • How soil stockpiles will be designed taking into consideration site conditions and the nature/composition of the soil

Examination Library ID	Name	Topic	Matter	NG Response
				• Specific measures for managing sensitive soils • Suitable protective surfacing where soil stripping can be avoided, based on sensitivity of the environment and proposed works • Approach to reinstating soil that has been compacted, where required • Details of measures required for soil restoration. Topsoil will be reinstated once the works are complete and the Applicant will look to return land to operation for agriculture as quickly as reasonably practicable. **8.2 Drainage Strategy DCO [REP1-072]** provides details of the Applicant's approach to drainage for the Project. Sustainable Drainage Systems (SuDS) shall be used for all temporary and permanent drainage to ensure runoff rates are attenuated to green field rates and that water quality is managed prior to infiltration or discharge. **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** shows the Project Concept Design and Section C Page 33 shows that the temporary drainage in this area is proposed as infiltration with no discharge to the reservoir.
REP1-208	Boxford (Suffolk) Holdings Ltd	Land Use	It is considered that this document lacks detail as far as horticultural cropping is concerned and that bunding and seeding will not be sufficient to prevent the leaching of nutrients and a loss in soil structure and friability.	**7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan** (SRP) **[APP-303]** would be developed into the final SRP prior to the commencement of development, taking into account more site-specific soil measures and soil baseline information including soil profiles as required. Soil stockpiles would be managed and monitored so they can be maintained in relation to stability and integrity and measures to manage and treat site runoff (such a nutrient leaching) would be set in place through a series of specific control measures as set out in the final SRP. Good practice mitigation measures to prevent the loss of soil structure and friability during handling, transporting and stockpiling activities are detailed in **7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303]**.
REP1-208	Boxford (Suffolk) Holdings Ltd	Water Environment	It is reiterated that the reservoir situated immediately to the north of the construction area is vital for the irrigation of multiple crops grown on the holding and within the glass houses. Given produce is packed and distributed for human consumption any contamination of the water supply, could result in wholesale contamination of significant volumes of, soft, stone and top fruit.	A baseline assessment and contamination preliminary risk assessment (PRA) has been undertaken in accordance with the process of contamination risk assessment defined within LCRM (Environment Agency) and is presented within **6.9.A1 Environmental Statement Appendix 9.1 - Baseline Information and Preliminary Contamination Risk Assessment [APP-182]**. The PRA has identified a generally 'very low/low risk' of significant existing contamination to be present within most of the Order Limits. The PRA has not identified any sites with a moderate or above risk classification for contamination within proximity to the reservoir. The Project includes underground cabling in closest proximity to the reservoir, to be constructed as open cut trenches. A groundwater risk assessment has been undertaken and is presented in **6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]**. The assessment concludes that risks to groundwater in areas of open cut trenches are very low.

Examination Library ID	Name	Topic	Matter	NG Response
REP1-208	Boxford (Suffolk) Holdings Ltd	Land Use	Once the underground cable is laid this will restrict the ability to lay new irrigation pipes across the land and will inevitably be more costly and impractical for the farm moving forwards, this is not an impact that can be quantifiable in respect of a financial loss. It is unknown whether the works will impact ground water levels in the future and as a result the irrigation reservoir.	As noted in the response above, groundwater risk assessment has been undertaken and is presented in **6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184]**. The assessment concludes that risks to groundwater in areas of open cut trenches are very low. With regard to irrigation pipes, commitment W04 within **7.2 Outline Code of Construction Practice [Revision B]** secures that the appointed contractor would work with landowners and tenants to seek to avoid interactions with irrigation systems, or where this is not practicable will provide alternatives.
REP1-208	Boxford (Suffolk) Holdings Ltd	Land Use	The new lines could prohibit the use of protection measures used in conjunction with such crops such as poly tunnels and hail netting. Furthermore the Health and Safety Executive (HSE) Agriculture Information Sheet No 8 (Working safely near overhead electricity power lines) also states that poly tunnels should not be erected within of 10 metres (measured horizontally) from the overhead lines, thus increasing the sterilised area. The crop protection system installed over the blueberries is similar to that of poly tunnels, therefore clarification is needed in respect of the over headlines. Poly tunnels and other crop protection systems are erected using telehandler machines with a long reach. The Management of Health and Safety at Work Regulations 1999 require risks to be properly assessed and controlled. It is therefore impractical to control such risks when operating telehandler machines under electricity lines.	The Applicant does not seek to prevent agricultural operations; however, it must design and operate the electricity transmission system safely. Where specialist cropping practices involve equipment or structures that cannot be safely accommodated beneath or adjacent to overhead lines, this is a recognised effect of overhead transmission infrastructure. The Applicant will, where reasonably practicable, continue to engage with affected landowners to explain the applicable clearances and provide site-specific advice on safe systems of work. Where the presence of the overhead line results in sterilisation of land or the loss of cropping capability, any demonstrable crop losses or associated financial impacts would be compensable under the statutory compensation code, including compensation for disturbance and, where applicable, depreciation in land value.
REP1-208	Boxford (Suffolk) Holdings Ltd	Alternatives	The underground cable poses a different issue in that these structures are installed up to 1.5 m deep into the ground and activity that is often restricted by any easement rights imposed under the DCO.	In respect of the permanent works, opportunities for localised refinements and layout and form of crop growing area will be explored through detailed design. The Applicant will engage with the landowner on these matters.
REP1-208	Boxford (Suffolk) Holdings Ltd	Land Use	Should there be any interruption to the water supply (reservoir) or electrical supply then this could affect a greater volume of fruit that is destined for the supermarket shelves.	The Applicant does not envisage any disruption to water or electric supplies and will work with affected parties to put in place required mitigation were reasonably practicable. The Applicant confirms that, where land or rights are acquired or where land is taken temporarily under the Development Consent Order, the Planning Act 2008 and the statutory Compulsory Purchase Compensation Code provide a clear and established framework through which landowners and occupiers may seek compensation for qualifying losses. This includes, where applicable, compensation for disturbance, temporary loss of use, crop loss, and proven business losses, assessed on a case-by-case basis.
REP1-208	Boxford (Suffolk) Holdings Ltd	Safety and Security	Within the order limits is ground that has consent to be used as a landing strip for light aircraft. The new overhead lines will not allow the reuse of this airstrip. The presence of the overhead lines will have a huge impact on this proposal and it is considered that the development of the fishing	Aerial mapping, ground truthing and engagement with the landowner indicates the abandonment of rights to use the land as an airstrip, with evidence of physical changes including the planting of fruit trees demonstrating current agricultural use. The planning history of this site does not suggest that permission for mixed use has been granted or a

Examination Library ID	Name	Topic	Matter	NG Response
			lodges will no longer be viable due to the visible and noise disturbance created by the lines.	new material change of use to enable reuse as an airstrip has been granted or sought. On this basis, the current use of site has been considered within the Project design, and potential impacts on aviation safety and operations have not been assessed. The Applicant acknowledges the concern that the proposed overhead line may affect the perceived attractiveness and commercial appeal of the proposed fishing lodges. The potential landscape and visual effects of the Project have been fully assessed through the Landscape and Visual Impact Assessment (LVIA) reported in the Environmental Statement (ES), which identifies where significant effects may occur and sets out embedded mitigation. Operational noise from overhead lines has been scoped out of the ES on the basis that the proposed conductor technology would not give rise to significant audible noise effects, including during wet weather conditions, and this approach was agreed by the Planning Inspectorate. While it is recognised that the presence of overhead electricity infrastructure can influence user perception, matters relating to business viability, loss of income, injurious affection or diminution in value are compensation matters to be addressed separately under the statutory Compensation Code.
REP1-201	Aura Power Developments	Land and property	1. Context: 1.1. Marsh Lane Solar Farm is a 30MWac ground-mounted solar PV development situated near Diss, Norfolk (Solar Project). 1.2. Aura Power Developments Ltd (Aura Power) holds the land, grid, and planning rights for the Solar Project and intends to commence construction during 2027. 1.3. Planning approval for the Solar Project was granted following a cross boundary application, determined by Mid-Suffolk District Council and South Norfolk District Council. 1.4. Mid-Suffolk District Council Planning Committee resolved unanimously to approve the Solar Project in April 2025, with the Decision Notice issued on 13th August 2025 (LPA ref: DC/23/05426). 1.5. Planning permission for the underground cable route connecting the Solar Project to Diss BSP, was granted in April 2025 under delegated powers by South Norfolk District Council (LPA ref: 2023/3574). 1.6. A copy of the approved Solar Project Layout Plan is shown in Figure 1, and a copy of the approved Location Plan that also shows the Solar Project's underground cable route is shown in Figure 2 2. Interaction of the Norwich to Tilbury Project (Pylon Project) with the Solar Project: 2.1. We have reviewed Sheet 1 of the "EN020027-000561-2.2 Land Plans - Section B" and Sheet 1 of the "EN020027-000250-2.3 Works Plans - Section B" and Sheet 1 of "EN020027-000266-2.5 Access Rights of Way and Public Rights" documents included within the Pylon Project's DCO application, as well as the "2025 DCO Submission" version of the Norwich to Tilbury interactive map	The Applicant is aware of this development and has had previous online meetings. We also note that the level of interaction has been reduced as a consequence of feedback from the developer in conjunction with other feedback which has moved the pylons to the east. The residual interface is noted and the Applicant will engage with Aura Power Developments Ltd to seek to agree further details of the proposed interactions and proposed associated acquisition of rights along with protections required by the respondent to mitigate across both construction and operation (and maintenance) impacts to the solar development.

Examination Library ID	Name	Topic	Matter	NG Response
			displayed on National Grid's website (accessed on 25th February 2026) with screenshot of this shown in Figure 3 below. 2.2. These plans show the Pylon Project interacting with an area of the north eastern part of the Solar Project as well as the Solar Project's underground cable route, affecting title numbers SK176181 & SK113952 & SK129903 which Aura Power holds legal charges against title over in the form of an Option for Lease agreement in favour of an Aura Power subsidiary, Haedus Solar Limited (Co. Reg. No. 13663837). 2.3. During the construction phase, Aura Power understands the plans currently indicate that interaction with the Solar Project and its underground cable route would involve, but not be limited to: 2.3.1. compulsory acquisition of rights for the construction of a "Primary Access Route" that is understood to be an approx. 20 metre wide temporary construction haul road, together with temporary access for scaffold installation and a crossover bellmouth access point off Millway Lane with visibility splay ("RG-B061"); and 2.3.2. compulsory acquisition of rights for a new permanent pylon ("RG91") together with access rights from Millway Lane to the pylon; and 2.3.3. compulsory acquisition of rights for access to pylons RG90 & RG89; and 2.3.4. compulsory acquisition of rights for undergrounding of the existing 11kV overhead line within proximity of new pylon RG92 2.4. Once construction is complete, Aura Power understands the plans indicate that the long-term interaction of the Pylon Project with the Solar Project and its underground cable route would include, but not be limited to: 2.4.1. the new permanent pylon RG91 located within the Solar Project site; and 2.4.2. permanent access rights to new pylons RG91 & RG90 & RG89 as well as any ongoing rights needed for access and maintenance of the new overhead line and the existing 11kV overhead line near RG92 that is proposed to be relocated underground. 2.5. The Pylon Project's plans as currently proposed will therefore have a material impact on the Solar Project, its underground cable route, and its proposed areas for BNG and ecological mitigation. 3. Compensation for Loss or Damage: 3.1. Where DCO powers to acquire land and rights in land compulsorily are exercised, any loss or damage caused to landowners, occupiers and those with another interest in land by the exercise of the powers is compensable. 3.2. Should land that Aura Power has rights over be acquired (either temporarily or permanently) by the Pylon Project, Aura Power outlines its position that it will be entitled to compensation for all costs and loss of revenue related to any land taken and any impact the Pylon Project has on the Solar Project and its underground cable	

Examination Library ID	Name	Topic	Matter	NG Response
			route. This compensation will need to recognise that following the grant of planning permission, alongside work to discharge planning conditions in 2026 and work to commence construction in 2027, the Solar Project is committed to development. 3.3. Compensation would include, but not limited to: 3.3.1. Land/Rights acquisition cost 3.3.2. Loss of development value 3.3.3. Disturbance 3.3.4. Injurious affection 3.3.5. Severance 3.3.6. Legal and professional fees 3.3.7. Statutory Loss payments 4. Summary of Aura Power's Position: 4.1. Aura Power generally supports projects that will improve the transmission of electricity within the UK so long as such projects provide best value for money for consumers, and ultimately UK taxpayers. 4.2. Aura Power submitted the planning application for its Solar Project in November 2023 and engaged with National Grid during the early development phase of the Pylon Project. Aura Power welcomed the relocation of two towers following those discussions, however the proposed construction haul road and proposed acquisition of access rights outlined in 2.2 -2.4 will have a material impact on the operation of the Solar Project. 4.3. The Solar Project was known to National Grid and received planning permission prior to the Pylon Project submitting its DCO application on 29th August 2025. 4.4. Aura Power firmly believes that an alternative route should be sought for the construction haul road ("Primary Access Route") over undeveloped land to completely avoid its impact on the Solar Project, which is committed development, and the significant compensation that will result from the currently proposed interference with the Solar Project. 4.5. Aura Power objects to the location of the proposed works shown in Figure 3 on the basis of the points outlined in 4.2 - 4.4 as the proposed works do not provide best value for money for consumers and UK taxpayers who will ultimately have to fund an avoidable significant additional cost in the form of consequential compensation that would become payable to Aura Power to reflect the impact of incurred costs and lost revenue for the Solar Project.	
REP1-224	Westlands Farm Developments (Lower Dunton Road)	Land and Property	Lynton, Lower Dunton Road, CM13 3BP This document presents a preliminary appraisal of the impact of the proposed Norwich to Tilbury electrical connection project on the residential development planned at Lynton, Lower Dunton Road. Westlands Farm Developments purchased Lynton in 2016, with the sole objective of developing the land for residen7al use. At that time	The Applicant has been made aware of the previous plans for development on the site which if those plans progressed would conflict with the proposed diversion route for a 132 kV underground cable. For the avoidance of doubt we are aware of the potential adoption of the site within the Basildon Local Plan. Our experience is that there is typically flexibility within both the layout of proposals such as Lynton and in the diversion works that are required for the Project, indeed this

Examination Library ID	Name	Topic	Matter	NG Response
			the site was within the Green Belt but had been safeguarded for future residential development by the LPA. Since this time, Basildon Council have considered a range of options for the release of land from the Green Belt, but after a lengthy preparation and consultation process, the site has been included in the Basildon Borough Council's Housing and employment land availability assessment 2021 (The HELAA) (site SS0603). The site is very clearly located within the proposed H11 residential allocation within the latest revision of the Local Plan, which we presume that both National Grid and the Planning Inspectorate will be familiar with. Basildon Council has advised that the Local Plan including the H11 residential allocation will be adopted in the very near future. Information on the proposed development of Lynton has also previously been shared with National Grid and the Planning Inspectorate. This document is not intended to reproduce the above, or any other previously presented information, but to concisely appraise the impact of the proposed electrical infrastructure on the residential development, and to propose some alternative design approaches which could be adopted by National Grid with a modest impact on their infrastructure, greatly mitigating the adverse impact on Lynton's residential development potential. As is clear from the drawing shown on this page *[see WR],* the proposed electrical infrastructure has a very significant impact on the Lynton site. It is also clear that the routing of the underground cable, and its no-build zone, is quite flexible, as elsewhere on the same plan it is shown as incorporating turns in same cases exceeding 90 degrees, to align with plot boundaries and avoid impacting specific properties. Impact We are in possession of a number of drawings showing variants of the National Grid proposals. As we shall explain below, we have attempted on numerous occasions to engage with National Grid, to verify the details of their design, and to understand the rationale behind it. Our hope has always been to establish a direct dialogue with individuals having both relevant technical knowledge and some decision-making authority. Unfortunately, this has not proved possible to-date. For the purposes of the present representations, we have assumed that the plan reproduced on this page (NG-NT-2025-06-GF-CON-R3_191) *[see WR],* represents the most complete and current version of National Grid's proposal. As is immediately obvious from the drawing shown here: • The no-build zone reserved for National Grid's infrastructure occupies a very significant proportion of the site • The route of the proposed (underground) cable does not align with any of the site boundaries	is inherently identified in the constructive representation. We would welcome a meeting to explore this further in conjunction with UKPN (the owner and operator of the line) to work to a mutually agreeable solution.

Examination Library ID	Name	Topic	Matter	NG Response
			• The positioning and alignment of the no-build zone leaves small and irregularly shaped parcels of land to its west and south-east, effectively blighting all of the southern part of Lynton as a residential development site • The proposed cable is to continue southwards under the railway embankment, confirming the technical viability of crossing the line of the railway viaduct in whatever alignment is determined by other considerations • The proposed cable passes under Lower Dunton Road, to the east of the site, at an angle with no obvious alignment to any site boundaries or other topographical features As was noted on the previous page, the routing of the underground cable, and its no-build zone, appears to be quite flexible, as nearby it is shown as incorporating turns in same cases exceeding 90 degrees, to align with plot boundaries and avoid impacting specific properties. Our immediate conclusion is therefore that the impact of National Grid's infrastructure on the development potential of Lynton is extremely significant but substantially avoidable. Alternative A We would request that National Grid consider an alternative routing of the underground cable, entirely by-passing Lynton to the east and south. Alternative B If our Alternative A is unviable for whatever reason, we would request that National Grid consider an alternative routing of the underground cable, aligned with Lynton's southern boundary, substantially within the zone adjoining the railway embankment which has a higher flood risk and is therefore of limited development value. Alternative C A further alternative which National Grid may consider would route the underground cable through the central part of Lynton, but align the no-build zone with an area dedicated to amenity uses, thus having very limited adverse impact on the residential development. This is shown in greater detail on the next page. Lack of engagement As explained above, we do not oppose the Norwich to Tilbury proposal in principle, and recognise its importance to the UK's infrastructure, energy security and economy. We also understand that such a project will inevitably have some adverse impact on land in private ownership. We do believe. However, that National Grid have an obligation to mitigate such adverse impact wherever this is technically possible, and that there is considerable flexibility for National Grid to do so, as is clear from the routing of the proposed underground cable, weaving around various plots of land to the north of Lynton.	

Examination Library ID	Name	Topic	Matter	NG Response
			We have met on site with N-T Surveys / Fisher German, who have been instructed as National Grid's agents. In our face-to-face meetings with N-T Surveys and our exchanges of e-mails, we were given the impression that our arguments were logical and understood, and would be communicated to relevant decision-makers. Unfortunately, subsequent to our first meeting with N-T Surveys, we received a revision of National Grid's proposals which had a significantly greater adverse impact on Lynton that the previously consulted proposal. We can only therefore assume that N-T Surveys were unable or unwilling to communicate what we had explained to them to the relevant designers and decision-makers, or that our representations were deliberately ignored. We are also frustrated by N-T Surveys' complete inability to explain the rationale for National Grid's design, or any of the technical constraints within which National Grids are working. Our overwhelming impression is that N-T Surveys have been instructed as a PR exercise, and have no remit to engage in any meaningful technical discussions, nor to act as a reliable conduit between interested parties such as ourselves and those with the discretion and technical understanding to meaningfully consider our representations and offer a coherent response. We trust that the Planning Inspector will agree with our sentiments and, at the very least, require National Grid to respond much more meaningfully to the representations contained in this document	

5. Applicant's Comments on WRs submitted by Non-Statutory Organisations

5.1 Overview

5.1.1 The Applicant's comments on WRs submitted by non-statutory organisations are provided in Table 5.1.

Table 5.1 The Applicant's comments on WRs submitted by non-statutory organisations

Examination Library ID	Name	Topic	Matter	NG Response
REP1-250	Lower Thames Crossing	N/A		The Applicant notes the respondent's written representation which notes that discussions are continuing and details of outstanding issues are listed in **8.3.4 Draft Statement of Common Ground – Lower Thames Crossing [REP1-075]**. A response to the National Highways written representation is provided under 'Statutory Bodies' in Section 2 of this report. **3.1 Draft Development Consent Order (Revision B)**submitted at Deadline 2 includes amendments to give effect to the decision to proceed with Scenario B.
REP1-230	Scottish Power Renewables (EA3)	N/A		The Applicant notes the respondent's written representation. The content of the written representation and the Applicant's response to the matters raised is as stated in **5.9.30 Draft Statement of Common Ground - Scottish Power Renewables (East Anglia 3 & East Anglia 1) [REP1-056]**. The Applicant has been in discussion with SPR for some time in relation to the technical aspects of the interactions between the Project and the East Anglia Three (EA3) site. The Applicant and SPR are in the process of negotiating principles which will underline a bespoke Side Agreement between the parties.
REP1-215	Brumfelda	Historic Environment	Late Iron Age/Romano-British Archaeological Site The line crosses this site near the proposed tower TB147 *[see WR for image]* Potential mitigation: This may therefore need to include full excavation. Alternatively, mitigation could be provided by re-routing the proposed OHL to a corridor east and south of Chelmsford; or by a very slight change of alignment as shown on Map E below. This would also move the OHL slightly further away (west) from Partridge Green Farmhouse, though it would move the OHL closer to Tufnell Mere and slightly closer to Bushy Wood.	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including archaeology. The Applicant fully recognises the importance of safeguarding archaeological remains, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** already includes provision for a range of evaluation and mitigation strategies, including preservation in situ, should highly significant remains be identified. 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 -**

Examination Library ID	Name	Topic	Matter	NG Response
				Overview, 5.9.1-5.9.12 and 5.914 [APP-088 to APP-100 and APP-102]. The Applicant is committed to ensuring that all necessary mitigation measures in this area will be appropriate and effective, informed by ongoing assessment and in consultation with Historic England and relevant Local Planning Authorities' heritage advisors. This will ensure the protection and recording of archaeological remains throughout the Project.
REP1-215	Brumfelda	Historic Environment	Listed Vault west of Partridge Green Farm OHL pass just 50-60m from this important and unusual historic asset (shown on Map E), with the closest tower TB144 being only 125m to the west. With OHL and towers so close, the setting will inevitably be seriously harmed.	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including listed buildings. The closest pylon of the listed building 'Vault to the West of Partridge Green Farm' (1306289) will be TB146. During construction phase, this asset is assessed to experience a temporary minor adverse significance of effect, and during operation phase, a permanent minor adverse significance of effect (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-070]**). For both phases, the asset is assessed to undergo a Lower Less Than Substantial Harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). **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. Overall, The Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on designated assets, including changes to their setting.
REP1-215	Brumfelda	Historic Environment	Hylands House and Park The OHL would approach Hylands Park from the north-west, to an angle tower where it would turn away to the south-west. When seen from the Park, this would form a backdrop to a tract of ancient woodland, South Wood, with the pylons clearly visible above it. As with Langleys in Great Waltham, the pylons would introduce a dominant modernist structure to this listed country park. The Council notes that the route of the OHL was amended slightly in 2023 to avoid running parallel to the Park boundary. However, this is not considered to be sufficient mitigation and it means the OHL would run on to higher land, closer to a number of woodland tracts and footpaths around Edney Common and Highwood (including the publicly accessible land at Millgreen Common). Overall, this area is too constrained by the presence of environmental assets. The only effective forms of mitigation would be undergrounding or entirely re-routing the OHL.	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including listed buildings and registered parks and gardens. In **6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]**, it has been assessed that the setting of the Registered Park and Garden of 'Hylands Park' (1000197) and the listed building 'Hylands House' (1264253) do not extend to the Order Limits as the intentionally placed tree belts, woodland, copses and mature tree cover create an internal focus that severs their visual and spatial connection with the wider landscape. This is illustrated by visualisations from viewpoints 6.15 and 6.26 (**7.12 Visualisations - Part 7 of 9 [APP-349]**). The Applicant is confident that the assessment is robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on designated assets, including changes to their setting.

Examination Library ID	Name	Topic	Matter	NG Response
				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.
REP1-209	Boxted Airfield Historical Group	Safety and security	The effect on the Museum by the pylons would restrict the ability of aircraft to fly over the site of the original airfield.	**6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** identifies Boxted airfield as not operational. This followed engagement with former users who previously hosted aviation events at the site and advised that the runway was no longer useable. It is listed as disused on current aviation charts. Early engagement with the site owner did not reveal aviation concerns in relation to the Project. No impacts on the safety or operation of the airfield have therefore been assessed. There is potential for aircraft to overfly the site in the presence of the Project as an obstacle in the vicinity, but this has not been subject to Applicant assessment. Safety impact considerations would be variable and include the aircraft performance characteristics, and the height and direction of travel.
REP1-209	Boxted Airfield Historical Group	Socio-economics, recreation and tourism	All of this activity would stop if the pylons went ahead in the area that is suggested, this would severely affect the income of the Museum.	No land take is anticipated from the museum. Taking into account mitigation measures set out in **7.2 Outline Code of Construction Practice [Revision B]** and **7.3 Outline Construction Traffic Management Plan [APP-309]**, access to the museum would be maintained during construction. The Project is not anticipated to have a significant adverse effect on the museum during construction and operation as set out in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**.
REP1-209	Boxted Airfield Historical Group	Landscape and visual	The siting of the pylons would also affect the visual impact of the original airfield site. The location of the pylons would spoil the look of this important heritage site.	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including the Boxted WWII Airfield (4063). During the construction phase, this asset is assessed to experience a permanent minor adverse significance of effect concerning the below ground remains, and a temporary moderate adverse significance of effect for its setting (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-070]**). For below ground remains, **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 historic environment stakeholders, including the historic environment advisors to the Local Planning Authorities and Historic England. Mitigation follows the mitigation hierarchy and measures include the

Examination Library ID	Name	Topic	Matter	NG Response
				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. For the setting, standard construction mitigation would be adopted as detailed in **7.2 Outline Code of Construction Practice [Revision B]**. Changes to the setting from construction activity would be temporary and would be removed once the construction phase is completed. For the operation phase, it is assessed to experience a permanent moderate adverse significance of effect. **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. The Applicant is confident that the assessment and the proposed mitigations are robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on the non-designated assets, including changes to their setting. The Applicant has sought to reduce potential impacts on landscape and visual receptors through routeing and siting, as far as practicable. It is recognised, however, that significant effects on landscape character and visual amenity will occur. These effects are reported in the Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The LVIA recognises the following landscape and visual receptors will experience significant effects within approximately 1.5 km of the Project: • Langham Farmland Plateau Landscape Character Area, within which the former airfield is located • Visual Receptor Area (VRA) C11 Langham, which includes the former airfield north of the Project • VRA D3 Great Horkesley and Horkesley Heath which includes the former airfield south of the Project. The viewpoint assessment contained within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]** illustrates the Project in the view from Viewpoint 4.01: Boxted Airfield Memorial. The viewpoint assessment recognises that the visual effects of the Project will be moderate and significant (adverse) during operation.

Examination Library ID	Name	Topic	Matter	NG Response
REP1-262	Norwich Diocese Board of Finance	Land and property	Impact of the Current Proposed Route The latest alignment directly affects our client's landholding through the installation of overhead cables and a pylon. The proposed arrangement will cause severe and lasting disruption to agricultural operations. Key impacts include: • Fragmentation of fields and reduced machinery efficiency • Loss of productive land Interference with cropping rotation • Restrictions on access for large agricultural equipment Increased operational time and costs • Disruption from haul roads, compounds, and utility diversions • Longterm risks to drainage and soil structure • Permanent constraints on land management practices • These impacts have not been properly assessed, justified, or explained in relation to this specific holding.	The assessment within **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** presents residual effects on agriculture and soils and sets out mitigation measures to avoid, prevent, reduce and compensate (where relevant). The detailed design of construction access, haul roads, compounds and working methods is still being finalised and will be developed further in consultation with affected landowners. This process is intended to minimise disruption to agricultural operations, maintain access where reasonably practicable, protect soil structure and drainage, and minimise the extent and duration of temporary land take. The Applicant's land agents will continue to engage with the landowner to understand holding-specific constraints, cropping patterns and operational requirements. Where land is temporarily or permanently affected, the Applicant confirms that statutory compensation provisions apply, and that landowners and occupiers are entitled to be compensated for losses arising from the construction and operation of the Project in accordance with the relevant compensation code.
REP1-262	Norwich Diocese Board of Finance	Land and property	Our client's principal concerns relate to the location of pylons, the overhead lines and engagement with the Tenants. A meeting was held with Fisher German on 24 February 2026, attended by myself. Limited additional detail on the project was provided. As this was the first meaningful contact, our client has not had a reasonable or fair opportunity to consider the proposals or respond in an informed manner. To properly understand the implications of the scheme and its long term impact on the agricultural holding, our client requires detailed and specific technical information. This includes, but is not limited to: • Soil Storage, Handling, Reinstatement and Aftercare • Field Drainage Strategy and Reinstatement • Location, Design and Restoration of Haul Roads • Access arrangements agreed with the landowner • Attenuation Ponds and Water Infrastructure • Flood Risk and Water Management • Water mitigation measures • Dust, Noise and Crop Quality • Noise management • Measures to protect crop quality and farm operations • Access routes to Order Limits • Restrictive Rights and Operational Constraints • Full clarity on permanent rights and easements • Assurance there are no unnecessary constraints on cultivation depth, drainage, future cropping or land use	The Applicant confirms that they did meet with the affected party on 24 February 2026 where further information was provided and/or reasoning given for why certain aspects around the detailed design of the Project cannot yet be provided, but can be addressed through ongoing engagement as the Project progresses. The Applicant does not agree that this was the first meaningful engagement with the affected party and previous invitations to meet have been offered throughout the development of the Project, including the various stages of non-statutory and statutory consultation, but these have not been accepted. The Applicant minimises impacts through a combination of route selection and refinement, embedded mitigation secured by the Development Consent Order, and land specific design developed through ongoing engagement. Construction and operational effects are controlled through enforceable management plans, including **7.2 Outline Code of Construction Practice [Revision B]** and associated construction, soil, drainage, traffic, noise and environmental control plans, which must be approved before works commence and complied with throughout construction. These measures are designed to limit land take, protect soils and drainage, maintain access where reasonably practicable, reduce disruption to agricultural operations, and manage effects on heritage, landscape and communities. Detailed layouts for access routes, haul roads, compounds and working methods will be refined at the next stage in consultation with affected landowners and occupiers to reflect holdingspecific constraints and operational requirements. Where residual impacts remain unavoidable, statutory compensation provisions apply in accordance with the compensation code. The Applicant would welcome further engagement with the affected party to address all of the points made and discuss site-specific requirements.

Examination Library ID	Name	Topic	Matter	NG Response
			• Furthermore, our client requires clarity on the proposed mitigation measures to: • Reduce loss of productive farmland • Manage short term and long term operational inefficiencies • Minimise disruption to farm management and viability To date, none of this information has been provided in sufficient detail.	
REP1-262	Norwich Diocese Board of Finance	Land and Property	Heads of Terms were issued to our client by Fisher German on 31 October 2025. An initial meeting took place on 23 January 2026 to commence negotiations and discuss practical issues arising from the scheme. Despite that meeting, no feedback, clarification or substantive response has been received. As a result, negotiations remain stalled, and fundamental uncertainties persist. This continued absence of engagement is causing significant concern. For progress to be made, timely and meaningful communication is essential. We therefore request an urgent update addressing all outstanding matters in full.	The Applicant notes that Heads of Terms were issued by its land agents Fisher German on 31 October 2025 and that a meeting took place to discuss the Heads of Terms and explore practical matters arising from the Project. The Applicant acknowledges that the affected party feels that not all matters raised at that meeting have yet been resolved and confirms that further clarification and responses will be provided as discussions progress. The Applicant does not accept the assertion that negotiations have stalled. In fact, discussions have continued between the relevant parties, with a further meeting held on 24 February 2026 specifically to review and discuss the Heads of Terms. Following this meeting, the Applicant communicated to the affected party that the Heads of Terms would be reissued shortly, incorporating relevant amendments where practicable. The revised document has already been sent to the appointed agent of the affected party for their consideration. The Applicant's approach is to continue engagement in good faith, recognising that negotiations are iterative and dependent on the availability of evolving technical detail, and requirements.
REP1-453	Richard Prentice	Consultation	We have held multiple meetings with clients and Fisher German through the various consultation phases, we have submitted change requests to National Grid, some of these may have been significant, such as asking for sections of the line to be buried and some may have been much smaller – perhaps moving a pylon closer to a field boundary to minimise disruption to farming operations. Having listened to [redacted text] who represented the applicant we were surprised to hear that the applicants felt they had provided feedback to Land Agents where change requests had been made, this is not our experience. There has been no direct explanations to our clients as to why a change request could or could not be facilitated. The process has not been constructive and has left many land owners disenfranchised with the whole process and in some cases there mental wellbeing has been significantly impacted. This could have been avoided if constructive two way dialogue had been facilitated by the applicant. Most clients are understanding of the project but expect to be treated fairly and when asked to engage there is an expectation of some feedback.	The Applicant notes the concern raised regarding the timing and manner in which information on route amendments and design adjustments has been communicated, including the perception that landowner-specific requests and outcomes have not been directly notified in advance of information being placed in the public domain. Following the close of statutory consultation in 2024, the Applicant undertook a structured change control process, all requests were considered and some were accepted into the design. Each accepted change was then considered to determine whether it constituted a change that would trigger a requirement for further targeted consultation, in accordance with the Planning Act 2008 and associated government guidance. Where changes were not considered to require further consultation, information was instead incorporated into the application documents made publicly available in accordance with guidance. The Applicant does not feel that this approach represents a failure of consultation. It recognises that landowners with significant interactions with the Project may reasonably expect clear and direct dialogue on landowner specific matters. Engagement with landowners has continued through correspondence, meetings and discussions with the Applicant's land agents, and remains an ongoing process as the Project progresses through Examination.

Examination Library ID	Name	Topic	Matter	NG Response
				Given the size of the Project, and the several thousand responses received at each consultation, the Applicant noted that it had taken an approach of not responding directly to every individual response. However, at the appropriate time, feedback on individual requests was provided to instructed land agents and reported in various documents such as **5.1 Consultation Report [APP-066]**.
REP1-453	Richard Prentice	Land and Property	With respect to the Heads of Terms that have been issued, generic Heads which were issued in late Summer 2025, feedback was given by us in Autumn 2025 and eventually a meeting was held in mid January 2026 to go through these change requests with Fisher German. We still await hearing whether the applicant is prepared to make any alterations to the Heads of Terms despite feedback being originally given in Autumn 2025. At the current time we cannot advise our clients to sign up to the voluntary Heads of Terms as they are little better than simply relying on the statutory provisions were the consent order to be granted .	Heads of Terms were issued by the Applicant's appointed agent, Fisher German, and meetings have subsequently been held to discuss and identify land-specific and practical matters arising from the proposals. As is typical for Nationally Significant Infrastructure Projects, matters raised at such meetings require internal consideration and, where necessary, input from relevant technical disciplines to ensure that any response is accurate, proportionate and consistent across the Project. The Applicant does not accept that the period following the January meeting represents an absence of engagement, but rather reflects the time required to review the points raised and to coordinate an appropriate response within the context of the Examination timetable. Following a thorough review of the points raised during the previous meeting and in accordance with the process outlined for Nationally Significant Infrastructure Projects, the Applicant will shortly be reissuing the Heads of Terms to the affected party. This step ensures that all concerns and suggestions have been duly considered, and that the documentation accurately reflects the discussions to date. A copy of this revised document has already been issued to appointed agents so that they can discuss with their clients. In addition, the Applicant will provide a further opportunity for the affected party to meet and discuss the revised terms. This meeting will also serve as a forum to address any other practical matters that may require attention, thereby maintain open communication and continue constructive engagement throughout the ongoing process.
REP1-221	CPRE - The Countryside Charity	Planning policy	In response to the Norwich to Tilbury (N2T) proposals, CPRE branches in Essex and Norfolk (together with the Suffolk Preservation Society) commissioned a report, entitled "Greening the Great Grid Update" (May 2024) *[appended to Written Representation]*. It was authored by Dr Andy Tickle, an independent planning, campaign and policy consultant. The report shines a light on the inequitable impacts of the Great Grid Upgrade on East Anglia's countryside and communities and, equally importantly, aims to start wider conversations about grid planning and better outcomes for landscapes, communities, heritage and biodiversity. The report calls for a new 'green' grid, fit for 21st century multi-purpose landscapes and, to achieve the social licence required for the Great Grid Upgrade, there needs to be a national conversation about place-making for electricity transmission infrastructure. In order to achieve this, the report sets out a new green planning vision and makes a series of recommendations which offer practical,	The Applicant acknowledges the publication of CPRE's report as referenced in their written representation and in their feedback to the 2024 statutory consultation. 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 contributing to our energy security in the future, helps the country to achieve the UK Government's Net Zero target and ensures that the Applicant meets future power demands.

Examination Library ID	Name	Topic	Matter	NG Response
			workable solutions which dovetail into the ongoing development of new grid planning, design and delivery mechanisms.	
REP1-221	CPRE - The Countryside Charity	Needs Case	Currently new grid infrastructure schemes must deliver best value and promote the 'cheapest consentable solution'. This generally means overhead lines to which there is invariably and understandably considerable opposition. For this reason, planning is inefficient, slow and unpopular. If community confidence, and social licence, is to be won for the Great Grid Upgrade, more collaborative and innovative planning is needed urgently. This involves a fresh approach to the needs case. In this respect, over-estimating the need will lead to overbuilding of the network and creation of costly stranded assets. This is a major concern when the impacts of infrastructure on communities and the environment are significant and long lasting. Much greater ambition for locational demand, improved energy efficiency, distributed energy and flexibility is required to avoid overprediction of future energy need and grid system overbuild. Independent analysis of the N2T scheme (Hiorns report) illustrates the continuing dangers of the 'predict and provide' approach which pervades the Great Grid Upgrade stating that 'it is too early to conclude that N2T presently represents the best solution in meeting future system needs'.	The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks[12] and published its response in April 2024, which is available on the Project website. The Applicant concluded that it does not agree with the report's conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis[13], Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers in terms of constraint costs and would impact the Applicant's obligations under the planning requirements and its transmission licence. Paragraph 2.8.5 of National Policy Statement EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2, an obligation to provide transmission services when requested. The delay to any investment would incur £2.7 billion in constraint costs, as set out in Annex 2 of the NESO Clean Power 2030 report.
REP1-221	CPRE - The Countryside Charity	Needs Case	The report highlights both defects in strategic and NSIP planning that risk the delivery of the Great Grid Upgrade. The cheapest and simplest option of overhead lines are being prioritised by government strategy which risks incalculable damage to landscapes, communities and social licence. This is unacceptable. As a result, the report proposes changes that would reduce impacts, enhance outcomes, increase social acceptability and speed up consenting and delivery: - a more pro-active approach to planning and alternatives is required if the onshore impacts of electricity transmission are to be minimised in rural areas. - a more determined approach to creating a truly offshore grid must be facilitated both in policy and guidance. - a substantive shift in policy and guidance to prioritise undergrounding of lines where there will be significant impacts on landscapes and communities. - a greater use of technological innovation in delivering a new green grid.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. **5.15 Design Development Report [APP-122]**, paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in 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. 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]**. 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

[12] Andy Hiorns (2023) East Anglia Transmission Network Reinforcements

[13] National Energy System Operator (2024) Clean Power 2030 - Annex 2: Networks, connections and network access analysis

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				LVIA in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**.
REP1-302	Brooks Leney	Land and property	Feedback Over the past three years, Brooks Leney have held numerous meetings with clients and with Fisher German through various consultation phases, and have submitted a range of change requests to National Grid. Some requests were substantial—for example, proposals for rerouting sections of the line—while others were more modest, such as repositioning a pylon to a field boundary to minimise disruption to agricultural operations, or making minor realignments. Many clients have offered valuable local insight in an effort to engage positively and constructively in the process. We were therefore surprised to hear the Applicant assert during the hearings that feedback had been provided to land agents in relation to change requests. This has not been our experience. While Fisher German have engaged with us and our clients, communication has not extended beyond this point. No direct explanations have been provided to our clients as to why their change requests have, or have not, been adopted. This absence of constructive two way dialogue has led many landowners to feel disengaged and, in some cases, severely affected in terms of their mental wellbeing. Such outcomes could have been avoided through the establishment of a genuine and transparent feedback process. Whilst most clients recognise the strategic importance of the project, they reasonably expect to be treated fairly and to receive substantive responses when asked to participate. Furthermore, the Applicant's 5,000+ page consultation report fails to record many of the comments and submissions made by our clients—whether provided through meetings with Fisher German (where we were consistently assured comments would be relayed to National Grid) or submitted directly. We are able to supply numerous examples should further evidence be required. Heads of Terms With regard to the Heads of Terms issued—initially circulated in late Summer 2025—Brooks Leney provided formal written feedback in Autumn 2025. A meeting was eventually convened in mid January 2026 to review our proposed amendments with Fisher German. Although Fisher German were fully aware of our written comments, they informed us that they had not been instructed by National Grid to negotiate or discuss the Heads of Terms substantively and were operating solely in a "listening mode". We continue to await confirmation as to whether the Applicant intends to adopt any of the amendments proposed, despite those proposals having been issued several months earlier. We have now been advised that amended Heads of Terms will be issued to landowners within the next one to two weeks, with no opportunity for further negotiation. Landowners are therefore being presented with terms for a voluntary agreement that have not been	**Feedback** The Applicant notes the concern raised regarding the timing and manner in which information on route amendments and design adjustments has been communicated to, including the perception that landowner specific requests and outcomes have not been directly notified in advance of information being placed in the public domain. Following the close of statutory consultation in 2024, the Applicant undertook a structured change control process, all requests were considered and some were accepted into the design. Each accepted change was then considered to determine whether it constituted a change that would trigger a requirement for further targeted consultation, in accordance with the Planning Act 2008. Where changes were not considered to require further consultation, information was instead incorporated into the application documents made publicly available, in accordance with guidance. The Applicant does not feel that this approach represents a failure of consultation. It recognises that landowners with significant interactions with the Project may reasonably expect clear and direct dialogue on landowner specific matters. Engagement with landowners has continued through correspondence, meetings and discussions with the Applicant's land agents, and remains an ongoing process as the Project progresses through Examination. **Heads of Terms** Template Heads of Terms were first issued in Summer 2025 alongside various policy documents that relate to the acquisition of rights on a voluntary basis including the National Grid Land Rights Strategy. These were issued by the Applicant's appointed agent, Fisher German. Subsequently populated version of the Heads of Terms were sent to landowners in a phased approach during the Autumn and Winter of 2025. During this period multiple meetings have subsequently been held with agents across Norfolk, Suffolk and Essex to discuss the terms offered, where feedback has been collated and considered which has resulted in a re-issue of a revised set of template terms to all agents in February 2026, this will be followed with a route wide populated Heads of Terms mail out to all landowners on a phased basis, commencing in March 2026. The revised terms offered, reflect key changes as a result of the direct feedback received from agents including but not limited to matters such as injurious affection provision, improved payment terms, additional provision for land drainage, treasure finds and amendment to enabling works provision. For the avoidance of doubt the Applicant is committed to an ongoing dialogue in respect of the terms on offer and is happy to continue negotiating these terms via their agent Fisher German. In parallel with the ongoing negotiations on the Heads of Terms documents, the Fisher German team have been undertaking and requesting meetings with landowners and their representatives to

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			subject to professional negotiation between the respective land agents and are instead being issued on a take it or leave it basis. In our view, this approach does not align with the requirements of the Act, which obliges the Developer to engage meaningfully and negotiate actively with landowners to establish voluntary terms. Consequently, we question whether the Applicant has demonstrated the necessary level of engagement to warrant the granting of compulsory acquisition powers for the scheme. At present, and based on the latest available draft of the Heads of Terms, we cannot recommend that our clients enter into voluntary agreements. The Terms offer little advantage over reliance on statutory provisions should a consent order be granted. There are many shortcomings in the proposed Terms which don't adequately address practical and technical issues surrounding the project. We can provide further detail regarding the deficiencies of the voluntary Heads of Terms upon request. Based on our experience of previous National Grid projects, we have concerns that, even where voluntary Heads of Terms appear to be under negotiation, delays in document execution often lead to National Grid relying on statutory powers to secure possession. Some may interpret this pattern of behaviour as a deliberate attempt to avoid genuine voluntary agreement whilst ensuring that Development Consent Order powers are obtained. Statutory Undertakers Many clients are not only affected by the installation of new pylons and cables but also by the rerouting of existing infrastructure—particularly UKPN wires, pylons and poles—which must be buried or relocated to enable construction of the new line. As at the date of writing, we have received no engagement from UKPN or their agents. We understand that an agent has only recently been appointed, which is regrettably far too late in the process. This leaves landowners facing a period of uncertainty regarding both the treatment of existing infrastructure and the division of compensation and remedial responsibilities between UKPN and the Applicant. We have significant concerns about a model in which access, reinstatement and compensation are to be addressed separately by multiple statutory undertakers operating within what is, in practice, a single project.	identify land specific and practical matters arising from the proposals on matters such as crossing points accommodation works, land drainage, severed land areas etc, in order to seek to mitigate the impact of the proposals on landholdings during the construction phase The outputs of these meetings are being recorded on a project Commitments register that will form the basis of land holding specific commitments to manage the interaction between existing operations on the land and construction requirements. As is typical for nationally significant infrastructure projects, matters raised at such meetings require internal consideration and, where necessary, input from relevant technical disciplines to ensure that any response is accurate, proportionate and consistent across the Project. The Applicant confirms that the Heads of Terms issued for the Project are intended to be clear, proportionate and fair, and have been developed to ensure consistency of approach across all affected landowners. The terms reflect statutory requirements, established valuation principles and the need to treat comparable interests in a consistent manner, while allowing for landspecific matters to be considered through ongoing engagement. The Applicant considers that the Heads of Terms provide a transparent basis for voluntary agreement and remain subject to discussion as negotiations progress, with the objective of securing agreements by consent wherever reasonably practicable. **Statutory Undertakers / UK Power Networks** The Applicant recognises that this distinction, and the involvement of separate agents, has given rise to uncertainty regarding responsibilities and the appropriate route for engagement. The Applicant confirms that the works in question fall within the scope of the Norwich to Tilbury Development Consent Order, which is being promoted by National Grid as the Applicant. Where third-party works are required to facilitate the delivery of the authorised development such as works undertaken by UK Power Networks these are addressed within the DCO framework through protective provisions and third-party agreements. National Grid retains overall responsibility for promoting the DCO and for ensuring that land and rights required for the Project are secured in a coordinated and lawful manner. The Applicant remains the DCO Applicant and is responsible for the overall coordination of land rights required for the Project. Fisher German act as National Grid's appointed land agents. UK Power Networks is responsible for delivering certain statutory undertaker works and may appoint its own agents to negotiate land rights specific to those works, but this does not sit outside the National Grid DCO framework. All engagement, consultation and acquisition of land or rights for works authorised by the DCO whether undertaken directly by National Grid or by UK Power Networks as a third party are governed by the DCO and associated statutory processes.

