



Application by National Grid Electricity Transmission for the Norwich to Tilbury project

The Examining Authority's written questions and requests for information (ExQ1): Issued on 20 March 2026

Responses are due by deadline 3: Friday 10 April 2026

The following table sets out the Examining Authority's (ExA's) written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided as **annex C** to the [Rule 6 letter](#) dated 13 January 2026. Additional topics have been added which may have arisen from representations, and to assist in the ExA's assessment of the application against relevant policies.

There are a large number of written questions, many of which are lengthy and/ or detailed. The scale of the proposed development is significant both in nature and geographically, and it encompasses 13 different local authority areas. The ExA would like to stress to the applicant and all interested parties (IPs) that the ExA need comprehensive answers to its written questions at this stage because the examination period is limited to a maximum of 6 months, and time in the hearing sessions planned for the weeks commencing 27 April and 22 June will be limited. Such hearings will be focused to those issues which the ExA seek oral contributions, so as to assist in its understanding of the application and to inform its recommendation to the Secretary of State. There will not be sufficient time within those hearings to cover the wide range of issues encountered in the ExA's review of the application documents and relating to submissions from IPs.

All parties are reminded that the examination is a primarily written process.

Due to the period of time between deadline 2 (12 March 2026) and the issuing of these questions, it has not been possible for the ExA to fully evaluate all the information submitted at that deadline. Unless otherwise stated, the questions relate to submissions received up to deadline 1 only. It is therefore possible that deadline 2 submissions may have already provided the information requested. If that is the case, then there is no need for a party to re-submit the information. Therefore, in response to the question, please signpost where the information can be found by specific reference within a document identified through its Examination Library reference.

Column 2 of the table indicates which IPs and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.



When the table states '**all local authorities**' this refers to the following: Norfolk County Council (CC), Suffolk CC, Essex CC, South Norfolk District Council (DC), Mid Suffolk DC, Babergh DC, Tendring DC, Colchester City Council, Braintree DC, Chelmsford City Council, Brentwood Borough Council (BC), Basildon BC and Thurrock Council.

Each question has a unique reference number which starts with a suffix for the topic then has an issue number and a question number. For example, the first question on air quality issues is identified as AQ 1.1. When you are answering a question, please start your answer by quoting the unique reference number.

You should respond to the questions by using the **Have your say** function on the [project page of the National Infrastructure website](#) and selecting 'Responses to Examining Authority's First Written Questions (ExQ1)' when asked.

If you are responding to a small number of questions, you can submit your answers by choosing 'Make a comment' and entering your answers in the 'Your comments' box. If you are answering a larger number of questions you should download a copy of the Microsoft Word version of the document, enter your answers and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

Microsoft Word version: Examining Authority's Written Questions 1 (ExQ1)



Abbreviations used:

Abbreviation	Description	Abbreviation	Description
AC	Alternative Current	CIEEM	Chartered Institute of Ecology and Environmental Management
AI	Artificial Intelligence	CNP	Critical National Priority
AIL	Abnormal Indivisible Load	CoCP	Code of Construction Practice
AIS	Air Insulated Switchgear	CPRSS	Corridor and Preliminary Routeing Siting Study
ALBA	Ardleigh/ Little Bromley Area	CSE	Cable Sealing End
ALC	Agricultural Land Classification	CSNP	Centralised Strategic Network Plan
AMS	Archaeological Mitigation Strategy	CTMP	Construction Traffic Management Plan
AP	Affected Person	CWS	County Wildlife Site
BAT	Best Available Technique	DASSI	Design Approach for Site Specific Infrastructure
BATNEEC	Best Available Technique Not Entailing Excessive Cost	DC	District Council
BC	Borough Council	DCO	Development Consent Order
BESS	Battery Energy Storage System	DESNZ	Department for Energy Security and Net Zero
BMV	Best and Most Versatile Agricultural Land	DHGV	Dunton Hills Garden Village
BNG	Biodiversity Net Gain	DMP	Dust Management Plan
BoR	Book of Reference	DPD	Development Plan Document
CA	Compulsory Acquisition	EACN	East Anglia Connection Node
CAA	Civil Aviation Authority	ECoW	Ecological Clerk of Works
CC	County Council	EIA Regulations	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017