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				The Applicant confirms that the landowner's representations have been received and are being considered. The Applicant accepts that clearer communication on this point should be provided. The Applicant confirms that the landowner will have a further opportunity to engage directly with the Applicant, in addition to any engagement with UK Power Networks' appointed agents, to ensure transparency and accountability.
REP1-240	George Durrant and Sons Ltd	Land and property	Feedback We have held multiple meetings with clients and Fisher German through the various consultation phases, we have submitted change requests to National Grid, some of these may have been significant, such as asking for sections of the line to be buried and some may have been much smaller – perhaps moving a pylon closer to a field boundary to minimise disruption to farming operations. Having listened to who represented the applicant we were surprised to hear that the applicants felt they had provided feedback to Land Agents where change requests had been made, this is not our experience. There has been no direct explanations to our clients as to why a change request could or could not be facilitated. The process has not been constructive and has left many landowners disenfranchised with the whole process and in some cases there mental wellbeing has been significantly impacted. This could have been avoided if constructive two way dialogue had been facilitated by the applicant. Most clients are understanding of the project but expect to be treated fairly and when asked to engage there is an expectation of some feedback. Secondly with respect to the Heads of Terms that have been issued, generic Heads which were issued in late Summer 2025, feedback was given by us in Autumn 2025 and eventually a meeting was held in mid January 2026 to go through these change requests with Fisher German. We still await hearing whether the applicant is prepared to make any alterations to the Heads of Terms despite feedback being originally given in Autumn 2025. At the current time we cannot advise our clients to sign up to the voluntary Heads of Terms as they are little better than simply relying on the statutory provisions were the consent order to be granted.	The Applicant notes the concern raised regarding the timing and manner in which information on route amendments and design adjustments has been communicated to, including the perception that landowner specific requests and outcomes have not been directly notified in advance of information being placed in the public domain. Following the close of statutory consultation in 2024, the Applicant undertook a structured change control process, all requests were considered and some were accepted into the design. Each accepted change was then considered to determine whether it constituted a change that would trigger a requirement for further targeted consultation, in accordance with the Planning Act 2008 and associated government guidance. Where changes were not considered to require further consultation, information was instead incorporated into the application documents made publicly available, in accordance with guidance. The Applicant does not feel that this approach represents a failure of consultation. It recognises that landowners with significant interactions with the Project may reasonably expect clear and direct dialogue on landowner specific matters. Engagement with landowners has continued through correspondence, meetings and discussions with the Applicant's land agents, and remains an ongoing process as the Project progresses through Examination. Heads of Terms were issued by the Applicant's appointed agent, Fisher German, and meetings have subsequently been held to discuss and identify land specific and practical matters arising from the proposals. As is typical for nationally significant infrastructure projects, matters raised at such meetings require internal consideration and, where necessary, input from relevant technical disciplines to ensure that any response is accurate, proportionate and consistent across the Project. The Applicant does not accept that the period following the January meeting represents an absence of engagement, but rather reflects the time required to review the points raised and to coordinate an appropriate response within the context of the Examination timetable. Following a thorough review of the points raised during the previous meeting and in accordance with the process outlined for nationally significant infrastructure projects, the Applicant will shortly be reissuing the Heads of Terms to the affected party. This step ensures that all concerns and suggestions have been duly considered, and that the documentation accurately reflects the discussions to date. A

Examination Library ID	Name	Topic	Matter	NG Response
				copy of this revised document has already been issued to appointed agents so that they can discuss with their clients. In addition, the Applicant will provide a further opportunity for the affected party to meet and discuss the revised terms. This meeting will also serve as a forum to address any other practical matters that may require attention, thereby maintain open communication and continue constructive engagement throughout the ongoing process.
REP1-257	Norfolk Wildlife Trust	Biodiversity, ecology and nature conservation	Our written representation provides further detail on the following: We have ongoing concerns about Meadow Wood candidate County Wildlife Site (CWS) and the surrounding habitat. We recommend further assessment of alternative routes is undertaken.	The area of land indicated as being a candidate County Wildlife Site (CWS) 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 CWS in the assessment, this area of woodland has been included under the priority habitat receptor and as such has been given significant weighting in routeing design decisions. Mitigation proposals for the candidate CWS would relate to the impact on woodland habitat and this is already clearly set out within **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. The Applicant has carefully considered the routeing and does not consider it necessary or appropriate to modify the route to the extent requested. The rationale for this change is set out in **5.15 Design Development Report [APP-122]** at paragraphs 4.4.1 to 4.4.6 but identifies that a more restricted change that has been implemented was preferred. Compared with the request this was preferred because it does not just transfer effects to other landowners, uses the pylon positions and heights to reduce effects on veteran trees and avoids the introduction of further angle changes.
REP1-257	Norfolk Wildlife Trust	Biodiversity, ecology and nature conservation	We support Suffolk Wildlife Trusts concerns around The Waveney and Little Ouse Landscape Recovery Project (WaLOR) & the crossing of the River Waveney Valley, principally relating to the proposed river restoration works.	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.
REP1-257	Norfolk Wildlife Trust	Biodiversity, ecology and nature conservation	Bats, notably barbastelle, may be impacted by hedgerow loss as commuting routes are severed. We advocate for monitoring of these to provide further certainty in their effectiveness.	The bat survey scope was agreed with Natural England in advance of surveys being undertaken, as included within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034].** Automated static detector surveys have been undertaken in locations where effects on bats are anticipated because of severance/ fragmentation of habitat, temporary/ permanent removal of vegetation and/or indirect effects arising from light and noise of temporary construction (i.e., haul roads, access tracks, temporary construction compounds) and/or operational use of permanent assets (i.e. substations, CSE compounds, permanent access roads for substations/CSE compounds). Bat activity has been assessed **within 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]**.

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				This bat activity assessment considers all bat species, including but not exclusive to barbastelle bats. At key locations where the survey data have indicated a high usage feature by foraging/commuting bats, artificial bat flyways have been proposed 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 [Revision C]** as outlined within the relevant LPA **Draft Statements of Common Ground submitted at Deadline 1 [REP1-008 to REP1-033]**. 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.
REP1-257	Norfolk Wildlife Trust	Biodiversity, ecology and nature conservation	Norfolk Wildlife Trust are interested in the delivery of Biodiversity Net Gain. Firstly, it must be remembered that Biodiversity Units are a proxy for biodiversity value; the Project should be delivering a biodiversity legacy which offers genuine long-term biodiversity benefit to Norfolk, Suffolk, and Essex. The delivery of Biodiversity Net Gain should focus on those areas identified by the Local Nature Recovery Strategy. It is the view of Norfolk Wildlife Trust that any habitat defined as providing compensation for a loss of nesting bird habitat should not contribute beyond no-net-loss. We therefore ask that National Grid provide suitable evidence of both mitigation and compensation in relation to how these are considered regarding Biodiversity Net Gain.	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-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. BNG is intended to deliver a net gain in biodiversity value across the Project. The assessment of effects on breeding and wintering/passage birds does not depend on BNG to demonstrate that no significant residual effects remain. Accordingly, no separate mitigation/compensation area is required to address permanent habitat loss for breeding or wintering/passage birds, as the assessment concludes that such losses do not give rise to significant residual effects. However, landscape proposals within the Environmental Areas will provide additional beneficial effects overall to breeding birds.
REP1-257	Norfolk Wildlife Trust	Biodiversity, ecology and nature conservation	Norfolk Wildlife Trust recommend that, as part of the DCO process, an Ecological Advisory Group (EAG) is established	The Applicant acknowledges the large scale and complexity of the Project and sees the value in setting up an Ecology Working Group for the construction phase. This Ecology Working Group would be formed post-consent to provide progress updates on ecological mitigation, as set out within **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and **7.2 Outline Code of Construction Practice [Revision B]** during the construction period. The Ecology Working Group would include the Ecological Clerk of Works and suitably qualified and experienced members from the Local Planning Authorities, Wildlife Trust/s and Natural England on their request and agreement with the Applicant. The next iteration of the Outline Landscape and Ecological Management Plan will be updated to include the requirement for a post-consent Ecology Working Group.

Examination Library ID	Name	Topic	Matter	NG Response
REP1-254	Norfolk Gliding Club	Safety and security	**5. Safeguarding** **5.1.** Following advice from the BGA, the General Aviation Awareness Council (GAAC), the Combined Aerodrome Safeguarding Team (CAST) and the Civil Aviation Authority (CAA) in 2022, the club developed a safeguarding plan with the help of the Airfield Advisory Team (AAT) of the CAA. **5.2.** Because of the number of runways at Tibenham (six asphalt and seven grass) we chose to adopt the CAA AAT's advice and create a circular safeguarding zone which is of 5km radius centred on the airfield rather than the multiplicity of Obstacle Limitation Surfaces (OLS) that would be produced using CAA CAP 168. **5.3.** The OLS approach is recognised and accepted by the CAA AAT as providing a 'one size fits all' starting point and is useful in situations where the airfield has only one or two runways. However, in a mixed power and gliding airfield where gliders can approach and land from any height in any direction onto either the asphalt runways or surrounding grass areas it is totally impractical. Having said that we note that NG's consultants refuse to accept the safeguarding zone and base all their aviation assessment on the OLS method contrary to the advice and guidance from the CAA AAT. **5.4.** This plan has been lodged with and is in use by Norfolk County Council, South Norfolk Council and Breckland Council. **5.5.** In addition, the presence of the proposed pylon route, which would effectively result in an 11km notch of the AAT's airfield well through this zone, would make representation to the above councils impossible. This combined with planning applications in the protected areas and their combined effect would have a significant adverse effect on operations at Tibenham together with the financial viability of the club.	**3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]** summarises the Applicant's ongoing efforts to address matters raised previously during consultation, within the Norfolk Gliding Club Relevant Representation **[RR-2754]** and remains relevant here. We note the Respondent's provision of detailed commentary (most notably from their independent consultant), which is welcome, provides agreement in key areas, and offers opportunity to progress outstanding matters (focusing on gliding operations and the assessment and mitigation of risks of aerotow take-offs, forced landings and competition approaches). Key points addressed from the Respondent's submission are as follows: **5. Safeguarding** As per the Applicant's response to Matter 6.5 within **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]** the Applicant has duly considered the aerodrome's defined safeguarding zone, albeit recognising its primary purpose is to ensure prospective developer awareness of the aerodrome and to prompt operator consultation (see paragraph 5.5.13 of National Policy Statement EN-1, 2024). The Applicant acknowledges that the complexity of the site and its operations may limit the value of including multiple Obstacle Limitation Surfaces (OLS) within a single, broadly defined safeguarding zone. The Applicant agrees this is a matter for the aerodrome operator. Whilst neither safeguarding zone nor OLS infringement preclude development, there is a distinction between the purposes of a safeguarding zone and the Applicant's undertaking of aviation impact assessments focused on obstacle clearance and consideration of the significance of OLS infringement amongst other factors. The Applicant's approach to the latter is described within para 15.3.27 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]**, which recognises OLS consideration to be a best practice, standardised and objective measure for obstacle assessment, as defined under the Civil Aviation Authority (CAA) CAP 168 regulations for licensed aerodromes[14].
REP1-254	Norfolk Gliding Club	Safety and security	7. Tibenham Airfield - The Aviation Safety Risks and Potential Consequences 7.1. As with all activities there is always a risk, and in that respect, aviation in its various forms is no different. 7.2. In all walks of life from the Government down we strive to review the things that go wrong, determine the root cause and initiate change that is aimed at reducing that risk 7.3. But the proposed pylons are taking us in the wrong direction and even NG's consultants admit that the proximity of the route to the airfield will result in an increase in safety risk, the question is	7. and 8. Aviation Safety Risks, Potential Consequences and the Nature of Risks at Tibenham The Applicant strongly agrees that the significance of any risk of the Project as a hazard to aviation is of fundamental importance to establishing whether the risk can be accepted, or if mitigation is required. This is consistent with safety risk management principles as described within the CAA's CAP 1059[15] guidance. The Applicant has recognised that the presence of the proposed Project as a new obstacle in the vicinity of aerodromes is a hazard that should be subject to evaluation and is therefore the principal focus of our assessments. Whilst the severity of potential incidents

[14] Civil Aviation Authority (2025) CAP168: Licensed Aerodromes

[15] Civil Aviation Authority (2013) CAP1059 Safety Management Systems: Guidance for Small Non-Complex Organisations

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			one of degree – How significant is that increased risk and what would be the consequence if things were to go wrong? 7.4. Over the period shown in the chart above there were a total of some 66,000 departures together with, of course, 66,000 arrivals making a total of 132,000 aircraft movements in 16 years at Tibenham 7.5. The reporting mechanisms through the Air Accidents Investigation Branch (AAIB) is not as thorough as we might like and from my own experience, I am aware of accidents, some fatal, that do not appear on their database 7.6. About 25 years ago the AAIB improved their reports database which currently allows for analysis of some 11,000 accidents. A search of those reports looking for the term 'engine failure' as the probable cause identified 174 records. Of these • 75 occurred during take-off • 34 occurred during approach and landing • Of the 75 take-off incidents, 56 of the reports indicated the height at which the problem occurred • 35 (62%) of these were at 300ft agl or lower 7.7. From the chart above we have an average of say 8,250 aircraft movements per year over those 16 years 7.8. Local knowledge and discussions with club members identified 11 Engine Failure On Take-Off (EFATO) type incidents at Tibenham in the period 1985 to 2025 which resulted in • 4 aircraft being destroyed • 6 aircraft requiring major repairs • 1 aircraft without damage • 6 people with no injuries • 6 people with minor injuries • 1 person with serious injuries • 3 fatalities 7.9. By definition these figures only cover powered aircraft since gliders do not have engines but the possibility of a glider having to make an emergency off airfield landing due to an aborted aerotow is still real – see Appendix H 7.10. Virtually all glider pilots have, at some time in their flying career, been faced with the need to land in a field having attempted to fly cross country and failed to get back to the airfield as the 'lift' decays. 7.11. At Tibenham, currently, our team of instructors are able to simulate this 'emergency' to prepare pilots at various levels of	resulting from the Project obstacle may have severe consequences, risk likelihood is low (as recognised by the Respondent) and could be accepted, subject to review and mitigation, if appropriate (as illustrated by the CAP 1059 Risk Tolerability Matrix). Through the aerodrome-specific impact assessments, the Applicant has detailed and quantified the extent of potential impacts against an objective and standardised baseline, and in the case of Tibenham, has concluded impacts are not significant as clearances are adequate including for aerotow (considering specific, official performance data) and in forced landing circumstances (see para 15.4.24 and Table A15.2.11 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]**). We note the Respondent's agreement that powered aircraft can take off with a sufficient safety margin and would welcome clarification of what they consider this margin to be to inform our understanding of Operator risk acceptance. In terms of flight test data for aerotow flights, we would welcome further detail on how these tests were conducted, as per our previous requests, noted within Matter 6.4 of **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]**. The Applicant's position is that there can be multiple reasons for forced landing (including mechanical causes such as locked brakes or aerotow issues), but the key risk assessment factor in terms of the effect of the Project is consideration of whether there is sufficient distance from the overhead line for the pilots of tug and glider aircraft to manoeuvre and land safely, before or beyond the overhead line in a forced landing event. The Applicant's key assessment parameters in terms of take-offs and approaches are conservative and therefore allow for a range of flying conditions and the level of pilot experience. For take-off, for example, they include a maximum 15° bank angle (compared with 30° referenced by the Respondent). We note the Respondent's statements relating to similar parameters and look forward to confirming the sources of these measures, as well as the data underpinning assumptions. In relation to competition flying, the Applicant has sought clarity on the specific implications of the Project for Tibenham competition finishes, understanding the nature and height of finishes to be defined by the host[16] to ensure aircraft can land safely, and the potential therefore for the Project to be accounted for within the finished design. We continue to seek clarity on this possibility. We note the Respondent's position that, in a gliding context, Air Accidents Investigation Branch incident reporting mechanisms are unreliable and CAA guidance relating to obstacle-focused impact assessments is not suitable. With regard to the latter, the Applicant has proactively engaged aviation stakeholders to seek agreement on an objective or standardised means of assessing potential gliding impacts. In the interim, our impact assessment conclusions have

[16] British Gliding Association (2022) Simplified Rules for Regional and Club Competitions

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			experience on how to achieve a safe landing. The proximity of the proposed pylon route will restrict this level of training 7.12. A safe emergency landing from an aborted aerotow adds another level of complication in that there will be two aircraft (the tug and the glider) both trying to land in the same field 7.13. If we were to combine the two sets of data then over the 40 years covered by the EFATO incidents we might expect in the region of 330,000 aircraft movements and in that time have 10 aircraft either destroyed or needing major repair, 7 people with injuries and 3 fatalities 7.14. Which brings us back to NG's consultants and their agreement that the proximity of the pylons will increase the safety risk. 7.15. Luckily the incidence of aircraft colliding with cables in the UK is relatively rare but when it does happen the results are usually fatal. I have only witnessed one such accident in 50 years of flying when a Piper PA28 hit a cable. Of the three people on board, two were killed outright and the third, a young girl, spent the rest of her life in a wheelchair. 7.16. In their general aviation handbook, the CAA quote 800 sites, 20,000 registered aircraft and 29,000 general aviation pilots which, given the number of flights that must have taken place over the last 20 years, does support the ASA view that the risk is small however a fatality is just that and we should not be complacent in terms of looking for improvement rather than taking a retrograde step when a safer alternative is available 7.17. This level of analysis is also supported by the Civil Aviation Safety Authority (CASA) in Australia who have carried out a study of EFATO incidents. Their data shows that during and after take-off, a partial power loss is three times more likely in today's light single engine aircraft than complete engine failure. Furthermore, there have been nine fatal accidents in the years from 2000 to 2010 as a result of a response to a partial power loss compared with no fatal accidents where the engine failed completely 7.18. Appendix G shows that a study carried out by the National Energy Systems Operator (NESO), commissioned by a number of MPs identified that the cost of undergrounding is less than that of pylons but even if that were not the case and the proposed pylons resulted in only one fatality isn't that one too many when it could so easily be avoided? 8. Tibenham Airfield - The nature of the aviation safety risks 8.1. The fundamental problem is the close proximity of the proposed pylons to the airfield and in particular how that would affect the use of runways 26 and 33 8.2. The problem is compounded by the presence of Priory Farm airfield which is situated to the west of Runway 26 and just over half way between the Tibenham boundary and the proposed pylons	necessarily informed development of the Project, in the absence of alternative evidence of adverse impact to justify changes. 9. Policy and Guidance Context Recognising EN-1 and EN-5 to be the primary determining policies for the Development Consent Order (DCO) application, the Applicant has foremost ensured its compliance with its responsibilities defined therein, including undertaking an assessment of potential effects on aviation, and including appropriate mitigation measures as an integral part of the proposed development, ensuring the Project has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes (see **5.7 Policy Compliance Document [APP-086]** regarding EN-1 (2024) paras. 5.5.37 and 5.5.43). The Applicant notes the EN-1 para 5.5.50 requirements on operators to regularly review the possibility of agreeing to make reasonable changes to operational procedures, which it suggests is complementary to the provisions within para 200 of the National Planning Policy Framework (Ministry of Housing, Communities and Local Government, 2025) relating to existing businesses not having unreasonable restrictions placed on them as a result of development permitted after they were established. **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]** recognises the aerodrome's status as a sports club, but summarises assessed effects (including on the business) as being non-significant during construction and operation. The conclusions of the Applicant's impact assessments do not justify changes to the proposed Project alignment on the grounds of adverse impacts on the operation and safety of Tibenham aerodrome. We have suggested that the operator consider making reasonable changes to its operational procedures (during competitions, for example, or through the implementation of measures to enhance pilot awareness) to address any residual impacts it perceives.

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			8.3. As part of the agreed deconfliction between our two airfields, Priory Farm circuits are flown to the west and wherever possible ours are to the east of our respective airfields 8.4. In the case of normal powered aircraft take-offs • As a general rule all powered aircraft should be able to depart from runway 26 or 33 and either turn to avoid overflying Priory Farm or cross the pylon route with a sufficient safety margin 8.5. In the case of aerotow flights • The rate of climb of an aerotow combination is much lower than that of normal powered aircraft which is confirmed in the CAA AAT guidance in appendices J and K • Despite this guidance from the CAA AAT, NG's consultants in their Airfield Impact Assessment, have chosen to ignore it and quote an achievable clearance of 236ft over the pylon meaning the combination would be at around 436ft agl based on the nominal maximum pylon heights • Flight tests held in September 2025 showed that whilst some were able to cross the proposed pylon line with sufficient safety margin others did not with one combination not even reaching 200ft agl • National Grid's consultants have suggested that the combination should initiate a turn to avoid the line but BGA guidelines advise that no turn should be made lower than 300ft agl • Even if such a turn were attempted the radius of the circle would be in the order of 500m and it would put the combination directly overhead and in conflict with Priory Farm and their circuit 8.6. In the case of Engine Failure After Take Off (EFATO) or other similar emergency such as a low level aborted aerotow • CAA guidelines can be found in CAP 793, chapter 5, paragraph 8 which state that wing bank angles should be limited to 300 or less and heading changes to less than 300 either side of the aircrafts nose • A tug/glider combination is about 200ft long with limited manoeuvrability and a reduced climb rate when compared to that of the non-towing aircraft performance. Any low-level emergency (say below 300ft) would require both aircraft to land straight ahead • With the proposed pylons being so close to the end of runway 26, an aborted aerotow could mean that neither tug aircraft nor	

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			glider would be likely to clear the obstacle with potentially fatal results • At one of the consultations, NG's consultant, ASA claimed that since there is no documentary proof that any such incident has ever occurred, they cannot be considered. However, there is no requirement to document them and in the many years of being a tug pilot and glider instructor with some 7,000 launches I have at some time encountered every one 8.7. In the case of returning cross country gliders• Gliding competitions are an integral component of the sport for many glider pilots where speed and efficiency are crucial to performance and success • Success in regional competitions gives the pilot a rating which allows them to compete in national events where success leads to the possible selection to the British Team and their participation in international competitions – see appendix C • Due to the location of Tibenham within East Anglia virtually all crosscountry flights made by our pilots either for competition or their own interest and practice involve returning to the airfield from the south or west • Glider performance is usually expressed in terms of a glide ratio. This is defined as the ratio of the distance travelled to the height lost and can vary significantly from aircraft to aircraft. • Appendix L shows the typical extent of the area covered during a competition event • In such a competition pilots will be set a task (course to fly), subject to the weather, which can be of several hundred miles, before approaching straight into the airfield, landing ahead without the necessary height or speed to carry out a conventional circuit. • Success or failure in the competition is based on the time taken to complete the course and taking time to gain the additional height will affect the overall speed. • Modern gliders used for these competitions are capable of achieving glide ratios of 1 in 60 which in terms of the proximity of the pylons would mean that a glider planning to land straight in on runway 08/26 would cross the pylon line at just over 100ft agl, half their proposed height • As explained by the BGA in appendix C, the presence of the proposed pylons would inevitably reduce the number of such events	
REP1-254	Norfolk Gliding Club	Safety and security	10. The Statement of Common Ground 10.1. Throughout their limited engagement, along with other airfield operators, NGC has found a reluctance on behalf of NG to explain	10. and 11. Statement of Common Ground In addition to **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]**, **8.8.2 Applicant's Comments**

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			their process in detail with expressions similar to 'have been considered' being used without any attempt at an objective evaluation 10.2. In particular, the dismissal of guidance from the CAA and their team of aviation professionals gave NGC concern as to how seriously NG were addressing the matter and in particular the question of aviation safety 10.3. The draft Statement of Common Ground (SoCG) was received from Project Director in June 2025 followed shortly later by a request from their consultants LSTC for a fourth consultation 10.4. NGC considered their proposed agenda did not meet the objectives of the consultation which was to work towards an agreed SoCG and Airfield Impact Assessment (AIA) 10.5. Following an exchange of emails with LSTC an agenda was agreed as is shown in the email to LSTC dated August 4th 2025 - see appendix F 10.6. At the consultation (August 7th 2025) NG announced that they never had any intention of providing the agreed information and after a general discussion on various topics the meeting was adjourned to allow NG to reconsider their position 10.7. Since then, we have made a number of requests to LSTC for the withheld information and have offered Tibenham as a venue in order that we can meet, resume the adjourned consultation and reach agreement on the SoCG, the AIA and produce an agreed set of minutes 10.8. To date LSTC have not taken up our offer, have emailed to say that the matter has been reverted to NG and that they (NG) consider the information has been supplied which is of course untrue 10.9. Following the Open Floor Hearing (OFH) in Norwich on February 12th in a brief discussion with members of the ExA it was suggested that NGC produce their own version of the SoCG and include it with the Written Representation. The NGC version of the SoCG is in appendix M 1. Conclusion 11.1. Listening to many of the speakers in the three OFH's one comment appeared to be raised time after time – that NG did not engage in a meaningful way and did not address the concerns but appeared to just dismiss them 11.2. In that respect the experience of NGC was no different 11.3. During the summer of 2022 NG held a series of 'Road Shows' under the guise of being non-statutory consultations. NGC, along with other airfields, were not invited and as was subsequently discovered, the proposed pylon route had been designed without reference to any of those active airfields 11.4. The decision to involve airfields in the 2023 round of non-statutory consultations raised significant concerns from aviation safety risks through to airfield viability but despite their 'agent of	**on Local Impact Reports (Safety and Security – Airfields)** details the Applicant's consideration of the CAA Airfield Advisory Team's (AAT) feedback, as well as CAA regulations and guidance (also addressed within para. 15.2.15 to 15.2.18 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]**). The Applicant reflects that CAA AAT consultation resulted in development of Study Area parameters, mutual recognition of multiple site-specific risk factors, and independent peer review of impact assessments. The Applicant notes the CAA AAT offered no advice on how objective assessments should be undertaken, nor were acceptable clearance or risk thresholds agreed. Section 4 of **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]** provides a chronology of engagement with the Respondent, including detail of correspondence and discussions relating to progression of a Statement of Common Ground (SoCG). The Applicant holds records of correspondence listed from both parties. Proposed tracked changes within section 4. have been suggested (but not accepted) to differentiate between a factual account of consultation events and meetings held, and comments made from a single party's perspective, which we have queried or suggested are re-located to matters under discussion (Section 6), which is considered reasonable. The Applicant does not consider that information has been withheld from the Respondent, having shared impact assessments (with supporting technical drawings) and signposted relevant submitted materials including **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]**, **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]**, **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]** to further explain route development, consideration of consultation feedback, aviation impact assessment and design decision making. The Applicant has sought to progress SoCG discussions, but this has been made conditional on the Respondent's requirements for the Applicant to commit to assertions regarding its approach to assessment of impacts and consultation, to which the Applicant is unable on the basis of the reasons set out in this response. As per Matter 6.2 within **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]**, the Applicant is confident that the consultation undertaken was fully compliant with **5.1 Consultation Report – Appendix E: Statement of Community Consultation (SoCC) and supporting evidence [APP-071]** and legislative requirements under the Planning Act 2008. The Applicant continues to seek constructive engagement with the Respondent to agree matters relating to impact assessments and determine appropriate mitigation measures.

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			change' role the response to those concerns from NG amounted to only minor changes 11.5. It is perhaps indicative of that attitude when in late 2025/early 2026 NG suggested that my comment in the chronology section of the draft SoCG with respect to NGC not being involved in any 2022 consultation be moved to a section 'items under discussion' rather than 'items of fact' as though they were attempting to hide something 11.6. Throughout the previous 3 years the aviation consultants employed by NG have continued to assert that there is only a small safety risk to aviation from the proposed pylons but fail to advise that any accident involving a light aircraft colliding with pylons and overhead lines is likely to result in one or more fatalities 11.7. In the absence of the withheld information, we can only assume that the decision to use the pylon and overhead line approach rather than undergrounding is based on cost but that in itself presents a conundrum. There are a number of offshore wind farms under various stages of development off the Norfolk Coast and all, without exception, are designed to bring the power ashore with underground cables running to sub stations at Necton or Norwich. 11.8. The guidelines and objections to the project on the grounds of aviation safety other than those from NGC are many and varied and include • DfT, protection against adverse development • NPPF, ensure new development can be integrated • NPS EN1, essential that safety of airfields not affected • EN-1 para 5.5.50, the Secretary of State should be satisfied that the proposal minimises adverse impacts on operation and safety of aerodromes • CAA CAP738, safeguarding guidance, ensure the aerodrome is not adversely impacted by the proposal • BGA, objections on the grounds of safety, operational constraints and longer-term financial viability • GAAC, planning and safety issues • South Norfolk Council, long-term financial viability 11.9. In terms of the aviation safety risks associated with any airfield, it is the responsibility of the operator to respond to those risks and take the appropriate action (CAA CAP738). Since NGC consider the proximity of the proposed pylon line to be an unacceptable risk to aerotows and power flights from both runways 26 and 33 they could have no alternative but to close them contrary to all the advice and guidance on new developments and aviation safety 11.10. In comparison a similar scheme in the North East, which is in the early stages of the project, is being approached in an entirely	

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			different way with the potentially impacted airfields being consulted, listened to and have their concerns and mitigation being seriously considered. It almost appears as though dual standards were being employed when compared to the 'steam roller' approach of this project 11.11. Therefore, as the operator and according to the CAA, the holder of expert opinion on safeguarding the airfield with respect to potential aviation safety risks posed by new obstacles, NGC do not agree to the proposal as presented by NG	
REP1-268	Raydon Wings Aerodrome	Safety and Security	1. In scoping its Environmental Impact Assessment, the Applicant did not consider the possibility of a major disaster including loss of life resulting from its application. Accordingly, this possibility was never adequately addressed and remains unaddressed. 2. When creating its initial 'graduated swathe', the Applicant took no account of General Aviation (GA) aerodromes proximate to the proposed route to be taken by the overhead line. 3. There was no engagement with GA aerodromes or aircraft operators in order to identify potential hazards (HAZID) prior to publishing the graduated swathe. 4. The Applicant failed top engage with Raydon Wings Aerodrome (RWA) until it receive a response from us to its initial public engagement. Further, we say that the Applicant has failed to engage meaningfully and in good faith at any point. 5. Following the initial engagement, the Applicant suggests that it re-routed the over head line as a result of our objection to its location some 700 metres from the runway threshold (but we understand that this in fact resulted from its location close to a Grade 1 listed building). 6. The Applicant moved the overhead line and cable end sealing compound to a location less than 300 metres from the runway sideline. At no point was the feasibility or practicality of this change discussed with RWA. 7. The proposal was presented as a 'fait a compli' during an online meeting held on 29th April 2025 which formed a part of the Suffolk 6 Targeted Consultation. 8. At this meeting, which was supposed to be a consultation regarding the proposals and therefore a test of its proposals, our suggestion than the Cable End Sealing Compound should be moved a few metres north was rebuffed on the basis that the geological and ecology reports supported the chosen site. We were informed that this decision would not be reviewed changed under any circumstances. This raised the question as to what the purpose of the consultation meeting actually was. 9. The Applicant accepts that it's proposal does not meet normal CAP168 aerodrome safeguarding standards in respect of the penetration of safeguarded slopes by the proposed overhead lines. The Applicant suggests that this penetration is acceptable but has	These matters are addressed by the Applicant responses within **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]**. 1. In the context of major accidents and disasters, paragraph 5.7.3 of **6.19 Scoping Report [APP-296]** shows the Applicant's early recognition of risks associated with third-party transport disturbing or damaging Project infrastructure, potentially leading to serious harm. In response, the Applicant states they will consult aviation bodies and aerodromes that may be affected to understand potential impacts on their operations. This undertaking is consistent with the engagement approach taken, as described within **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** and in accordance with the Planning Inspectorate's **6.20 Scoping Opinion [APP-297]** which advised that any likely significant effects on users of airfields should be assessed within the Environmental Statement (see para. 3.13.13). 2.,3. and 4. 7.18 2022 – **Corridor and Preliminary Routeing and Siting Study [APP-356]** was undertaken to identify broad locations for the required infrastructure, resulting in a preferred corridor graduated swathe which was subject to non-statutory consultation in 2022. The study recognised aviation and defence as sub-topics for consideration within the Options Appraisal (see Table 3.3) but related sites did not form a constraint to be avoided by a defined separation, which is considered to be a reasonable and responsible approach at this early stage of the route's development in view of the variable and site-specific factors that could determine Project impacts on aviation. The Applicant responded to the Respondent's 2022 non-statutory representation, recognising their concerns and requesting further information to inform impact assessment. 7.20 2023 – **Design Development Report for the Project [APP-358]** describes how potential aviation impacts relating to Raydon Wings were duly considered in the subsequent development of the corridor into the 2023 preferred draft alignment (see paras. 5.5.78 and 6.4.65). 5. and 6. **7.21 2024 – Design Development Report for the Project [APP-359]** describes how multiple potential effects including heritage impacts were considered with aviation impacts, resulting in the change to the location of the Cable Sealing End (CSE) compound within the 2024 preferred draft alignment. Paras. 5.4.104 to 5.4.105 describe how consultation with the Respondent informed

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			not sought our opinion in this regard and for the reasons already stated, cannot make this assessment. 10. NPS EN1 5.5.16 states that, “The CAA makes clear that the responsibility for the safeguarding of General Aviation aerodromes lies with the aerodrome operator”. The Applicant’s aviation expert is simply not qualified to make such assessments and in any case, the activities that are planned at any aerodrome (of which the Applicant’s expert has no prevision because it has not taken the tie to enquire) heavily influence an aerodrome’s tolerance of local obstacles. 11. The National Policy Statement for Energy - EN1 (NPS EN1) 5.5.53 states that “Applicants should engage airport operators at an early stage of the planning process to understand the potential impacts of development on aviation operations and develop mitigations if appropriate”. We say that the Applicant has made no meaningful attempt to engage or to develop realistic mitigations in cooperation with us. It has evidently preferred to rely upon the erroneous advice given by its aviation expert. 12. The Applicant suggests that Raydon Wings Aerodrome “has not confirmed that the proposed Project is acceptable and continues to propose changes to the location of the CSE compound”. Whilst this is in part correct, what the Applicant should say is that we have strongly objected to the proposed development on grounds of safeguarding and on grounds of the limitations on future use of the aerodrome that these proposals impose (IE no parachuting, aerobatics or gliding activity due to the proximity of the lines and the location of the CSE compound). We have formed the strong impression that, backed by a strong political wind, the Applicant prefers to take its chances with the Planning Inspectorate than to work to reach a mutually acceptable resolution with us. 13. We say that had the Applicant engaged with us to any reasonable or meaningful extent, it would have been relatively simple to agree a routing that would have minimised impact on RWA whilst, at the same time, securing the Applicant’s objectives. 14. The Applicant’s proposals will give rise to a breach of the policies set out in NPS EN1 because the existing and future use of RWA will be adversely affected to an existential degree by the proposed development, all of which might be avoided by a few relatively simple modifications to the proposed scheme. NPS EN1 states at 5.5.5 that, “It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure”. 15. We have been clear with the Applicant that we have no ideological objection to its proposals and that we recognise that, as per NPS EN1 5.5.50 “It is incumbent on operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures.” However, to give effect to this, - the Applicant will need to engage and cooperate with us as	this decision. The changes were subject to the 2024 Statutory Consultation, during which the Applicant met with the Respondent to discuss the changes and their continued concerns. **5.15 Design Development Report [APP-122]** describes the consideration of alternative CSE compound locations in response to feedback, determining these to be less preferred (see para. 6.1.6). As further described within the Applicant’s Position of May 2025 at Matter 6.7 within **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]** the evaluation of alternative sites involved the consideration of a number of potential environmental effects, including aviation impacts, balanced with technical benefits and capital cost requirements, in accordance with the Horlock Rules. Further changes to the Project design were not implemented as they were not considered to be appropriately justified by the assessed minimal potential adverse impacts on the operation and safety of the aerodrome. 7. and 8. The 2025 Targeted Consultation for Suffolk 6 focused on proposed changes to the underground cable alignment, not the position of the CSE compound or the overhead line alignment. The proposed purpose of the 29 April 2025 meeting was to discuss Project proposals, the Respondent’s feedback, impact assessment conclusions and identify areas of agreement as well as outstanding matters as suggested within the draft SoCG shared beforehand. As per Matter 6.7 of **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]** the Applicant has made clear that, in view of aviation impact assessment conclusions, the re-opening of the CSE siting decision was not considered to be justified. We have advised that this position would be reconsidered if compelling information became available. 9., 10. and 11. The information within Table A15.2.9 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] and** accompanying technical drawings were shared with the Respondent in April 2025 and discussed during the meeting of 29 April 2025. In addition, conclusions regarding compliance with CAP168[1] and associated infringement of surfaces were provided and discussed. Para. 4.5 of the guidance advises with regard to consideration of the extent of any infringement (amongst other factors) as well as potential safety measures to be implemented as mitigation, demonstrating the OLS should not be treated as an absolute exclusion zone**.** To make clear, there is a minor infringement of the Inner Horizontal Surface (IHS) by the proposed overhead line alignment. The proposed CSE compound does not penetrate protected surfaces. As per Matter 6.4 of **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]**, the Applicant does not dispute the Respondent’s responsibilities for aerodrome safeguarding but is fulfilling its own responsibilities as defined in the Overarching National Policy Statement for Energy (EN-1, 2024) in preparing an assessment of the impact of the Project on aviation (see

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			opposed to simply publishing its proposals in isolation and the refusing point blank to discuss changes or compromise. 16. NPS EN1 5.5.50 also states that, "In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes…". We say that because the Applicant has failed to properly engage with us or to accommodate even small changes in order to reach a workable compromise, the Secretary of State cannot be assured that this requirement has been met. We say that it has not been met. 17. We believe that the Applicant, determining that it has a favourable political wind behind it, has quite deliberately and as a matter of policy taken little or no account of General Aviation activity along and adjacent to the proposed route preferring, instead, to take its chances with the Planning Inspectorate and the Secretary of State. It is otherwise difficult to see how so little meaningful engagement could have taken place. Instead, in substitution, too much reliance has been placed upon the (unqualified) opinions of an aviation expert in the pay of the Applicant, presumably with the aim of suggesting that the Applicant has properly considered aviation risks and impact. We say that this approach has not been effective and has not fulfilled the Applicant's obligations to engage and consult with General Aviation stakeholders. 18. We ask the Inspector either to reject the application on the grounds that due process has not been followed or, alternatively, to instruct the Applicant to engage with us properly (along with other applicable GA aerodromes) in order to properly undertake the mitigation work that it should reasonably have carried out during the pre-application process with the aim of reaching agreement with us regarding an acceptable accommodation over the location of the Cable End Sealing Compound and to discuss possible mitigations relating to the proposed route of the overhead line (which agreement would not be unreasonably withheld).	paras. 5.5.37 to 5.5.42 refer). Whilst the operator has not confirmed the acceptability of the Project's position on compliance with CAP168 and the minor infringement, they have not provided any alternative information to challenge assessments or evidence risk or harm of continuing existing operational procedures. With regard to mitigation, **5.7 Policy Compliance Document [APP-086]** outlines the Applicant's consideration of para. 5.5.44 of EN-1 (2024, also 5.5.46 of the current EN-1) regarding OLS infringement and engagement with stakeholders to consider acceptable changes to operational procedures to mitigate impacts. As per Matter 6.7 of **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103],** the Applicant has suggested the Operator might consider measures to enhance pilot situational awareness of the Project. 12. Regarding the Respondent's concerns that the Project would limit proposed future uses of the aerodrome, Matter 6.5 of **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]** notes that the Applicant requested details regarding these activities to ensure consideration as an assessment factor (correspondence of 19 May 2025 refers). Further information has not yet been provided to the Applicant. 13. 14. and 16. The Applicant's position is that, following significant changes to the Project design implemented within the 2024 Preferred Draft Alignment, adverse impacts on the operation and safety of Raydon Wings Aerodrome have been minimised, in accordance with EN-1 (2024, see para. 5.5.50). 15. and 17. Section 4 of **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]** provides a chronology of the Applicant's engagement with the Respondent to date. As per Matter 6.3 the Applicant is confident that the consultation undertaken was fully compliant with the published **5.1 Consultation Report – Appendix E: Statement of Community Consultation (SoCC) [APP-071]** and legislative requirements under the Planning Act 2008.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	Suffolk Wildlife Trust strongly suggest the establishment of an Ecological Advisory Group (EAG) to advise on the design and implementation of ecology and biodiversity compensation and mitigation associated with the construction and operational lifetime of the proposed Norwich to Tilbury Project. The EAG should comprise representatives of, at a minimum, county and local councils (or their future functional equivalents), statutory bodies (including Natural England and the Environment Agency), and nonstatutory nature organisations (including Suffolk, Norfolk, and Essex Wildlife Trusts). While we appreciate that this is a linear project covering multiple authorities, which has meant that such a group has not yet been established, meetings between Norfolk and Suffolk, and Suffolk and Essex representatives have proved useful. We believe that an overarching group united by jointly agreed principles and ambitions	The Applicant acknowledges the large scale and complexity of the Project and sees the value in setting up an Ecology Working Group for the construction phase. This Ecology Working Group would be formed post-consent to provide progress updates on ecological mitigation, as set out within **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and **7.2 Outline Code of Construction Practice [Revision B]** during the construction period. The Ecology Working Group would include the Ecological Clerk of Works and suitably qualified and experienced members from the Local Planning Authorities, Wildlife Trusts and Natural England on their request and agreement with the Applicant. The next iteration of the Outline Landscape and Ecological Management Plan will be updated to include the requirement for a post-consent Ecology Working Group.

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			could support focussed discussions which may provide the best possible biodiversity outcomes for the project.	
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	The Ecology Advisory Group is a long-term partnership providing an interactive and sustainable vehicle for dealing with biodiversity matters to meet the ambition for the Norwich to Tilbury Project. This will cover the pre-construction phase, post-construction phase and decommissioning (where relevant). The Ecology Advisory Group comprises Scheme representative(s), Natural England, local host authorities, wildlife trusts, other relevant stakeholders and, if relevant, research group representative(s). Further details of the Ecology Advisory Group will be included in the detailed document, such as a LEMP, with terms of reference including such aspects as scrutiny of monitoring data, adaptive habitat management, site conditions, and working practices where necessary to meet the ambition for the Project	The Applicant acknowledges the large scale and complexity of the Project and sees the value in setting up an Ecology Working Group for the construction phase. This Ecology Working Group would be formed post-consent to provide progress updates on ecological mitigation, as set out within **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and **7.2 Outline Code of Construction Practice [Revision B]** during the construction period. The Ecology Working Group would include the Ecological Clerk of Works and suitably qualified and experienced members from the Local Planning Authorities, Wildlife Trusts and Natural England on their request and agreement with the Applicant. The next iteration of the Outline Landscape and Ecological Management Plan will be updated to include the requirement for a post-consent Ecology Working Group.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	The delivery of components of the WaLOR project are proposed where the Norwich to Tilbury project crosses the Waveney River Valley, with timescales for delivery in this area of the valley not yet fixed for either project. Ongoing discussion is therefore essential regarding scheduling for both WaLOR and the Norwich to Tilbury Project to ensure continued compatibility between both projects.	The Applicant is committed to continuing to collaborate with the Waveney and Little Ouse Recovery (WaLOR) project to ensure both projects can be successfully delivered.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	3.2.1 River Restoration A key component of the WaLOR project is the restoration of the section of the River Waveney between Dolt Lane and Royden Fen, where the Norwich to Tilbury Project crosses the valley. The aim of restoring the old meander in this section is to promote slow water flow, restore and increase floodplain water storage, and increase biodiversity. Details of the interaction of the river restoration and the Norwich to Tilbury Project have been discussed by Suffolk Wildlife Trust and the Norwich to Tilbury Project Team. We acknowledge that pylon locations have been changed in part to reduce impacts on the river restoration. A key issue is the timings of works, which are not yet defined for either project, and ongoing discussions to keep all parties informed regarding timing are planned and an essential requirement for effective coordination between WaLOR and Norwich to Tilbury.	The Applicant is committed to continuing to collaborate with the Waveney and Little Ouse Recovery (WaLOR) project to ensure both projects can be successfully delivered.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	3.2.2 Undergrounding of Existing Overhead Line An existing 33kV overhead line will be undergrounded as part of the project. Ongoing discussion over the detailed planning and delivery of this work (including timing, and micro-siting of telegraph poles and underground cables) is needed to ensure coordination and compatibility between WaLOR works and Norwich to Tilbury. Following the undergrounding of the existing line and beyond the habitat reinstatement works outlined as part of the Outline LEMP Suffolk Wildlife Trust also recommend that post-development monitoring is undertaken following restoration to ensure that	The Applicant is committed to ongoing collaboration with the Waveney and Little Ouse Recovery (WaLOR) project team. The Applicant's 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. On completion of the Project works replacement planting will be undertaken in line with the measures set out within **7.4 Outline Landscape and Ecological Management Plan [Revision C]**.

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			restoration is successful and that the extent of bare ground has not been colonised by undesirable species such as common nettle Urtica dioica or invasive non-native species. If necessary, remedial measures to the habitat management may be required (which should be funded by National Grid).	
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	3.2.3 Peat Soil Creation The creation of peat soil, a vital carbon store and potential WaLOR project revenue source from the sale of environmental credits, will be promoted in the Waveney valley crossed by the Norwich to Tilbury Project. Peat soils are already present here and WaLOR proposals to create a wetter area here, through the re-meandering and other habitat creation, will aid further peat creation. The removal of what was previously Pylon RG088 (a pylon location now removed from the project) has avoided impacts to an area where peat soils are known to be present. This has improved the environmental outcome of the proposed Norwich to Tilbury scheme.	We welcome Suffolk Wildlife Trust's support for the conclusion that removal of what was previously Pylon RG088 has avoided impacts on peat soils. **7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]** details measures for handling organic-rich soils during construction to prevent any disturbance leading to its degradation with consequential environmental effects.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	3.2.4 Bird Strike Suffolk Wildlife Trust accept the assessment that bird strike is unlikely to cause significant impacts to populations of wild birds in the area. We also welcome the acknowledgement within supporting documents that the WaLOR Project will likely see an increase in wetland birds moving through the Waveney Valley, increasing from the baseline numbers identified during supporting surveys. We therefore welcome the inclusion of diverters at this location. As stated within Chapter 8 Ecology and Biodiversity of the supporting Environmental Statement2 the NPS for Electricity Networks Infrastructure (EN5) highlights the need for diverters or bird flappers. Detail on the markers used is provided in Section 8.6.4 (Embedded Mitigation) and section 6.1 of the Outline LEMP where it is stated that orange spacers and bird diverters will be applied to the earth wire. Research suggests that markers incorporating reflective, glow-in-the-dark, high contrast, and moving elements are likely to be most effective and Suffolk Wildlife Trust expect the use of products which meet these criteria. The provided documents do not state the distance apart at which diverters will be placed; however, a typical placement is at intervals of 10m. Suffolk Wildlife Trust suggest that monitoring of the effectiveness of this mitigation is undertaken, with distance between markers reduced if deemed necessary. Monitoring may also suggest that the location where markers are installed is extended to the south, beyond Pylon RG88 and to the south of the River Waveney itself, where they are not currently proposed. If there appears a significant impact on species of conservation concern, then further consideration to provide funding for habitat enhancement measures for said species should also be provided as compensation.	The Applicant welcomes Suffolk Wildlife Trust's support for the conclusion that bird strike impacts are unlikely to be significant and for the proposed use of bird diverters in the Waveney Valley on a precautionary basis, in line with National Policy Statement EN-5 (2024). **7.4 Outline Landscape and Ecological Management Plan [Revision C]** confirms that orange spacers and bird diverters will be applied to the earth wire at the River Waveney between pylons RG87 and RG88. Suffolk Wildlife Trust's recommendation for diverter design, as well as spacing distance has been noted. This will be considered and final design details, including spacing, will be confirmed during detailed design, in line with ecological advice and will be presented within the final Landscape and Ecological Management Plan. This approach is considered proportionate and sufficient to reduce bird collision risk to a level that is not significant, including the consideration of anticipated increases in wetland bird movements through the Waveney Valley. This mitigation addresses the source of collision risk rather than relying on any post construction validation or monitoring. As a result, the Applicant considers that the proposed mitigation is already sufficient to reduce collision risk to non-significant levels, and no operational monitoring is required.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	3.2.5 Need for Future Access by National Grid	The Applicant has carefully considered the Waveney and Little Ouse Recovery (WaLOR) project, and the associated wetland habitats,

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			Suffolk Wildlife Trust recognise the need for future access for maintenance, and the potential impacts of this access are reduced by the removal of what was Pylon RG088, which significantly reduces the likely need for future maintenance access to areas where peat soils are present. We understand that no permanent access is proposed for the Wavey Floodplain, with the proposed pylon locations accessed from High Road and Ling Road. It is therefore unlikely that access will create any significant impacts to habitat created as part of the WaLOR project. However, any changes to this or works requiring access between pylons may be a concern and could impact habitat condition (and therefore impact on delivery of the project and its saleable outputs, e.g. Biodiversity or Carbon Units).	within its design of the Project and has looked to reduce impacts wherever practicable. The Applicant can confirm that no temporary or permanent access road is required between pylons RG87 and RG88 within the Waveney Valley, during either the construction or operation phase of the Project.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	Suffolk Wildlife Trust agree that National Grid has, where reasonably possible, sought to avoid direct impacts to CWSs through design (demonstrated by changes made during and following previous consultations). Where impacts occur, reasonable measures are put forward in line with the Mitigation Hierarchy.	The Applicant welcomes Suffolk Wildlife Trusts acknowledgement of the careful routeing and siting undertaken by the Project in relation to County Wildlife Sites and their support of the proposed mitigation measures set out with **7.4 Outline Landscape and Ecological Management Plan [Revision C]**, where complete avoidance of impacts has not been practicable.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	4.1.2 Habitat Restoration Suffolk Wildlife Trust understand that the undergrounding of the overhead line here will be significantly smaller scale than works to underground the high voltage Norwich to Tilbury line, with a reduced working area of 20m width through the CWS. An Ecological Clerk of Works (ECoW) will provide suitable briefing as defined within the Outline LEMP. The role of the ECoW should include ensuring that the 20m working width is stringently followed, with block-and-panel fencing used as necessary. The reinstatement of grassland is considered within the Outline LEMP. Suffolk Wildlife Trust agree that reinstatement should be undertaken at the earliest appropriate time of year following works. Seeding is proposed for most areas as opposed to natural regeneration, as defined within the Outline LEMP. The reinstatement of original turf is not considered, which we see as acceptable for this location where works avoid the most floristically important areas. The identification of a suitable seed mix should be informed by surveys already undertaken at Thrandeston Marsh CWS. Further consideration could extend to the use of locally sourced green hay. We also recommend that post-development monitoring is undertaken following restoration to ensure that restoration is successful and that the extent of bare ground has not been colonised by undesirable species such as common nettle Urtica dioica or invasive non-native species. Monitoring should be undertaken after one, three, and five years, with remedial management measures undertaken if restoration is not delivering the desired outcomes. The use of green hay could again be	As detailed within **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. **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 **7.4 Outline Landscape and Ecological Management Plan [Revision C]**.

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			considered at this stage as part of remedial measures to increase floral diversity.	
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	4.2.1 Site Information The CWS is crossed by the project with pylon JC16 located within the CWS boundary. This will see a small permanent area of habitat lost, with another area temporarily lost as part of construction, including a temporary haul road. Any trees within the 40m swathe around the pylon route will be removed. An existing 132kV overhead line crosses the site, perpendicular to the proposed Norwich to Tilbury route; this line will be undergrounded as part of the Norwich to Tilbury project, with a working width of 25m stated within the ES. Habitat loss on the CWS includes a range of habitats (Table 8.23 Impact assessment including residual effects on ecology and biodiversity receptors during construction); the greatest loss is the 1.39ha of other neutral grassland, with no other losses proposed greater than 0.03ha. As with Thrandeston Marsh CWS, it is also considered that accidental encroachment could see the area of habitat lost increase.	Mitigation measures for designated sites, including Sproughton Park County Wildlife Site (CWS), are included in **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and **7.2 Outline Code of Construction Practice [Revision B]**. 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 [Revision B]**. At Sproughton Park CWS the 132 kV undergrounding swathe (working area) would be reduced to 25 m in width through the designation to reduce direct impacts and all contractors working within the CWS will be briefed by the Ecological Clerk of Works (ECoW) on the ecological constraints ahead of works.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	4.2.2 Habitat Restoration Suffolk Wildlife Trust understand that the undergrounding of the overhead line here will be significantly smaller scale than works to underground the high voltage Norwich to Tilbury line, with a reduced working area of 25m width through the CWS. An ECoW will provide suitable briefing as defined within the Outline LEMP. The role of the ECoW should include ensuring that the 25m working width is stringently followed, with block-and-panel fencing used to reduce the likelihood of encroachment occurring. We believe that similar methods are required where the haul road is installed to reduce the risk of accidental encroachment. Suffolk Wildlife Trust agree that reinstatement should be undertaken at the earliest appropriate time of year following works. Seeding is proposed for most areas as opposed to natural regeneration, with the reinstatement of original turf is not considered. The identification of a suitable seed mix should be informed by surveys already undertaken at Sproughton Park CWS. The use of green hay has not been considered but would provide an additional option to promote local provenance. We also recommend that post-development monitoring is undertaken following restoration to ensure that restoration is successful and that the extent of bare ground has not been colonised by undesirable species such as common nettle or invasive non-native species. Monitoring should be undertaken after one, three, and five years, with remedial management measures undertaken if restoration is not delivering desired outcomes. The use of green hay could again be considered at this stage as part of remedial measures to increase floral diversity while retaining local provenance.	As detailed within **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 ECoW who will ensure impacts on important ecological features, such as Sproughton Park County Wildlife Site (CWS), will be minimised as far as practicable and no impacts beyond those absolutely necessary will be undertaken within the CWS. Fencing will be used as appropriate to demarcate the working areas. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** sets out proposed habitat reinstatement methods, which will include natural regeneration within Sproughton Park CWS as appropriate. Should grassland seeding be necessary, an appropriate seed mix of local provenance will be used, details of which will be incorporated into the final Landscape and Ecological Management Plan. Monitoring visits will also be undertaken at designated sites impacted by the Project, including Sproughton Park CWS, during and following the completion of the habitat reinstatement works over a five-year period as set out within Section 11.4 of **7.4 Outline Landscape and Ecological Management Plan [Revision C]**.

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REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	4.2.3 Impacts to Reptiles Suffolk Wildlife Trust are content that proposed mitigation will suitably reduce the potential for direct killing or injuring of reptiles to a negligible extent; the Outline LEMP details reasonable avoidance measures which will be implemented at Key Reptile Sites (including Sproughton Park CWS) within Section 6.1.47 – 6.1.50. Suffolk Wildlife Trust agree that these methods, which follow standard practice, are suitable and should be used at Sproughton Park CWS. Our concerns are focussed on whether the proposed undergrounding of the existing overhead line will impact the reptile population and how they use the site. Significantly, we note that the Outline LEMP does not consider habitat fragmentation impacting the reptile population. Dependant on the timing and duration of works, the open trench onsite could create a significant barrier stopping a proportion of the population from reaching hibernacula. Failure to have access to hibernation sites in autumn could significantly impact the reptile population at a Key Reptile Site. Suffolk Wildlife Trust seek assurances that measures will be put in place to ensure reptiles have suitable access to hibernacula. The easiest method to insure this is to create new hibernacula either side of the undergrounded overhead line to ensure that no individual is isolated from hibernacula. These new hibernacula should be constructed following input and advice from the Project Ecology Team, with work overseen by a ECoW. Following completion of works, hibernacula should be left in place to provide enhancement for the onsite reptile population. Suffolk Wildlife Trust strongly suggest that post-development monitoring of the population is undertaken to ensure the CWS continues to qualify as a Key Reptile Site.	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 [Revision C]** 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. Any existing sheltering/hibernation features, such as log piles and rubble, will be moved outside of the works area to be available for the local reptile population both during and post construction works. This requirement is already set out within Section 6 of **7.4 Outline Landscape and Ecological Management Plan [Revision C]**.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	4.3.1 Site Information Fore and Bushy Groves CWS lies adjacent to the Draft Order Limits, with an existing RG 33kV line being undergrounded through the CWS. This will result in the temporary loss of 0.25ha of lowland mixed deciduous woodland, although it is noted that this is where the existing 33kV line runs and no mature trees are present in this corridor due to management constraints in place by the existing overhead lines. This swathe has been present within the area of woodland for over 80 years, with aerial photographs from 1945 clearly showing the route of the overhead lines8 . The ES states that the undergrounding would take place on the existing alignment, with no working width provided (unlike at Thrandeston Marsh or Fore and Bushy Grove CWSs); it is therefore assumed that works will be undertaken within the existing swathe, however clarity on this is welcomed. In addition to this there is potential for accidental encroachment to impact a wider area.	The Applicant can confirm the undergrounding of the existing 33 kV overhead line, that goes through Fore and Bushy Groves County Wildlife Site (CWS) will be on the same alignment through the CWS as the existing overhead line. Given the small size of the 33 kV line, the width of the required trench will be significantly smaller than that required for 132 kV undergrounding. Impacts to the woodland habitat within the CWS will therefore be minimal and short term. Mitigation measures for designated sites including Fore and Bushy Groves CWS are included in **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. Following the application of the outlined mitigation, **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** concludes that there would be an overall negligible magnitude of impact, with no significant residual effect on Fore and Bushey Groves CWS.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	4.3.2 Habitat Restoration	The approach to habitat reinstatement is outlined within **7.4. Outline Landscape and Ecological Management Plan [Revision C]**.

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			Guidance within the Outline LEMP for the reinstatement planting of woodland habitats suggests that low height, shallow rooted shrub species will be planted; these do potentially fit within the woodland edge habitat already present. The species proposed for shrub planting, provided within Appendix C of the Outline LEMP are typically frequent within Suffolk woodland shrub layers, and the final selection should focus on those species already present within the CWS; if suitable, wild-service tree should be included in addition to those outlined. The species present are known to have benefits to wildlife, which we support If species which already occur within the planting list proposed (as included in Appendix C of the Outline LEMP) are present within the area of the CWS then Suffolk Wildlife Trust would support an element of natural regeneration being allowed to occur in this area. If this were to be undertaken then we understand that as per the previous habitat, management restrictions would be in place. Given the need for ongoing management to ensure vegetation growth remains suitable over the undergrounded 33kV line Suffolk Wildlife Trust assume that monitoring will be undertaken here. Suffolk Wildlife Trust further would welcome the inclusion of any additional support which could be provided to the landowner towards management of the CWS.	Natural regeneration of woodland post construction is proposed for woodlands where existing third-party infrastructure is being removed from woodland, such as that at Fore and Bushy Groves County Wildlife Site (CWS). Removal of third-party assets is considered a long-term ecological benefit, as the woodland would have been subject to an existing vegetation management regime under the existing overhead lines. Natural regeneration will allow the woodland to regenerate based on existing seed bank within the soil. Where deemed necessary, supplementary planting of saplings will be added to the woodland, which will involve tree species present with the retained woodland habitat. Monitoring visits will also be undertaken at designated sites impacted by the Project, including Fore and Bushy Groves CWS, during and following the completion of the habitat reinstatement works over a five-year period as set out within Section 11.4 of **7.4 Outline Landscape and Ecological Management Plan [Revision C]**.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	5.1.1 Conservation Status of Hazel Dormice in Suffolk Suffolk Wildlife Trust have raised question over the submitted records of hazel dormice within the Dormice Report supporting the Norwich to Tilbury project, with several records which occur outside the known range of the species in Suffolk being inconclusive (identification from nests as opposed to recorded dormice, dormice footprints, or nuts featuring characteristic hazel dormice markings). We understand that discussions between the Project Ecology Team and Natural England regarding a project level licence for hazel dormice are ongoing and a licence will be agreed. Suffolk Wildlife Trust have not been part of these conversations. There are areas outside of the Natural England licence which we believe require further consideration, including the potential to significantly improve hazel dormice mitigation practices for future projects.	A draft licence application for dormouse has been submitted to Natural England for review. The Applicant is working with Natural England towards obtaining a Letter of No Impediment (LONI) for dormouse as detailed within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]** and expecting receipt during the examination phase. Where the dormouse survey findings were inconclusive, a precautionary approach has been taken with dormouse presence assumed.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	5.1.2 Hedgerow Loss & Fragmentation While we acknowledge the role of Natural England within the licencing process, we remain concerned about hedgerow loss within areas where hazel dormice are known or suspected to be present. Hedgerow loss can impact dormice in several ways; killing or injuring during removal, a loss of foraging habitat, a loss of shelter, and a loss of landscape scale connectivity. The most severe impacts will be considered as part of the licence agreement between the Norwich to Tilbury Project Team and Natural England. However, there are still areas of concern outside those to be agreed under licence which Suffolk Wildlife Trust are keen to pursue. Key	A draft licence application for dormouse, has been submitted to Natural England for review. The Applicant is working with Natural England towards obtaining a Letter of No Impediment (LONI) for dormouse as detailed within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]** and expecting receipt during the examination phase. 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

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			areas are the retention of connectivity during construction and the short-to-medium term mitigation required to retain connectivity until replacement hedgerows mature. In addition to the delivery of these, we strongly advocate for continued monitoring of these measures. **Habitat Fragmentation** Suffolk Wildlife Trust are not involved in licensing discussions between the Norwich to Tilbury Project Team but understand that as part of these, as well as compensation measures and Biodiversity Net Gain requirements, hedgerows will be reinstated with suitable species (i.e. suitable for planting over the underground cable route and where possible suitable or beneficial for hazel dormice). However, there is a significant, in terms of the typical lifespan of an individual hazel dormouse, delay in hedgerows becoming suitable for hazel dormice to use (as much as 7-10 years).Habitat can therefore be seen as fragmented during construction and potentially for the next 5-10 years. Suffolk Wildlife Trust therefore expect mitigation design to deliver retained connectivity during construction where possible, including during short-term periods of inactivity (such as weekends, overnights, bank holidays), as well as medium-term mitigation delivering habitat connectivity viable for 5-10 years until newly planted hedgerows can provide suitable habitat. **In-combination Impacts** The impacts of short-and-medium-term hedgerow loss associated with Norwich to Tilbury are replicated by other nationally and regionally significant infrastructure projects, both ongoing and proposed, occurring within an overlapping 10-year period (these include: Bramford to Twinstead and SPA Bury St. Edmunds to Colchester water transfer scheme). In combination, short-and-medium-term hedgerow loss as a result of these schemes is likely to have more significant and widespread impacts on dormouse populations in Suffolk and Essex than would be the case for any of the schemes in isolation Suffolk Wildlife Trust accept that it is not the job of one project to offer mitigation and compensation for such impacts. However, one recurring theme we have identified is variation within the proposed mitigation for the short-term loss of connecting habitat where hedgerow removal occurs (in the delivery of linear underground infrastructure projects, typically for electricity or water supply). That mitigation, typically in the form of artificial bridges, is delivered is a positive, however the variation in methodology and lack of detailed monitoring of its effectiveness means there is a lack of genuine evidence that such mitigation is working. Where monitoring at the mitigation location has taken place, it does not typically coincide with monitoring within the wider surrounding landscape, meaning it is unknown if mitigation is unsuccessful due to design, or due to the lack of presence of hazel dormice. Filling this evidence gap is essential to inform good design and ensure the best possible outcome for hazel dormice.	to suitable dormouse habitat are 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 will travel more than 12 m across open ground. All dormouse habitats would be reinstated following the completion of the works. No specific mitigation for dormouse fragmentation such as artificial bridges are required. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** also outlines the mitigation for dormouse during construction, including the application of precautionary clearance measures, for areas where dormouse were not confirmed to be present but which offer some habitat for dormouse. Given no dormouse fragmentation impacts have been identified as a result of the Project, there are no in-combination effects expected.

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REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	5.1.3 Recommendation for Monitoring Suffolk Wildlife Trust welcome the project-wide hazel dormice survey undertaken to supporting the Norwich to Tilbury Project, which included areas well outside the known range of the species, but where presence has been suspected. While we have raised questions about some findings provided within the Hazel Dormice Report, the assessment provided is thorough. Our recommendation is that ongoing monitoring, during construction works, is undertaken on a regular basis as part of the project to provide data on dormice presence/ absence where any mitigation for hedgerow loss is delivered, as well as the area surrounding this (where access is possible). The monitoring of works around other key locations, including where hazel dormice records were included within Project Surveys, and areas of highly suitable habitat (notably including the transition from overhead line to undergrounding to the east of Raydon Great Wood where the scheme crosses a former railway line).	A draft dormouse licence has been prepared and issued to Natural England for review. The Applicant is working with Natural England to agree upon necessary dormouse mitigation as detailed within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]** and expects to receive a Letter of No Impediment during the examination phase. Due to the small scale of impact on any of the dormouse sites (including the railway line east of Raydon Great Wood where dormouse were not confirmed present during surveys), it is not expected that this would include the requirement for any ongoing dormouse monitoring.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	5.2.2 Habitat Loss & Fragmentation Suffolk Wildlife Trust remain concerned that the construction process, notably through the undergrounded section of the project in Suffolk (through Dedham Vale National Landscape), will see numerous gaps created within the hedgerows where trenching is used. This could create short- and medium-term loss of connecting habitat. While we acknowledge that gaps will be minimised, research has shown that gaps of as little as 10m may be significant for bats. Suffolk Wildlife Trust therefore expect mitigation design to deliver retained connectivity during construction where possible, including during short-term periods of inactivity (such as weekends, overnights, bank holidays). The proposed design of the artificial bat flyway is what as expected and Suffolk Wildlife Trust welcome the use of any natural materials to bolster this and encourage the Project Team to avoid the use of plastics where possible. We understand that hedgerows will be reinstated post-construction with suitable species (i.e. suitable for planting over the underground cable route). However, there is delay in hedgerows becoming of significant value for bats, and mitigation should be provided until hedgerows return to the condition, they were in prior to works taking place.	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 through consultation on **7.4 Outline Landscape and Ecological Management Plan [Revision C]**, as outlined within the relevant **LPA Statements of Common Ground submitted at Deadline 1 [REP1-008 to REP1-033]**. These artificial flyways have been used successfully on other Nationally Significant Infrastructure Projects for relatively short sections of temporary impact. On completion of the Project works, replacement planting will be undertaken in line with the measures set out within **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. The Applicant has committed to a five-year after-care period for sites with reinstated woodland, trees and hedgerows, as outlined in **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. Hedgerow planting will initially be protected to shield young trees from browsing fauna using fencing. Replacement planting will provide connectivity value for bats well before becoming fully established.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	5.2.3 Recommendation for Monitoring The impacts of short-and-medium-term hedgerow loss associated with Norwich to Tilbury are replicated by other nationally and regionally significant infrastructure projects (including those noted previously), both ongoing and proposed, occurring within an overlapping 10-year period in Suffolk (and north Essex, where the Dedham Vale National Landscape extends). Suffolk Wildlife Trust accept that it is not the job of one project to offer mitigation and compensation for such impacts. However, one	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 Suffolk Wildlife Trust on a monitoring study sitting outside of the DCO requirement process.

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			recurring theme we have identified is variation within the proposed mitigation for the short-term loss of connecting habitat where hedgerow removal occurs (in the delivery of linear underground infrastructure projects, typically for electricity or water supply). That mitigation, typically in the form of artificial bridges, is delivered is a positive, however the variation in methodology and lack of detailed monitoring have significant failings; namely, the lack of genuine evidence that such mitigation is working. The Strategic Pipeline Alliance project included some monitoring of mitigation measures provided for bats where hedgerow loss occurred and this highlighted the need for further research into the mitigation measures proposed to retain hedgerow connectivity for bats. As far as we are aware, this is the only publicised study we are aware of assessing these concerns in Suffolk. Suffolk Wildlife Trust therefore encourage and support the concept of continued monitoring around all proposed artificial flyways included within the Norwich to Tilbury Project.	
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	6.1.1 Biodiversity Net Gain and Delivering Biodiversity Gains The delivery of Biodiversity Net Gain, including the delivery of a 10% net gain as defined by the Statutory Metric, should consider how best to offer genuine biodiversity uplift. There are many ways in which this should be considered. These include delivering the right habitat in the right place, supporting local conservation priorities, a consideration for natural regeneration scrub and woodland as opposed to planting, the inclusion of additional habitats such as ponds, and a long-term commitment to replacement planting or remedial management. Additionally, where planting is undertaken not only the right species in the right location, but local provenance plants should also be considered. The delivery of Biodiversity Net Gain must consider ways to offer additional biodiversity benefits to local priority species, including those for which compensation and enhancement has been provided. Species of note include hazel dormice and turtle dove. While we appreciate that several of these points are considered within the supporting documents, a continued commitment to delivering the best outcomes for biodiversity, as well as Biodiversity Net Gain, would be strongly welcomed by Suffolk Wildlife Trust.	The Applicant agrees with Suffolk Wildlife Trust that the fundamental basis of Biodiversity Net Gain (BNG) is to deliver the best outcome for biodiversity. **7.1 Biodiversity Net Gain Report [APP-299]** sets out the Applicant's approach to BNG, with a voluntary commitment to 10% BNG with environmental and societal benefits. The overall aim of the Project's BNG strategy 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, benefits to other protected species (including dormouse and birds), cost and timings amongst others.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	6.1.2 Delivery of Off -Site Units & the Local Nature Recovery Strategy The Suffolk Local Nature Recovery Strategy (LNRS) was published in 2025, providing a blueprint for the delivery of habitat creation for nature recovery in Suffolk. Suffolk Wildlife Trust strongly advocate that where any habitat is created with the aim of enhancing biodiversity that it is informed by the LNRS. This includes habitat delivered within the Draft Order Limits, National Grid landholding, or where offsite Biodiversity Units are purchased.	**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. This includes all details on the locations of on-site habitat replacement planting and areas of habitat creation/enhancement (Environmental Areas). The Applicant will consider the Local Nature Recovery Strategies for Norfolk, Suffolk and Essex as part of the off-site BNG selection

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				process, where sites are available, and appropriate to project circumstances. 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.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	6.1.3 Delivery of Watercourse Units Suffolk Wildlife Trust note that the delivery of the required watercourse units is reliant on enhancing affected watercourses. This enhancement is achieved through various means including removal of invasive non-native plants, bank top planting, marginal and aquatic seeding and planting, and the removal of rubbish. Where ditches are reinstated, the measures proposed to enhance are similar, and again theoretically suitable. However, we do highlight that delivering these measures in perpetuity, which must be the aim of this project, will require ongoing management and monitoring. Notably, where enhancement through the removal of invasive non-native species, such as Himalayan Balsam Impatiens glandulifera or floating pennywort Hydrocotyle ranunculoides (both present within the Waveney Valley), is proposed simply removing a species once is unlikely to see it removed permanently. Many species, including Himalayan balsam, are notoriously difficult to remove due to their presence in the seedbank and ability to recolonise from seed which is easily spread. Long-term removal may require the removal of upstream populations and frequent management visits. Suffolk Wildlife Trust therefore seek assurances that there is an ongoing commitment to the removal of invasive non-native species in affected watercourse and ditches. We believe that this is required to fully deliver the net gain requirements of the Norwich to Tilbury Project. If this commitment is not viable then, it is the view of Suffolk Wildlife Trust, that a contingency plan may be needed for the proposals to deliver the required watercourse units.	A range of watercourse enhancement method options have been included within **7.1 Biodiversity Net Gain Report [APP-299]**, dependent on the existing condition of a specific watercourse. This includes invasive species management, such as removal of Himalayan balsam. These enhancement watercourse measures will be implemented and subject to management and monitoring for five years as set out within **7.1 Biodiversity Net Gain Report [APP-299]**. Ongoing management of the watercourses will then be returned to the landowner.
REP1-278	Suffolk Wildlife Trust	Biodiversity, ecology and nature conservation	6.1.4 Biodiversity Net Gain and Nesting Bird Compensation Suffolk Wildlife Trust note that within the supporting documents (such as Table 8.23 of the ES) it is stated that the loss of nesting bird habitat is negated by Biodiversity Net Gain delivery. Any habitat creation or enhancement to provide compensation for a loss of nesting habitat – or other impacts to protected and priority species that would be required regardless of the requirement to deliver BNG – can only be counted up to no-net-loss within the Biodiversity Net Gain assessment. While we agree and understand that areas of habitat creation undertaken to contribute towards the Projects Biodiversity Net Gain requirements will see nesting habitat created, this should be seen as incidental.	The Applicant can confirm that no habitat creation or enhancement is proposed specifically for breeding or wintering/passage birds within the Environmental Areas. The reference in Table 8.23 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, to habitat creation/enhancement associated with Biodiversity Net Gain (BNG), relates solely to the measures proposed to address permanent habitat loss at the Project level. It is not relied upon as mitigation for breeding birds or wintering/passage birds; however, it will provide additional beneficial effects overall to breeding birds. Mitigation for breeding / wintering birds is provided through established construction phase measures and habitat reinstatement, as set out in **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. These include seasonal timing of vegetation

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			We therefore ask that National Grid provide suitable evidence of both mitigation and compensation in relation to how these are considered within the Biodiversity Net Gain assessment.	removal, pre-works nesting bird checks, exclusion zones around active nests, reinstatement of temporarily lost habitat, and measures to minimise disturbance. These measures operate independently of BNG and ensure that impacts on breeding and wintering/passage birds are avoided or reduced at source. BNG is intended to deliver a net gain in biodiversity value across the Project. The assessment of effects on breeding and wintering/passage birds does not depend on BNG to demonstrate that no significant residual effects remain. Accordingly, no separate mitigation/compensation area is required to address permanent habitat loss for breeding or wintering/passage birds, as the assessment concludes that such losses do not give rise to significant residual effects.
REP1-258	North-West and South-West Chelmsford Parishes Group	Alternatives	*Given the length and detail of this submission, to which the Applicant has responded previously in **5.1 Consultation Report [APP-066]**, the Applicant provides the following summary: North-West and South-West Chelmsford Parishes Group have proposed an alternative design they call 'Corridor L/Q' which is preferred to the alignment proposed in the Project, between Fairstead and Buttsbury (Works Nos 13 to 17). The submission from the Parishes Group includes an explanatory paper detailing the proposed alternative, as well as the Parishes Group's concerns regarding engagement with the Applicant on the matter. The submission also comprises an independent landscape review by Alison Farmer Associates, conducted in January 2025.*	The Applicant would remind the Examining Authority that its starting point for the assessment is the Government's strong starting presumption for overhead lines. It also notes that there are circumstances when this presumption is reversed and underground cable is utilised or where effects exceed defined thresholds for landscape effects and cable can be justified. However no such locations that could achieve the reversal of the NPS EN-1 (2024) provision are present, nor meet the threshold for consideration of underground cables. The Applicant would also note that a number of engagements have been undertaken with a representative of this group at various consultation events and direct contacts. The suggested alternatives propose different arrangements for seeking to lead to a re-location of the proposed connection from passing the north and west of Chelmsford and to instead pass to the east of Chelmsford. From here there are alternatives to south west and south east to connect to Tilbury. The main rationale for the move is to seek to route the new connection in the proximity of existing overhead line structures (both 400 kV and 132 kV lattice pylon lines are present). The Applicant has considered this feedback each time it has been raised but continues to arrive at the same conclusion. That is, that there is no readily identifiable overhead line route to achieve the connection in full. Much is made by the respondent of individual extracts from Options Appraisal Summary Tables, however, there remain some fundamental constraints such that the Applicant's position remains unchanged. In terms of routes to Tilbury we have concluded there is insufficient space for an additional 400 kV overhead line to be routed via the east then south east of Chelmsford then routeing via corridor Q, or via a deliverable variant of Corridor Q. If a connection could be made to pass to the east of Chelmsford, the route via corridor Q becomes highly constrained. The main areas of difficulty arise around Rayleigh and on the subsequent section to Tilbury where there are locations where predominantly residential development limits the routeing of a new connection (with or without potential to underground sections of 132 kV connection. Over and above this, the alternative presents its own environmental effects including proximity to areas identified as Special Protection Areas where the legislation places emphasis on

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				favouring alternatives without or with reduced effects on such areas and their qualifying features. The other alternative is to route to the east and then south of Chelmsford. However whilst noting the opportunity in some sections to adopt an alignment close to the existing 400 kV overhead line (potentially in place of an undergrounded 132 kV connection) the overall conclusion and position of the Applicant is that the route is not achievable as overhead line or underground cable due to the combination of numerous residential properties, a school and a UK Power Networks substation amongst other infrastructure around Sandon. In theory there may be an opportunity to use a tunnel to avoid such features but this adds effects in its own right over and above those associated with the alternative and would add to what would otherwise be broadly comparable costs. Whilst appreciating that these alternatives seemingly address concerns of the north west and south west Chelmsford parishes, the Applicant's position is that the alternatives do not justify a change. They lead to their own environmental effects, albeit a different balance transferred to other locations. They are substantially constrained at some locations to the extent that they may not be deliverable, or only deliverable with methods with substantial additional costs. On this basis the Applicant remains clear in its view that the preferred arrangement is the submitted Project.
REP1-266	Pylons East Anglia	Alternatives	*Cable Ploughing submissions summary paper.* *[This document is provided as Appendix B to the Pylons East Anglia submissions following the Open Flood Hearings. In summary it states that ploughing is the least harmful, fastest and most cost effective method for installing underground cables. It argues that underground cables laid by ploughing would avoid many of the environmental, heritage, landscape, safety and ecological harms associated with the Project and would be a viable alternative that would reduce impacts, costs and delivery time.]*	**7.19 2023 - Strategic Options Backcheck and Review [APP-357]** Section 14 'Offshore 1' pages 103 to 111, and all High Voltage Direct Current (HVDC) alternatives in other options, all considered a marine cabling HVDC base cost. The standard installation method for HVDC in a marine environment is cable ploughing, so ploughing was considered within these options. **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** sets out why the Applicant's Project was taken forward following the assessment.
REP1-267	Pylons East Anglia	Alternatives	*Fuller Long Objection Statement, 2024* Re-submission of a document prepared in response to the 2024 statutory consultation, which in summary, states that the use of HVDC undergrounding should be explored further in order to minimise heritage harm.	The same methodology is used by the Applicant to assess strategic options applying the same set of cost considerations for all projects in England and Wales and as used in Appendix D: Economic Appraisal pages D1-D14 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. This also sets out the lifetime cost issues addressed by our methodology, including maintenance costs for each technology. Appendix C - Technology Overview of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** provides detail of each technology. The cost differential between the proposed Project and all HVDC alternatives is stark, and is set out in the economic appraisal in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. The following costs were set out at Issue Specific Hearing 1 with all data from **[APP-357]** and all cost information is in Appendix D - Economic Appraisal pages D1-D14 **[APP-357]:** • Wholly Overhead Line — Project Total: £894.50m

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				• Wholly 4-Ended HVDC Option Project Total: £5,854.50m • Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m • Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6, page 11 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** states '*Should this circuit at full 6000 MW capacity* [be] *made multiterminal to provide the same system flexibility as the AC circuit options* [there] *would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).*' The Applicant has set out the consideration of HVDC. **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** sets out why the Applicant's Project was taken forward following the assessment.
REP1-308	Catherine Hill (Remus Animal sanctuary)	Transport and traffic	The proposed development seeks to utilise our private track, for which we bear sole responsibility for maintenance and upkeep. This track is particularly narrow and was not designed to accommodate construction vehicles or large maintenance equipment. Its route runs directly alongside horse fields, significantly increasing the risk of disturbance and presenting potential safety hazards for both the horses and people who use the area.	The Applicant notes the respondent's feedback. The access route shown at Remus Animal Sanctuary is for future surveys and maintenance if required and will not be used for construction. We are not proposing to construct anything for this permanent access route, existing tracks and roads are being used where possible. The track would only be used by 4x4 vehicles and cars similar to the current use. Ahead of future maintenance or survey access the Applicant's lands team will liaise with and agree access arrangements at the time to reduce impacts where practicable.
REP1-308	Catherine Hill (Remus Animal sanctuary)	Water environment	Track Accessibility Issues A further significant concern is the frequent inaccessibility of this track due to extensive flooding from the Ford.	The Applicant notes the respondent's feedback. The access route shown at Remus Animal Sanctuary is for future surveys and maintenance if required and will not be used for construction. We are not proposing to construct anything for this permanent access route, existing tracks and roads are being used where possible. The track would only be used by 4x4 vehicles and cars similar to the current use. Ahead of future maintenance or survey access the Applicant's Lands Team will liaise with and agree access arrangements at the time to reduce impacts where practicable.
REP1-308	Catherine Hill (Remus Animal sanctuary)	Transport and traffic	Access to Our Home During Track Upgrades Another pressing matter relates to how access to our home will be managed during periods when the track is being upgraded for pylon access.	The Applicant notes the respondent's feedback. The access route shown at Remus Animal Sanctuary is for future surveys and maintenance if required and will not be used for construction. We are not proposing to construct anything for this permanent access route, existing tracks and roads are being used where possible. The track would only be used by 4x4 vehicles and cars similar to the current use. Ahead of future maintenance or survey access the Applicant's Lands Team will liaise with and agree access arrangements at the time to reduce impacts where practicable.