Abbreviation	Description	Abbreviation	Description
EM	Explanatory Memorandum	km	Kilometres
EMF	Electric and Magnetic Fields	LEMP	Landscape and Ecological Management Plan
ES	Environmental Statement	LIR	Local Impact Report
ETDP	Electricity Transmission Design Principles	LLFA	Lead Local Flood Authorities
ExA	Examining Authority	LoD	Limits of Deviation
ExQ1	Examining Authority's First Written Questions	LONI	Letter of No Impediment
GIS	Gas Insulated Switchgear	LRT	Land Rights Tracker
FRA	Flood Risk Assessment	LSOA	Lower Layer Super Output Area
ha	Hectares	LWS	Local Wildlife Sites
HGV	Heavy Goods Vehicle	m	Metres
HLC	Historic Landscape Characterisations	MW	Megawatts
HMMP	Habitat Management and Monitoring Plan	NDHA	Non-Designated Heritage Assets
HoTs	Heads of Terms	NE	Natural England
HRA	Habitats Regulations Assessment	NERC Act	Natural Environment and Rural Communities (NERC) Act 2006
IAPI	Initial Assessment of Principal Issues	NESO	National Energy System Operator
ICNIRP	International Commission on Non-Ionizing Radiation Protection	NL	National Landscape
IMD	Index of Multiple Deprivation	NPPF	National Planning Policy Framework
INNS	Invasive Non-Native Species	NPS	National Policy Statement
IP	Interested Party/ Parties	NSIP	Nationally Significant Infrastructure Project
ISH1	Issue Specific Hearing 1	NSR	Noise Sensitive Receptors



Abbreviation	Description	Abbreviation	Description
OFH	Open Floor Hearing	SPD	Supplementary Planning Document
OHL	Overhead Line	SSEP	Strategic Spatial Energy Plan
PA2008	Planning Act 2008	SSSI	Site of Special Scientific Interest
PAR	Primary Access Route	TA	Transport Assessment
PC	Parish Council	TP	Temporary Possession
PRoW	Public Right(s) of Way	TPO	Tree Preservation Order
RAG	Red/ Amber/ Green	TTRO	Temporary Traffic Regulation Order
RR	Relevant Representation	USI	Unaccompanied Site Inspection
RVAA	Residential Visual Amenity Assessment	VP	Viewpoint
SAC	Special Area of Conservation	VRA	Visual Receptor Area
SOBR	Strategic Options Backcheck and Review	WR	Written Representation
SoCG	Statement of Common Ground	WSI	Written Scheme of Investigation
SoR	Statement of Reasons	ZOI	Zone of Influence

The Examination Library

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: [Norwich to Tilbury Examination Library](#)

It will be updated as the examination progresses.

Citation of questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number, for example GEN 1.1 – refers to the first question in this table.