Examination Library ID	Name	Topic	Matter	NG Response
REP1-308	Catherine Hill (Remus Animal sanctuary)	Transport and traffic	Building Next to Our Cess Pit We would also like to raise concerns regarding the proposal to build next to our cess pit. This matter requires careful consideration, as the cess pit is located adjacent to the proposed access route for servicing Pylon TP195	Prior to works commencing on the land in question the Main Works Contractor or its representative may visit the owner/occupier to discuss the works to take place and to identify any constraints such as the cess pit. The location of the cess pit may be marked on site and a suitable distance maintained between it and the proposed access route. Alternatively, or in addition, measures may be taken to protect the cess pit from damage.
REP1-308	Catherine Hill (Remus Animal sanctuary)	Socio-economics, recreation and tourism	Impact on Remus Animal Sanctuary Remus Animal Sanctuary is accessed up the private track mentioned previously and is home to 72 animals. The proposals highlight all their land, and this would mean many animals would need to be relocated and may not even make it with the shock of the construction work and known effects of pylons on horses and other animals.	The direct access of the business falls within the Order Limits. However, no physical works are proposed. The potential effects on the business are assessed to have a negligible, not significant adverse effect during construction, and a neutral effect during operation. See National Grid response for examination library ID REP1-308.

6. Applicant’s Comments on WRs submitted by Other Interested Parties

6.1 Overview

6.1.1 The Applicant’s comments on WRs submitted by other IPs are provided in Table 6.1.

Table 6.1 Applicant’s Comments on WRs submitted by Other Interested Parties

Examination Library ID	Name	Topic	Matter	NG Response
REP1-469	Sir Bernard Jenkin MP	N/A		This document was labelled as an WR on the Planning Inspectorate’s website at Deadline 1 but is in fact a written summary of the oral submission made at the Open Floor Hearings. It is therefore responded to in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings**.
REP1-319	Councillor Ben Rigby	N/A		The Applicant notes the WR and considers the matters raised are reflected in the Brentwood Borough Council LIR, which considers impacts on Hutton and Havering’s Grove. The Applicant’s response to the LIR is provided in **8.8.2 Applicant's Comments on Local Impact Reports.**
REP1-468	Simon Polley	Transport and traffic	Further to my written representation made at Registration, I now attach my Risk Assessment spreadsheets produced to illustrate the impact that the proposal will have on Public Rights of Way (PRoW). Each spreadsheet, covering Essex, Suffolk and Norfolk, have an introduction outlining the method adopted so as to verify that a total of 449 PRoW will be either restricted, diverted or inaccessible during the overall construction period of at least 4 years. I have attached as both excel spreadsheets and pdf copy	The Applicant notes the methodology used in the submitted spreadsheets, but does not agree with the stated figure of 449 Public Rights of Way (PRoWs) being restricted, diverted or inaccessible. The interested party’s approach appears to include all PRoWs located within 50 m of the Order Limits, including many that are not affected by the Project and will therefore not be restricted, diverted or inaccessible. In addition, in some locations the Order Limits have been drawn in order to secure permanent rights of access for future maintenance activities. As a result, certain PRoWs fall within the DCO boundary but are not affected by construction works and will not be restricted, diverted or otherwise affected during construction. Based on the submitted DCO documentation, including **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]**, the total number of PRoWs that are directly affected by construction activities within the Order Limits by the Project is 363. 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 PRoW. 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 the provision of appropriate temporary diversions. As a result, no PRoWs would be closed without a diversion

Examination Library ID	Name	Topic	Matter	NG Response
				in place and no severance of the overall network is anticipated during construction. **7.6 Outline Public Rights of Way Management Plan [APP-329]** also provides indicative durations for the management regimes applicable to each affected PRoW during construction of the Project. These durations reflect the specific construction activities affecting each PRoW and, in many cases, the period during which a PRoW would be subject to temporary management is limited to only a few days or short discrete periods. The Applicant would also note that, as indicated in **7.6 Outline Public Rights of Way Management Plan [APP-329]**, temporary PRoWs impacts will be phased as construction progresses along the Project route, such that impacts on adjacent, alternative PRoWs occur at different times, rather than occurring concurrently along the full length of the Project. The durations and timings of temporary PRoWs impacts will be further refined by the Main Works Contractor as part of the detailed construction programme, the aim being to keep the duration of any PRoWs impacts as short as practicable, with arrangements being discussed and agreed with the relevant local highway authority PRoW Officers in advance.
REP1-468	Simon Polley	Transport and traffic	With a construction period of at least four years (beginning in 2027 - Norwich to Tilbury) we can see that a significant swath of Essex Countryside will be either restricted or inaccessible for those wishing to use these 208 Public Rights of Way, up from 195 in 2024 and 116 in 2023.	See response above regarding the overall numbers of PRoWs affected. In addition, the Applicant notes the methodology used in the submitted spreadsheets, but does not agree with the stated figure of 208 PRoWs being restricted, diverted or inaccessible. The interested party's approach appears to include all PRoWs located within 50 m of the Order Limits, including many that are not affected by the Project and will therefore not be restricted, diverted or inaccessible. Based on the submitted DCO documentation, including the **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]**, the total number of PRoWs that are directly affected within the Order Limits by the Project in Essex is 164.
REP1-468	Simon Polley	Transport and traffic	With a construction period of at least four years (beginning in 2027 - Norwich to Tilbury) we can see that a significant swath of Norfolk Countryside will be either restricted or inaccessible for those wishing to use these 53 Public Rights of Way, up from 51 in 2024 and 34 in 2023.	See response above regarding the overall numbers of PRoWs affected. In addition, The Applicant notes the methodology used in the submitted spreadsheets, but does not agree with the stated figure of 208 PRoWs being restricted, diverted or inaccessible. The interested party's approach appears to include all PRoWs located within 50 m of the Order Limits, including many that are not affected by the Project and will therefore not be restricted, diverted or inaccessible. Based on the submitted DCO documentation, including **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]**, the total number of PRoWs that are directly affected within the Order Limits by the Project in Norfolk is 47.

Examination Library ID	Name	Topic	Matter	NG Response
REP1-468	Simon Polley	Transport and traffic	With a construction period of at least four years (beginning in 2027 - Norwich to Tilbury) we can see that a significant swath of Suffolk Countryside will be either restricted or inaccessible for those wishing to use these 188 Public Rights of Way, up from 178 in 2024 and 65 in 2023!	See response above regarding the overall numbers of PRoWs affected. In addition, the Applicant notes the methodology used in the submitted spreadsheets, but does not agree with the stated figure of 208 PRoWs being restricted, diverted or inaccessible. The interested party's approach appears to include all PRoWs located within 50 m of the Order Limits, including many that are not affected by the Project and will therefore not be restricted, diverted or inaccessible. Based on the submitted DCO documentation, including the **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-033 to APP-040]** and **7.6 Outline Public Rights of Way Management Plan [APP-329]**, the total number of PRoWs that are affected by the Project in Suffolk is 152.
REP1-390	John Bell	Socio-economics, recreation and tourism	As tourism small business owners in Forncett St Mary, the negative impact of the proposed pylons will be horrific on our business, income and lives. We have pointed this out clearly in all our submissions to date and continue to do so. The pylons/wirescape will destroy our business and massively devalue our largest asset which we have worked a lifetime to pay off and develop. This is unacceptable to us and unacceptable on a human level. Without any compensation, NG will destroy us as a business and family. This is akin to the post office scandal. At no point have NG ever bothered to respond to our concerns, they simply aren't bothered and just pay lip service to the 'consultation' process.	The Project has been designed to avoid sensitive features as far as reasonably practicable and **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]** provides a robust assessment on all identified local businesses. Where mitigation cannot avoid impacts, the Applicant is engaging with business owners regarding compensation. Effects on businesses located within the 1 km Study Area has been assessed in **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]**. The Applicant noted the business location is redacted. The Applicant is keen to provide a further response if provided with the redacted details.
REP1-390	John Bell	Transport and traffic	The lane we live on, is proposed as a construction route for the building of the pylons. NG have clearly never even bothered to look at what this lane is like - it is a farm track which is wholley unsuitable for HGV/contruction traffic. The lane passes less than 0.5m from our home/business and the traffic will undoubtedbly damage the foundations of our property. This is simply unacceptable and NG need to use an alternative road/access should the horrific scheme go ahead. We would like a site visit to show the planning inspectors just how ludicrous it would be to use as it is often incorrectly referred to)	The Applicant notes the respondent's concerns. However, the Applicant emphasises that the section of highway shown in the images attached to the respondent's Written Representation is not proposed for use by construction traffic during construction of the Project. The proposed construction routeing strategy for the Project is set out in Section 5.4 of **7.3 Outline Construction Traffic Management Plan [APP-309]**, and specifies that construction traffic will only utilise the Strategic Road Network (SRN), Main Road Network (MRN), or designated construction access routes denoted as 'Primary Access Routes' ('PARs'). Proposed PARs in Norfolk are shown in **7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section A [APP-313]**, noting that PARs with references H02-A1 and H03-A1 on Sheets 2 to 4, and H03-A2 and H04-A1 on Sheets 5 and 6 are proposed to serve the section of works in the vicinity of Forncett St Mary. The Applicant additionally notes that, where the alignment crosses local roads in the vicinity of the location referenced in the respondent's Written Representation – Cheney's Lane close to proposed pylon reference RG35, and Northfield Road close to RG36 – crossover arrangements are proposed to be provided, at which construction

Examination Library ID	Name	Topic	Matter	NG Response
				traffic would not be permitted to join or leave the public highway. Outline design of these locations has been undertaken, and subject to the Road Safety Audit process detailed in **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]**, overseen by Norfolk County Council as the Local Highway Authority.
REP1-398	Karl Owen	Alternatives	"The Holford Rules are all broken here" said Simon Pepper as he took in the landscape he wished to corrupt with his giants, here at [redacted text], while trying to redesign the alignment at 'Suffolk 3' on the hoof (as the farmers say) trying to move the haulage road out of our back garden and navigate a high-pressure gas pipeline (both of which were somehow missed in the woefully poor design stage). In the end Pepper put the nearest pylon, RG138, even closer than it was to our home; a home built 400 years ago when the heaviest passing vehicle was a horse and cart. Now it its expected to survive a passing motorway and building site for thousands of throbbing and polluting HGV's, cranes and diggers. The haulage road now goes through the site of a medieval dwelling instead of my compost heap. And what of us? My wife has permission to live here in the cottage in perpetuity but we do not own [redacted text], it its part of a larger farm estate owned by her father and brother who still cling to the ancient rules of primogeniture. As such we will not be fairly compensated despite being the ones most harmed by National Grid's most harmful choice. We are not landed gentry, we have no financial options to move away, son we must endure and suffer this madness. Our sacrifice is one that National Grid is happy to make.	There may be some misunderstanding of the submitted scheme by the respondent. The nearest pylon to the north RG138 is the same distance to the property, following the targeted consultation which is referred to, as previously but with the alignment moved to the western side. This increases the separation to the garden which is substantially to the east and south with views filtered by vegetation along the access road. In the main views from the property which are to the south the alignment has been moved to the west such that pylons are to the periphery of the view and more distant. The assertion regarding the haul road is incorrect as this is now around 200 m to the west of the property compared with around 50 m previously. The respondent is correct that there is no compensation for changes to view though Government is looking at some mechanisms to compensate those living near new infrastructure. The Government has announced its intention to develop a bill discount scheme for households located within 500 m 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. The Government has also 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 ensuring community benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network.
REP1-488	Tina Robinson	Land and property	I submitted a written representation last year and respectively ask that my concerns are reviewed and responded to. I would like to know if the site near me has been visited. I have received confirmation my area was visited but would be interested to know if my concerns have been reviewed. I object to the project work behind our home for the reasons already stated along with the hours of work - seven days a week, that were indicated in the recent meetings. The noise, disruption and loss of access to the area is also a concern. My other concern that is causing distress and harm, is that whilst National Grid have confirmed there are no changes to the plans in my area, the plans submitted are not transparent. The area of concern is EEPK14 CSE tower. The plans do not confirm exactly where this is going to be put. National Grid have said that they will try to modify the existing pylon but if that can't be done a new CSE tower would be placed very	Wherever possible we would seek to modify existing equipment as this would minimise the degree of change. This will be confirmed following the completion of detailed design by UK Power Networks (the owner and operator of this connection). If the existing pylon cannot be re-used then a new pylon (of the same approximate height as EEPK14) would be constructed. This is proposed to be built just to the south of the existing pylon. UK Power Networks will be engaging with affected landowners.

Examination Library ID	Name	Topic	Matter	NG Response
			close to us. This is a stressful time and transparency would be appreciated	
REP1-477	Susan Dawn Holmes	Transport and traffic	Comments on the file re impossible access to the site for HGVs. Weight Limit 7,5 ton due to small, weak bridge which is already in need of repair due to overweight farm vehicles.	The Applicant notes the respondent's concerns. However, the Applicant emphasises that the section of highway referenced in the images attached to the respondent's Written Representation is not proposed for use by construction traffic during construction of the Project. The proposed construction routeing strategy for the Project is set out in Section 5.4 of **7.3 Outline Construction Traffic Management Plan [APP-309]**, and specifies that construction traffic will only utilise the Strategic Road Network (SRN), Main Road Network (MRN), or designated construction access routes denoted as 'Primary Access Routes' ('PARs'). Proposed PARs in Norfolk are shown in **7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans – Section A [APP-313]**. The Applicant additionally notes that, where the alignment crosses local roads in the vicinity of the location referenced in the respondent's Written Representation – Heywood Road close to RG70 – a crossover arrangement is proposed to be provided, at which construction traffic would not be permitted to join or leave the public highway. Preliminary design of this location has been undertaken, and subject to the Road Safety Audit process detailed in **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy [APP-334]**, overseen by Norfolk County Council as the Local Highway Authority. The additional access routes shown both north and south off Heywood Road are permanent access routes to the pylons for future survey and maintenance access that utilise existing access points and tracks where possible. Ahead of future maintenance or survey access the Applicant's lands team will liaise with and agree access arrangements at the time to reduce impacts where practicable.
REP1-368	Henry James Micklem	Alternatives	Balls Farmhouse, a Grade II listed building, is located 100 meters from TB143 and has direct views of the pylons from three of its four outlooks. In a previous consultation response, my clients requested a modest shift of the line to the northern boundary of the field to reduce the impact on Balls Farmhouse. National Grid has stated that this adjustment was not accepted because it would move the line closer to a properties on Lark's Lane and properties on Chelmsford Road rather than passing through at an equidistance between properties. The suggested change proposed in figure 2 maintains a similar crossing point at Lark's Lane. This adjustment does not alter the overall impact on [redacted text] to the west but significantly improves the situation for Balls Farmhouse. Additionally, [redacted text] has substantial mature planting and screening along its eastern boundary, whereas Balls Farmhouse has little to no screening on its western boundary. Also, Balls Farmhouse is a Grade II listed	The Applicant responded to this request in **5.1 Consultation Report [APP-066] Ref no. 9-7.327** *'National Grid has routed and sited the alignment in accordance with the Holford Rules. A summary of the Holford Rules is provided within Appendix I22 of this report. TB141 (now TB143) is proposed to be approximately midway between properties along Lark's Lane, therefore, to move this pylon further away from one property would move them closer to another. To move TB139-TB142 (now TB140-TB144) further north would also move the alignment closer to properties north along Chelmsford Road where we are currently crossing at an approximately equal distance between properties. We therefore are not proposing a change to the alignment in this location.'* The Applicant's position remains unchanged on this matter.

Examination Library ID	Name	Topic	Matter	NG Response
			building, whereas [redacted text] is not. Listed Buildings are buildings of special architectural or historic interest with legal protection, the weight attributed to these properties should be greater than those that are not listed. Therefore, being equidistant between properties is not always justified or fair where heritage impacts are involved. If a minor shift closer to [redacted text] is required for the angles, this is acceptable, as the overall impact on [redacted text] would remain unchanged. The proposal also maintains similar crossing position at Chelmsford Road, therefore not changing the impact on these properties. The suggested movement would shift TB140 slightly further south, but this is a minimal adjustment. The pylon would remain in the same field with no increased impact on residential properties or other features. The line would then continue a similar route to TB138/139 as originally proposed, ensuring no additional impact. This minor realignment would reduce the impact on the listed Balls Farmhouse while not increasing any other harmful impact.	
REP1-368	Henry James Micklem	Alternatives	North-Western Route Rerouting north and west of Great Waltham, through the largely open arable land between Great Waltham and Pleshey, is a more suitable option. The Design Development Report states that this route is not being pursued due to the presence of the Wilderness Foundation charity. However, it seems disproportionate that a charity, without security of tenure and the potential to relocate should take precedence over permanent heritage assets and residential receptors such as Langleys and the surrounding villages.	The inference, that this has been the main reason for the western route not being pursued, is incorrect. The reasons are stated in the last bullet point of paragraph 9.2.4 of the 5.15 **Design Development Report [APP-122]** and relate to transfer of effects to a longer and less direct route. The reference to the Wilderness School was made in 7.21 2024 **Design Development Report for the Project [APP-359]** at paragraph 5.4.180 with it noted as one of a number of consequences arising from the alternative route option. The report refers to effects on residential amenity, landscape and views and notes '*the route would also need to cross part of the land used by The Wilderness Foundation*'. The Applicant's position remains unchanged on this matter.
REP1-368	Henry James Micklem	Consultation	In the Targeted Consultation Booklet Essex 8, the map illustrating the new route contains a misleading blue information box. It states that pylons TB135 and TB142 are being repositioned, whereas, in reality, all pylons between TB135 and TB142 are being relocated. The Design Development Report April 2024 initially proposed low pylons, however, when the 2024 plan was released in July, my clients were informed that only high pylons could be used. Now, low pylons are being implemented, contradicting previous statements that this was not an option. This misinformation significantly influenced my client's previous consultation responses. The provision of unclear and contradictory information has made it difficult for my clients and other stakeholders to fully understand the situation and engage meaningfully in the consultation process. Furthermore, no feedback has been received from the responses submitted in July 2024. There has not been a two-way dialogue and, as such, cannot be considered a proper consultation. If National Grid has reasoning for rejecting suggested changes, landowners should be informed so they can consider and respond accordingly to the new proposals.	The Applicant acknowledges that there was a slight inconsistency in the annotated map produced for Essex 8 regarding the pylons affected by the proposed change. The description of the proposed change in the text of the consultation leaflet and EIC document were both correct and did not impact the ability to provide feedback. **7.21 2024 - Design Development Report for the Project [APP-359]** stated that the Project was being progressed with traditional lattice pylons, but that this would continue to be backchecked with the final design being submitted in the development consent application (if an overhead line was progressed). Appendix C of **7.21 2024 - Design Development Report for the Project [APP-359]** laid out how lower height pylons were considered and stated that the design then proposed did not include low height pylons. The Applicant 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

Examination Library ID	Name	Topic	Matter	NG Response
			National Grid has used historic England to defend the route proposed but Historic England has yet to respond. Not showing a fair representation to any property with historical interest especially grade 1 and 2 building and parkland.	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]**). The Applicant notes the respondent's comment regarding Historic England.
REP1-410	Maddy Everington	Biodiversity, ecology and nature conservation	In Ardleigh, trees that are classified as ancient would be ripped out and habitats for an abundance of local destroyed. This includes protected strips and feeding areas for turtle doves, which have been established for several years to preserve habitats for this endangered species, as part of the RSPB'S Operation Turtle Dove.	There appears to be confusion as to the classification of 'ancient' trees. According to the records held by the Woodland Trust via the Ancient Tree Inventory (ATI website last checked on 4 March 2026), there is one ancient tree (ATI Ref No 233649) within the boundaries of Ardleigh Parish Council. This tree is located near the Premier Inn to the southern side of the A12 and will not be impacted by the Project. Arboricultural surveys undertaken by the Applicant within the Parish of Ardleigh have identified a further five trees (classified as veteran trees) either in or within 30 m of the Order Limits. None of these trees have been reported as being removed. The Project recognises the sensitivity of turtle dove and the importance of the established feeding and foraging habitat (or strips as described). As set out in **7.4 Outline Landscape and Ecological Management Plan [Revision C]**, any temporary loss of habitat required during construction will be reinstated to its original condition once the works are complete. These areas will be reinstated using appropriate species mixes and management prescriptions that will continue to benefit species such as turtle dove. The delivery and long-term management of these reinstated habitats are secured through the measures set out in Section 9.2 of **7.4 Outline Landscape and Environmental Management Plan [Revision C]**. Through these commitments, the Project ensures that habitat suitable for turtle doves is maintained in the long term, consistent with the requirements of the DCO.
REP1-401	Kevin Baxter	Biodiversity, ecology and nature conservation	Is there a fully costed plan to achieve Biodiversity Net Gain? (including the purchasing of the land required to achieve this?). Has this cost been fully included in NG's figures? Is this plan based on an independent report by a trusted, qualified, independent body? Would all replacement habitat be in place locally to that being lost and in good time to provide shelter for displaced animals, birds and insects? Has any thought been given to wildlife corridors and their essential role in nature? How would such a plan compensate for the loss of just one fully mature oak tree for instance? (a replacement sapling would be totally inadequate and in no way replace the habitat lost from that one, potentially ancient, tree). How does a project that labels itself as "Green" justify the felling of over a million trees and the scrubbing up, and burning, of hundreds of miles of hedgerows?	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 Project work includes assumptions about how BNG obligations will be delivered, and these have informed National Grid's Early Construction Funding application to Ofgem. The Applicant can therefore confirm that the costs of delivering BNG have been included in the Project costs informing the recent Early Construction Funding application. The Funding Statement confirms that any land rights that the Applicant needs to purchase for the Project, which includes any BNG obligations, will be funded. A detailed BNG report has been prepared by professional ecologists on behalf of National Grid, the detail of which has been reviewed and scrutinised by Natural England and the Local Planning Authorities. In line with the BNG mitigation hierarchy, replacement planting onsite will be a priority to ensure habitat is replaced as close to the impact as

Examination Library ID	Name	Topic	Matter	NG Response
				practicable. However, in order to achieve 10 % BNG, offsite units may be required. 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. **Section 9.2 of 7.4 Outline Landscape and Environmental Management Plan [Revision C]** provides details of landscape reinstatement plans including aftercare. On completion of works all areas of temporary construction impacts would be subject to replacement planting, replanting the habitat type that was lost, including any loss to wildlife corridors. 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. Through routeing, siting and detailed design, the Applicant has sought to reduce, as far as practicable, potential impacts on wildlife corridors, and protected species, including ensuring adequate habitat suitable for sheltering are available for animals (including birds and insects) either side of the Project. 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 fragmentation impacts during construction have been identified, mitigation measures such as bat flyways have been proposed as detailed within **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. While blocks of woodland will be mitigated/compensated through the standard multipliers applied through the BNG metric, the Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within **7.4 Outline Landscape and Ecological Management Plan [Revision C]** which is secured by Requirement 4 within **3.1 Draft Development Consent Order [APP-056].** Table 5.1 in **7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]** contains information on compensation for veteran trees that is to be agreed on a case-by-case basis. The Applicant does not recognise the numbers of tree and hedgerow loss suggested by the respondent. Full details on the tree and hedgerow impacts can be found within **6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** and **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236].**

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REP1-401	Kevin Baxter	Alternatives	It seems the only compelling reason for going on-shore is to open up the countryside to predatory solar installations, (and the immense extra damage these will cause to nature).	There has been no influence of solar farm connection requests on routeing and siting for the Project. Some local route refinements and pylon positions have responded to operational needs and approved plans. 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.
REP1-417	Michael Arthur Bertie Juby	Alternatives	The physical scope of this document addresses the National Grid proposed route (latest) through the Waveney Valley. Specifically, just the (approx.) stretch of the route which encloses Roydon on three sides and going southwards for about 2km. Because the route has been changed by NG from the original, it now dances its way in a zig-zag fashion going through a 50m wide gap between Roydon Fen (site of rare species) to the East and Wortham Ling to the West (an SSSI) before coming up towards the rear gardens of Roydon people. Then a sharp turn (nearly 90 degrees) to the west before almost immediately another sharp turn to the North followed by another sharp turn to the East to surround Roydon on three sides. The original Blue Corridor was further to the West of Roydon, but not by much, but enough for it to be (just) acceptable to the citizens. This is because it would have reduced the exposure around Roydon from 3 sides to 1.5 sides. The closest point that the pylon route (latest) would be to Blooms of Bressingham would be where it crosses the A1066 which is the same point on the old Blue Corridor route. Also, the distance from Blooms to this point is nearly a mile and would be obscured by trees anyway. (Please note point 1 in Appendix A and point 1 and 4 in Appendix D). The so-called "well being centre" is a private piece of land with some tents and huts and now some hens and a donkey or two (Please see Appendix E second para for more information and appendix K for diagrams of routes). I do not see why this one objection should take precedence over 2,500 fully residential people who live in their homes 24/7 (and are at least connected to the mains electric so maybe have more of a right as to how it is provided?). However, I recognise that this may cause some distress to the owners so simply go further to the West of this very small (200m trapezoid) to the other side of the hedge rather than Eastwards which goes right up to the homes of the people of Roydon?	The Applicant firstly notes that the appearance of the route on a plan is not the same as the on-ground experience. At this location a combination of landform and screening by buildings and vegetation mean that very few locations will have visibility of pylons to three sides. The blue corridor referred to is the graduated swathe from the 2022 consultation. This was less preferred with the route moving further to the east as a result of its greater effects on a grade I church at Wortham, Brook Farm airstrip and greater impact on woodland. The wellness centre received planning approval part way through the Project development process and is a legitimate interest and forms a further factor in the balanced decision making. This was set out in **7.20 2023 - Design Development Report [APP-358]**. The Applicant's position remains unchanged on this matter.

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			They also state they would be “avoiding locally protected landscape” and they have done this by finding a 50m wide gap between Roydon Fen (protected) and Wortham Ling (SSSI) and plonking a zig zag route to find this gap!	
REP1-417	Michael Arthur Bertie Juby	Air Quality and Emissions	There is much information on the Internet regarding hazards associated with living near high voltage pylons. NG would have it that their “experts” and studies have concluded a minimum “safe” distance based upon experiments by themselves “and other bodies”	National Grid looks to authoritative and independent scientific organisations such as the World Health Organisation (WHO) and the UK Health Security Agency (UKHSA) to review the worldwide body of scientific evidence on electric and magnetic fields (EMFs) and health. We believe important decisions on health should be made independently of industry, as is the case in the UK. 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 national guidance and policies is key to our approach. 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). Our approach ensures all our assets comply with those policies, which are set by Government on the advice of their independent advisors UKHSA. This ensures that health concerns are properly and adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines is included in **7.8 Electric and Magnetic Fields Compliance Report [APP-330]**.
REP1-417	Michael Arthur Bertie Juby	Health and wellbeing	EMFs act upon particles in the air which can make them “sticky” and are inhaled, or otherwise absorbed, by human beings, and it is this that can/may cause cancers and other illnesses. These particles have been observed at over 1Km away, and up to 2km or more, from pylons which is far in excess of the 50m “safe” distance that NG state.	In the 1990s, the Bristol University Human Radiation Effects Group published a series of papers suggesting that the electric fields from high-voltage overhead lines might influence the behaviour of airborne particles in such a way as to be harmful to human health. The main example given was radon daughter products, but, if the theories were valid, they could also apply to other airborne particles, for example from pollution generated by road traffic. The suggestions made were that electric fields increase the concentration of harmful particles in the atmosphere near the source of the field and make harmful particles from the atmosphere more likely to stick to the skin. Additionally, it was suggested that overhead lines produce ‘corona ions’ which make particles in the atmosphere, such as radon daughter products more likely to stick in the lungs. National Grid believe it is right that the decisions on public health matters are made independently of Industry, rather than based on our own assessment of the science. The evidence on these theories has been reviewed by authoritative, independent scientific bodies and in 2004 the then National Radiological Protection Board’s Advisory Group on Non-Ionising Radiation, concluded: ‘*…it seems unlikely that corona ions would have more than a small effect on the long-term health risks associated with particulate air pollutants, even in the individuals who are most affected. In public health terms, the proportionate impact will be even lower because only a small fraction of the general population live or work close to sources of corona ions.*’ and

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				'*Any health risks from the deposition of environmental particulate air pollutants on the skin appear to be negligible.*' In 2007 the World Health Organisation (WHO) published Environmental Health Criteria on EMFs and concluded: '*High-voltage power lines produce clouds of electrically charged ions as a consequence of corona discharge. It is suggested that they could increase the deposition of airbourne pollutants on the skin and on airways inside the body, possibly adversely affecting health. However, it seems unlikely that corona ions will have more than a small effect, if any, on long term health risks, even in the individuals who are most exposed.*' The overall summary of the evidence by the authoritative groups is against EMFs having an adverse health effect via this mechanism and more recent epidemiological studies (Toledano et al., 2020; Swanson et al., 2014) support these conclusions. Corona ions, as described have been the subject of a significant amount of research, with the Government Scientific Advisors completing a significant review of the evidence in 2004. This research has been considered by the Government's Scientific Advisors when recommending EMF policies which should be applied to electricity infrastructure, as set out in NPS EN-5 (2024). As already stated, National Grid believe it is right that the decisions on public health matters are made independently of Industry, rather than our own assessment of the science. The evidence concerning compliance with the EMF policies, including the numerical guidelines and precautionary policies Government require, which take full account of the evidence on corona ions, is included in **7.8 Electric and Magnetic Fields Compliance Report [APP-330]**.
REP1-417	Michael Arthur Bertie Juby	Landscape and Visual	Appendix G shows the current view over the Waveney Valley. Imagine if you will a whole series of 50m high, and nearly the same wide, of pylons marching through the Valley and then doing an abrupt turn across it. By encircling Roydon on three sides and cutting through local amenity and beauty sites does NOT appear to be considering much of the people around here nor the places valued by the local community. These pylons also cut over the Angles Way (a long-distance footpath) and will be highly visible from local recreational areas of Roydon Fen and Wortham Ling (SSSI).	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 needed to balance the potential effects on heritage assets, the Waveney and Little Ouse Recovery (WaLOR) project, landscape and views, and the experience of users of the Angles Way. The Applicant has routed and sited the alignment in accordance with the Holford Rules, as well as taking cognisance of the results of survey information and consultation feedback. The alignment in this area was the preferred alignment to be taken forward for detailed assessment, whilst taking account of all these factors. The value of the landscape and visual receptors is considered as part of the Landscape and Visual Impact Assessment (LVIA). The visual assessment was undertaken, based on consideration of views experienced from a number of Visual Receptor Areas (VRA). The area around Roydon falls within VRA A11: Fen Street, and VRA A12: Roydon and Diss. 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]**.

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				Significant adverse effects are identified within approximately 1.5 km of the Project within VRA A11, and within approximately 0.5 km within VRA A12. An assessment of effects on the Angles Way is provided in Section 13.12: Assessment of Effects on Routes within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229]**, page number 314 onwards. Significant adverse effects are identified.
REP1-417	Michael Arthur Bertie Juby	Alternatives	The WVA is to put this short stretch underground as they have done so elsewhere on the route. Local residents accepted that there may be some disruption to traffic and access as well as some disruption to the local fauna and flora in the short term but the long-term benefits to the area far outweighed the short-term disadvantages. It would reduce the surrounding of Roydon from three sides to about one and a half and preserve the current views over the Waveney Valley reducing the sight pollution enormously. As the prevailing winds come from the south and west, and this is the area which would be underground, then the danger of ionised particles, “sticky particles”, (which are likely carcinogenic) being blown over Roydon residents for them to inhales, is significantly reduced.	On the point regarding ‘sticky particles’ please see the answers above relating to Air Quality. On the wider routeing point the Applicant’s position remains unchanged on this matter for the reasons set out below and expanded upon in section 4.6 of **5.15 Design Development Report [APP-122]**. The Applicant carefully considered the use of overhead lines or underground cable and has concluded that an overhead line is the appropriate basis for the Project. 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 to consider a change to underground cable 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. Even if others took a contrary view regarding the test at 2.9.23, then different undergrounding methods either give rise to a high level of impact on trees, on high organic matter soils or on the WaLOR project; present unacceptable risks to cable integrity; or are at a level of cost inconsistent with National Grid’s duties and relevant planning policy (i.e. Electricity Act 1989 and NPS EN-5 (2024)).
REP1-417	Michael Arthur Bertie Juby	Costs	NG have been using a separate company to purchase land on the proposed route and have not included such purchases when doing comparative costs with underground (for example). They also do not include in their costings the devaluation of housing and property or the costs (as in my specific example – see personal impact section below) of having to relocate. NG must be forced to release detailed costings of route and alternatives and the risks and assumptions used if they use “cost” as a reason for not implementing the WVA.	As a general point, all options have the potential to incur the costs of mitigation and the comparative costs used reflect real world insight and track record on typical mitigation cost. As set out in the preceding response the decision making regarding the WVA is founded in compliance with policy and the effects arising from cable installation techniques. Cost is also a legitimate part of the picture being identified amongst other criteria as a decision-making factor for the Secretary of State.
REP1-417	Michael Arthur Bertie Juby	Alternatives	One of the earliest alternative solutions I suggested was to go underground between Mellis to the South of Roydon towards Burston to the North, which is a distance of 8.2Km However, if you only do the Waveney Valley Alternative (WVA) that is only 2Km long so would be roughly one quarter of the extra cost which was calculated at £31.5M so one quarter is (roughly and generously) £8M. I then calculated the cost to be per household in South Norfolk District, over a period of 40 years pay back, to be 25p per week for each household. When just using the much shorter WVA this falls to roughly 6p per week.Since then, I have been informed from NG data that only 37% of produced electricity goes to	The development of the details of Projects by the Applicant is undertaken within the context of the relevant planning policy, in this case, NPS EN-1 (2024) and EN-5 (2024). These define a strong starting presumption for the use of overhead lines with underground cable where routes crossed nationally designated landscapes and under certain other circumstances. The Applicant is clear that the area identified (Mellis to Roydon to Burston) does not meet the criteria (it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable. On this basis we would restrict comment to the fact that willingness to pay approaches do not provide a credible basis to justify costs to Ofgem and that the calculations significantly underestimate

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			households and the rest to industry. So now each household in South Norfolk would only have to pay 2.22p per week to pay for this section to underground using existing NG plans. If this were to be extrapolated to the nation as a whole (they benefit from this route apparently) then this would be a one off payment of 24p per household (or 2.0p/month for one year only) This would mean taking the £8M extra cost and multiplying by 37% and dividing the result by the 30Million households in the UK. This equals 10p per household. This is not even calculated over a 40-year period but a simple one off payment per household of 10p to preserve the beauty of the Waveney Valley and protect the citizens of Royden and its surrounds from potential harm.	the cost of the length of underground cable inferred. The Applicant's position remains unchanged on the technology selected in this area.
REP1-417	Michael Arthur Bertie Juby	Health and wellbeing	being surrounded by 400KV 50m high pylons there is little hope that my main means of communication to like minded enthusiasts will ever get through as my 100Watts pales into insignificance to the EMF's surrounding me caused by 400KV on three sides.	The proposed Project, including the overhead line has been designed to limit radiofrequency emissions as set out in Section 3 of **7.8 Electric and Magnetic Field Compliance Report [APP-330]**. 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 to minimise interference issues
REP1-304	Caroline Blacker	Land use	Acid sulphate soils and their risk of oxidisation. The soilscapes presented by NG do not align with the mapping of the Soil Survey of England and Wales. It has been noted that Dr David Dent warned NG of the presence of these soils in the Waveney Valley (and most probably elsewhere, e.g. Dedham Vale). Proper testing requires either 3 months of incubation under oxidising conditions or hydrogen peroxide treatment. Neither method is reported in NGs documentation. Why has NG not tested rigorously and scientifically for these soils across all 3 counties? - What assessment has been made of the environmental and human health impacts when acid sulphate soils are exposed during construction? - What is the management plan if acid sulphate soils are encountered? - And what assessment has been made of the risk to the pylons themselves?	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 (see **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** for reference). 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.
REP1-462	Sally Ann Head	Planning / Landscape and Visual	Under CROW, the relevant local authority must ensure all decisions and activities must consider the potential effect they will have within the DVNL and land outside its boundary. This is clearly intended to encompass land immediately outside the DVNL boundary, such as that immediately south of Birchwood Road, CO7. It is highly logical, therefore, that no pylons, cable sealing ends nor construction compounds should be located within sight of the DVNL. If unspoilt views are maintained in the centre of the DVNL (where all one can see is land within the boundary), then it is very reasonable for unspoilt views to be maintained on the edge of the	The Project is designed to minimise effects on Dedham Vale National Landscape in accordance with EN-1 (2024), including consideration of the Project within the National Landscape and its setting. An assessment of effects on the special qualities of the 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]**.

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			DVNL (where one can see land both inside and outside the boundary). The National Planning Policy Framework regarding development within the setting of nationally designated landscapes states that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on AONBs[6](paragraph 176). It is therefore clear that the care taken to mitigate detrimental impacts wholly within DVNLs should extend to those potential detrimental impacts on the boundaries. The Dedham Vale AONB and Stour Valley Management Plan 2021 – 2026 extends by definition to the area immediately south of Birchwood Road, CO7 and therefore the comments above regarding the need for undergrounding apply equally. It logically follows that pylons, Cable Sealing Ends, and construction compounds should not be located in the vicinity of Birchwood Road, Parney Heath, Dedham, CO7. This is an important access route from the A12 into the key tourist area and area of high amenity and historic value: the Dedham Village. Undergrounding should extend significantly beyond the DVNL boundary such that pylons are not visible from the DVNL. This will mitigate against long term detrimental visual impacts in the setting of the DVNL and in single track country lanes such as Boxhouse Lane, Maltings Farm Lane and Hunters Chase and help to protect views of the existing valuable landscape characterised by scenic open vistas and beautiful countryside.	The assessment is based on the Project design as described in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The assessment concludes there will be significant effects on the special qualities of the National Landscape during construction. Once the Project is operational and the land has been restored, effects on special qualities will gradually reduce (as the landform and vegetation cover is restored), such that they will not be significant. The construction and operation of the CSE compounds and the EACN Substation that fall within 3 km of the National Landscape will have negligible and not significant effects on the National Landscape, as described in Table A13.1.1 on page 10 of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. The assessment recognises there will be some views of sections of the overhead line from the Dedham Vale National Landscape; however, these are not judged to have significant effects on the special qualities of the National Landscape over the longer term, as explained in Table A13.1.3 on page 17 onwards of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. 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 (including by minimising tree loss). 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]**.
REP1-462	Sally Ann Head	Alternatives	The proposed underground cabling in the vicinity of Boxhouse Lane, Parney Heath, Dedham, CO7, should be located as far west as possible, as close as possible to the existing A12 corridor and distant from residential properties located along Boxhouse Lane, in order to minimise the detrimental impact of the construction phase. It is extremely confusing that the undergrounding swathe is proposed to directly abut Park View and Petalo Lodge when there exists a field of 550 metres within which the swathe can be placed.	Deviation of the route of the underground cable further to the west would increase the length of the connection and increase effects on the agricultural use and be at greater cost. Given the adoption of mitigation measures outlined in **7.2 Outline Code of Construction Practice [Revision B]** is expected to control effects, the Applicant does not consider a change in the route as suggested to be justified.
REP1-462	Sally Ann Head	Programme	The construction period is currently estimated at 4 years, but it would be sensible to add a significant period of delay to this estimate given the history of delay in infrastructure projects in the UK. By way of example, Hinkley Point C and the Elizabeth Line overran by a significant number of years.	National Grid has binding customer connection obligations which require the Project to be delivered to a defined programme. The construction period is therefore not discretionary and cannot be extended without risking non delivery of committed customer connections.

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				Delays to the availability of network capacity can also result in increased system constraint costs, which are ultimately borne by electricity consumers. The Applicant has therefore focused on managing construction impacts through appropriate controls and mitigation, rather than prolonging construction duration.
REP1-462	Sally Ann Head	Mitigation of Construction / Air / Noise / Flooding / Compensation	In the event that the undergrounding swathe remains in its current position, careful consideration should be given to ways of minimising the detrimental impact of the construction phase on the neighbouring properties e.g. compensation for nuisance, reduction in working hours or weekend working, minimisation of noisy construction activities, and timely completion of works to enable reinstatement back to original landscape as early as possible. As residents of Boxhouse Lane frequently witness, a number of the protected muntjac deer living in the locality regularly migrate through gardens, passing through boundary hedges east to west specifically the garden of Park View, Boxhouse Lane, across the open fields and proposed undergrounding site towards woodland adjacent to A12. What mitigating measures are to be put in place to allow for this? The water table across the whole of Parney Heath is notoriously high and in times of high rainfall the whole area is frequently subject to flooding and overflowing ditches. Significant assurances and mitigation measures are sought regarding the drainage and water management proposals for the construction phase and specifically regard should be had on the impact on Park View ditches.	The defined core working hours per **3.1 Draft Development Consent Order [APP-056]** provide essential flexibility critical to critical to maintaining programme resilience, allowing the Project to respond to challenges that are often outside the control of the Applicant. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** assessed the impact to sensitive receptors from noise and vibration during the construction phase. The assessment concluded that with the embedded mitigation and controls set out in **7.2 Outline Code of Construction Practice [Revision B]**, significant effects from noise and vibration during the construction phase are not anticipated. **7.2 Outline Code of Construction Practice [Revision B]** sets out noise and vibration mitigation measures during the construction phase. The measures set out within 7.2 **Outline Code of Construction Practice [Revision B]** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft Development Consent Order [APP-056]** within the detailed final CoCP. Section 7.2 **of 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** presents the construction dust assessment. This assessment was undertaken in line with IAQM Construction Dust Assessment Guidance. The assessment concludes that with appropriate implementation of the mitigation measures specified in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]** there would be no likely significant effect from construction dust. Muntjac deer, are not protected species and are actually classified as an invasive non-native species under the Invasive Alien Species (Enforcement and Permitting) Order 2019. As a result, projects are not permitted to implement mitigation measures that facilitate or encourage the movement or conservation of muntjac deer. Given their invasive status, no specific mitigation is required or appropriate within the proposed works area. Muntjac deer are widespread, highly adaptable, and capable of moving freely through a variety of habitats without assistance, and the proposed construction works would not create barriers that would impede their movement significantly. **8.2 Drainage Strategy DCO [REP1-072]** was submitted at Deadline 1. The strategy provides additional information as to how negative effects on the land drainage regime and rainfall infiltration and runoff would be managed during construction and operation of the Project.

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				The mitigation measures described in the strategy are secured through inclusion of commitments within **7.2 Outline Code of Construction Practice [Revision B]**.
REP1-462	Sally Ann Head	Landscape and Visual	As it currently stands, pylons sited in the vicinity of Dedham Road and along Wick Lane, Ardleigh, (Towers TB13-TB21) would be seen from the southern boundary of the DVNL. The topography of this area is flat, and at a distance of c. 1km, 50-meter-high pylons would be clearly visible. It is obvious that the sight of such pylons from within the DVNL does not conserve (let alone enhance) the beauty of the area and its surroundings. It therefore follows that, if pylons are installed within sight of the DVNL, National Grid will be breaching its statutory duties. The landscape in question is of great value and is directly comparable to that of the nearby DVNL. On this evidence alone it should be protected by undergrounding. In terms of a few specific examples: • Boxted WWII Historic Airfield, Langham, CO4 5NW – this museum and airfield is of great cultural value. The site often holds open days which attract all ages and educate visitors on the area's historical importance. As well as this, a run of pylons will cause obvious and grave danger to aircraft taking off and landing. • In all the same ways as we have discussed for the DVNL above, pylons will have enormous detrimental impacts on the landscape character and visual amenity of National cycle network routes through Langham village and the surrounding area. • The visual impact will extend to the long-distance footpath through the Essex countryside, the Essex Way, in the Horkesley area. This footpath spans the width of the county and is of huge significance to the local residents and visitors. Installation of pylons as is currently proposed in Ardleigh, Langham, Boxted and Great Horkesley will cut through a significant number of residential properties. As well as being hugely psychologically damaging for these residents, the presence of such pylons renders their property virtually un-sellable. In conclusion, it is clear that proposed pylons TB1 to TB35 from the EACN at Ardleigh to Great Horkesley, a distance of a mere approximately 9 km, should be replaced by further undergrounding, therefore negating the need for any pylons at all in this locality and mitigating against the issues discussed above.	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]**. **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** identifies Boxted airfield as not operational. This followed engagement with former users who previously hosted aviation events at the site and advised that the runway was no longer useable. It is listed as disused on current aviation charts. Early engagement with the site owner did not reveal aviation concerns in relation to the Project. No impacts on the safety or operation of the airfield have therefore been assessed. The Project is designed to minimise effects on Dedham Vale National Landscape in accordance with EN-1 (2024), including consideration of the Project within the National Landscape and its setting. 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 recognises there will be some views of sections of the overhead line from Dedham Vale National Landscape; however, these are not judged to have significant effects on the special qualities of the National Landscape over the longer term, as explained in Table A13.1.3 on page 17 onwards of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]**. Effects on the Essex Way and National Cycle Route 1 are set out within Section 13.12 Assessment of Effects on Routes within **13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Effects on visual receptors on the Essex Way would range from major and significant (adverse) to minor and not significant (adverse). Effects on receptors along NCN1 would range from major and significant (adverse) to no effect (not significant). Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including the Boxted WWII Airfield (4063). During the construction phase, this asset is assessed to experience a permanent minor adverse significance of effect concerning the below ground remains, and a temporary moderate adverse significance of effect resulting from impacts through change to its setting (**6.11.A2**

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				Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]). For below ground remains, **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. For the setting, standard construction mitigation would be adopted as detailed in **7.2 Outline Code of Construction Practice [Revision B]** to be issued at Deadline 2. Changes to the setting would be temporary and would be removed once the construction phase is completed. For the operation phase, it is assessed to experience a permanent moderate adverse significance of effect. **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. An assessment of how the Project could potentially affect the mental health and wellbeing of local residents is contained in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. Health effects are considered at a population, rather than an individual level, as appropriate for a project of this scale and nature (following good practice guidance associated with health impact assessment and assessments completed for other nationally significant infrastructure projects). Overall, the Applicant is confident that the assessment and the proposed mitigations are robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on the non-designated assets, including changes to their setting. Matters relating to injurious affection or diminution in value are compensation matters. Such matters would be assessed separately, on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code, and are not matters to be determined through the Examination of the Development Consent

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				Order. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are attributable to the Project, including claims relating to depreciation in value or the loss of development potential, assessed on a case-by-case basis.
REP1-462	Sally Ann Head	Alternatives	Any proposal for the positioning of pylons should be carefully considered in terms of pylon design, in order to minimise the harmful visual impact to the setting of the AONB. The 'T' pylon or lower height lattice pylon is likely to have less detrimental impact and should therefore be installed to mitigate against visual harm. Extensive and appropriate planting should take place to mitigate the significant detrimental visual impacts on the locality and setting of the DVNL.	The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics 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 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. 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

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				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. The second section of low height lattice is to the east of Thurrock airfield where the change to low height pylons alongside existing 132 kV 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 Project would be underground within the National Landscape and its setting. The Applicant has committed to undertake replacement planting at the earliest opportunity given the right planting season to mitigate, where practicable, vegetation removal during construction. The Project also proposes landscape planting around the Environmental Areas surrounding the CSE compounds and EACN substation. In addition to this the Applicant has committed to a 3:1 replanting ratio for individual trees. Further details in relation to the reinstatement planting, Environmental Areas and 3:1 commitment can be found in **7.4 Landscape and Ecological Management Plan [Revision C].**
REP1-462	Sally Ann Head	Design / Construction	The Construction laydown and Construction Laydown Area, currently proposed to abut the DVNL on Birchwood Road, Dedham, (JCCC04) should be relocated. The potential harm to the visual amenity of this important gateway to the Nationally recognised DVNL and Dedham Village Conservation Area should not be underestimated. It does not make sense to, on the one hand, proceed with undergrounding of cables from the DVNL to Badley Hall (i.e. preserving the beauty of the setting of the DVNL), while, on the other, building an enormous construction compound within that very setting. The setting of the DVNL must be preserved and enhanced at all times, with disruption kept to an absolute minimum. It does not follow that a construction compound should be situated virtually within the DVNL. From the day construction begins on the compound to the day the final piece of it is removed, there will be continuous (24 hours a day, 7 days a week) disruption. That is unacceptable in an area which is protected by national legislation. The construction compound should clearly be re-located. It seems to us (and many other local residents) that an alternative location which does not disrupt the established beauty of the Dedham Vale should be found.	The Applicant notes the concerns raised. The below explanation sets out the reasoning behind the location of the Construction Compound and Construction Laydown Area. Construction compounds need to be sites adjacent to the cable construction swathes in order to minimise vehicle movements when transporting materials and to support efficient working. A compound (and laydown area) close to the cabling works is therefore necessary. In this location, the extent of cabling to be served by the compound is bounded by the A12 to the north and Great Eastern mainline Railway to the south. Of the available options along this 3.7 km length the selected location is considered to provide the best access to the A12 in that it is located only a short distance from that highway, thus minimising travel time and the potential for impacts upon other road users. Were the compound to be relocated, for example north of Birchwood Road this would result in a far greater number of construction vehicles needing to then cross that road, to access the majority of the cable section to the south. Furthermore, the compound would be closer to properties and within the DVNL. Similarly, a move further southeast would also result in additional traffic movements whilst a location to the east of Dedham Road would require access through Lamb Corner which is considered unsuitable. 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**

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				Landscapes - Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The Project is designed to minimise effects on Dedham Vale National Landscape in accordance with EN-1 (2024), including consideration of the Project within the National Landscape and its setting. An assessment of effects on the special qualities of the 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 is based on the Project design as described in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. The Applicant assessment concludes there will be significant effects on the special qualities of the National Landscape during construction. Once the Project is operational and the land has been restored, effects on special qualities will gradually reduce (as the landform and vegetation cover is restored), such that they will not be significant.
REP1-462	Sally Ann Head	Traffic / Route	The proposed Primary Access Route (PAR 27) – Birchwood Road, Dedham, is ill-conceived and wholly inappropriate. The excessive 258% increase in weekday flows by HGVs and articulated vehicles during the extended 4-year construction period would cause unimaginable harm and nuisance to nearby residents and existing road users, in addition to presenting a potential road safety risk. This bendy and narrow local road with no pavements regularly experiences traffic issues and congestion when just a few farm vehicles collect harvested crops from the adjoining fields, rendering the opposite carriageway impassable by larger vehicles e.g. the local bus and long traffic queues to develop. It is highly likely that significant problems will persist on a daily basis in connection with the flows of HGVs and low loader vehicles associated with the construction and laydown areas proposed, causing unreasonable disturbance and inconvenience for local residents, visitors and all road users. (Footnote Preliminary Environmental Information Report Vol 1 April 2024) Reconsideration should be given to a more appropriate location for this industrial facility.	The Primary Access Routes have been determined through a robust assessment and have been assessed for two-way HGVs passing each other. The Project is proposing to use Birchwood Road (PAR 27) from the A12 Ipswich Road to the junction with Wick Road and Bellmouth JC-B053 (located to the west of the junction of Boxhouse Lane). Within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** the number of HGV movements along Birchwood Road (PAR 27) estimated in the future baseline is notably low in relative terms, with 77 HGVs over a 12 hour weekday period (07:00-19:00) in the vicinity of Bellmouth JC-B053. Therefore, a daily increase of 310 HGV movements during the Project worst case peak construction period (one week), presents as a high percentage increase when compared to the future baseline (over the same 12 hour period). The maximum increase of HGVs will occur only during a short-term period (one week), whereas for most of the duration of the construction period the impact is expected to be of lower magnitude. As presented within **7.11 Appendix E: LRN AM and PM Peak Construction Traffic Committed Development Impacts [APP-338],** the Applicant is proposing a worst-case of an additional 54 vehicle movements in the AM peak hour (28 LGVs and 26 HGVs), a percentage increase of 14%, for the peak duration of one week. In the PM peak hour, this is proposed to be the same number of LGVs and HGVs, with a total 15% increase on future baseline and cumulative development. The presence of construction traffic on Birchwood Road (PAR 27) would not have a significant impact on delay. This percentage growth would have limited material environmental effects.

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				A summary of the impact assessment for Birchwood Road (PAR 27) is presented in Table A16.4.8. Summary of impact assessment found within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275**]. The findings of the assessment identified that there would be slight adverse effects on driver/public transport delay, and on pedestrian, cyclist and horse-rider severance, amenity and fear and intimidation. These effects would be temporary and are not considered significant when mitigation is provided as outlined within **7.3 Outline Construction Traffic Management Plan [APP-309]).** The Applicant is proposing mitigation in the form of a driver information pack to identify locations where pedestrians may be walking on the footway, ensuring vegetation is maintained to keep verge clear and provide signs to warn drivers of upcoming pedestrians in the road. In addition, during construction, Birchwood Road (PAR 27) is proposed to a have a temporary speed limit restriction of 40 mph. These measures will help ensure the safety of all road users on Birchwood Road (PAR 27) during the construction of the Project. Indicated in **7.3 Outline Construction Traffic Management Plan Appendix C: Indicative Highway Mitigation Plans – Section C [APP-315]**, two mitigations are proposed. This includes the temporary removal of street furniture on the A12 slip road, due to being identified as narrow width for design vehicle movements, and the temporary removal of street furniture on the junction of Grove Hill and Perry Lane. A section of Birchwood Road (PAR 27) is proposed to be closed for a short-term duration, less than 4 weeks, for specific construction activities to take place. The proposed diversion route is shown on Section C, Plan C of **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-035]**.
REP1-460	Ruth Jennifer Hawkshaw	Consultation	I have attended public information events and had company representatives visit my home to better understand the project and its effects. However, the maps and paperwork provided were unclear and sometimes irrelevant, marking other people's land, leaving me uncertain about the extent and nature of the damage this project will cause to my property and garden.	The Applicant acknowledges the concern that some of the maps and consultation materials were perceived as unclear or not specific to the affected property. The consultation materials were produced to explain the Project at an appropriate level for public consultation and to present the proposed alignment and Order Limits across a wide geographical area. The Applicant can confirm that the affected party's property is included within the wider Project Order Limits due to their proximity to planned UK Power Networks mitigation works and vegetation management works associated with an access visibility splay. The Applicant would be happy to further engage with the affected party to provide clarification on how their property may or may not be affected by the planned works and the Applicant's appointed land agent Fisher German has been instructed to make contact.
REP1-460	Ruth Jennifer Hawkshaw	Health and Wellbeing	The prospect of being overlooked by this construction causes me great distress and adversely affects my mental health.	An assessment of how the Project could potentially affect the mental health and wellbeing of local residents is contained in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing**

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				[APP-192]. The assessment notes that, during the construction phase, there may be heightened levels of stress and anxiety experienced by people as a result of potential environmental impacts in their local area (for example, noise, dust, traffic and visual impacts associated with construction activities). A variety of measures have been identified to mitigate these impacts and these are set out in **7.2 Outline Code of Construction Practice [Revision B]**. Examples of measures include ensuring construction lighting is minimised; that activities carried out or equipment located within temporary construction compounds that may produce a noticeable nuisance are located away from sensitive receptors such as residential properties; and that members of the community will be kept informed regularly of the works through active community liaison. This will typically include the notification of 'noisy activities', heavy traffic periods and start and end dates of key phasing.
REP1-460	Ruth Jennifer Hawkshaw	Noise and Vibration	I am also worried that I will be unable to open my windows due to what I expect will be ongoing noise. My concerns extend to potential damage to my property. For example, current groundworks for a solar farm across the road have caused my bungalow to shake, resulting in items falling from walls and shelves and breaking. I fear similar or worse structural damage may occur from this project, including harm to the roots of the surrounding trees.	Construction noise and vibration is assessed in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. Construction noise and vibration would be managed via commitments in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]**. These measures ensure that best practicable means (BPM) would be implemented by the Main Works Contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments would be undertaken by the Main Works Contractor(s) based on their specific methodologies. Specific mitigation measures would be identified during these assessments and incorporated in the final NVMP. Potential building damage due to vibration is assessed as part of the construction vibration assessment which identifies locations with potential risk. Mitigation measures in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** ensure that this is reassessed by the Main Works Cntractor(s), and suitable mitigation measures and monitoring are put in place should a risk of potential damage be identified. This specific property, has been identified as a construction noise and vibration 'hot-spot' where specific mitigation measures would be implemented to avoid potential significant adverse effects. At this property there is the potential for vibration to be perceptible but threshold for potential damage is not expected to exceeded. Trees surveyed by the Applicant have been given root protection areas using the methodology in BS 5837:2012. This has been applied for high and moderate value trees with a buffer zone used for low value trees. Details of this can be found within the Arboricultural Constraints Reporting section in Appendix J (Arboricultural Strategy) of **6.19 Scoping Report [APP-296]**. Section 7 of **7.4 Outline Landscape and Ecological Management Plan [Revision C]** details tree protection

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				measures and the need for an Arboricultural Method Statement following detailed design and prior to construction operations commencing.
REP1-460	Ruth Jennifer Hawkshaw	Consultation	Furthermore, during a recent visit by two company representatives, I felt intimidated by the use of technical jargon and acronyms, despite my repeated requests for clearer language. This breakdown in communication forced me to politely ask them to leave.	The Applicant confirms that their appointed land agent, Fisher German has met with the affected party on two separate occasions at the property and spoken with the affected party over the phone. The Applicant also acknowledges that on one of these occasions the representatives from Fisher German were asked to leave. The Applicant does not accept that unclear language was used and when acronyms were referred to these were explained in an appropriate manner to avoid misunderstanding. The Applicant would be happy to meet with the affected party again and avoid the use of technical language and acronyms. In any case, the Applicant recognises the importance of clear, accessible and respectful communication when engaging with members of the public and landowners. The Applicant's approach to consultation and engagement is to explain proposals in plain language, respond to questions, and adapt communication to the needs of the individual concerned, as reflected in its wider consultation and landowner engagement framework. The Applicant acknowledges that technical language can be challenging and confirms that its representatives are expected to avoid unnecessary jargon and to clarify terminology when requested. Where concerns are raised during engagement, the Applicant expects its representatives to respond appropriately and to respect any request to pause or conclude a discussion.
REP1-342	Erik Ronald Ambrose Ellis	Safety and Security	There is no control on the direction of approach of a disabled aircraft to the Airfield so the Cable Sealing in Compound in Raydon should be moved further north to near Pylon JC26 as a MINIMUM to maintain a clear safe approach from ALL directions to Raydon Wings Airfield. This has the added benefits of utilising Wenham Thicks as a natural screen and changing the access route viability (see dismantled railway access route suggested above) with the few properties affected at Bottle Bridge Corner on Wenham Road being screened by mature trees.	**6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** describes the Applicant's assessment of impacts on aviation operations from Raydon Wings aerodrome, including consideration of forced landing events as a risk factor. Paragraph 15.4.15 provides the assessment conclusions that, whilst the Project will represent a new obstacle in the vicinity, existing circuits can continue to be used safely, including to the north, overflying the overhead line at a safe height from which there will be a range of alternative landing sites in the event of an emergency. **7.21 2024 – Design Development Report for the Project [APP-359]** describes how aviation impact assessments, amongst other potential effects, contributed to a decision to change the location of the Cable Sealing End (CSE) compound within the 2024 preferred draft alignment (see paras. 5.4.104 to 5.4.105). **5.15 Design Development Report [APP-122]** describes the subsequent consideration of alternative CSE compound locations in response to Statutory Consultation feedback, determining these to be less preferred (see para. 6.1.6). As further described within the Applicant's Position of May 2025 at Matter 6.7 within **8.3.35 Draft Statement of Common**

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				Ground – Raydon Wings Aerodrome [REP1-103] the evaluation of alternative sites involved the consideration of a number of potential environmental effects, including aviation impacts, balanced with technical benefits and capital cost requirements, in accordance with the Horlock Rules. Further changes to the Project design were not implemented as were not considered to be appropriately justified by the assessed minimal potential adverse impacts on the operation and safety of the aerodrome.
REP1-342	Erik Ronald Ambrose Ellis	Landscape and Visual	The Materials Lay Down Area and Construction Compound (JC CC02) planned for the B1070 / Acacia Road junction will be clearly visible from the Dedham Vale National Landscape, an area renowned for its tranquillity and lack of industrial development. In the light of this the Construction Compound must be moved from the highly visible Acacia Road location onto Notley Enterprise Park (disused Raydon Airfield), North of the originally proposed Materials Lay Down Area to place it adjacent to an Industrial area, already having some infrastructure and partially screened by existing planting	The Applicant acknowledges the concerns raised regarding the potential effects of the Project on Dedham Vale National Landscape (DVNL) during construction. JC CC02 is located approximately 1 km to the north-east of DVNL. Effects on visual receptors are considered in **13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229].** The area around the B1070 / Acacia Road junction is within Visual Receptor Areas (VRA) C6 Raydon and C7 Holton St Mary and East Bergholt. Significant adverse effects are identified for visual receptors within approximately 0.5 km of the Limits of Deviation (LoD) during construction, including as a result of views towards JC CC02. These effects would be temporary. During operation, effects within this localised area (the B1070 / Acacia Road junction) would not be significant. Whilst significant effects on DVNL are identified during construction, these would be as a result of the underground cabling works through the National Landscape rather than the location of JC CC02.
REP1-342	Erik Ronald Ambrose Ellis	Transport and Traffic	Feedback from the consultation suggested all should be moved to Notley Enterprise Park (site of original materials lay down area) NG have completely ignored this and now wish move all to the more visible, unscreened 'high altitude' location as illustrated below [*See WR for image].* Should the B1070 be closed during construction, Noakes Rd/Raydon Rd U4315/Bacons Green U 4315 / C474 should also be closed to stop a 'rat run' through Bacons Green with HGVs trying to pass on single track roads - witnessed when Anglian Water closed the B1070 for 24 hours and only signed these lanes as an unsuitable diversion.	The Applicant considered a compound location adjacent to Notley Enterprise Park following consultation feedback however, the increased 1.9km distance from the primary access point for this section of the cable works would have impacted on the construction programme, vehicle movement requirements and journey times, which would influence noise, dust and air quality factors. An additional temporary compound would also have had to be provided to support the access works given their extent. A section of the B1070 is proposed to be closed for a short duration during construction, with diversion routes detailed in Section C, Plan B of **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-035].** Detailed in **7.3 Construction Traffic Management Plan [APP-309]**, where diversions are necessary (due to temporary closure of roads), they will adopt the principle that they will use the same standard of road, or higher where practicable and available. Noaks Road and Bacons Road have been identified as suitable diversion routes for the closure of the B1070. Temporary diversion signs will also be installed in accordance with relevant signage design guidance.
REP1-342	Erik Ronald Ambrose Ellis	Transport and Traffic	Holton St Mary Footpath 8 is marked for temporary closure. This in the only way to travel by foot between the villages of Holton St Mary and Raydon without using the highway – the roads are either single	The Applicant notes the concern regarding Holton St Mary Footpath 8. As set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**, this PRoW will remain accessible throughout construction

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			carriageway or a busy B road commuter route. Neither road has a footway. This footpath must remain accessible at all times on the grounds of road safety	under a temporary managed access regime, rather than being fully closed. Managed access will allow users to continue to make use of the PRoW but may involve brief holding of users while specific construction activities are paused to allow safe passage, or directing of users around a working area where appropriate. These measures will only be applied where necessary for safety, and access along Holton St Mary Footpath 8 will be maintained at all times. The detailed management arrangements for this location will be developed by the Main Works Contractor and agreed with the Local Highway Authority as part of the final PRoW Management Plan.
REP1-342	Erik Ronald Ambrose Ellis	Biodiversity, ecology and nature conservation	I also note from the tree removal map that a mature oak is planned to be felled to increase a visibility splay crossing a U4315 road between Noakes Rd and Bacons Green.	The Applicant confirms that removal of this mature tree is required to achieve the visibility splay necessary for the safe operation of the Bacons Green crossing points (JC-B018 and JC-B019). During detailed design (post-consent) the Contractor will further develop the design, and it is anticipated that the amount of vegetation loss would be reduced and impacts to trees and hedgerows will be minimised as far as practicable. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and **7.2 Outline Code of Construction Practice [Revision B]** both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable as tree canopy lifting may be achievable and meet with Highways approval.
REP1-342	Erik Ronald Ambrose Ellis	Transport and Traffic	I also note no consideration was given to using the disused railway line from A12 Capel St Mary as a delivery route where a safer, grade separated, junction exists to the 'sealing in compound. In either its current proposed position or a possible new position should the undergrounding start further North close to Pylon JC26	The Applicant notes the suggestion with regard to the historic railway alignment between the A12 near Capel St Mary and Hadleigh. **5.1 Consultation Report [APP-066]** summarises responses to previous suggestions of this type, in particular: 9-4.188, 9-5.173, 9-5.176, 9-5.276, 10-33.26, 10-33.29, and 11-4.30. The Applicant further notes that – as set out in the Consultation Report referenced above – suggestions as to the usage of the historic railway corridor were assessed during consultation, but found not to represent a feasible alternative to the proposed usage of the B1070 as an access route for construction traffic (a Primary Access Route, or 'PAR', as set out in **7.3 Outline Construction Traffic Management Plan [APP-309]**). However, it is also explained within the Consultation Report that feedback received in respect to this issue supported identification of the opportunity to propose the use of an offline temporary haul road from the B1070 to allow construction traffic to bypass Holton St Mary. This proposed arrangement is set out in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, and shown in **6.4.F1 Environmental Statement Figure 4.1 – Proposed Project Design [APP-133]**, Section C Pages 19 and 30.
REP1-342	Erik Ronald Ambrose Ellis	Consultation	The map chosen to present the targeted consultation was out of date by a number of years and did not show the 50 or so properties at these locations. This gave a false impression of the number of	The Applicant notes the concerns about the mapping. The maps the Applicant produced for the targeted consultations used data from the latest OS mapping software, however, we are aware that some more

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			properties affected by the amendments and misrepresented the amendment being consulted upon.	recent developments might not be fully shown on these maps. The Applicant uses a wide range of sources when developing our proposals to ensure a thorough knowledge of the local area and how our proposals might impact communities. We apologise for any confusion caused by data shown on the maps and had a dedicated phoneline and email address if anyone had questions on the documents produced or the proposed changes. The Applicant believes that all the relevant information required for the public to make informed decisions on the proposals was made available throughout the consultation period.
REP1-376	James Cartlidge	Need Case	Pylons are not the only option We know that pylons are not the only option for East Anglia. In March 2024, National Grid ESO (now NESO) published their East Anglia Study which assessed different electricity network configuration options that transferred power across the region. The study found that underground HVDC (U-DC) was the cheapest option with the baseline comparison date of 2034. Their senior technicians even re-ran the figures to ensure their accuracy.	The Applicant responded to the Electricity System Operator (ESO) East Anglia Network Study report in April 2024, alongside this report and the National Energy System Operator (NESO) Clean Power 2030, both reports recognised the need for urgent investment as soon as possible. The report also recognised constraints in delivery of any alternative. The requirement for energy security independence and net zero are to be achieved as soon as possible. The Independent NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis Section 2.4: Securing Works for a 2030 delivery, page 8, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers, of constraint costs, and would impact the Applicant's obligations under the planning requirements and its transmission licence. Paragraph 2.8.5 of NPS EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2 (Appendix A page A3 paragraph A.3.3 of 7.17 Strategic Options Backcheck and Review [APP-355]), an obligation to provide transmission services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NESO Clean Power 2030 Report. The Applicant also notes constraints in the high voltage direct current (HVDC) market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available. The availability of HVDC circuit breakers is another technical limitation at the current time. This especially restricts the amount of generation directly connecting to an individual HVDC network to 1,800 MW

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				because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards (NETS SQSS), which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard and quality of service (Appendix A page A3, paragraph A.3.4 of **7.17 Strategic Options Backcheck and Review [APP-355]**. The 1,800 MW HVDC infeed ceiling should be measured against the 3,480 MW already contracted from the Essex Coast alone — a figure more than double the technical limit. This makes the deliverability of an offshore/HVDC alternative even more acute than is apparent from the general argument. The NPS EN-1 (2024) offshore coordination argument is also directly addressed. NPS EN-1 states: *'3.3.81 The importance of accelerating coordination does not, however, militate against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits.'* The cost differential between the proposed Project and all HVDC alternatives is stark, and is set out from the transparent economic appraisal in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. The following costs were set out at the hearing with all data from **[APP-357]** and all cost information defined by the fully transparent cost model for circuit alternatives, in its Appendix D — Economic Appraisal, pages D1-D14: Wholly Overhead Line — Project Total: £894.50m Wholly 4-Ended HVDC Option Project Total: £5,854.50m Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6, page 111 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** states: '*Should this circuit at full 6000 MW capacity* [be] *made multiterminal to provide the same system flexibility as the AC circuit options* [there] *would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).*'

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				There is no evidence that the cost differential between these alternatives will improve over time. In fact, due to the materials, manufacturing and technical requirements of alternatives, alongside the market constraints set out above, the gap between technologies is currently likely to increase rather than decrease.
REP1-376	James Cartlidge	Consultation	Not consulted on other options Throughout the non-statutory and statutory consultation stages with National Grid, my constituents were not consulted on all of the other transmission options i.e. offshore or underground routes, instead they were presented with a purple swathe of pylons across the countryside and were 'consulted' on whether the line should go over their field or the field next-door.	At each stage of consultation, the Applicant has laid out our consideration of the alternative route options and technologies. The Applicant's consideration of alternatives is set out in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. The Applicant's 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 the government and our regulator Ofgem. The proposals that the Applicant has chosen to consult on and develop are the ones which meet our statutory duties, including the duties imposed on us by National Policy Statements EN-1 (2024) and EN-5 (2024).
REP1-376	James Cartlidge	Planning Policy	Challenging the pylon presumption In Germany, the U-DC option is the legal default. Crucially, the last Government recognised this and confirmed in May 2024 – at the final Adjournment debate before dissolution – that it would urgently review the 'pylon presumption', in light of new facts from ESO showing the comparable cost competitiveness of U-DC.	National Policy Statements (NPS) are produced by the government through a parliamentary approval process, and they present the planning policy framework for all decision making for NSIPs. In April 2025, the government launched a consultation on proposed changes to EN-1, EN-3 and EN-5 that ended on 29 May 2025. Having considered the feedback from respondents, the government maintains its position that the starting presumption remains appropriate for reasons of efficiency, referring to the Institute of Engineering and Technology (2025) A Comparison of Electricity Transmission Technologies: Costs and Characteristics. After a 21-sitting day consideration period within parliament the new NPS EN-5 came into force on 6 January 2026. The new NPS EN-5 (2026) maintains the strong starting presumption in favour of overhead lines. Since the application for development consent was accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs have effect in accordance with the terms of those NPSs. The transition provisions set out in section 1.6 of NPS EN-1 (2026) apply to the application as it was accepted prior to publication of the revised policy. The updated NPS are capable of being important and relevant considerations in the decision-making process. NPS EN-1 and EN-5 together form the primary policy for decision-making on NSIP proposals relating to new electricity transmission infrastructure.
REP1-376	James Cartlidge		The impact on local communities I have been contacted by hundreds of constituents in South Suffolk who will be negatively impacted if this planning application were to be granted. From their enjoyment of the	The Project has been designed in line with NPS EN-5 (2024), which sets a strong starting presumption in favour of overhead lines for new electricity transmission infrastructure.

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			countryside to house prices, pylons would cause lasting visual harm and financial harm. Of course, I recognise that undergrounding does cause disruption but it's short term, and residents know that the land will be 'made good' after construction is complete. Pylons cause the permanent despoilment of our beautiful countryside, and we know that the AC underground cabling proposed in this application requires far wider trenching than U-DC.	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. The Applicant has rigorously tested all realistic alternatives to assess those impacts, including onshore AC cable, AC gas insulated line, high voltage direct current (HVDC) options, and offshore AC and HVDC solutions. Option selection has been driven by a balanced assessment of technical, environmental, socioeconomic, programme and cost considerations, all of which were clearly presented at each stage of consultation. In every case, onshore and offshore HVDC alternatives were substantially more expensive than overhead line solutions, while failing to provide equivalent system flexibility or full capacity. 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. 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. The Applicant pursuing an underground 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.
REP1-466	Scott Wentworth	Socio-economics, recreation and tourism	The impact on the village core and GP surgery My home and the adjacent GP surgery represent the functional and social heart. Construction blight: the Street is the primary artery for this village. If the DCO is granted, the surgery will be subjected to years of heavy machinery, noise and vibration. This will not only devalue homes but will impede access to essential healthcare for the most vulnerable members of our community.	Construction noise, and construction traffic noise is assessed in **6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]**. Construction noise and vibration will be managed via the commitments in **7.2 Outline Code of Construction Practice [Revision B]** and associated **Outline Noise and Vibration Management Plan [APP-306]** (NVMP). These measures ensure that best practicable means (BPM) will be employed by the contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments will be undertaken by the contractor based on their specific methodologies. Specific mitigation measures will be identified during these assessments and incorporated in the NVMP. The Applicant has assessed driver delay/public transport delay to passengers, pedestrian, cyclist and horse-rider delay, severance, amenity and fear and intimidation on all Primary Access Routes (PARs) as detailed within **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. A summary of the significance of effects can be found within Table A16.4.8 Summary of impact

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				assessment **within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275].** The assessment concludes that in general with mitigation in place, as detailed within **7.3 Outline Construction Traffic Management Plan [APP-309],** there would be no significant effects as a result of construction traffic. An assessment of community facilities has been undertaken as part of the ES. The assessment concludes that no GP surgeries will be affected within the Order Limits as set out in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. An assessment of access to social infrastructure facilities (including healthcare) during the construction phase, for both general and vulnerable populations, is set out in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. The assessment concludes that impacts would be negligible during the construction phase, and that, although some individuals within the areas affected by construction activity may experience heightened anxiety (for example perceptions about how road closures may impact their ability to attend medical appointments or other requirements), with appropriate communication and community engagement as set out in **7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305]**, concerns should be effectively mitigated. Matters relating to injurious affection or diminution in value are compensation matters. Such matters would be assessed separately, on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code, and are not matters to be determined through the Examination of the Development Consent Order. The Applicant adheres to the Compensation Code and will compensate for qualifying losses where they can be demonstrated and are attributable to the Project, including claims relating to depreciation in value or the loss of development potential, assessed on a case-by-case basis.
REP1-326	David Burns	Landscape and Visual	The route selected for pylons emergent from Ardleigh and the location of the Western CSE in particular are extremely poor. The EACN is in a location where it will be visible over between 20% and 25% of the Dedham Vale, as are many of the pylons. All fall within the 10-15% category. Had the Western CSE at Little Horkesley (red circle in lower left of diagram) been moved only 500m (per National Grid, the additional underground distance is less than the absolute distance between the two sites as the underground route going in would be altered slightly) to the south near to their alternatively proposed site near to TB42	The Project was designed to minimise effects on Dedham Vale National Landscape (DVNL), including consideration of the Project within the National Landscape and its setting. The potential for effects on the Special Qualities of the DVNL was considered when siting the Cable Sealing End (CSE) compounds to the north of Raydon airfield and at Great Horkesley. 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]**. While there will be significant effects during construction due to the

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			(pink circle at bottom of diagram) it would have fallen into a valley from which it would have been visible over less than 5% of the Dedham Vale and from which it would not have interrupted any views from any historic buildings into the Vale. Subsequent pylons would also have similarly far less visible.	installation of underground cables, these will gradually reduce as vegetation cover re-establishes, and will become 'not significant' in the longer term. There will however be some significant visual effects on views looking outwards from the edge of the DVNL, where some of the proposed pylons would be visible. The EACN Substation is approximately 1.3 km from the National Landscape boundary. The ZTV in **6.13.F12 Environmental Statement Figure 13.12 - ZTV of East Anglia Connection Node EACN [APP-248]** indicates few publicly accessible locations within approximately 1.3 km to 3 km from which glimpsed views of the tops of taller equipment such as gantries within the substation may be possible. The Great Horkesley (Tilbury side) CSE compound is approximately 1.3 km from the National Landscape boundary. The ZTV in **6.13.F14 Environmental Statement Figure 13.14 - ZTV of Great Horkesley Tilbury side CSE Compound [APP-250]** indicates few publicly accessible locations within 1.3 km to 3 km from which glimpsed views of the gantries may be possible. Views towards the EACN Substation and Great Horkesley (Tilbury side) CSE compound would be filtered and screened by existing tree cover and over time mitigation planting would increase screening. At worst effects relating to the EACN Substation and Great Horkesley (Tilbury side) CSE compound would be negligible and not significant and as mitigation planting within the Environmental Area around the infrastructure matures there would be no visual effect. The Applicant has a statutory duty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000, to seek to 'further the purposes' of the National Landscape. The Applicant consideration of this duty 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]**.
REP1-326	David Burns	Planning Policy	In the terms of NPS-EN5 this change is REQUIRED. Because National Grid themselves have already considered the alternative site near to TB42 there will be no loss of time or other delay resulting from the change. The original choice of site was already far less impactful on the Dedham Vale than the one they are now defending at TB35/36 in Little Horkesley and they have reached the conclusion that it needed to be further away.	The Applicant notes the respondent's feedback but also notes that it is the level of effects that are taken into consideration in siting decision making, not the fact of whether infrastructure is or is not visible. The infrastructure may be visible but if this does not lead to a level of effect that, in policy terms, engages parts of policy that would lead to a need for change, then there is no basis for the location of the infrastructure to be changed. In this case the effects on residential views, listed buildings, and the National Landscape amongst other factors do not justify the effects and additional costs from a change in Cable Sealing End (CSE) compound location. The Project is in accordance with EN-1, EN-3 and EN-5 (2024). Paragraph 4.1.3 of EN-1 sets out a presumption in favour of granting consent for energy NSIPs. There is also a further presumption that the urgent need for critical national priority (CNP) infrastructure, such as the Project, will *'in general outweigh any other residual impacts not being addressed by the application of the mitigation hierarchy'*

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				(paragraph 3.3.63). The Project will help meet the urgent need for CNP infrastructure to meet *'energy objectives, together with the national security, economic, commercial, and net zero benefits'* (Paragraph 3.3.63 of EN-1).
REP1-326	David Burns	Landscape and Visual	I have annotated the diagram to illustrate that whilst in the North of the Dedham vale there are few positions from which 37 - 52 pylons will be visible, in the South of the Dedham vale there is a huge area right on the border of the vale from which at least 37 will be visible. This is largely the result of the choice of location for the Western CSE at Little Horkesley combined with effects of the pylons emergent from Ardleigh.These impacts also would be dramatically reduced by moving the Western CSE at least as far as TB42 due to natural screening of land form.	The Applicant notes the concerns raised regarding the location of the western CSE compound and confirms that alternative positioning has been considered. The Applicant does not consider alternative locations preferred for the reasons set out in paragraph 7.2.5 of **5.15 Design Development Report [APP-122]**. The theoretical visibility of the CSE compound is illustrated in **6.13.F14 Environmental Statement Figure 13.14 - ZTV of Great Horkesley Tilbury side CSE Compound [APP-250]** and is discussed in response to previous comments in REP1-326. The Applicant recognises that the Zones of Theoretical Visibility (ZTV) in **Figure 13.19 - Landscape and Visual – ZTV within Dedham Vale National Landscape [APP-255]** suggest at least 37 pylons would be visible from locations south of Dedham Vale National Landscape. The Applicant wishes to clarify the ZTV mapping is based on theoretical visibility to the tops of pylons within the Project. A large proportion of structures would be barely perceptible due to distance and intervening layers of vegetation. The first pylon connected to Great Horkesley (Tilbury Side) CSE compound would be just over 1.3km south of the National Landscape. For example, viewpoint 4.07: School Road / Stour Valley Path, west of Little Horkesley is approximately 1.7 km from the nearest above ground structure of the Project. The assessment of effects from Viewpoint 4.07 can be found in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 3 of 4 [APP-231]**, pdf page 17. At this distance, effects are judged to be negligible and not significant (adverse) during construction, at year 1 and also year 15 of operation. Figures contained within Annex B of **6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]** illustrate the extent of theoretical visibility of smaller sections of the overhead line to the south of Dedham Vale National Landscape: • Figure A13.5.8 – Landscape and Visual – Zone of Theoretical Visibility (ZTV) Pylons TB3 – TB12 • Figure A13.5.9 – Landscape and Visual – Zone of Theoretical Visibility (ZTV) Pylons TB13 – TB21 • Figure A13.5.10 – Landscape and Visual – Zone of Theoretical Visibility (ZTV) Pylons TB22– TB32 • Figure A13.5.9 – Landscape and Visual – Zone of Theoretical Visibility (ZTV) Pylons TB37 – TB43