Index

GEN General and cross-topic questions7

DES Design, parameters and other details of the proposed development 13

ALT Alternatives 15

AQ Air quality and emissions 17

BIO Biodiversity, ecology and natural environment 18

HRA Habitats Regulations Assessment.....24

CA Compulsory acquisition, temporary possession and land rights24

DCO Draft Development Consent Order28

Articles 28

Schedules 33

HE Historic environment37

HW Health and wellbeing45

LUS Land use and soils, green infrastructure47

LV Landscape and visual50

MW Minerals and Waste57

NV Noise and vibration58

PRoW Public Rights of Way61

SS Safety and security62

SET Socio-economics, tourism and recreation.....64

TT Traffic and transport.....66

WE Water environment: flood risk, hydrology and drainage..... 69

ExQ1	Question to:	Question:
GEN General and cross-topic questions		
GEN 1.1	The applicant All interested parties	<p>Responses to submissions by Interested Parties</p> <p>It is essential for the successful delivery of the timetable of the examination that all parties are able to easily interpret the applicant's responses to comments made by interested parties (IPs) in their submissions both in writing and orally.</p> <p>The ExA issued a Rule 17 letter on 3 March [PD-012] and responded to the applicant's response to that letter on 6 March [PD-013]. The letters set out the ExA's concerns relating to the lack of detail in the applicants response to relevant representations (RRs) [REP1-132], and there were similar issues with the applicants response to submissions to the open floor hearings (OFH) [REP1-140].</p> <p>The ExA accepts that a number of issues are common to a large number of IPs. Nonetheless, those responses which include specific locational detail (for example to a certain natural environment designation, landscape feature, heritage asset, affected business and so on) which is not common to other submissions should be specifically responded and not grouped with the issues which arise from the project as a whole. Submissions by all statutory consultees should also be responded to in appropriate detail. Statutory consultees include parish councils. Responses should not only refer to the relevant section of the Environmental Statement (ES) or other application document, but should also provide a brief summary so that the applicants response can be easily interpreted by all parties.</p> <p>The ExA expects this approach to be taken throughout the examination.</p> <p>In doing so, the applicant and other parties are advised to title issues as they are listed in the initial assessment of principal issues (IAP1) as set out in annex C of the Rule 6 letter [PD-009], and other issues as titled in the categories within these written questions.</p>
GEN 1.2	The applicant All parties	<p>Artificial Intelligence</p> <p>The Planning Inspectorate issued updated guidance in relation to the use of artificial intelligence (AI) on 20 March 2026.</p> <p>All parties are asked to review the guidance carefully, and ensure that in any answers to ExQ1 or in other written submissions where AI has been used a short statement is provided. In particular, the ExA requests that you make checks on the submission and take responsibility for the factual accuracy of its content. All parties are directed to the ExA's procedural decision in annex F(1) of the Rule 6 letter dated 13 January 2026 [PD-009]. The ExA's position on this was also set out at the preliminary meeting on 10 February 2026 [EV3-001] to [EV3-005].</p>
GEN 1.3	All local authorities in particular: Norfolk CC Essex CC Colchester CC Tendring DC Basildon BC Thurrock Council Parish councils: Swainsthorpe Newton Flotman Hintlesham and Chattisham Copdock and Washbrook	<p>National and local planning policy compliance tracker</p> <p>Since the policy compliance document submitted with the application [APP-086] was produced (1 April 2025) a number of local and national planning policies have been updated or newly issued. This includes the energy suite of National Policy Statements (NPS) EN-1, EN-3 and EN-5 (Updated National Policy Statements). The transition provisions set out in section 1.6 of NPS EN-1 (December 2025) 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.</p> <p>The applicant submitted a policy compliance tracker [REP1-133] at deadline 1. It includes an assessment of the updated NPS alongside those which are designated, and a number of new insertions including the consultation draft National Planning Policy Framework (NPPF), local plan policies and neighbourhood plan policies.</p> <p>The listed relevant planning authorities and Parish Councils (PC) who have a newly adopted or emerging local plan and neighbourhood plan are invited to confirm that the policy compliance tracker is an accurate representation of their newly designated and/ or emerging policies and provide any additional comments relating to the applicant's regard to those policies.</p> <p>All relevant planning authorities are invited to make comment on the content of the compliance tracker. If you have already dealt with changes to policy in your local impact report (LIR) there is no need to provide a response.</p>
GEN 1.4	All local authorities	<p>Development plan documents and supplementary planning documents</p> <p>All local authorities are asked to review the listed development plan documents (DPD) and supplementary planning documents (SPD) (including masterplans) as currently set out in the planning statement [APP-085] (paragraph 2.5.12) and provide any updates, setting out which have been adopted, updated, or are emerging since production of the planning statement.</p>
GEN 1.5	The applicant Norfolk CC Suffolk CC Ipswich BC Colchester CC	<p>Local government reorganisation</p> <p>Local elections are to take place in a number of the host local authorities on 7 May 2026, and many will be undergoing local government reorganisation and/ or devolution.</p> <p>The listed local authorities are asked to set out:</p> <p>a) any implications for their continuing involvement in the examination and how a consistent approach to their responses can be assured</p>

ExQ1	Question to:	Question:
	Thurrock Council	<p>b) any implications for their role as a discharging authority post-consent, and whether any changes to the draft Development Consent Order (DCO) would be necessary</p> <p>The applicant: explain any changes to its ongoing dialogue with the affected local authorities and how it intends to deal with any changes in the draft DCO.</p>
GEN 1.6	<p>All local authorities MOD Natural England Environment Agency Any IPs who wish to make comment</p>	<p>Critical national priority</p> <p>The planning statement [APP-085] references the need for the proposed development in the context of the urgent need for renewable energy generation within the UK, and in doing so, it refers to the presumption specifically in relation to critical national priority (CNP) infrastructure. Paragraph 4.2.7 of NPS EN-1 (2023) makes it clear that the CNP policy does not create an additional or cumulative need case or weighting for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. It will be given consideration by the ExA when making its recommendation to the Secretary of State, who will apply the CNP policy in its decision making specifically in reference to any residual impacts that have been identified.</p> <p>NPS EN-1 paragraph 4.1.7 notes that for projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. Paragraphs 7.2.7 to 7.2.28 of the planning statement [APP-085] sets out a summary of the potential residual impacts (non Habitats Regulations Assessment (HRA) impacts) which may remain after the mitigation hierarchy has been applied. These relate to the relevant exceptions listed in the CNP policy at NPS EN-1 paragraph 4.2.15: human health and public safety, defence, irreplaceable habitats, the achievement of Net Zero, and flood risk.</p> <p>Paragraph 4.2.17 of NPS EN-1 sets out that the Secretary of State will also take as a starting point that CNP infrastructure will meet a number of policy tests including in relation to green belt, sites of special scientific interest (SSSI), nationally designated landscapes and heritage assets.</p> <p>IPs are invited to review the applicant's consideration of CNP in the planning statement [APP-085] (in particular paragraphs 7.2.52 to 7.2.257) and the policy compliance tracker [REP1-133] (tables 1.4 and 1.5), and state if they agree with its approach, including in respect of the updated NPS published in December 2025 (which the ExA considers to be an important and relevant consideration in decision making)</p> <p>In particular the ExA requests all local authorities and the listed statutory consultees to provide comment on the policy tests on matters of human health and public safety, defence, irreplaceable habitats, flood risk, green belt, sites of special scientific interest, nationally designated landscapes and heritage assets, as well as the HRA.</p>
GEN 1.7	The applicant	<p>Centralised Strategic Network Plan (CSNP)</p> <p>Chapter 3 of NPS EN-1 (2025) makes reference to the forthcoming CSNP (paragraph 3.2.5).</p> <p>Noting that the consultation period for responding to the approach by the National Energy System Operator (NESO) to strategic energy planning closed in January 2026, and that the timescales for its completion are currently unknown, notwithstanding the update in the applicant's policy compliance tracker [REP1-133], the applicant (and any IPs who wish to comment) is asked to clarify its understanding of how the publication of the CSNP might affect the progression of the proposed development through examination, and implications for the Secretary of State's decision.</p>
GEN 1.8	The applicant	<p>Community benefit</p> <p>The DESNZ guidance Community Funds for Transmission Infrastructure was updated in November 2025. It sets out the government's expectation for how communities that live near onshore electricity transmission infrastructure should benefit from the development of this infrastructure, with the use of community funds. The government through this document makes clear that it expects engagement with communities at an early stage.</p> <p>The applicant is asked to summarise any progress made in engagement with this process and its plans in progressing community funds in the future.</p>
GEN 1.9	<p>Lower Thames Crossing Project Port of Tilbury London Limited Sheringham Shoal and Dudgeon Extensions Projco Limited Five Estuaries Offshore Wind Farm North Falls Offshore Wind Farm Longfield Solar Energy Farm Limited EcoPower Suffolk Limited Brickkiln Farm Solar Limited Crouch Solar Farm Limited</p>	<p>Report on interrelationship with other infrastructure projects</p> <p>A report on interrelationship with other infrastructure projects was submitted by the applicant at deadline 1 [REP1-134].</p> <p>The applicants/ developers of the projects listed in table 2.1 of the report (those which are IPs in this examination) are asked to provide comments on the content of the report, cross referencing to any relevant statements of common ground (SoCG) where necessary.</p>