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				• Figure A13.5.9 – Landscape and Visual – Zone of Theoretical Visibility (ZTV) Pylons TB44 – TB51 These figures are useful to aid in the understanding of theoretical visibility in this location because they relate to the theoretical visual influence of pylons more local to the area in question rather than considering the entire Project. It is important to note that ZTV mapping is just one of the tools from which to understand potential visibility. Judgements are informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to significant visual effects. As set out in **7.4 Outline Landscape and Ecological Management Plan [Revision C]** illustrative landscape designs have been provided for Environmental Areas around CSE compounds. These areas will provide landscape and visual mitigation, while also offering ecological value and Biodiversity Net Gain (BNG). The purpose of the landscape mitigation proposals is set out in paragraph 9.7.23 of **7.4 Outline Landscape and Ecological Management Plan [Revision C]**: • To filter and screen views from the surrounding area, to reduce significant effects on visual receptors including local residents and users of the minor road and PRoW networks, including within the National Landscape • To connect existing hedgerows and woodland, to improve green networks and enhance landscape character. The Project has sought to maximise the extent of habitat creation and enhancement where possible in these areas. Once detailed design of the Project has been developed the illustrative landscape designs will be updated and finalised. The Environmental Areas cover land that would be owned and managed by National Grid. The Applicant has committed to a 30-year aftercare period at the proposed Environmental Area in line with commitments made within **7.1 Biodiversity Net Gain Report [APP-299]**.
REP1-423	Penny Lang	Examination	Not convinced by “explanation” as to why not Colchester Stadium in February. NG must organise to reserve it for the whole week in April. They have two months’ notice.	At the time the Preliminary Meeting date first became known to the Applicant, Colchester FC did not have the main meeting room available for the full sequence of sessions required in February 2026. A suitably sized space was needed for both the Preliminary Meeting and the additional hearings during that same week. The venue was unable to offer the Applicant the rooms consecutively because other events had already been booked. The Applicant is making every effort to secure suitable venues for all future hearings, including at Colchester FC.
REP1-423	Penny Lang	Consultation	NG appears to be as dilatory with regard to coordinating with other utilities: LTC, Highways, crucial Oil Pipeline, as they have been with engaging with those of us who have been attempting to deal with them for 4 years.	National Grid has been engaging with affected utility operators throughout the Front End Engineering Design (FEED) phase and engagement continues through DCO examination. The details and history of such engagement can be found within stakeholder specific

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				Statements of Common Ground. An overview document detailing these individual Statements of Common Ground has been included within the DCO at submission - **5.9 Draft Statement of Common Ground - Overview]APP-088].**
REP1-423	Penny Lang	Land and property	However they are perfectly happy for the project limits to encroach quite a way into our garden & a grade 2 listed building. Brick Cottages. TB57 Aldham (Ford Street) There is a flood plain behind (to the East) of Ford Street, near a proposed pylon placement, and also near a proposed equipment compound, which might require CPO of large part of resident's garden.	The Applicant acknowledges the concern regarding the extent of the proposed Order Limits in the vicinity of the Interested Party's property, including potential encroachment into the garden associated with Brick Cottages, a Grade II listed building, and the proximity of proposed infrastructure to areas of floodplain to the east of Ford Street. The Order Limits shown at consultation represent a reasonable worst-case scenario to ensure the Project can be constructed, operated and maintained safely, taking account of engineering, environmental and flood risk constraints. Inclusion of land within the Order Limits does not mean that all such land will be permanently required, nor that compulsory acquisition would necessarily be exercised. The Applicant recognises the sensitivity of works in proximity to residential curtilage and although the affected properties property currently falls within the Projects order limits and limits of deviation this will be further refined as the Project's progresses through detailed design. The intention is to build the Project as indicated with the use of Limits of Deviation responding to as yet unknown factors. However, it would be unlikely for the pylon to move to the extent that would lead to conductors under side wind conditions extending to the edge of the Order Limits.
REP1-321	County Councillor Jessica Fleming	Safety and security	Security Risk, critical vulnerability of some locations (e.g. Bramford and Yaxley), and need for a Full Security Review.	The Applicant is aware of all of the requirements of the National Electricity Transmission System Security and Quality of Design Standards (NETS SQSS) and Critical National Priority (CNP) infrastructure requirements. The Applicant has set out how our proposals both meet the Technical and Policy need case as set out in the National Policy Statements and our Licence obligations as required. CNP infrastructure assessments and requirements are undertaken on an ongoing basis across our Network and as can be appreciated are of the upmost sensitivity and disclosure requirements, for reasons of security the written question sets out. However, the Applicant can be clear that we have network arrangements that within the DCO order limits can be utilised to manage and meet any immediate requirements associated CNP infrastructure obligations
REP1-321	County Councillor Jessica Fleming	Cost	Lack of clarity over project costs, indirect benefits to the applicant, and consideration of long term cost to local residents from the project. It has been claimed (open floor hearing speaker) that the 'Equator Principles' have not been complied with which addresses the need to minimise harm to indigenous people, in this case, English people. Whole life cost principles have not been followed	The Applicant provided a transparent and detailed model of costs used for the appraisal of alternatives set out in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, Appendix D: Economic Appraisal pages D1-D14. This methodology is used by the Applicant for all projects in England and Wales and published in our Strategic Options Backcheck and Review at each stage of the Project. It also sets out the lifetime cost issues addressed by our methodology

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REP1-386	Jennifer Micklem	Historic Environment	Within one kilometre of the proposed pylon alignment in Great Waltham there are 83 listed buildings. This represents an exceptionally high concentration of nationally significant heritage assets within a rural landscape. The introduction of large-scale industrial pylons into this historic setting would permanently alter the character and visual context of these assets. The setting of a listed building contributes to its significance. Once that setting is eroded, the resulting harm is enduring and irreversible. I reside in a Grade II listed property. My family also owns Grade I and Grade II listed buildings and registered Parkland that would be adversely affected by the proposed route. Historic England's submission (Environmental Statement, Document Reference 6.11) was not made publicly available prior to its inclusion within the DCO application in August 2025. I was required to submit a Freedom of Information request to review it. In Chapter 11 (Historic Environment) of the Environmental Statement, Historic England states: "A number of high-value heritage assets would experience a significant effect from the erosion of the rural landscape at this location, and we recommend further consideration of the approach here. Despite this clear recommendation, the Applicant has responded by: • Reducing pylon height to 40 metres; • Increasing the number of pylons; and • Retaining the ability to revert to the original 50-metre alignment. This does not constitute meaningful reconsideration of the identified harm. Nor does it demonstrate adherence to the Holford Rules (1959), which emphasise the avoidance of high amenity and sensitive landscapes wherever possible.	Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including listed buildings and registered parks and gardens. The Project has assessed the potential impact on designated heritage assets in this area in accordance with **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 [AS-068]**, 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. 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 critical national priority infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. The Applicant is confident that the assessment and proposed mitigation is robust, proportionate, in accordance with the Holford Rules and that the methodology has given appropriate weight to the potential impacts of the Project on designated assets.
REP1-386	Jennifer Micklem	Biodiversity, ecology and nature conservation	The proposal involves the removal of significant green infrastructure in Great Waltham, including: • 67 trees to be felled; • A further 24 trees potentially to be removed; • 26 trees to be managed; • Extensive lengths of established hedgerows to be destroyed. These are mature landscape features forming wildlife corridors and contributing to biodiversity, carbon sequestration, and rural character. The removal of established hedgerows and mature trees results in immediate and long-term ecological harm. Replacement planting cannot replicate the environmental or landscape value of mature features within a meaningful timeframe	**6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]** and **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** 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 trees and hedgerows will be minimised as far as practicable. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** and **7.2 Outline Code of Construction Practice [Revision B]** both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** 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

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				Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10 % Biodiversity Net Gain 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.
REP1-386	Jennifer Micklem	Need Case	This is what I believe the Norwich to Tilbury pylon line is all about - it is not as proposed designed to get more power to London, but to make a spine across East Anglia to branch off from for other projects. Hence the reason the off shore option is being ignored	**7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 'Need Case' pages 28-38 sets out the need for the Project and includes setting out where demand centres are located across the country *'3.1.6 page 20 states "Electricity demand is especially concentrated in large urban areas, including urban areas in the M62 corridor, the M18 corridor, the Midlands, the M4 corridor and the Southeast. The transmission system carries bulk energy from the generators to points on the network where that power is taken onto the distribution networks for onward transmission to homes and businesses across England and Wales. As the country decarbonises, this demand for energy will increase and replace fossil fuel usage.'* Section 3.3.7 page 23 also states: *'3.3.7 The wider Southeast area, is made up of the 400kV and 275kV network which connects generation and demand in the major towns and cities of the wider Southeast and Midlands regions.'* So power is not just supplying London, but the whole south east and midlands regions and the towns and cities within these regions.
REP1-438	Paul Whittle/Bounds Farm	Historic Environment	National Grid make no mention of the noise which is associated with the substation, nor do they say why they cannot move the substation further east or construct it underground to reduce the visual and noise damage to the listed property, Bounds Farm. In addition it does not say that the overhead pylons and the cables underground will all have to cross Hungerdown Lane in an extremely narrow gap of 50 metres immediately adjacent to the southern boundary of Bounds Farm. Bounds Farm dates back to the sixteenth century and was largely constructed with minimal foundations. The construction phase of the National Grid project may severely damage the structure of the property. National Grid has failed to make any suggestion as to how the damage to Bounds Farm can be minimised, or what compensation they intend to make to the owners who will suffer injurious affection	Operational noise from the proposed substation is assessed in **Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259]**. The assessment also includes consideration of the cumulative effects of the proposed North Falls and Five Estuaries substations. The assessment indicates that adverse effects from operational noise are not expected at Bounds Farm. Construction noise and vibration is assessed in **6.14 Environmental Statement Chapter 14: Noise and Vibration [APP-256]**. Construction noise and vibration would be managed via commitments in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]**. These mitigation measures ensure that best practicable means (BPM) would be implemented by the Main Works Contractor(s) to reduce the effects of noise and vibration during construction as far as practicable. Further detailed construction noise and vibration assessments would be undertaken by the Main Works Contractor(s) based on their specific methodologies. Specific mitigation measures would be identified during these assessments and incorporated in the final NVMP.

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				Potential building damage due to vibration is assessed as part of the construction vibration assessment which identifies locations with potential risk. Suitable control measures in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix F -Outline Noise and Vibration Management Plan [APP-306]** would ensure that this is reassessed by the Main Works Contractor(s), and suitable mitigation measures and monitoring are put in place should a risk of potential damage be identified. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment, including listed buildings such as the Grade II listed 'Bounds Farmhouse' (1147743). It has been assessed that during construction and operation phases this asset will experience a temporary, during construction and permanent, during operation, moderate adverse significance of effect (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-070]**) and a Mid Less Than Substantial Harm (**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. Overall, the Applicant is confident that the assessment and the proposed mitigation are robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on the historic environment, including changes to setting.
REP1-438	Paul Whittle/Bounds Farm	Transport and Traffic	Furthermore the NG plan envisages both overhead and underground cables crossing Hungerdown Lane in the same narrow 50 yard gap which will involve the loss of mature oak trees and the blocking of a popular walking, cycling and riding route.	The Applicant notes the respondent's concerns with respect to accessibility along Hungerdown Lane, although emphasises that a long-term closure of the public highway in this location is not anticipated under the Project. In line with the approach established in **7.3 Outline Construction Traffic Management Plan [APP-309]** short-term closures associated with Overhead Line, Underground Cable, or bellmouth construction works are expected to be in place for no more than four weeks. Any such closure would be implemented with the inclusion of a suitable posted diversion route.

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				The Applicant has sought to minimise impacts on trees through careful routeing, siting and detailed design, **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** sets out the assessment of arboricultural features supported by extensive surveys undertaken between 2023 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]**. The necessary loss of trees is addressed through the Reinstatement Planting Plan, secured under Requirement 9 in **3.1 Draft Development Consent Order [APP-056].** This plan places priority on replanting within the Order Limits.
REP1-483		Landscape and Visual	I am concerned about the current proposed siting of the tower within the central area of the adjoining field, which would result in a substantial and direct visual impact on my property and residential amenity.	Impacts on Residential Visual Amenity have been considered in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]**. This has been produced in line with Landscape Institute Technical Guidance Note 2/19 'Residential Visual Amenity Assessment (RVAA)' and assesses permanent visual amenity effects for properties within 200 m of the proposed overhead line to determine if there would been any breaches to the Residential Visual Amenity Threshold (RVAT). No breaches of the threshold are anticipated at this location.
REP1-483		Land Use	Whether the applicant has fully explored micro-siting or minor alignment adjustments that could position the tower closer to an existing field boundary, particularly where boundary vegetation or hedgerows may provide partial screening.	The Applicant has developed the design seeking to apply a balanced approach to decision making, in this case considering positioning relative to the nearby wedding venue and other residential properties. Some adjustment within Limits of Deviation is likely to be possible to position the pylon closer to the boundary. This will be considered through detailed design and informed by site-specific discussions between the Great Grid Partnership (the Applicant's delivery partner) and the relevant landowner. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations.
REP1-483		Alternatives	In particular, I would welcome clarification on: • Whether alternative tower positions within the same field were assessed; • Whether proximity to residential receptors was a determining factor in final tower placement; • Whether boundary-aligned siting has been evaluated as a mitigation measure.	The Applicant has developed the design seeking to apply a balanced approach to decision making, in this case considering positioning relative to the nearby wedding venue and other residential properties. In this case given the distance to nearest properties there was a slight preference to seek to avoid hedgerow loss. The potential for micro-siting remains with some adjustment within Limits of Deviation likely to be possible to position the pylon closer to, on or beyond the boundary but is subject to uncertainty. This will be considered through detailed design and informed by site-specific discussions between the Great Grid Partnership (the Applicant's delivery partner) and the relevant landowner. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations.

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REP1-415, REP1-347, REP1-461		Land and property	One example is the correspondence dated 18 June 2025, which stated that our land “may be temporarily or permanently required for the construction of the project.” The accompanying maps showed areas of “Land of Interest” around [redacted text] —mostly car parks or grassed areas unrelated to our property. Other residents received similar documents with differing areas marked, and no explanation was given as to how these areas might be used. When we contacted Fisher German, a representative visited the site and brought a clear plan showing the project proposal in full. They explained that the intention was to access [redacted text] land to lower a low-voltage power line to ground level in preparation for moving the high-voltage line closer. This would have required digging up our only access road. While on site, the contractors acknowledged that the maps sent to residents were unhelpful and agreed to explore an alternative option involving access through nearby arable land instead of our shared access road. To date, we have not received an accurate revised plan nor any feedback regarding whether this alternative will be taken forward.	The Applicant notes the concerns raised regarding correspondence dated 18 June 2025, the accompanying plans showing areas identified as ‘Land of Interest’, and the subsequent engagement with the Applicant’s land agents. Following contact with the Applicant’s appointed land agents, a site visit was undertaken, and a further plan of the Project proposals was presented. The Applicant notes that, during that visit, it was explained that the potential requirement for land related to enabling works associated with the lowering of an existing UK Power Networks low-voltage power line in preparation for works to the high-voltage line, and that this could have involved temporary works affecting the shared access road. The Applicant can confirm that access to all the properties will be maintained while works are carried out and UK Power Networks will be sending out further information to the residence in due course. The Applicant confirms that design development and access arrangements remain subject to refinement. The identification of alternative access routes, including those avoiding shared private access roads where reasonably practicable, is consistent with the Applicant’s approach to minimising disruption to residents and landowners. However, such alternatives require further technical assessment and coordination before they can be confirmed.
REP1-415,		Land and property	I have significant concerns about the wider impact on my property and quality of life, including: • Visual impact and potential reduction in property value. Evidence suggests that homes located close to pylons can be more difficult to sell. Even where risks are unproven, buyers often perceive pylons negatively.	Changes in overall property values can be due to several different local, national and global factors affecting the housing market. These are constantly changing. It is difficult to single out any one factor alone which could determine house prices. We do, however, recognise that the visual impact of any new overhead line is likely to be a significant concern for many local communities, so as mentioned we always try to avoid communities and individual properties in balance with our other duties. These include the need to be economic and efficient and keep costs down in the interest of bill-paying customers. Norwich to Tilbury, like all forms of development, is regulated through the statutory planning process to ensure that material impacts are considered and, where appropriate, are mitigated and do not cause blight on neighbouring properties. The Compulsory Purchase Code allows for a claim of compensation for the loss that you may have suffered because of the retained part of a property ownership being worth less as a direct result of the works. Diminution in property value known as ‘injurious affection’ and any other appropriate heads of claim will be considered on an individual basis in accordance with current legislation. Statutory Blight occurs when the value of a property is reduced due to works and the owners are unable to sell it at market value. The diminution in value is assessed on a case-by-case basis and the onus is on the claimant to

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				submit a valid blight notice. Blight applies to land if the compulsory acquisition of the land is authorised by a Development Consent Order (DCO) and the land falls within the limits of deviation within which powers of compulsory acquisition conferred by a DCO are exercisable. We note that properties that have a view of the proposed infrastructure do not typically qualify to make a claim as currently UK law does not require developers to compensate for a loss of view.
REP1-347,		Health and Wellbeing	Potential health concerns associated with electromagnetic fields.	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. 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 and evidence of compliance is available in **7.8 Electric and Magnetic field Compliance Report [APP-330]**.
REP1-461		Alternatives	Impact on the rural character and amenity of the area. is a peaceful, rural location with open countryside views. I strongly support the transition to green energy, including the Bloys Grove solar farm. However, I cannot support a renewable project that appears environmentally damaging when greener alternatives may exist.	The development of the details of Projects by the Applicant is undertaken within the context of the relevant Planning policy. In this case NPS EN-1 and EN-5. These define a strong starting presumption for the use of overhead lines with underground cable where routes unavoidably cross nationally designated landscapes and under certain other circumstances. The Applicant is clear that the area identified (near Bloy's Grove solar farm) does not meet the criteria (it is not subject to a national landscape designation nor meets the threshold under paragraph 2.9.23) to justify a change to underground cable. It is unclear what the greener alternatives are but if they refer to alternatives such as high voltage direct current (HVDC) alternatives (onshore or offshore) the Applicant's position has been set out in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (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 onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1800 MW as set out in the Security and Quality of Supply Standards. Further information is available in the Response to ISH1 and to the Local Impact Reports.
REP1-265		Historic Environment	1. Location of new pylon(s) in proximity to The Vale	1a. Through routeing and siting the Applicant has sought to reduce as far as practicable potential impacts on the historic environment,

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		Health and Wellbeing Landscape and visual	1a The Vale is identified by South Norfolk Council as a non-designated heritage asset (NDHA). The proposed new pylon(s) and wires will significantly affect this status. Nothing I have read assures me that this consideration will be taken into account. 1b New pylons have been said to create health risks to those living in proximity. Are these risks being taken into by NGET? Could we please be advised in writing? 1c Such evidence as has been made available suggests that there will be a detrimental Impact on the environment surrounding The Vale and, therefore, of amenity. Are these effects being taken into account, and, if so, are they being discounted?	including the Former Henstead Union Workhouse and Vale Hospital, Swainsthorpe (1312). During the construction phase, this asset is assessed to experience a permanent negligible adverse significance of effect and neutral significance of effect during the operation phase. For below ground remains, **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 historic environment stakeholders, including the historic environment advisors to the Local Planning Authorities 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. For the setting, standard construction mitigation would be adopted as detailed in **7.2 Outline Code of Construction Practice [Revision B]**. Changes to the setting from construction activity would be temporary and would be removed once the construction phase is completed. The Applicant is confident that the assessment and the proposed mitigation are robust and proportionate, and that the methodology has given appropriate weight to the potential impacts of the Project on the non-designated assets. 1b. 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. 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 of the infrastructure proposed as part of this project complies with the requirements of NPS EN-5 and evidence of compliance is available in **7.8 Electric and Magnetic field Compliance Report [APP-330]**. 1c. An assessment of impacts on residential visual amenity has been undertaken in document 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 & APP-234], this includes a detailed assessment of impacts anticipated for The Vale, which recognises that there would be a high magnitude of change to views from this property, however the Residential Visual Amenity Threshold, as described in 'Landscape Institute Technical Guidance Note (LI TGN) 2/19 Residential Visual Amenity Assessment (RVAA)' would not be breached at this location.
REP1-265		Land and property	2. Proposed works on the site of The Vale	The Applicant understands the scope of works necessary to construct and operate the Project. It is common for DCO applications to seek

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			2a Contradictory information has been made available as to the material impact of works on the site, suggesting that the developers have no clear idea of what works they will undertake or of the impact of these works. 2b Your correspondence dated 18 June 2025, stated that our land "may be temporarily or permanently (sic) required for the construction of the project." 2c This prospect has alarming implications for the amenity of The Vale and for the value of property. No specific information has been provided as to the locations likely to be affected. When will this information be made available? 2d There has been mention of the digging up of shared access road to The Vale from Church Road with no reference as to how residents will gain access to their properties. 2e There has been mention of replacement and relocation of overhead power cables on the site, with no indication that alternative locations have been explored, e.g., on the periphery of the field on the Western perimeter of The Vale. This would involve consultation with one landowner. Has this possibility been explored? 2f The interests of property are not confined to the limits of their property. Through a Property Management Company, owners make annual contributions to the upkeep of grounds and car parks. The condition of these grounds and car parks make an important contribution to amenity and to the market value of individual properties. What account is being taken to avoid damage and to make good any material impact? 2g What measures are envisaged to compensate property owners for temporary and/or permanent damage to their property? In order that property owners can make contingency plans, they should be informed at the earliest opportunity of the existence or absence of such measures of financial compensation. This consideration applies also to residents, who may wish to relocate.	flexibility within the consent. This may be because of the need to undertake additional survey to inform the detailed design and/or to allow the final size and location of construction compounds to be confirmed by the main works contractor based upon their knowledge and experience. Flexibility is accounted for and the effects assessed and within the environmental statement. With regard to locations to be affected, **6.4 F1 ES Figure 4.1 Proposed Project design [APP-133]** identifies the proposed temporary design details and their locations. Where the Applicant has proposed to use existing highways or private roads for construction access it will, where practicable and safe to do so, maintain access throughout the construction period or as agreed through the landowner/local highway authority discussions. This may require signed diversions or temporary restrictions to access. The means of access to affected properties, facilities and land parcels will be communicated to affected parties at the start of the Project / at the start of the relevant sections, with any changes communicated in advance of the change being implemented. This commitment is secured within as AS03 within **7.2 Outline Code of Construction Practice [Revision B]**. Where a person's land is not acquired and no land rights are taken, but they consider that their property may be adversely affected by the construction or operation of the Project, they may fall within what is commonly referred to as a Category 3 (Cat 3) claim interest. A relevant claim may arise where physical factors attributable to the Project such as noise, vibration, lighting or other measurable effects can be demonstrated to have caused a compensable loss. Claims based solely on generalised blight, perceived loss of value, or concern about proximity to the Project are not compensable under the statutory framework. The Applicant cannot confirm in advance whether a person will be entitled to make a Category 3 claim, nor whether any claim would result in compensation. All claims are assessed on a case by case basis, having regard to the specific circumstances and the statutory tests that apply.
REP1-406		Historic Environment	I think Halfords rules 1,2 and 7 should be used to protect the historic environment between pylons 132 and 144.	The Applicant disagrees with the implication that the Holford Rules have not been used. Throughout the development of the Project they have been considered in conjunction with information on constraints, homes and environmental features and the finding of the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also

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				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. Our decision making and how the Holford Rules informed decision making is set out in documents including **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]**).
REP1-320		Good Design	NGET replaced the standard 50-metre pylons (TB136–TB142) with lower 40-metre lattice pylons, which require a wider stance and a heavier frame. This change also introduced an additional pylon, including TB141, positioned immediately beside Chelmsford Road — the main pedestrian and vehicular route linking the two villages. From extensive engagement with residents, I know that the proposed siting of lower height TB141 is a major local concern. From a distance, the top of the reduced height pylons may be less visible, but close up their bulkier form is ugly and overbearing and closer to the road, closer to the Great Waltham Conservation Area and closer to housing Reinstating just two standard height pylons in this section would allow TB141 to be moved further from the Conservation Area boundary, the main road, and nearby heritage assets, more towards the centre of the field, and significantly reducing the overbearing impact on the much used road and footway.	The Applicant as per the Design Scenarios Table as per **8.6.1 Deadline 1 Cover [REP1-140]** has confirmed a decision to progress with Scenario B only in this location, with standard height pylons (not low height pylons) proposed to the south of the River Chelmer. In making this change one of the low height pylons can be removed and the pylon proposed closest to Chelmsford Road (TB141) can be moved approximately 70 m further west away from the road (subject detailed design and limits of deviation). Heritage: During construction phase the Great Waltham Conservation Area (CA55) is assessed to experience a temporary minor adverse significance of effect and during operation phase a direct, permanent minor adverse significance of effect (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-070]**). For both phases, the asset is assessed to experience Lower Less Than Substantial Harm (**6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). **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.
REP1-287		Landscape and Visual	My property is situated within 50 metres of the proposed enabling works and less than 500 metres from the permanent pylon alignment.	Impacts on Residential Visual Amenity have been considered in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 & APP-234]. This has been produced in line with Landscape Institute Technical Guidance Note (LITGN) 2/19

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			The proposed route takes a "dogleg" shape to the East, South, and Southwest of my home. This configuration ensures that nine pylons (TB145, TB146, TB147, TB148, TB149, TB150, TB151, TB152, and TB153), each standing 50 metres tall, will be visible from my property.	'Residential Visual Amenity Assessment (RVAA)' and assesses where permanent changes to visual amenity may affect living conditions at specific properties within 200 m of the Project centreline, and where the Residential Visual Amenity Threshold (RVAT), as described in LITGN 2/19 may be breached. Although elements of the Project may be visible beyond a distance of 200 m, they are not considered likely to affect living conditions to such an extent that the RVAT would be breached, and as such have not been included in this report. However, visual effects for residential receptors within a wider study area are considered more broadly within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232].
REP1-287		Landscape and Visual	This stunning countryside is treasured by thousands of walkers and cyclists who use the Green Belt to escape the frantic pace of the City of Chelmsford. Due to the flat nature of the terrain, an estimated 25,000 to 30,000 residents across West Chelmsford will have their views permanently industrialised. The peace and tranquillity of this Green Belt, which is fundamental to the local identity, will be destroyed.	The Applicant has sought to reduce, as far as practicable, potential mpacts on landscape and visual receptors, through routeing and siting. However, the Applicant acknowledges the concerns raised regarding the potential effects of the Project where it passes to the north and west of Chelmsford. Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. This includes existing overhead lines which fall within the LVIA study area, as illustrated on **6.13.F4 Environmental Statement Figure 13.4 - Settlements and Infrastructure [APP-240]**. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. Effects on visual receptors within north and west Chelmsford are set out within Visual Receptor Area (VRA) F4 Little Waltham, VRA F6 Chelmsford North-West and VRA F8 Writtle and Chelmsford West, in **13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Significant adverse effects on visual amenity would be experienced within approximately 1.5 km of the Project; this includes parts of the north-western edge of Chelmsford and the western edge of Broomfield and Writtle. Effects on receptors beyond 1.5 km would not be significant due to distance and the filtering and screening of views by vegetation and buildings within settlements. The Applicant has reviewed the judgements made and remains comfortable that the matters raised have been considered and that the assessment is fair.
REP1-287		Biodiversity, ecology and nature conservation	The Chignal Smealy area is a recognised breeding ground for raptors, owls, and falcons. These birds are highly vulnerable to the "strike risk" posed by high-voltage wires, particularly in a dogleg configuration which complicates flight paths. The Request: I ask the ExA to demand a more granular ecological study. General mitigation	The Chignal Smealy area is located approximately 2km to the north-west of the Project, which is assessed as a significant distance in relation to breeding raptors. Activity during the breeding season is primarily concentrated within the core territory rather than regular use of specific flight corridors (it is acknowledged further distances will be travelled by some raptors but activity in the outer limits of a home

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			is insufficient when dealing with a concentrated population of protected birds of prey in this specific flight corridor.	range will be lower than the centre). In this section of the Project, the alignment is positioned close to Chelmsford, which is assessed as significantly reducing the potential fragmentation of continuous blocks of farmland, woodland, grassland and waterbodies around the Chignal Smealy area. As detailed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and **6.8.A7 ES Appendix 8.7: Breeding Bird Report [AS-030]**, the assessment on breeding birds included 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. Over 13,500 records for 103 species which have the potential to breed were returned and a map produced showing their distribution. The Chignal Smealy area was not highlighted as an area of notable concern with respect to raptors during this desk study.
REP1-287		Land and Property	The proximity of my home to the enabling works (50m) and the pylon run (500m) has created an immediate state of social stagnation. Homeowners in this corridor are effectively 'held captive.' Potential buyers are understandably reluctant to purchase homes with a view of nine 50-metre pylons.	The Applicant notes the concerns raised regarding the proximity of the home to proposed works, the proposed overhead line corridor, and the perception that this has resulted in uncertainty and reluctance in the local housing market. The Applicant recognises that major infrastructure proposals can give rise to concern and uncertainty for nearby residents, particularly during the preconstruction phase. The potential effects on residential amenity, including visual effects and the presence of overhead line infrastructure, have been assessed within the Environmental Statement on a reasonable worst case basis and are matters for consideration within the planning balance, alongside the national need for the Project. In regard to the proximity to the enabling works the Applicant an confirm that this is the proximity to a permanent access route and importantly, no construction works or site access will be associated with this route during the construction phase of the Project. The applicant has adopted routing and siting strategies to avoid measures to mitigate impacts on communities. The applicant understands that the visual impact of any new electricity infrastructure is likely to be a concern, however, UK law does not require to compensate for loss of view or changes to a view.
REP1-311		Noise and Vibration	This further comment relates to a proposed modification to the route of the access road out of the storage compound being proposed by National Grid in the middle of our tiny village. The proposed change is shown on a drawing referenced “Change Request 2” The effect of this amendment is to bring the dust, noise and visual impairment much closer to a number of residential properties along Shop Road. I can see no justification for this when there is ample open space across fields to route the road away from Shop Road.	The Applicant is preparing an Addendum to the Environmental Statement which provides a review of whether Change Request 2 (Little Bromley) (either individually or in combination with Change Request 1 (Bulphan)) is likely to result in new or different likely significant environmental effects, compared to those reported within the Environmental Statement (ES) [APP-123 to APP-287, AS-026 and AS-068]. The Applicant intends to submit its formal application in March 2026.
REP1-429		Historic Environment	This letter constitutes a formal objection to the proposed access arrangements in proximity to [redacted text] (Grade II listed), and a	Potential building and heritage asset damage due to vibration, is assessed as part of the construction vibration assessment in **6.14**

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			formal requirement that any survey access must be subject to prior written agreement and strict safeguards. [Redacted text] is a Grade II listed, mid-18th century timber-framed and thatched dwelling. Preservation of the building and its setting is a statutory consideration. The farm track adjacent to the property was constructed in the 1950s for agricultural use (approx. 8 tonnes). Proposed plant and machinery exceeding 35 tonnes presents material structural and vibration risk. Before any access occurs, the following are required: • Full structural engineering assessment of the access track • Vibration impact assessment specific to the listed building • Pre-condition survey of the track and dwelling at your expense • Written confirmation of indemnity and insurance cover for structural damage	**Environmental Statement Chapter 14: Noise and Vibration [APP-256]** which identifies locations with potential risk. Suitable control measures in **7.2 Outline Code of Construction Practice [Revision B]** and **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** would ensure that this is reassessed by the Main Works Contractor(s), and suitable mitigation measures and monitoring are put in place should a risk of potential damage be identified. Where an affected party's land is not acquired and no land rights are taken, but they consider that their property may be adversely affected by the construction or operation of the Project, they may fall within what is commonly referred to as a Category 3 (Cat 3) claim interest. A relevant claim may arise where physical factors attributable to the Project such as noise, vibration, lighting or other measurable effects can be demonstrated to have caused a compensable loss. Claims based solely on generalised blight, perceived loss of value, or concern about proximity to the Project are not compensable under the statutory framework. The Applicant cannot confirm in advance whether a person will be entitled to make a Category 3 claim, nor whether any claim would result in compensation. All claims are assessed on a case-by-case basis, having regard to the specific circumstances and the statutory tests that apply. The Applicant will be happy to provide more detailed information regarding the historic environment assessment once the redacted details about the listed building are provided.
REP1-429		Biodiversity, ecology and nature conservation	Little Newton Wood (S1 monument record BRK 097) is identified as ancient woodland. Bluebell colonies, pyramidal orchids and established woodland flora are present. The following documentation is required: • Full survey methodology details • Confirmation of qualified ecological supervision • Root protection area plans • Biosecurity protocols • Written confirmation that no clearance or ground disturbance will occur	**6.8.A1 ES Appendix 8.1: Habitat Report [AS-028])** includes details of the ancient woodland survey methodology and results which were undertaken by qualified professional ecologists. Any potential impacts to ancient woodland including Little Newton Wood 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, including Little Newton Wood, 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].** No impact on Little Newton Wood or the land within 15 m is anticipated as a result of the Project. Commitment B17 **of 7.2 Outline Code of Construction Practice [Revision B]** ensures that ancient woodlands, including Little Newton Wood, and the associated 15 m exclusion buffers will be demarcated to ensure no accidental encroachment. **7.4 Outline Landscape and Ecological Management Plan [Revision C]** includes the requirement for a professional Ecological Clerk of Works (ECoW) to supervise the works and ensure all tree protection measures and biosecurity protocols are followed.
REP1-429		Transport and Traffic	The proposed access route utilises a public footpath adjacent to [redacted text]. Please confirm highway authority authorisation, traffic management plans, operational hours, and any proposed	The Applicant is not proposing a Primary Access Route (PAR) to be used during construction for construction vehicles on this access route. The Route proposed is an easement the Applicant is seeking to

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			stopping up orders.	provide future access to undertake visual inspections once a year. The vehicle accessing the site is anticipated to be a 4x4 during the operational period.
REP1-429		Socio-economics, recreation and tourism	The property is in the process of establishing a glamping enterprise ('Sunset Holidays') reliant upon rural tranquillity and landscape character. Construction traffic and survey intrusion materially affect commercial viability.	The Applicant noted the business location is redacted. The Applicant is keen to provide a further response if provided with the redacted details. The Project has been designed to avoid existing sensitive features as far as reasonably practicable. The Applicant's approach is to work with affected landowners and businesses, through ongoing engagement to minimise disruption, where reasonably practicable. This includes engagement on construction phasing, access arrangements and timing, with the objective of reducing impacts on landowners and businesses, where this can be achieved without prejudicing safe and efficient delivery of the Project.
REP1-383		Safety and Security	The attached photographs are of the area showing the current flooding situation this is the natural floodplain for this part of the river Colne. To store equipment in a holding area here seems irresponsible.	Fluvial and surface water (pluvial) sources pose a risk to some temporary construction worksites. These risks would be reduced and managed by implementing a range of mitigation measures set out in **7.2 Outline Code of Construction Practice [Revision B]**, including those detailed in **7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]** and by programming construction activities in floodplains to avoid periods of likely high river levels where practicable. Should the potential for flooding materialise then the measures contained within **7.2 Outline Code of Construction Practice Appendix G - Outline Flood Warning and Evacuation Plan [APP-307]** will be followed. **7.2 Outline Code of Construction Practice [Revision B]** commits that 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 would 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 also be located outside of the fluvial floodplain where practicable.
REP1-475		Transport & Traffic	I asked about impact on roads during the long construction phase and was told with confidence that there will"not be any as temporary roads will be made across open fields". Also I was verbally told at a consultation that there was "no plan for a lorry park near Bunwell Hill". In time this information has been completely changed. Now we are told that certain roads will be shut for many months, this is devastating news for me. With the exception of one route the roads around my house are all through fords which I cannot drive through for a few days following rainfall as they are frequently too deep for a	The construction access strategy of using Primary Access routes to route vehicles from the Major Road/Strategic Road Network is detailed in **7.3 Outline Construction Traffic Management Plan [APP-309]**. There are no proposed Primary Access Routes near Bunwell Hill. There are several proposed temporary road closures in the area surrounding Bunwell Hill, to enable the construction of the crossover bell mouths and safety netting. These temporary road closures will be for a short duration (days/weeks) and will be communicated to the

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			normal car. That one reliable route will be closed long term which will cut me off for days at a time – preventing me from getting essential supplies as well as taking my wife to…. We are now told that a lorry park has always been planned near Bunwell Hill which is very large and I expect will lead to lots of heavy vehicles which is likely to impact our quality of life and prevent my Wife from getting rest when really needed.	public in advance. The proposed temporary closures and associated temporary diversions are shown on Section A, Plan C of the **2.5 Access, Rights of Way and Public Rights of Navigation plans [APP-033].** Where diversions are necessary, they will adopt the principle that they will use the same standard of road, or higher where practicable and available. As noted in Section 6.5 of **7.3 Outline Construction Traffic Management Plan [APP-309]**, members of the community and local businesses will be kept informed regularly of the works through active community liaison. The Applicant will use the Permit Schemes run and managed by the relevant Local Highway Authority to help coordinate the closures and maintain continued access for residents. The Applicant is not proposing a lorry park at this location. The Applicant is proposing a material laydown area to the south, which is proposed to be used for construction material, and will not be used as a lorry park.
REP1-475		Alternatives	We have relatively new a power station near Snetterton that is connected to Norwich underground, there was absolutely no noticeable disruption installing the cables and no one sees them now. In other UK areas NG has chosen undersea connections to save money and time, I have been told that it is different here because East Anglia is just flat and featureless – which shows a lot of ignorance as it is not true at all. NG own a company in the USA that produces lightweight high “conducting” HV cabling – this also has been ruled out in favour of traditional copper that is heavy and expensive and although I am not a physicist but I understand that power is transmitted by the electric field around the cable, not by the flow of electrons in the metal cable itself, so there is plenty of scope for improving upon solid copper core designs that would reduce the number of cables required in the first place. Regarding number of cables I was told by NG that the key reason that undersea is not feasible is that they will need more than one cable, they do not seem to realise that two lines of pylons carry a dozen or more cables that are vulnerable to the elements and are known (by NG) to require higher ongoing maintenance costs than undersea and underground solutions	**7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 ‘Need Case’ page 20-38 sets out the need for the Project. The Project requires a circuit greater than 6 GW to meet the need. This is one of the highest capacity of circuits which will be greater than output of the power station referenced. The higher the power the larger the circuits need to be. The Applicant uses the same methodology nationally to assess strategic options applying the same set of cost considerations as explained in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, Appendix D: Economic Appraisal pages D1-D14. This methodology is used by the Applicant for all projects in England and Wales and published in our Strategic Options Backcheck and Review at each stage of the Project. It also sets out the lifetime cost issues addressed by our methodology. Including maintenance costs for each technology. Appendix C ‘Technology Overview’ pages C1-C9 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** provides detail of each technology. The cost differential between the proposed Project and all high voltage direct current (HVDC) alternatives is stark, and is set out from the transparent economic appraisal in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. The following costs were set out at the hearing with all data from **[APP-357]** and all cost information defined by the fully transparent cost model for circuit alternatives, in its Appendix D — Economic Appraisal pages D1-D14: Wholly Overhead Line — Project Total: £894.50m Wholly 4-Ended HVDC Option Project Total: £5,854.50m Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m

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				Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** page 111 states: '*Should this circuit at full 6000 MW capacity* [be] *made multiterminal to provide the same system flexibility as the AC circuit options* [there] *would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).*' Therefore, the evaluation considered alternative technologies and offshore alternatives. The evaluation was based upon the same methodology used nationally. It took into account maintenance costs of each alternative along with the capacity required to meet need.
REP1-475	Stephen Jones	Alternatives	NG's key argument is that the planned N2T route is the cheapest and best for the environment as well as the end consumer but they have consistently failed to prove this. The shear amount of Steel that I understand is being shipped from China and concrete used in the foundations as well as the 1000's of tonnes of earth that will be excavated and transported elsewhere seems to be glossed over. I am unconvinced that this is a Green project as they have argued. I also do not believe it is quick or cheap compared with the alternatives but it will certainly be a major disruption and cause a permanent blot on the landscape as well as affecting many people financially and environmentally. NG has taken a lengthy approach using misinformation and delays to wear us down thinking that we will runout of energy and give up. We have not been consulted and not been given any democratic rites over the future of our countryside, quality of life or wealth. Instead we have been told what will happen and informed that we have no choice. NG need to enter the 21st century, listen to people, consider ideas properly and most importantly do what the public wants and that is not lines of ugly steel towers stretching across 3 counties. Even if and it is a big IF undersea is more expensive than pylons then no one has asked us if we are happy to pay more to save our environment – which actually would be forward thinking.	**7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 'Need Case' page 20-38 sets out the need for the Project. The Project requires a circuit greater than 6 GW to meet the need. This is one of the highest capacity of circuits which will be greater than output of the power station referenced. The higher the power, the larger the circuits need to be. The Applicant uses the same methodology nationally to assess strategic options applying the same set of cost considerations **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, Appendix D pages D1-D14: Economic Appraisal. This methodology is used by the Applicant for all projects in England and Wales and published in our Strategic Options Backcheck and Review at each stage of the Project. It also sets out the lifetime cost issues addressed by our methodology. Including maintenance costs for each technology. Appendix C 'Technology Overview' pages C1-C9 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** provides detail of each technology. The cost differential between the proposed Project and all HVDC alternatives is stark, and is set out from the transparent economic appraisal in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. The following costs were set out at the hearing with all data from [APP-357] and all cost information defined by the fully transparent cost model for circuit alternatives, in its Appendix D — Economic Appraisal: pages D1-D14 Wholly Overhead Line — Project Total: £894.50m

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				Wholly 4-Ended HVDC Option Project Total: £5,854.50m Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6, page 111 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** states: '*Should this circuit at full 6000 MW capacity [be] made multiterminal to provide the same system flexibility as the AC circuit options [there] would be a need for an additional three sets of HVDC convertor stations and three sets of 50 km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).*' Therefore, the evaluation considered alternative technologies and offshore alternatives. The evaluation was based upon the same methodology used nationally. It took into account maintenance costs of each alternative along with the capacity required to meet need. All options require materials, which are taken into account in the costings. HVDC options have large convertor station, power electronics, foundations, copper cables. Undergrounding has copper cables, excavations. Whilst all options including overhead lines require different materials that con be sourced in a worldwide market the cost and lifetime cost assessment takes these into account as part of the assessment. This is also reflected in the independent Institution of Engineering Technology IET *report 'A comparison of electricity transmission technologies: Costs and characteristics'.* Which provides a detailed independent view of the build up of costs in technologies A comparison of electricity transmission technologies: Costs and characteristics
REP1-349	Gareth Morgan	Alternatives	Seek clarification on the following: 3.1 Whether a full seabed survey has been carried out for the proposed Norwich–Tilbury offshore route. 3.2 If so, when the survey was undertaken, its scope, and the level of detail involved. 3.3 Whether this work included in-depth route planning and feasibility analysis sufficient to allow meaningful comparison with the overland alternative. 3.4 Whether the findings of this work—including any offshore route options identified, assessed, or discounted—can be published for the	**7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 'Need Case', pages 20-38 sets out the need for the Project. The Project requires a circuit greater than 6 GW to meet the need. This is one of the highest capacity of circuits which will be greater than output of the power station referenced. The higher the power the larger the circuits need to be. The Applicant uses the same methodology nationally to assess strategic options applying the same set of cost considerations as explained in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, Appendix D: Economic Appraisal. Pages D1-D14 This