ExQ1	Question to:	Question:
	Eden Renewables Innova Renewables Limited (Hall Farm BESS and Parkgate Solar Farm) Crest Nicholson Conrad Energy Pivoted Power Ingrebourne Valley Ltd Sewells Reservoir Construction (SRC) Group Limited	
GEN 1.10	The applicant	<p>Other infrastructure projects</p> <p>The ExA is aware that the application for East Pye Solar has recently been submitted to the Planning Inspectorate. The applicant is asked to provide a summary of this project and any interrelationships with it, clarify whether an update to the cumulative assessment is necessary, and include this within the next version of the interrelationship report which is expected to be submitted by deadline 4.</p> <p>Should any other nearby projects get added to the national infrastructure project website during the examination, the applicant is asked to do the same.</p>
GEN 1.11	The applicant South Norfolk Council Norfolk CC	<p>Norwich Main substation (Work No.1)</p> <p>The ExA noted on Unaccompanied Site Inspection (USI) 1 [EV1-002] that construction works relating to the extension of Norwich Main substation are well advanced.</p> <p>It is unclear where Work No.1 (b) to (e) are proposed within the existing substation and their illustrative design is not provided as it is for all other substations on the 'Design and layout plans subs and cables' [APP-041].</p> <p>The applicant is asked to clarify:</p> <ol style="list-style-type: none"> Have any of the proposed works listed under Work No.1 already taken place? Explain what current works are completed, under construction and are yet to be implemented at and around Norwich Main (South Norfolk Council and Norfolk CC are also invited to comment). Clarify whether there will be any overlap with the completion of the construction of Hornsea 3 offshore wind farm grid connection and associated works including mitigation areas.
GEN 1.12	The applicant	<p>Solar farms and battery energy storage system (BESS) interactions</p> <p>The interrelationship report [REP1-134] and a number of the RRs refer to a range of solar farms and BESS which interact with the order limits or are in close proximity to the proposed development, both Nationally Significant Infrastructure Project(s) (NSIP) and planning application(s), and at differing stages of proposals or development. The promoters/ developers/ operators of a number of solar farms and BESS have indicated that their infrastructure, including grid connections, would interact with the proposed development.</p> <p>Could the applicant provide a summary explanation of how in practice the interaction would operate and whether the solar farms/ BESS listed in the interrelationship report [REP1-134] are reliant on the proposed development for their own developments to proceed.</p>
GEN 1.13	The applicant Pivoted Power LLP	<p>BESS at Norwich Main Substation</p> <p>ES chapter 4 (project description) design scenario 1 (Norwich Main substation section A) [APP-130] refers to the limits of deviation and order limits being widened in this location 'to allow flexibility to change the alignment should planning consent not be granted for a battery storage facility to the south of the substation', and notes that sensitivity testing has been carried out to allow an overhead line (OHL) alignment to be accommodated further east should the BESS not be granted. Could the applicant explain:</p> <ul style="list-style-type: none"> Which BESS and planning application is being referred to in the area to the south of Norwich Main substation? The interrelationship report [REP1-134] at paragraph 3.3.3 refers to a BESS in this area however the report and the SoCG with Pivoted Power [REP1-094] indicate that planning permission has been granted, with the RR from Pivoted Power LLP [RR-2963] referring to an electricity cable having been laid in 2025. Please clarify. Why the widened order limits are necessary in this respect. <p>Pivoted Power are asked to provide an update on the status of their project including timescales for construction.</p>