Examination Library ID	Name	Topic	Matter	NG Response
			purposes of the examination, together with the reasons for any options being ruled out.	methodology is used by the Applicant for all projects in England and Wales and published in our Strategic Options Backcheck and Review at each stage of the Project. It also sets out the lifetime cost issues addressed by our methodology. Including maintenance costs for each technology. Appendix C 'Technology Overview' pages C1- C9 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** provides detail of each technology. The cost differential between the proposed Project and all HVDC alternatives is stark, and is set out from the transparent economic appraisal in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. The following costs were set out at the hearing with all data from [APP-357] and all cost information defined by the fully transparent cost model for circuit alternatives, in its Appendix D — Economic Appraisal: pages D1-D14 Wholly Overhead Line — Project Total: £894.50m Wholly 4-Ended HVDC Option Project Total: £5,854.50m Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6 page 111 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** states: '*Should this circuit at full 6000 MW capacity [be] made multiterminal to provide the same system flexibility as the AC circuit options [there] would be a need for an additional three sets of HVDC convertor stations and three sets of 50 km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).*' Therefore, the evaluation considered alternative technologies and offshore alternatives. The evaluation was based upon the same methodology used nationally. It took into account maintenance costs of each alternative along with the capacity required to meet need. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing. Initial

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				qualitative assessment has been carried out for all options using existing constraint mapping including the subsea alternatives, and published in **7.19 2023 - Strategic Options Backcheck and Review [APP-357].**
REP1-349	Gareth Morgan	Cost	Seek clear and comparable information on: 4.1 The amount of money and staff time spent to date on investigating and developing the offshore option. 4.2 The amount of money and staff time spent to date on the overland route. 4.3 How these figures compare, particularly in light of the apparent escalation of overland route costs associated with repeated correspondence, surveys, consultancy work, public exhibitions, venue hire for meetings, and related administrative activity 5.1 How costs associated with both the offshore and overland routes are being funded. 5.2 Whether these costs are borne directly by the applicant, recovered through electricity consumers, supported by government funding, or met through another mechanism.	**7.17 Strategic Options Backcheck and Review [APP-355]** Section 3 'Need Case' sets out the need for the Project. The Project requires a circuit greater than 6 GW to meet the need. This is one of the highest capacity of circuits which will be greater than output of the power station referenced. The higher the power the larger the circuits need to be. The Applicant uses the same methodology nationally to assess strategic options applying the same set of cost considerations as explained in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, Appendix D: Economic Appraisal. This methodology is used by the Applicant for all projects in England and Wales and published in our Strategic Options Backcheck and Review at each stage of the Project. It also sets out the lifetime cost issues addressed by our methodology. Including maintenance costs for each technology. Appendix C 'Technology Overview' of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** provides detail of each technology. The cost differential between the proposed Project and all HVDC alternatives is stark, and is set out from the transparent economic appraisal in 7.19 2023 - Strategic Options Backcheck and Review [APP-357]. The following costs were set out at the hearing with all data from **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** and all cost information defined by the fully transparent cost model for circuit alternatives, in its Appendix D — Economic Appraisal: Wholly Overhead Line — Project Total: £894.50m Wholly 4-Ended HVDC Option Project Total: £5,854.50m Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** states: '*Should this circuit at full 6000 MW capacity [be] made multiterminal to provide the same system flexibility as the AC circuit options [there] would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m +*

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				£1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).' Therefore, the evaluation considered alternative technologies and offshore alternatives. The evaluation was based upon the same methodology used nationally. It took into account maintenance costs of each alternative along with the capacity required to meet need. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing. Initial qualitative assessment has been carried out for all options using existing constraint mapping including the subsea alternatives, and published in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. In accordance with Section 9 of the Electricity Act 1989, the Applicant is required to develop and maintain an efficient, coordinated and economical system of electricity transmission. The Applicant is a regulated licence holder to ensure value is delivered for businesses and consumers in Great Britain. Both an offshore and onshore option would be funded in the same way through regulatory settlement. All cost would be recovered through consumer bills (domestic and commercial). Therefore, the Applicant earns a return on the investment that is made, based upon regulatory settlement. As such the higher the cost of an investment, the higher the return. Therefore, the Applicant is ensuring the conditions under the Electricity Act 1989 and Licence obligations are followed to deliver value to consumers and business rather than driving the highest return on investment.
REP1-344	Flora Leone	Land and Property	1.The communication throughout the consultation process has been inconsistent, poorly coordinated, and lacking transparency. a) Two proposed pylons with overhead cables are to be erected just outside the perimeter of The Vale. Given this proximity, I had reasonably assumed that all residents would receive key correspondence regarding the project timelines and landowner consultations. However, not all residents received the October/November 2025 letter informing them of the 27/11/2025 deadline, nor the June 2025 correspondence regarding landowner	The Applicant confirms that consultation and landowner correspondence has been undertaken in accordance with the statutory requirements set out in the Planning Act 2008 and the Applicant's Statement of Community Consultation. Letters issued in June 2025 and October/November 2025 were targeted at persons identified as having an interest in land or otherwise meeting the criteria for notification at that stage. The Applicant recognises that residents living close to proposed infrastructure may reasonably expect clear information and acknowledges that not all residents may have

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			consultations (I didn't). Only after a meeting was called with Fisher German representatives was this group of residents informed that the contractors intended to access The Vale to reroute the back lower voltage power line to move the higher voltage line closer. This would have required digging up our only driveway. A driveway that all residents use and have all recently paid to resurface. b) Very poor organisation and coordination transpire also in updating data and responses sent to NG. I rent the property next door to mine as office space. I have forwarded questionnaires to my landlady to which she has replied both online and by post. Despite this I have kept receiving the same questionnaires and letters asking for replies. I am also aware that the provision of maps and project information about the rerouting of the electricity line mentioned above has been unclear and contradictory, with inaccurate or inconsistent data. In some instances, map keys did not correspond to the maps themselves, and when residents requested clarifications, the representatives were unable to provide satisfactory explanations. As a result, residents still lack access to consistent and comprehensible maps clearly marking the affected areas. c) All information on the project is lacking transparency: the Community Letters are (expensive) marketing material with no accurate information on the project: National Grid's cost comparison with alternative projects vaguely states that alternatives could be 4.5 or 11 times more expensive than the proposed overhead line project, but fails to clarify what costs have been accounted for or how these figures were derived. Also email responses to specific questions on distances of pylons and cables have been ambiguous. Moreover, the language used and the procedural information in written and sometimes verbal communication is very often obscure to those who are not familiar with technical, bureaucratic and legal jargon. This is very concerning as it prevents many interested parties from giving meaningful responses.	received the same correspondence where they did not meet the relevant notification criteria at the time. Following contact with the Applicant's appointed land agents Fisher German, a site visit was undertaken, and a further plan of the Project proposals was presented. The Applicant notes that, during that visit, it was explained that the potential requirement for land related to enabling works associated with the lowering of an existing UK Power Networks low voltage power line in preparation for works to the high voltage line, and that this could have involved temporary works affecting the shared access road. The Applicant can confirm that access to all the properties will be maintained while works are carried out and UK Power Networks will be sending out further information to the residence in due course. The Applicant confirms that design development and access arrangements remain subject to refinement. The identification of alternative access routes, including those avoiding shared private access roads where reasonably practicable and in accordance with any consent, is consistent with the Applicant's approach to minimising disruption to residents and landowners. However, such alternatives require further technical assessment and coordination before they can be confirmed. The Applicant notes the concerns raised regarding transparency, clarity of information and accessibility of project communications. The Applicant does not agree that information about the Norwich to Tilbury project lacks transparency. Information shared to date has been intended to provide an accessible overview of the Project, its purpose and the options under consideration. With regard to cost comparisons, the Applicant confirms that the figures referenced are high-level indicative estimates intended to illustrate relative cost differences between broad strategic options. At that stage, they were not intended to represent detailed or final costings. The Applicant recognises the importance of explaining the basis of such comparisons and will continue to provide further context where appropriate. The Applicant also acknowledges comments regarding the clarity of written and verbal communications. The Applicant seeks to strike a balance between technical content and accessibility, particularly where complex technical, environmental and regulatory matters are involved. The Applicant recognises that some terminology may be unfamiliar to those without specialist knowledge and is committed to continuing to review its materials to ensure that information is presented as clearly as possible, supported by explanatory material where necessary. In relation to specific questions on the location and spacing of pylons and cables, the Applicant notes that precise distances and layouts could not at that time be confirmed, as those were due to be informed by ongoing technical, environmental and land-based assessments. Where responses have necessarily been indicative or qualified, that

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				reflected the current stage of the Project rather than an intention to be unclear. Notwithstanding the above, the Applicant is committed to enabling meaningful engagement and will continue to refine its communications.
REP1-432	Norman Stevens	Transport and Traffic	In Forncett, Cheneys Lane and Northfield Road are single track lanes used daily by walkers and horse riders. There are no footpaths from Cheneys Lane with direct access to Northfield Road. Between Northfield Road and Long Stratton Road there is only one footpath, Forncett footpath 25. National Grid's plans show that this footpath would be inaccessible with approx 1/3 of it covered by the project Order Limit. This path and lanes are used daily and are a valued asset for local residents and the N2T proposals would ruin the landscape and severely curtail use and enjoyment of our locality which is unacceptable.	The Applicant acknowledges the respondent's concerns around access in the vicinity of Forncett, Norfolk. In terms of impacts on Cheney's Lane and Northfield Road, the Applicant further acknowledges that short-term closures may be required, though considers that measures have been included within the Project proposals to suitably mitigate and control these potential impacts. In particular, the Applicant references **7.3 Outline Construction Traffic Management Plan [APP-309]**, which sets out that: • Traffic Management measures will be implemented, where safe and practicable, to deliver works as a first preference to temporary closures. • Specific locations, timings and the specific traffic management measures will need to be agreed with the relevant highway authorities. • Short-term closures associated with Overhead Line, Underground Cabling, and bellmouth construction are expected to each be in place for no more than four weeks. • Where temporary closures of the public highway are required, a full signed point-to-point diversion route will be provided. These diversion routes will make use of the same standard of road as that subject to the temporary closure, or higher where practicable and available. The overall PRoW strategy, as set out in **7.6 Outline PRoW Management Plan [APP-329]** is to maintain access along PRoW at all times during construction, either through managed access on their 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. Within this Document, Section 4 defines the proposed management regimes, and Table 8.3 references how these are proposed to be applied to each impacted PRoW. The Applicant therefore notes that the specific PRoW of concern identified by the respondent – Forncett FP25 – will require a temporary diversion impacted by the overhead conductor stringing working area, and for the remainder of the works in the area will remain open on it's existing alignment, with access managed through the use of appropriate safety measures On this basis, the Applicant considers that accessibility for PRoW users will be suitably maintained for the duration of the proposed works. Following completion of the works, this PRoW will be reinstated along its original alignment. **2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section A [APP-033]** Sheet 6 indicates the extents of the proposed road and PRoW impacts discussed above.

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REP1-310a	Charles Nicholas Micklem	Historic England	National Grid reply on Historic England for a lot of their evidence, I think the following needs clarification from Historic England 1. Historic England has provided advice on this application, correct? 2. Did Historic England meet directly with all affected heritage asset owners within Section F before forming its position? 3. In particular, did Historic England meet with the long-term custodians of the Grade I listed estate? 4. Did Historic England undertake any independent site visit from within the affected Conservation Areas? 5. How many site visits were undertaken within Section F specifically? 6. Were those visits undertaken during leaf-on or leaf-off conditions? 7. Did Historic England commission any independent landscape or visual modelling, or did it rely on the Applicant's visualisations?	The Applicant notes these comments which are directed to Historic England and therefore does not provide a response.
REP1-310a	Charles Nicholas Micklem	Alternatives	Alternative Alignment The Great Waltham Alternative, as identified in the Design and Development Report (2023), would relocate pylons into open farmland, materially reducing impacts on heritage settings and avoiding both Great Waltham and Little Waltham. Given: - the concentration of designated assets in Section F, - the scale of permanent residual effects identified, - and the existence of a viable alternative alignment, there is a strong planning case that the current alignment has not demonstrated compliance with Holford Rule 2 in this section.	The Applicant has applied the Holford Rules. Throughout the development of the Project they have been considered in conjunction with information on constraints, homes and environmental features and the finding of 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. A balanced decision is taken which is not the same as not considering the Holford Rules. We have considered Holford Rule 2 and carefully considered the effects on the related environmental topics, heritage, ecology etc in the relevant ES chapters. Our decision making and how the Holford Rules informed decision making is set out in documents including **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]**).
REP1-310a	Charles Nicholas Micklem	Alternatives	Design Changes and Consultation Clarity During both statutory and non-statutory consultation phases, the proposed pylon heights have varied between tall and shorter designs. This has materially affected the ability of consultees to assess landscape and heritage impacts. In the June 2025 landowners' consultation, pylon heights were not indicated on the maps provided. Confirmation required follow-up correspondence. Within the DCO documentation (APP-130), National Grid retains "flexibility" to revert to standard lattice pylons, including potential relocation. However, the Consultation Feedback	The Applicant notes the concerns raised regarding the level of detail shared during meetings with its land agents, Fisher German, including the presentation of more detailed design mapping. The Applicant recognises that landowner engagement meetings may involve the discussion of evolving design development, construction methodologies, and potential mitigation measures to explain how impacts may be managed in practice. All plans show by Fisher German at meetings are taken from documents submitted as part of the development consent application. The Applicant does not seek to withhold information from affected parties. Engagement meetings are intended to provide additional

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			document (APP-066, p.5236) indicates that the project will proceed using tall pylons. This represents a fundamental design parameter. Where scheme parameters materially affect landscape and heritage impact, clarity and consistency are essential to allow fair consultation and robust examination. The Examining Authority may wish to consider whether the parameterisation of pylon height has been presented with sufficient transparency. We had a meeting with Fisher German on the 25th February, where we were shown more design maps. This included a lot more detail than we have seen before. Including drainage ponds, compounds which aren't included in the DCO, digging of electric cables and other features. How are we to accurately respond to any consultation without all the detail. It is often felt that we always have one arm behind our back. As every meeting with Fisher German seem to bring more information to light that we haven't had a chance to comment on. Once again with National Grid, these maps are hidden from us and can only be seen in meeting. I have requested that we receive ordinate survey maps of all features on our land on the 25th February which al least will allow us to get soil testing done in preparation for the work to begin. If the Current Route is Retained Should the Examining Authority conclude that the Section F alignment is to remain, further mitigation should be secured. In particular: - Consideration should be given to the use of tall pylons between TB136–TB142 rather than lower-height pylons, if this reduces heritage setting harm. - Pylon TB143 should be repositioned further north to reduce impact on the setting of the Grade II listed Balls Farmhouse. Conclusion Section F is demonstrably more sensitive than any other part of the route. It contains the highest concentration of designated heritage assets and the only Registered Park and Garden affected by the scheme. The key planning test is whether this alignment represents the least harmful reasonable option in heritage and landscape terms. Given: - the exceptional concentration of assets, - the scale of permanent residual harm identified, - and the availability of an alternative alignment, there is a clear basis for concluding that: - Either the Great Waltham Alternative should be adopted;	clarity and to respond to landowner specific questions, rather than to introduce new proposals outside the scope of the application. Where landowners request additional information relevant to their land, including more detailed plans to support understanding of likely impacts or preparatory surveys, such requests are considered on a case-by-case basis and progressed through ongoing engagement. In terms of the routeing, the Applicant is guided by National Planning Policy and in this area which is not subject to a National Landscape Designation the relevant test is set out in NPS EN-5 (2024) at paragraph 2.9.23. Informing this a Landscape and Visual Impact Assessment (LVIA), included in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**, has been undertaken which assesses the likely significant landscape and visual effects from the Project. Whilst this assessment concludes that the introduction of an overhead line would give rise to significant adverse effects (in environmental impact terms), the Applicant does not consider the Project at the Chelmer Valley / Little Waltham / Great Waltham would meet the thresholds established by paragraphs 2.9.14 and 2.9.23 of Policy EN-5 (2024). The assessment has not identified a high potential for widespread and significant adverse effects. The Project has also assessed the potential impact on designated and non-designated heritage assets in accordance with **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 [AS-068]**, 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. On this basis the Applicant remains settled on its preference for the Project as submitted (and amended at Deadline 1 by the change from three low height pylons to two standard pylons to the south of the River Chelmer). The respondent may perceive that an alternative is preferred, and it will present a different balance of effects and consequences but The Applicant does not consider this alternative balance to be preferred nor for there to be a basis in policy to change.

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			- Or Section F should be modified to ensure proper compliance with Holford Rule 2 and statutory heritage duties.	
REP1-343	Faith Marchal	Land and property	Section F This is of course where the proposed route of the pylons affects me the most, spoiling the view not only from my house but from all the houses on near its intersection with Chignal Lane. Many more houses have also been built in Broomfield north of Hospital Approach, and between Woodhouse Lane and Little Waltham. No doubt the proposed addition of a chain of 50 metre high pylons in their sightlines will be felt very keenly by recent property buyers. Construction also continues on still more houses accessed from the west end of and another 100 houses are currently being proposed by Chelmsford City Council. The cost of these and indeed all new-build houses in the Chelmsford area is considerable, their value likely to be substantially decreased when and if these pylons are built. Even older semi -detached houses on Woodhouse Lane are selling in the region of £500,000 each - as at 2024.	The Applicant acknowledges that its proposals may cause concern to landowners. Diminishment of property value known as 'injurious affection' and any other appropriate heads of claim would be considered on an individual basis in accordance with current legislation. We would pursue a voluntary agreement with affected landowners, acquiring rights in accordance with our Land Rights Strategy (the strategy is subject to review). If a voluntary agreement cannot be reached, then the Compulsory Purchase Code allows for a claim of compensation for the loss that property owners may have suffered as a direct result of the retained part of your property ownership being worth less as a direct result of the works. If there are any specific concerns about the devaluation of property, National Grid would advise seeking third party advice, or alternatively please contact the Project team: Norwich-Tilbury@fishergerman.co.uk or by calling us on Freephone 0808 175 3314. Alternatively, you can write to Norwich to Tilbury Land Team, Fisher German, The Atrium, Risby Business Park, Newmarket Road, Risby, Bury St Edmunds, IP28 6RD
REP1-343	Faith Marchal	Landscape and visual	Some years ago, the area to the north and west of the built-up Broomfield village was identified as the 3rd (out of nine) most important areas in the parish for protection from development. I quote from p. 15 of Broomfield's Community Landscape Character Assessment of 2010: 'As the highest land in the Parish, it offers good views eastwards, towards the village and beyond and it can be seen clearly from the other side of the Chelmer Valley. As the current settlement sits comfortably in the gentle 'dip' of the valley, the views are not obstructed by buildings . . .' and yet this is exactly where the pylons are proposed. It stands to reason that if such high ground offers such good views, then anything built on it – such as 50-metre high pylons! -- can also be easily viewed, from miles away. The average mature oak tree is only 20 – 40 metres tall, so the pylons would dwarf Bushy Wood. National Grid plc have repeatedly been informed of this, in the process of both non-statutory and statutory consultations. I strongly object to the destruction and harmful desecration of such attractive rural landscape vistas and the compromising of local public footpaths, bridleways, parts of the Essex Way, and the Saffron Trail (another long-distance path within Essex that runs north – south between Saffron Walden and Southend). The footpaths in this area, north of and west of the more settled areas of Broomfield Parish have been well used by walkers for generations, with their use intensifying dramatically during the Covid-19 pandemic and continuing well after restrictions were lifted. They, together with itself, remain in frequent use today.	The Applicant acknowledges the objection to the Project. A Landscape and Visual Impact Assessment (LVIA) has been undertaken as part of the Environmental Impact Assessment (EIA) of the Project. It is 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 (GLVIA3). The LVIA Methodology sets out all data sources used to inform the baseline and the assessment of landscape and visual effects. This includes a range of detailed landscape character sources from national to local level, including the Essex LCA (CBA, 2003). The LVIA recognises that there will be significant landscape and visual effects of the Project during its construction and operation (and maintenance). 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 Applicant notes that the Broomfield Neighbourhood Plan Landscape Appraisal (February 2019) illustrates local character areas A-H which are based on the Broomfield Community Landscape Character Assessment (2010). It is noted that the Project passes through Broomfield Neighbourhood Plan Landscape Appraisal area G and close to area H. Area G sits within Central Essex Farmland LCA, and Chelmer Valley LCA. Area G sits within Chelmer Valley LCA, and Chelmsford & Environs LCA. Significant landscape effects are reported within approximately 1.5km of the Project in the Central Essex Farmland LCA, Chelmer Valley LCA and within approximately 0.5 km of the Project in Chelmsford & Environs LCA.

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				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 visual assessment has been undertaken based on consideration of views experienced from several Visual Receptor Areas (VRAs), those relevant to the areas around Broomfields include VRA F3 Great Waltham, VRA F4 Little Waltham, VRA F5 Chignall Smealy and VRA F6 Chelmsford North-West. The visual assessment within the VRAs is cross referenced to and supplemented by viewpoint assessments, many of which are supported by photomontages and wirelines. 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 assessment of visual effects on each VRA is presented in 6.13.A3 Environmental Statement **Appendix 13.3 – Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoint assessment contained within **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232]** illustrates the Project in relation to several views from the area around Broomfield including Viewpoints 6.04, 6.05 and 6.14. Significant visual effects are reported at construction and operation for Viewpoints 6.04 and 6.05. Visual effects from Viewpoint 6.14 are reported a not significant. In addition, viewpoints HE17and HE39 and accompanying visualisations support the historic environment assessment. These are presented in the **7.12 Visualisations [APP-350 - APP-351]**. Sequential assessments have also been undertaken for long distance paths such as the Essex Way and Saffron Trail as advocated in the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3) paragraph 6.22. This assessment is set out in Section 13.12 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**.
REP1-343	Faith Marchal	Historic Environment	We understand from having attended the consultation event at Chelmsford City Racecourse on 27 April 2024 that Footpath 5, running north from [redacted] to Pylon TB148, near Bushy Wood, has been designated as a Permanent Access Point for the maintenance of that particular pylon. It makes me wonder whether anyone from the National Grid plc has actually been to see it. This footpath has been used for many generations and is thought to have been the ancient Green Lane between Priors (then owned by Jericho Priory, Blackmore) and Pleshey, to the north. It is a narrow but well-used path. Some years ago, the path had become impassable due to excess seepage from the newly built lake at Scravels. Therefore, to maintain the right of way, Essex County Council built a bridge to cover the worst affected area. This bridge measures only 104 cm wide, and is intended only for pedestrian use. Many sections of the path remain muddy, however, especially after rain, and the churning up of the path from frequent use. Clearly it is unsuitable for motor vehicles, including heavy duty maintenance vehicles. Furthermore, widening the path to provide access for maintenance vehicles would	The permanent accesses to the pylons (including the one proposed for Pylon TB148) are intended for walking and/or vehicular access for future inspection, survey and maintenance purposes. We are not proposing to construct anything for this permanent access route, with existing paths, tracks and routes to be used where possible. Ahead of future inspection, survey or maintenance access, the Applicant's lands team will liaise with and agree access arrangements with the Local Highway Authority and landowners at the time to identify the most suitable access based on current land use (at that moment in time) and to minimise impacts where practicable, noting that access beneath and along the overhead line route itself remains an option. The Applicant notes that a proposed permanent access will run along Footpath 5 to Pylon TB150 from the south. Another permanent access is proposed to run along Footpaths 9 and 31 for Pylons TB148 and TB149 from the north. Vegetation removal along Footpaths 5, 9 and 31 is illustrated in the Arboriculture Impacts Plan (Figure A13.6.1) in **6.13.A6 Environmental Statement Appendix 13.6 -**

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			inevitably necessitate the destruction of the many large trees that line both sides of the path, especially at its southern and northern ends, thus harming the very nature of this popular path as well as opening up the view of the pylons to the north towards the Pleshey Farmland Plateau, the highest elevation In all of Broomfield, as previously mentioned. Importantly, there are also inspection chambers at intervals along Footpath 5 for the sewage waste systems that serve numbers 1 and 2 Priors Cottages, and Sunnymede Cottage, all on [redacted].	**Arboricultural Impact Assessment [APP-236]** on pages 272 and 273 of 352. 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 assessment is based on an assumed worse case tree and hedgerow removal, as detailed within **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** and illustrated in) in **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236].** The visual assessment has been undertaken based on consideration of views experienced from several Visual Receptor Areas (VRAs), those relevant in this location are F5 Chignall Smealy and F6 Chelmsford North-West. The assessment of visual effects on each VRA is presented in **6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment - Part 1 of 4 [APP-229].** The assessment reports major and significant adverse visual effects on visual receptors, including people walking on public rights of way, within 0.5 km of the Project during construction and operation.
REP1-343	Faith Marchal	Historic Environment	However, I also strongly object on the grounds of the potential despoilation of a historic site which has been the subject of considerable archaeological research since 2012. This work – which included field walking and geophysical surveys - explored the location of what had long been thought to be a Roman villa in a field known as Dragonsfoot, just northeast of Bushy Wood. Much of the Roman brick and tile within the fabric of Broomfield's 12th century parish church will almost certainly have been taken from this site. Over the years, over 500 Roman coins, and many other brooches and other metallic finds have been discovered there and well catalogued, some of which are on display in Chelmsford & Essex Museum. More recently, field walking and various forms of geophysical surveys undertaken by trained archaeologists have clearly identified the location of the Roman building – which is NOT a Roman villa but almost certainly a Romano-British temple -- as well as four features which may have served as votive pits. This alignment of pits and temple makes this site possibly unique in England. I and others have referred to our findings in each and every National Grid plc consultation exercise, but they seem to have paid not a bit of attention to this. Our findings from this research were written up and published in December 2023. The proposed route of the pylons will cut straight through this field, with one pylon proposed within metres of the temple itself. Placing the cabling underground would almost certainly destroy any remaining archaeological evidence, so the only viable solution to this dilemma is offshore. What is also truly disturbing is that Broomfield Parish Council, and I personally, wrote about this work in our responses to the non-statutory consultation of 2023, and yet none of the information we provided appears in the consultation documents of April 2024. Specifically, the Preliminary Environmental Report	National Grid has sought to reduce, as far as practicable, impacts on the historic environment including 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 examples through changes to the route alignment. As part of the Environmental Impact Assessment (EIA), National Grid has undertaken a robust and proportionate assessment of the impact of the Project on the Roman temple (6062). This assessment was undertaken in accordance with a methodology developed in line with best practice and discussed and agreed with key stakeholders, including Historic England, during the scoping process and subsequent thematic working group meetings. The methodology and assessment are documented within **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** and its appendices. The information provided in the Preliminary Environmental Information Report has been superseded by the information in the DCO submission and additional submission documents, which has taken account of the most recent information available at the time of production. Updated baseline information is provided 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 [AS-070]**. In addition, 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 additional submissions **[AS-068 to AS-083]**, and this included the

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			Volume 3, Technical Appendices 3-4, Section 3.7.84-87 pp 705 ff – contains inaccurate, out of date, incorrect information. This is what the National Grid's documentation had to say: "3.7.86 The site of a Roman villa with hypocaust has been identified in a field to the east of Woodhall Farm (6099). The site of the building is indicated by a finds scatter recovered during fieldwalking comprising brick, flue tile, tile, plaster, a Colchester type brooch, 11 coins, bracelet fragments and pottery sherds including samian, and Castor and Oxford wares. This site is located at Dragonsfoot Field 40 m north of a draft Order Limits access road and approximately 250 m west of the settlement of Broomfield, just south of Partridge Green. The site is of evidential and historical value and is of medium value." Despite earlier representations from me and others, National Grid plc appear to have made their assessment from the Heritage Gateway entry from 1993 (Heritage Environment Record 1013). However, this is over 30 years old! As you can see, there is mention of some 11 coins. In fact, we know from metal detectorist Mike Cuddeford that over the years he has discovered over 550 coins and some 140 other metal objects dating from the Roman settlement period in Dragonsfoot, al fully documented. Furthermore, as mentioned earlier, the Preliminary Environmental Report quoted above takes no account of the more recent archaeological investigations reported on last year and the harm that construction and access to pylons over such sites will cause in the short, medium and long terms.	preliminary results of geophysical survey within the same field as the temple site (6062). These results are described in 6.11 **Environmental Statement Chapter 11 - Historic Environment [AS-068]** and assessed in **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. This identified a possible circular enclosure (6086) between pylons TB148 and TB149 and outside the area of physical impact from the Project. No other anomalies of likely archaeological origin were identified in this field. The assessment concluded a negligible adverse, not significant, effect on this asset (6086) during construction, as it is outside areas of physical impact, and a neutral effect during operation (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**). The temple site (6062) is located outside the Order Limits and so has been assessed for potential impacts through changes in its setting. For the construction and operation phases it was concluded that this asset would experience a moderate adverse and significant effect (**6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**). Standard construction mitigation would be adopted as detailed in **7.2 Outline Code of Construction Practice [Revision B]**. Changes to the setting would be temporary and would be reversed once the construction phase is completed. No additional mitigation measures are proposed during the construction or operation phase for this asset as any measures designed to lessen the visual impact of the Project would be of a scale that would visually adversely alter the setting of the asset. The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order [APP-056]** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
REP1-343	Faith Marchal	Alternatives	What is most disappointing is the lack of comparative information concerning alternatives to the old-fashioned, outdated pylons proposed for the Norwich to Tilbury route. These include underground cabling, and my preferred option, an undersea solution. The costings that National Grid plc have provided are incomplete, for a start. For instance, I could not find mention of the thousands of pounds of compensation which will need to be paid to property owners thanks to the inevitable devaluation of their properties -- many in the Chelmsford area being of relatively new build -- nor mention of the impact of taking so many acres of prime agricultural land out of production. The difficulty of finding useful information, however, makes one think this is actually a deliberate ploy on their part, intended to baffle and frustrate prospective readers, and actually dissuade them from responding at all. It was quite by chance	The Project has been developed to be consistent with National Policy Statement EN-5 (2024) which is clear that the use of overhead lines is the strong starting presumption for the electricity networks development. At each stage of the Project a consistent level of information has been used to support decision making between alternatives leading to the selection of the preferred option. There is no requirement for all design variants or alternatives to be studied to the same level of detail captured within the Preliminary Environmental Information Report or Environmental Statement supported by a similar degree of detail from associated surveys. The Applicant does not consider it proportionate to complete such an extent of surveys, nor reasonable to impose such surveys on landowners when there can be shown, based on available data, to be no realistic prospect of an option progressing.

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			that I discovered the paragraphs quoted in my response to Q.12-13, above – p.705 (or 714 if viewed online) of a document totalling over 2000 pages – and this was one document alone of over 40 on National Grid plc's website! The visualisations we viewed at the consultation event were clearly based on computer modelling, and possibly Google Earth technology. It is hard to imagine that anyone from the National Grid has actually ever visited the areas being affected, in order to assess the real, visual impact of the pylons on the landscapes, and the harm it will do to local wildlife, not to mention the blight on the lives of those of us who live here. The name says it all: most of the electricity generated off our East Anglian shores will not be distributed within East Anglia at all, but towards London, and yet East Anglia is considered 'okay' for the National Grid to run roughshod over this part of the country	National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way[17]. 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 is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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 undertaken a range of ecological surveys between 2022 and 2025, including habitat and protected species surveys, covering 97% of the Order Limits. The results of these surveys and a detailed impact assessment are presented within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026].** It is important to note that the judgements presented in the LVIA, as set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** are based on first hand observations and professional judgements made during site visits and not on viewpoints and visualisations alone. Field survey work was carried out during multiple visits under differing weather conditions between 2022 and 2025 (in all seasons). Records were made in the form of field notes and photographs. Field survey work included visits to the Order Limits, viewpoints and designated landscapes, and extensive travel around the Study Area to consider likely effects on landscape character and on experiences of views seen from designated landscapes, settlements / communities, and routes. Field work was undertaken during both summer and winter months to fully understand the maximum level of visibility as part of the landscape and visual baseline.
Helen Dorothy Keeler	REP1-367	Health and wellbeing	I request a review and change to the proposed pylon TB 141 and High Voltage overhead cables at the Waltham Gap. This is based on the negative health impact of overhead high voltage transmission	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has specific policies for managing EMFs, which includes both numerical

[17] Electricity Act 1989, Section 9

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			cables, and in particular the detrimental lower height, wider spread pylons proposed through the 120m wide Waltham Gap. The issues raised are supported by scientific papers published in reputable academic journals. Many of the papers regarding harmful effects have been published in the last 10 years – after the initial proposal for the Norwich to Tilbury grid upgrade. This new information should therefore change the planning proposal for overhead cables at the Waltham Gap. High voltage overhead cables produce electro-magnetic fields (EMFs). This lower-level EMF exposure from overhead cables causes well-established biological and health effects. The proposed run of pylons at The Waltham Gap TB 135 TB 143 is too close to an area of high population and heavy amenity use and must be treated as a health hazard. Harmful physiological effects of EMFs on human health are • A reduction in the hormone melatonin – important in circadian rhythms phosphenes – flashing lights caused by EMFs activating the optic nerve. • Noise pollution from the cables is worse in wet weather and long periods of dry spells – exactly the climate Essex and the Waltham Gap. • A reduction in your white cell count, even occasionally causing neutropenia if you work close to overhead cables • A 4-fold increase in female infertility for those living within 500m of overhead cables increases in depression and anxiety • A non-statistically significant increase in adult cancers – Although I am sure you would consider this effect pretty significant • An increased risk of the health hazards to children The closer you are to a high voltage overhead cable – the stronger the electromagnetic field At the Waltham gap many of the 5000+ local residents will pass just a few metres from pylon TB141 every day and the cables will only be a maximum of 25metres from them as they go for a run, walk their dogs, walk to the bus stop, or go to the doctors' surgery in Little Waltham. Farm buildings, workers at the BT telephone exchange and some houses in the area, including Windmill house are no more than 100metres from the cables. It is not acceptable that we will all be exposed to higher density EMFs and increased health hazards than the normal population. In North Norfolk planning decisions have protected the environment and used underground cables; in the Dedham Vale planning has protected an area of outstanding natural beauty and used underground cables. The population of The Walthams may be neither outstanding nor beautiful, but you the representatives of the planning authority have a personal and professional duty to protect the population to the same extent. There are many of us who will have our health negatively affected if pylons are positioned through the Waltham Gap. For this reason, we the people, demand a change of approach at The Waltham gap to	exposure guidelines to protect against established acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These policies which were adopted by Government on recommendation by UKHSA and are incorporated into the decision-making process for Development Consent in the EN-5. The exposure guidelines in place are based on preventing established biological effects, which specifically cover magnetophophenes, flickering flashes of light perceived in the visual field. These occur when the retina or visual cortex is exposed to high time-varying magnetic fields inducing weak electric current, which in turn stimulate retinal cells. The exposure limits are set to prevent these effects occurring with a considerable 5-fold safety factor applied to the public limits. Research into the potential health effects of EMF has been carried out for decades and National Grid look to independent authoritative review bodies such as the UKHSA to review that science and for Government to advise on appropriate protective measures based on the outcomes of these reviews. Summaries of the scientific evidence and review body outcomes are provided in Section 2.6 of 7.8 Electric and magnetic fields compliance report [APP-330]. These review processes consider the totality of the scientific evidence, rather than being based on selected individual studies, though all relevant individual studies are taken into account. These reviews include research covering, but not limited to melatonin, adult cancers, fertility and childhood cancers. It is important to note that after decades of research into EMF and health, no health effects have been established below the Governments adopted exposure limits. Our approach ensures all our assets comply with those policies, which are set by Government on the advice of their independent advisors UKHSA. Irrespective of the technology used National Grid will always ensure that all of its equipment is designed to comply with Government's policies on EMF. This ensures that health concerns are properly and adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines is included in the 7.8 Electric and magnetic fields compliance report [APP-330]. The Applicant as per the Design Scenarios Table in 8.6.1 Deadline 1 Cover Letter [REP1-140141] has confirmed a decision to progress with Scenario B only in this location, with standard height pylons (not low height pylons) proposed to the south of the River Chelmer. In making this change one of the low height pylons can be removed and the pylon (TB141) proposed closest to Chelmsford Road can be moved approximately 70 m further west away from the road (subject detailed design and Limits of Deviation).

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			underground the cables or reconsider previously rejected routes avoiding the Walthams and adjacent villages	
REP1-373	Ian Head	Air quality and emissions, Noise and Vibration, Transport and Traffic	We are now in receipt of your communication Refence: P2/8086/1168 regarding the progress of the application to install pylons and associated infrastructure for the proposed new electric supply. We are long standing home owners in a location adjoining land that will be used in this construction. Whilst we were previously aware of the proposed route of the main pylons, this latest communication is far more comprehensive, and now gives us grave concerns with the works and upheaval that could be in close proximity. All this poses many questions that we'd like answered, and relate to how all these proposed works could affect us. These questions include: • Our property backs onto a field that (a) has existing pylons and (b) that you are using for the proposed project. So what disturbance are we likely to experience, in terms of noise, dust, visual – and for what period? • Should we be concerned that the inevitable dust & dirt from this adjoining field will have a negative impact on our house? I can foresee windows & doors will need cleaning far more regularly, and the rendered walls will need cleaning down and re-painting. Outdoor furniture will also suffer, and hanging out laundry to dry will also be problematic. • We would like to understand more about highway (and footpath) access, both in our immediate vicinity and the wider. i.e. Will Battisford Road be closed, and/or will it encounter higher volumes of traffic including large vehicles? – the first part of Battisford Road leading up from Barking Forge is very narrow. Will the road from Barking to Needham Market be compromised? Or going from Barking to Bildeston? And further afield what impact will be on the road from Needham Market to Stowmarket? • For our particular area of interest (Section B, sheet 14), when would you see proposed works starting and ending? And how many workers would you envisage being on site? • Will there be compensation available in relation to our property reducing in value, and the additional maintenance required to our property through the dust & dirt that will transpire from the works? Please can a representative with good knowledge of the proposed scheme in our interested area, please visit us in person to discuss all of the above, so we have a greater understanding of what might be expected in the future	The Applicant notes the questions submitted. The Applicant has completed an Environmental Impact Assessment which has assessed impacts such as noise and dust, this information can be found in **6.7 Environmental Statement Chapter 7 - Air Quality [APP-147]** and **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256].** The assessment concluded that there would be no significant residual effects following mitigation. We have also completed a Landscape and Visual Impact Assessment which is set out in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-266].** The assessment concludes that there will be significant visual effects within approximately 1.5 km of the Project, during construction and operation, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. With regards to disturbance from dust, we have produced **7.2 Outline Code of Construction Practice [Revision B].** An appendix to the CoCP **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]** has also been produced which outlines management for dust during construction. In relation to highway (and footpath) access matters, it is assumed that the narrow road that the respondent is referring to is also called Hascot Hill. The Applicant is proposing to undertake streetworks and construct temporary access points (bellmouths) on Hascot Hill, the B1078 Ringshall Road (which can be used to travel between Barking and Bildeston), and the B1113 Stowmarket Road (between Needham Market and Stowmarket). The Applicant is also seeking powers to temporarily close a section of the B1078 Ringshall Road and a section of the B1113 Stowmarket Road (between Needham Market and Stowmarket) and to divert traffic onto suitable alternative routes, whilst works are undertaken. The Applicant is not proposing to temporarily close the road from Barking to Needham Market. With regards to the detailed construction programme, details for specific areas activities such as an exact start and end date in a given location are not currently known, however when a detailed construction programme is known this will be shared with the relevant parties and communities will be kept informed through local engagement . With regards to compensation, where a person's land is not acquired and no land rights are taken, but they consider that their property may be adversely affected by the construction or operation of the Project, they may fall within what is commonly referred to as a Category 3 (Cat 3) claim interest. A relevant claim may arise where physical factors attributable to the Project such as noise, vibration, lighting or other measurable effects can be demonstrated to have caused a compensable loss. Claims

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				based solely on generalised blight, perceived loss of value, or concern about proximity to the Project are not compensable under the statutory framework. The Applicant cannot confirm in advance whether a person will be entitled to make a Category 3 claim, nor whether any claim would result in compensation. All claims are assessed on a case by case basis, having regard to the specific circumstances and the statutory tests that apply.
REP1-216	Bunwell District Councillor	Alternatives	A prime example of this is the experience of a Bunwell Hill resident who owns a very precious piece of rural land that has now been approved as a County Wildlife Site. Norfolk Wildlife Trust has said that National Grid should avoid this site altogether and has suggested an alternative route which is far less ecologically damaging. In addition, they believe the woodland may be a remnant of Ancient Wood Pasture and should therefore be put on the Ancient Woodland register. Again, a simple solution would be to slightly change the pylon route which runs over this land, aligning north to south (RG48 and 49) rather than crossing the land diagonally. But this has not even been considered by National Grid. Instead they changed the route in 2025 to mainly accommodate a honey bee tree nest. How can the needs of a colony of honey bees outweigh those of the myriad of organisms, wildlife and ecology residing in ancient woodland? Another resident spent many weeks putting together an incredibly detailed, meticulously researched and evidenced report regarding the loss of biodiversity, destruction of habitats and negative effect on the River Tas (a rare chalk stream) that this scheme would engender. This appears to have been completely ignored. She herself lives in a property which will be surrounded by pylons on three sides, very close to her house. Of course there are many others affected in this way, with properties and businesses blighted.	The Applicant is aware of the recent status change of Meadow Wood in the Tas Valley to a candidate and now approved County Wildlife Site (CWS), noting its consideration was prompted by the landowner following a number of rounds of Norwich to Tilbury Project consultation. The Applicant would also note that it has completed several detailed ecological and arboricultural surveys of the site and adjacent areas and been in dialogue with the landowners on multiple occasions and in several meetings on-site. The CWS was considered for local designation due to its woodland habitat. While not considered as a CWS in the assessment, this area of woodland has been included under the priority habitat woodland receptor within the **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and as such has been given significant weighting in routeing design decisions. Mitigation proposals for the candidate CWS would relate to the impact on woodland habitat and this is already clearly set out within **7.4 Outline Landscape and Ecological Management Plan [Revision C]**. The Applicant has carefully considered the routeing and does not consider it necessary or appropriate to modify the route in the manner proposed. The rationale for this change is set out in **5.15 Design Development Report [APP-122]** at paragraphs 4.4.1 to 4.4.6 but identifies that this does not just transfer effects to other landowners, uses the pylon positions and heights to reduce effects on veteran trees and avoids the introduction of further angle changes.
REP1-339	Eleanor Bullivant	Alternative	Section F proposals at the Walthams (Section F) will have serious and negative effects on architecture, historic sites and human assets. The plans dissect Little and Great Waltham from each other - these villages share amenities (GP surgery, pharmacy, village shop and post office as well as schools). Impact on daily human life and activity for residents will be immediate and negative. The aesthetic impact is also significant and may have psychological and aural affects based on disruption to surroundings and background noise. The plans intercept local woodlands which will disrupt and cause harm to wildlife such as deer, badgers, foxes and a number of water birds who live at the fishing lake beside Border Wood. Ancient roads, woodlands, human social connections are all at risk due to this plan. Alternative re-routing and undergrounding at the Walthams should be considered seriously and offered as the alternative.	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). Further information on alternatives at Great and Little Waltham is provided in Section 3 of its **Comments on Local Impact Reports [8.2.2]** submitted alongside this document at Deadline 2.

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REP1-288	Adrian Allen	Water Environment	There are many reasons why the impact of electricity pylons will be devastating in the areas around Buttsbury Essex particularly wildlife and historic buildings/scenery but one which i feel hasn't been given hardly any consideration is flooding. This area regularly floods after heavy rainfall with much of the surrounding roads and fields under water and saturated. The only option through this area is undergrounding or the overall scheme using offshore cabling.	A Flood Risk Assessment 7.9 Flood Risk Assessment [APP-331] has been undertaken, drawing on a range of data sources and informed by engagement with key flood risk management authorities. The FRA appraises flood risk from the River Wid and its catchment, which includes Buttsbury, as well as flooding from surface and groundwater. It identifies the flood risk management and control measures that need to be put in place to manage and prevent increases in flood risk from these sources. These measures are both integrated into the Project's design e.g. runoff capture and attenuation features and are secured within 7.2 Outline Code of Construction Practice, Revision B, and would be put in place by the appointed contractor(s). In combination, the measures and controls would prevent exacerbation of the flooding issues at Buttsbury.
REP1-411	Mark Passmore	Alternatives	The Holford Rules clearly state that the overhead power lines should avoid areas with the highest amenity. It is clear that the intention was (and continues to be) to preserve the quality of the natural environment that has existed undamaged for so long. There are clearly viable alternatives to overhead power lines, in particular burying cables underground or constructing an offshore grid. In either case, it would be appropriate to use the most up-to-date technology which would give longer term benefits in respect of efficiency and, undoubtedly, cost. The current proposals do not use up-to-date technology as used in other part s of the world and in their proposals National Grid have not seen fit to provide the most basic comprehensive economic justification for the scheme; in the costings that they have provided there are clearly significant costs that have not been recognised and have thus been excluded. The current proposals ignore the fact that untold damage would be done to large swathes of open countryside along the proposed route and, in particular, through the Dedham Vale and the valleys of the River Colne and the River Stour. Landscapes would be permanently destroyed for no good reason other than to line the pockets of wealthy investors. As has been argued so many times since these proposals were first made public, the documentation merely states that this is the cheapest way and that there is no other option. They merely seek to bulldoze their way through the planning system and generally ignore the rules that have been created for good reason. I live in a rural area in the Colne Valley that would be blighted by this project and suggest therefore, before proceeding, that the project be reappraised and properly costed in a professional manner recognising the options that so clearly exist. It is wrong that so many individuals could be so adversely affected for the benefit of so few.	The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in **7.17 Strategic Options Backcheck and Review [APP-355]**, **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]** and **5.15 Design Development Report [APP-122]**. More localised design variants have also been considered. National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way[1]. 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 is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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.
REP1-447	Pippa Baxter	Alternatives	National Grid have only ever given one option. Over time it has become apparent that this is because they intend to use the route to open up East Anglian countryside to Solar Farms. I fear the mass industrialisation of the countryside. Solar farms would take valuable farmland away from food production. Wildlife corridors would be	There has been no influence of solar farm connection requests on routeing and siting for the Project. Some local route refinements and pylon positions have responded to operational needs and approved plans. The Applicant is required to develop proposals in line with national policy and its regulatory duties. The **5.15 Design**

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			disrupted and rural communities, whose lives have been tied to the land for generations, would be robbed of their cultural heritage. I urge the planning inspectorate to reject National Grid's application and force them to consider offshore, sea-bed solutions.	**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.
REP1-413	Martin Bashall	Alternatives	It is unacceptable that National Grid's proposal fails to prioritise credible, modern alternatives. Both an offshore subsea route and undergrounding are viable, proven options — and when delivered using HVDC technology, they are far more efficient and environmentally responsible than traditional AC overhead lines. • HVDC subsea cables are already widely used for long distance transmission. They avoid inland environmental destruction entirely and offer lower losses, greater resilience, and none of the visual blight of pylons. • HVDC underground cables require narrower corridors, fewer above ground installations, and dramatically reduce landscape and habitat disruption. They eliminate the need for towering pylons and the permanent industrialisation of rural areas. These alternatives are not speculative or experimental — they are established technologies used across the UK and internationally. National Grid's refusal to prioritise them in this project is indefensible.	National Grid considered alternatives in the **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in 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 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
REP1-293	Alison Mary Chapman	Alternatives	The impact in Great Waltham/Littke Waltham Gap and villages would be catastrophic; and aside from destruction of countryside surrounding, visual impact seen for miles, damage to historic sites not to mention impact on wildlife. I really do believe that NG have not given enough thought to their proposal and how it will affect this area. Should the pylon scheme go ahead it should be placed underground to preserve for posterity the beautiful countryside and all that entails.	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).

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REP1-439	Paul Winston Thompson	Needs Case	Stop habitat destruction. Stop the mental health epidemic caused by the pylon plans. Stop the collapse of the housing market along the proposed route.	The Applicant notes the respondent's objection.
REP1-327 REP1-416	David Powley Maxine Janet Suter	Alternatives	The proposed route wraps around 3 sides of Roydon with multiple changes of direction, which goes against all the pylon guidelines set out by the government. It is absolutely devastating in the area between Roydon and Bressingham. At no other point on the entire route are so many properties situated so close to the pylons. The plan to route the overhead lines through this narrow gap will result in absolute devastation for these 2 beautiful villages, and the stunning Waveney Valley through Wortham Ling. Neighbouring Diss will be completely surrounded by pylons on both sides. The pylons will overshadow considerable numbers of listed properties and Roydon's Grade 1 listed church. It causes unacceptable and irreversible harm to our heritage. The financial impact on property values will be extremely significant according to local estate agent's, so many people rely on their property values as part of their pension plan so this has a huge impact on peoples retirement which was completely unforeseeable. The resulting mental health stress on residents is deeply concerning. It is completely unacceptable that the national grid is considering this route. There are far better alternatives which would have very little impact on the overall project, e.g. straightening out the proposed route and moving it away from Roydon and Bressingham. This situation is precisely what the planning inspector is designed to pick up on and look for a sensible alternative route. Why devastate so many peoples homes, lives, welfare, and local heritage when an alternative route is achievable. Roydon parish council have already come up with a proposed alternative route, and is also supported by local MPs.	Decision making on route alignment in the Waveney Valley area, including Roydon is set out in section 4.6 of **5.15 Design Development Report [APP-122]**. The Applicant has routed and sited the alignment in accordance with the Holford Rules, as well as taking cognisance of the results of survey information and consultation feedback. The alignment in this area was the preferred alignment to be taken forward for detailed assessment, whilst taking account of all these factors.
REP1-440	Penelope Richards	Alternatives	You are breaking the Halford Rules; to avoid areas with the highest amenity. The Woodland Trust has designed and maintained this area for some years; creating numerous footpaths in addition to the ancient paths linking Fordham to West Bergholt and including a renowned protected ancient woodland known locally as the 'Bluebell Wood"; visited by walkers, bird watchers and naturalists from a wide area surrounding Colchester/Essex and Suffolk. The space within and around the valley is consistently and frequently utilised by acrobatic flying enthusiasts, balloonists, Equestrians, cycling clubs, vintage car societies and tourists. The Archaeological sites are in constant development and have revealed artefacts of national importance; located next to Colchester, Britains oldest recorded City and an area first visited and en route to all others by the Romans; Vikings etc and inhabited by indigenous tribes. Your cursory attempts to ck that box will in no way protect the knowledge that you intend to bury and destroy.	The Applicant disagrees with the implication that the Holford Rules have been broken. Throughout the development of the Project they have been considered in conjunction with information on constraints, homes and environmental features and the finding of 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. An Environmental Impact Assessment has been undertaken which has assessed the impacts listed, this can be found in the application documents **[APP-122 – APP-287]** and [**REP1-062 - REP1-066]**. In terms of the consideration of alternatives as part of the examination of the substantive case, National Policy Statement (NPS) EN-1 (2024) indicates, first, that the consideration of alternatives should be carried out in a proportionate manner, and, second, that only alternatives that can meet the objectives of the proposed development need to be considered.

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			Whilst costing as much as possible is in your favour it is not in the Governments assuming they represent the people. The outdated pylons, made in your Welsh factory? From Chinese steel? Will of course need to be replaced with new technology hereafter as is used in the rest of the world.	NPS EN-1 paragraph 4.3.22 explains that the Secretary of State will be guided by whether there is a realistic prospect of the suggested alternative delivering the same infrastructure capacity, the same energy security, the same climate change, and the same environmental benefits as the proposal in the same timescale as the proposed development. NPS EN-5 (2024) says that overhead line is the strong starting presumption for electricity network developments in general, having regard to that duty. That strong starting position is reversed, but is only reversed for nationally designated landscapes. It is not displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where their benefits clearly outweigh any extra economic, social or environmental impacts, applying the test set out in EN-5. The Applicant has applied the presumption and the strong starting presumption of overhead lines in the correct places, and it has reversed that presumption in the circumstances of the National Landscape.
REP1-337	Dr Sara Knight	Alternatives	Whilst I accept that infrastructure to support increasing the capacity to the electricity grid is needed, I fail to understand why there is a steadfast rejection of the cost-effectiveness of the offshore option. It will save valuable farmland, it will have less environmental and tourist impact, it will save the lives of birds, and will cost roughly the same. This is the option favoured by all local residents and local authorities, and yet is being willfully ignored by all contractors and government agencies.	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.
REP1-392	John Cavill	Alternatives	The Norwich to Tilbury project team have consistently refused to accept that the proposed routing of tall power lines close to the village of Ingatestone, is an important local issue. The Wid valley is an important 'green lung' and recreation area for local residents, and spoiling the view from the valley should be considered carefully. This has not yet been done as the project team have not commented nor have they replied to my many objections. Adjustments to original plans have been made for the Waveney valley and the same should now be done for the Wid. I strongly oppose the despoilation of my local area and believe that the new power lines should be routed underground to preserve the view east from the footpath between Ingatestone Hall and Buttsbury Church. In the eventuality that it is decided to install power lines, then their exact placement matters and the further east they are positioned, the better.	The Applicant notes the respondent's comments, previous feedback, including comments on routeing in the vicinity of Ingatestone was responded to in 5.1 Consultation Report [APP-066], with further detail on routeing provided in 5.15 Design Development Report [APP-122]. National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way[18]. 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 is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground

[18] Electricity Act 1989, Section 9

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				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.
REP1-354	Gerald Rix	Landscape and visual	National Grid must demonstrate that they have considered the impact on the landscape and heritage as well as the ecological impact.	The Applicant notes this comment and has considered the impact on landscape, heritage and ecology. It has demonstrated this through the completion of an Environmental Impact Assessment, this can be found in the application documents [APP-122 – APP-287].
REP1-396	Julia Keen	Needs case	This just isn't wanted in our countryside. The damage that will be done is catastrophic. At the very least bury rather than build pylons. We owe it to next generations to do the right thing, not be guided by money and poor decisions.	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.
REP1-449	Rebecca Orchard	Landscape and visual	Dedham Vale is not ordinary countryside. It is nationally recognised for its exceptional natural beauty, historic character, and cultural significance. The statutory purpose of its designation is to conserve and enhance these qualities. Decision-makers are required to give great weight to protecting such landscapes. The introduction of large-scale overhead pylons would: • Industrialise open valley views • Interrupt historic sightlines • Introduce visually dominant vertical structures into a low-lying landscape • Permanently alter the character of the area This harm would be long-term and effectively irreversible. The visual and landscape impacts would extend far beyond the immediate footprint of the infrastructure. In a protected landscape, the threshold for allowing such harm must be exceptionally high. I am not convinced that the case for overriding this protection has been adequately demonstrated.	The Applicant notes the comments from the respondent. To confirm, the Project does not propose pylons within the Dedham Vale National Landscape, the Project is proposed to be underground through this designated area, therefore many of the comments made are not relevant to the application.
REP1-449	Rebecca Orchard	Health and wellbeing	Impact on Families and Community Wellbeing	As mentioned above, the Project is proposed to be underground through the Dedham Vale National Landscape. The Project however has completed and submitted an Environmental Impact Assessment

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			This proposal is not abstract infrastructure on a map. It directly affects the daily lives of those who live here. My children are growing up in this landscape. It shapes their: • Sense of place • Mental wellbeing • Connection to nature • Understanding of rural heritage The introduction of major industrial infrastructure into a protected valley fundamentally alters that lived environment. Rural communities should not be expected to absorb disproportionate impacts simply because they are less densely populated. National infrastructure should not come at the expense of the wellbeing of protected landscapes and the families who live within them.	including 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192] which has assessed the impact of the Project on health and wellbeing.
REP1-449	Rebecca Orchard	Alternatives	Consideration of Alternatives I am concerned that insufficient weight appears to have been given to less harmful alternatives, including: • Upgrading existing transmission infrastructure before constructing new lines • Coordinated offshore grid solutions to reduce onshore impact • Greater use of underground HVDC in sensitive and designated landscapes In areas of national landscape protection, the starting presumption should be to minimise harm wherever possible. Overhead lines should not be the default solution where alternatives may reduce permanent landscape damage. Where a designated National Landscape is affected, there should be clear and compelling evidence that: • The need for this specific form of development is proven • Less harmful alternatives have been fully and transparently examined • The level of harm is unavoidable I am not satisfied that this has been convincingly demonstrated.	As mentioned above, the Project is proposed to be underground through the Dedham Vale National Landscape. 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 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.
REP1-449	Rebecca Orchard	Landscape and visual	The cumulative impact on Dedham Vale must be assessed not only in technical terms but in terms of how it erodes the qualities for which the area is nationally protected.	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

Examination Library ID	Name	Topic	Matter	NG Response
				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]. 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)).
REP1-449	Rebecca Orchard	Landscape and visual	The burden of national grid expansion should not fall disproportionately on rural National Landscapes when alternatives may exist that would reduce harm.	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 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.
REP1-404	Leo Verhaag	Land and property	As far as I can see one aspect that doesn't appear in the many submissions that have been made is that of compensation to those affected by the proposed pylon scheme. One person I am aware of has already had confirmed by several estate agents that the value of his property will reduce very substantially (halved, assuming it can be sold). Similarly those whose livelihood will be affected (eg camp sites near the scheme, nature/recreational areas, farmers). The 'compensation' offered by NG is, I believe am right in saying, £125 off the annual energy bill for 10 (?) years. This of course is a laughable amount, it is not 'compensation' - if the full cost of compensation was taken into account then the proposed development would be hugely more expensive than projected by NG. I put it that NG must go back to the drawing board on their estimated costings, taking fully into account what full & proper compensation would look like.	The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the 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. The compensation notes by the respondent is offered by the government not National Grid. 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.
REP1-324	Darren Webster	Land and property	I continue to object to this proposal for the following reasons:- the location where one pylon will be situated is very close to a NDHA which will affect the outlook. One proposal (of many different ones that I have seen) has the compulsory purchase of one house in this location and another has the base of a pylon at the bottom of	The Applicant understands that the non-designated heritage asset referenced is the Vale, and therefore notes the comments made by the respondent are the same as submitted in REP1-265 therefore please refer to the responses provided

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			someone's garden. Will an independent EMF survey be conducted prior to any further consideration of location of this/ these pylons?- The vista which will be affected is part of the local village plan which has been submitted. This will protect it as a major characteristic of the village.- the proposal for the pylon requires considerable preliminary work to reroute another, lower voltage electricity line through our development. The suggestion is to dig up around 500m of private drive in order to do this causing considerable damage to the area and resulting (while the work is being undertaken) a huge amount of upheaval as there are 30 houses sharing one drive which it is suggested needs to be dug up to lay the cable.- commenting on the exact nature of this proposal has been very difficult due to the conflicting information that all residents in the neighbourhood has received. A meeting held with representatives from Fisher German caused more confusion when they couldn't decipher their own maps. This has caused stress and anxiety for many residents close to the proposed site, made worse by lack of specific communication from the electricity company and those acting on their behalf. We do not need your promotion materials, we need specific answers and a open discussion with people who know what they are talking about in order to comment effectively.	
REP1-348	Gaius John Napthine	Cost	I recall asking this elsewhere, but don't believe assurance has been provided as to how the costs associated with the work (however it proceeds in relation overground or underground/sea cabling) will be recovered and the period of time over which this is anticipated to take place.	National Grid 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 costs to build a new power transmission line. The cost is then gradually passed 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. As part of this regulatory framework we have to demonstrate to the regulator that the Project is offering value for money for the bill payer. The work put in to assess the different options available for this Project including the whole life costs was set out in 7**.17 Strategic Options Backcheck and Review [APP-355]**,
REP1-297	Anthony Banks	Historic Environment	As an owner of a listed building it is very clear to me that we are custodians of history for future generations. Listed buildings need to be preserved and nurtured, their stories told. If people do not want to buy a house because of its proximity to a badly executed grid upgrade then the houses will fall into disrepair and their stories lost forever. We owe our children and grandchildren the right to history of our green and pleasant land. We owe our nation its history. Upgrading the grid is not impossible to do without damaging beyond repair our historical assets. [***redacted***] is one of the 2000 listed properties directly affected by National Grid. This grade 2 house with a manorial history dates back to the doomsday book. The manor house was owned by Sir Robert de Sackville during the reign of Henry 1 in 1068. The fortification walls of the original manor are still visible today. By 1367 it became the property of the Hemenhale family and was the birth place of Ralph de Hemenhale's grandson, William de la Pole 4th Earl and first Duke of Suffolk. It has been owned by many historical figures, Sir	The specific property has been redacted from the WR and the Applicant is therefore unable to provide a specific response. The Applicant will respond in more detail if an unredacted submission can be provided.

Examination Library ID	Name	Topic	Matter	NG Response
			John Fastolf (Shakespeare's Falstaff) who created the deer parks that surround the house, Charles Brandon and Anne of Cleves. It has been owned by John Paston who wrote the Paston papers at the house by candlelight, although his ownership was disputed by Queen Elizabeth, wife of Henry VII. The setting and view from [***redacted***] has not changed for many hundreds of years and maps from the 1840s show the house as it is today with the fields around it set as they remain today. Under the Historic Environment Good Practice Guide to planning it is noted that settings and experiences of heritage assets should be protected as well as the assets themselves - and there is a reason for this. [***redacted***] will lose its historic character when haul roads are built and far higher than usual pylons seen within 400m. Its original configuration of deer parks and fields will be industrialised and its land use changed. [***redacted***] has two well used footpaths that run through the grounds, one will have a direct view of a proposed pylon. It is important to realise that if we, the owners of [***redacted***] wanted to change anything around the curtilage of the house, we would need to follow planning rules and regulations but it seems that National Grid can irreparably damage the setting and experience of this medieval manorial setting with ties to Tudor kings and queens without a blink of an eye. There are other ways to upgrade the grid without shattering British countryside and wiping out our important history.	
REP1-297	Anthony Banks	Alternatives	Why were there no National Grid (NG) alternatives to pylons presented as options at the consultations? Why were the consultations so badly timed and located that many people could not attend them? Why have NG all but ignored comments made at the consultations? Why are NG not prepared to make available for public evaluation their costs and cost comparisons of alternatives to pylons? What are they hiding? Why do NG think they can simply ignore the statutory rights and expectations of listed buildings? Why do NG believe they can ignore the Holford Rules? Why do NG assume they do not have to follow the Green Book? Why have NG not comprehensively researched the EMF health issues of living close to high voltage pylons? Why are NG proposing to use 100 year old engineering when modern technology offers more environmentally friendly alternatives? Why are NG apparently able to ignore the financial damage to properties along the route blighted by pylons and expect to give no compensation for the substantial devaluation of these properties? Why do NG simply dismiss the environmental damage that constructing the pylons will do to the East Anglian countryside which abounds with long-standing havens for wildlife and flora?	The Applicant notes that a number of questions were included in the WR that it is understood are directed to the ExA. The Applicant will respond to the ExA's, Written Questions at deadline 3.

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			Why are NG able to take down, with apparent impunity, many hundreds of ancient trees which can never be replaced? Why do NG not have to replace every tree they propose to take down to build this pylon route? Why are NG taking down pylons in other parts of the UK yet proposing to build the Norwich to Tilbury route with pylons? Why do NG believe they have every right able to destroy, for many years to come, prime agricultural East Anglian land? Why have NG given literally no consideration to the upheaval, gridlocking and noise to villages while building haul roads and constructing the pylons? Why do NG not have to justify or mitigate the massive Carbon emissions that will be generated by this project from haul roads to pylons, hard core to steel?	
REP1-479	Susan McGurk	Alternatives	I think it is crucial to seriously consider under sea methods. I am in favour of the project but not the miles of pylons which will be incredibly unsightly and ruin the area.	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.
REP1-472	Stephanie Hollick	Land and property	I just want to know is my electricity going to be affected whilst you carry these works out and is it going to effect me living in my home. Do I need to move house?	Electricity supply to properties should not be affected by the Project. There is also no need for residents to move house.
REP1-329	David Stacey	Land and property	As the proposals include compulsory acquisition powers, the Secretary of State would need to accept that there is a compelling case in the public interest to justify the proposed interference with private land rights and that the public benefits associated with the proposal outweigh any private loss.	The Applicants response to this can be found in 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138].
REP1-329	David Stacey	Alternatives	Less harmful routes and undergrounding options have not been adequately considered. There is evidence to suggest that an integrated offshore grid would be faster, cheaper, and more efficient, with studies citing significant savings. Large-scale loss of hedgerows, trees, and habitats will occur. While National Grid has mitigated impacts on designated sites such as SSSIs and ancient woodland, it fails to address the significant habitat loss on the much more significant areas which are not specifically designated.	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.

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				The Applicant and has considered the impact on ecology, including habitat loss in undesignated areas. Details can be found in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and associated appendices.
REP1-225	D & J Starling	Biodiversity, ecology and nature conservation	Destruction of woodland, harm to the local wildlife and accommodation works need to be assessed on site.	The Applicant and has considered the impact on ecology, including loss of woodland and harm to the local wildlife. Details can be found in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and associated appendices.
REP1-437	Paul Thompson	Needs case	Pylons are an outdated and destructive method of energy transmission. It will destroy valuable farming land and wildlife habitats. House prices are already being affected which will put thousands of people into negative equity and deny people of their pensions. Mortgage companies are refusing to lend on properties close to the proposed route. The mental health of rural communities is not being considered. The physical health risks of EMF are not being considered. Rural hospitality businesses will be forced to close. National Grid have acted in a very aggressive manner during the whole process. They want to do a cheap job which will not be fit for purpose. Power outages will become even more common as the climate changes and the weather becomes more volatile. Underground or offshore is used now in many European countries as a better solution to pylons. National Grid have not shown the true cost of the pylon scheme. Why should everyone and everything on the route suffer to keep their shareholders happy? There are better solutions.	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. The Applicant notes the other aspects of the response which have been responded to throughout the application documents: 7.8 Electric and Magnetic Field Compliance Report [APP-330] 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192] 6.15 Environmental Statement Chapter 15 - Socio-economics Recreation and Tourism [APP-265] 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 recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development. UK law does not include for compensation in cases of a loss of view or changes to a view. Under the Compulsory Purchase Code, property owners and

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				businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
REP1-382	Jane Lushington	Alternatives	the application for DCO has not considered alternatives or presented costs in a transpsrent. The inspectorate should ask for alternatives - e.g. offshore or undergrounding the route, as used by NGET and NG Ventures for other projects. and the project must be considered as part of an holistic transmission strategy	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. Costs, including for alternatives are presented in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**,
REP1-487	Timothy Hatchman	Needs case	This project should not go ahead because of the impact to local communities, the destruction of natural habitats, the loss of value to house and businesses and the huge local disruption it will cause in it's proposed construction. All these points are laid out by local authorities who I am in full support of.	The Applicant notes the respondent's objection.
REP1-366	Harry Lushington	Cost	Cost. The route is only half way to the source of power in the North Sea. Each of 10 windfarms then has to put in the remaining connections. NGET reports its solution is the cheapest – but this is only the cheapest for National Grid and leaves the consumer picking up the bill. This is an expensive solution. Recognising that each windfarm is not at the same endpoint the cost is at least 2 times the length of powerline needed, where NGET is providing only half the connection. The end consumer will carry the cost.	NGET has an established transmission network and we operate that within the operational requirements, offering customers connection points is a balance of utilitising existing system capacity and the need for new infrastructure. As NGET operate a network it is not always the most efficient to take the transmission network to the point of connection. NGET is not responsible for the chosen methods of transporting electricity to the transmission network and that is all part of the customers business case that they would consider at the time of acceptance of any connection offer.
REP1-366	Harry Lushington	Alternatives	The technology is inappropriate. All power suppliers are moving to HVDC (High Voltage DC), and moving away from HVAC (the technology used on pylons). This move to HVDC is recommended by NESO. All windfarms produce DC. AC is a leftover from when power was moved from central power stations to distribute out to the regions. NGET reports that undergrounding is uneconomic. This is true for AC as a wide trench is needed. But not true for DC which can be placed much closer together. Underground DC also needs less maintenance over time. However NGET has failed to provide the difference in the economics between underground DC and AC pylons. Further, NESO suggests that undergrounding HVDC becomes cheaper still in the near future due to commoditisation of the technology (all countries are moving in the same direction, except possibly the UK).	National Grid considered alternatives in the **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in **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).

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			The current approach by NGET has been designed to exploit the rush to 2030, where a more considered solution with advances in technology will have a greater impact for all. To justify National Grid's solution it has: a) Forced an approach that all technology used must be pre 2010. Which is ironic given the green revolution and windfarms are after that period. This luddite tactic will cause significant consumer and national harm. b) In order to justify not using undergrounding, NGET has stated the geological conditions are unsuitable. But Anglian Water has just put in new water mains across East Anglia on a similar path without issue – underground. The "facts" that National Grid has produced to justify its approach are simply not facts.	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 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems. The Applicant has not stated the reason for not utilising underground cable is due to geological conditions being unsuitable (although this is a factor in the technical feasibility of constructing the project and was a contributory factor to the decision on the Waveney Valley alternative). National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way19. 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 is not even displaced where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea, where the benefits clearly outweigh any extra economic, social or environmental impacts. 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.
REP1-366	Harry Lushington	Alternatives	The economic damage inflicted by NGET's solution has not been taken into account. There has been no financial review, even NGET's own costs have not been clearly articulated, including what is and what is not covered in the scope of the N2T solution. Its proposal covers installing pylons twice the size of existing pylons,	The costs for the Project are provided in **7.19 2023 - Strategic Options Backcheck and Review [APP-357],** which includes information about what is or is not included.

[19] Electricity Act 1989, Section 9

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			and a new private road dissecting East Anglia. No consideration has been provided for cutting communities in two, the blight caused to both businesses and residents, and the cost of disruption. For example, in our local village two small farmers will have their land bisected and will lose significant square meterage to production, effectively rendering their businesses unviable.	The Applicant recognises that construction activities, including temporary land take, access routes and working areas, can affect how agricultural land is operated during the construction phase. The Project has been designed to minimise permanent land take wherever reasonably practicable, with the majority of agricultural land affected on a temporary basis only, and with land expected to be reinstated following construction in accordance with the **7.2 Code of Construction Practice [Revision B]** and associated management plans. Construction methods and layouts will continue to be refined as the Project progresses, and the Applicant will work with affected landowners to seek, where reasonably practicable, to maintain access, accommodate machinery movements and reduce disruption to agricultural operations during construction. This includes consideration of haul routes, access points, phasing of works and reinstatement measures, recognising that detailed arrangements are secured post consent through the DCO Requirements. Where, despite reasonable mitigation, agricultural operations are adversely affected during construction or as a result of the rights sought, the Applicant confirms that compensation is payable in accordance with the Compensation Code. This includes compensation for temporary disturbance and any demonstrable losses arising directly from the Project.
REP1-336	Peter Batchelor	Landscape and visual	Severe Landscape and Visual Harm The Wid Valley east of Ingatestone is an area of exceptional local landscape quality, characterised by open valley views, mature vegetation, historic field patterns and a relative absence of modern infrastructure. The introduction of 50-metre lattice pylons (TB187–TB199) would: • Dominate the skyline and interrupt long-established views; • Introduce overtly industrial vertical elements into a predominantly rural landscape; • Create substantial cumulative visual impact in an area currently largely free from overhead transmission lines; • Permanently erode the tranquillity and undeveloped character of the valley. The magnitude of change would be profound and irreversible. The scale of the proposed lattice structures is wholly discordant with the existing landscape context.	The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routeing and siting. However, the Applicant notes the concerns raised regarding the potential effects of the Project where it crosses the Wid Valley, between pylons TB187 and TB199. 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. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]**. The area around Ingatestone and Fryerning is located within Landscape Character Area (LCA) D2: Brentwood Hills. As set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**, significant adverse effects are identified within approximately 1.5 km of the Project, during construction and operation.

Examination Library ID	Name	Topic	Matter	NG Response
				The area around Ingatestone and Fryerning is located within Visual Receptor Areas (VRA) F11 Margaretting and Stock, G1 Ingatestone and Fryerning, and G2 Billericay West. Significant adverse effects are identified within approximately 1.5 km of the Project, during construction and operation, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Cumulative effects are set out in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]** and supporting appendices. No significant cumulative visual effects are identified within VRA F11 Margaretting and Stock, VRA G1 Ingatestone and Fryerning and VRA G2 Billericay West.
REP1-336	Peter Batchelor	Historic environment	Heritage and Local Amenity Impacts The proposed pylons would adversely affect: • The setting of heritage assets within and around the valley; • Conservation areas and historic rural settlement patterns; • Public rights of way and recreational routes where open views form a key component of user experience; • The wider appreciation of the parish's rural character. The industrial form of traditional lattice pylons would be visually intrusive within historic and rural settings and would materially diminish public enjoyment of valued community spaces.	The Applicant acknowledges that the settings of some designated assets and some medium/high value non-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 on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of these assets falls within the Order Limits. With regard to the Ingatestone and Fryerning conservation areas; Ingatestone conservation area was scoped out of ES assessment in accordance with the agreed methodology set out in **6.19 Scoping Report [APP288 – APP295]**; whilst **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** concluded that the setting of Fryerning conservation area does not extend to the Order Limits. Landscape and visual effects on the same stretch are illustrated by general LVIA Viewpoints 7.01 and 7.09 (**7.12 Visualisations - Part 7 of 9 [APP-349]**) and by Heritage Viewpoints HE32a, HE32b and HE41 (photomontage) (**7.12 Visualisations - Part 9 of 9 [APP-351]**), which together confirm that the alignment minimises intrusion into key views. In relation to effects on landscape character and visual amenity, please refer to the Applicant's response to 1. Severe Landscape and Visual Harm, above. The area around Ingatestone and Fryerning is located within Visual Receptor Areas (VRA) F11 Margaretting and Stock, G1 Ingatestone and Fryerning, and G2 Billericay West. Significant adverse effects are identified within approximately 1.5 km of the Project, during construction and operation, as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. This includes significant effects on users of Public Rights of Way (PRoW). The assessment of effects on long-distance routes, including St Peter's Way, is presented in Section 13.12.

Examination Library ID	Name	Topic	Matter	NG Response
REP1-336	Peter Batchelor	Alternatives	Failure to Give Adequate Weight to Less Intrusive Alternatives I'm concerned that alternatives — particularly offshore routing and underground cabling — have been discounted primarily on cost grounds. While cost is clearly a material consideration, it cannot in itself justify proposals that would result in significant and permanent environmental harm. National policy requires a balanced assessment of environmental, social and economic factors. A purely financial comparison, without transparent cost-benefit and environmental impact analysis specific to sensitive locations such as the Wid Valley, is insufficient. Similarly, the apparent dismissal of modern, lower-impact overhead designs — most notably the T-pylon — has not been convincingly or transparently justified.	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.
			The T-pylon is materially shorter than a conventional 400kV lattice pylon, has a smaller footprint, and presents a more streamlined and less visually intrusive form. National Grid's own published material acknowledges that the reduced height and contemporary design of the T-pylon can lessen visual impacts in sensitive landscapes. I therefore consider the targeted use of T-pylons within the Wid Valley to be a proportionate, reasonable and deliverable mitigation measure.	The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics[20] 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 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.

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

Examination Library ID	Name	Topic	Matter	NG Response
REP1-496	Xandie Nutting	Biodiversity, ecology and nature conservation	My clients are concerned that comprehensive ecological surveys have not been carried out, meaning National Grid cannot fully understand or quantify the impacts their proposals will have on the biodiversity and habitats within the woodland. Without this information, it is not possible to ensure that appropriate mitigation or avoidance measures are put in place to protect this important habitat.	The area of land known as Ruffian Dog Park, between TB90 - TB91, has been subject to a full range of ecological surveys over 2022-2025. These surveys have included habitats, bats, badgers, reptiles and birds and the results and assessment of impacts on ecological receptors are presented within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and the associated ecological appendices. Surveys have identified the presence of broad-leaved woodland habitat, which is classified as Section 41 priority habitat under the Natural Environment and Rural Communities (NERC) Act 2006. The Applicant has sought to minimise impacts on the woodland habitat at this location with careful design. Both pylons TB90 and TB91 have been positioned outside of the woodland and the construction haul road has been diverted around the woodland to minimise impacts where practicable. There will however be some vegetation removal/management required associated with oversail over the 400kV overhead line. Measures to mitigate the impacts have been set out within the **7.4 Outline Landscape and Ecological Management Plan (Revision C). 7.4 Outline Landscape and Ecological Management Plan (Revision C)** 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 wider environmental and societal benefits.
REP1-496	Xandie Nutting	Biodiversity, ecology and nature conservation	The oversail passes through the centre of the dog walking area, and during construction the entire area will be unusable, with tree and vegetation clearance proposed. National Grid has not provided timescales for the works or details on how the land will be reinstated. Business will be lost and in a worst case scenario the dog walking field could be closed for several months or longer until the works are complete and the land restored.	The Applicant acknowledges the concern regarding the temporary effects of construction activities on land currently used for dog walking, including the potential for temporary loss of access, vegetation clearance and disturbance during construction. At this stage, the Application seeks consent within defined Order Limits and does not fix detailed construction programming or the precise duration of individual activities at specific locations. These matters will be developed by the appointed contractor and controlled through the Outline Code of Construction Practice (CoCP), which secures commitments relating to access management, vegetation clearance, protection of retained land and reinstatement following construction. Where land is required temporarily, it will be returned to a condition suitable for its former use, subject to reasonable wear and tear, and reinstatement will be undertaken in accordance with the final CoCP and any landowner specific agreements. The Applicant recognises that temporary disruption may give rise to loss during construction; however, compensation for any losses arising from the exercise of statutory powers is provided for separately under the Compensation. The Applicant will continue to engage the affected party to minimise disruption, provide mitigation and to provide further information as construction details are refined.
REP1-375	Jackie Allum	Consultation	The lack of proper consultation is against the law and, therefore “the examining authorities should pause the examination; (…) the Secretary of State lacks the legal power to grant the development	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

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			consent" (Sir Bernard Jenkin MP). A consultation happens when proposals are still formative, whereas the choice of a 400kw overhead transmission line and lattice pylons was imposed on the public without alternative proposals.	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). 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 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. 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. 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 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 reports and 5.1 Consultation Report [APP-066]. 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.
REP1-375	Jackie Allum	Needs case	There is insufficient clarity on the need for a connection date by 2031. More than one contribution highlighted that the independent review commissioned by Norfolk Suffok and Essex County Councils suggested that current network capacity is likely to be sufficient for connections until 2035. This would allow time for appropriate analysis of alternative options.	The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks and published its response in April 2024, which is available on the Project website. The Applicant concluded that it does not agree with the report's conclusions that a delay to 2035 would be possible. The requirement for energy security independence and net zero are to be achieved as soon as possible. The NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis[21], Section 2.4: Securing Works for a 2030 delivery, states that the requirements indicate that the Project should be delivered sooner than 2031 if possible, and that a delay would have significant consequences to consumers of constraint costs and would impact the Applicant's obligations under the planning requirements and its transmission licence.

[21] National Energy System Operator (NESO) (2024) *Clean Power 2030 Annex 2: Networks, connections and network access analysis*

Examination Library ID	Name	Topic	Matter	NG Response
				Paragraph 2.8.5 of National Policy Statement EN-5 (2024) makes it clear that the Applicant, as a transmission company, is required to facilitate generation, and this is reflected in its transmission licence obligation D2, an obligation to provide transmission services when requested. The delay to any investment would incur the cost of £2.7 billion, as set out in Annex 2 of the NESO Clean Power 2030 report.
REP1-375	Jackie Allum	Costs	Lack of transparency of costs: more than once the contributions highlighted how other alternatives have been vaguely dismissed by NG as more costly than the one it wishes to impose. ESO's East Anglia Network Study of March 2024 shows that an underground High Voltage Direct Current (HVDC) is a cost-comparable, and potentially more cost-effective, alternative to traditional overhead AC pylons, indeed 600million cheaper if delivery is delayed beyond 2030.	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.
REP1-375	Jackie Allum	Land Use	(Pylons East Anglia) has pointed out the problem of the presence of Acid Sulphate Soils potentially in at least 3 areas along the pylon route. She defined them as the nastiest soils in the world causing no harm when left undisturbed but once exposed to air they generate sulphuric acid with well documented devastating consequences to wildlife, animals and human health risks. These soils would also erode the pylons themselves. There is no evidence of tests being carried out by National Grid for these potential soils.	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[17] by competent soil scientists with the competencies as set out by the British Society of Soil Science18. 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.
REP1-375	Jackie Allum	Consultation	National Grid has been defined as "incompetent" and unwilling to engage with the public by many, and of using Fisher German as buffer between the interested parties and themselves, and often not responding at all to queries.	The Applicant notes the respondent's feedback. The Applicant has undertaken statutory and non statutory consultation and continues to offer engagement through its appointed land agents. The Applicant remains willing to continue dialogue to explain the proposals and to discuss how construction impacts may be managed as the Project progresses. The Applicant has also responded to all feedback the 5.1 Consultation Report [APP-066].
REP1-375	Jackie Allum	Alternatives	Moreover, one contribution expressed concern that the arguments used by National Grid to justify the Overhead AC solution seem to contradict what has been said for the Eastern Green Link projects,	National Grid considered alternatives in the **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC

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			namely that high-voltage direct current (HVDC) subsea cables are considered a superior, more controllable technology compared to traditional onshore HVAC (high voltage alternating current) lines, offering lower delivery risks and favourable cost-to-benefit ratios for connecting Scottish renewables to England. It has been underlined how the same should apply also to the Norwich to Tilbury Project.	gas insulated line and high voltage direct current (HVDC) Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in 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 1800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
REP1-384	Jayne Marshall	Land use	In May of 1991, Eastern Generation Ltd, a wholly owned subsidiary of Eastern Electricity, submitted a formal proposal to build a 380 MW Combined Cycle Gas Turbine (CCGT) power station at the very same place National Grid (NG) proposes to site its proposed East Anglian Connection Node (EACN) for its Norwich to Tilbury project - on the border of Ardleigh and Little Bromley in Essex. The 'Rural Power Station Action Group' (RPSAG) was formed, and its members (myself Included) with much knowledge and varied expertise set out to demonstrate that the proposed site had indeed, been poorly chosen. Based on local evidence, Eastern Electricity was refused permission due to the rural nature of the area! Thirty Five years later, we are now head on with National Grid (NG) and its proposals to mutilate Grade 1, Best Most Versatile (BMV) land that still, after all this time, remains unchanged, yet still continues to provide an all important contribution to the country's essential food production. I ask the question as to why NG, before considering other options to upgrade the grid system (ie Integrated offshore grid, HVDC undergrounding), would think that it is better positioned to achieve success, when in actual fact, it failed to look at brownfield sites where access would be better and the cumulative harms on the environment and local communities considerably less! Why take the gamble on a site previously denied such massive industrial development? When Eastern Generation was denied development consent, national press portrayed it as a David and Goliath situation!	Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant's connections by underground cable. The preliminary location for the EACN Substation was developed as set out in **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various **Design Development Reports [APP-122, APP-358, APP-359 and APP-360]**.

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