ExQ1	Question to:	Question:
GEN 1.14	The applicant	<p>East Anglia Connection Node (EACN) substation site and nearby offshore wind farm connections and other development</p> <p>Page 106 of the interrelationship report [REP1-134] and ES figure 17.2 short list plan 13 of 24 [APP-286] indicate the order limits for North Falls and Five Estuaries offshore wind farm however the plans are difficult to interpret.</p> <p>The applicant is asked to provide a separate, more readable and labelled plan to an appropriate scale which shows the Ardleigh/ Little Bromley Area ('ALBA') in more detail, including:</p> <ul style="list-style-type: none"> the indicative locations of the offshore wind farm substations and other permanent above ground infrastructure and landscaping for both North Falls and Five Estuaries the existing Lawford substation the existing farmsteads and dwellings which bound the sites existing and proposed landscape features and access roads the location of any infrastructure associated with the proposed Tarchon Interconnector, if available <p>A standalone plan should be provided at deadline 3 and incorporated in the next version of the interrelationship report at deadline 4.</p>
GEN 1.15	The applicant	<p>Norwich Main and Bramford substations and Tilbury North site – other developments</p> <p>Similar to the previous question, the ExA seeks separate labelled plans to an appropriate scale for the areas around the existing Norwich Main and Bramford substations and the proposed Tilbury North site which detail the surrounding existing and proposed developments, existing and proposed landscape features and access roads.</p> <p>Standalone plans should be provided at deadline 3 and incorporated in the next version of the interrelationship report at deadline 4.</p>
GEN 1.16	Colchester City Council South Norfolk DC Suffolk CC Babergh DC Mid Suffolk DC	<p>Local impact reports (LIR) – navigation</p> <p>Colchester City Council [REP1-156] and South Norfolk DC [REP1-176] are asked to provide a contents page for their LIRs, for easier navigation. This should include electronic page numbers against each section of the report and the list of appendices with corresponding page numbers.</p> <p>Suffolk CC/ Babergh DC/ Mid Suffolk DC are asked to insert page numbers against their list of annexes and appendices on pages 5 and 6 of their LIR [REP1-178].</p>
GEN 1.17	All local authorities	<p>Local impact reports – cumulative developments and the interrelationship report</p> <p>The LIRs from each local authority include details of other developments in their area to varying degrees of detail.</p> <p>Each local authority is asked to review ES chapter 17 (cumulative effects) appendix 17.2 (long list and short list of other developments) [APP-283] and figure 17.2 [APP-286], and confirm if the details provided by the applicant are accurate. Only those developments rated green in tables A17.2.2 to A17.2.14 (short listed developments) need to be checked.</p> <ul style="list-style-type: none"> All local authorities are asked to provide an update where relevant, which should include the current status of the application (whether and when consent has been granted and implemented). If any other major developments in your local authority area are not included, please provide details including planning reference, description, location, relevant dates, and current status (or development plan allocation details). <p>Additionally a report on interrelationship with other infrastructure projects was submitted by the applicant at deadline 1 [REP1-134].</p> <ul style="list-style-type: none"> All local authorities are also asked to review the non-NSIP projects listed in section 3.3 and table 6.1 of the report and confirm if the application reference details are correct and that the applicant's summary of interactions between each project is reasonable, together with any other comments you wish to make on the report.
GEN 1.18	The applicant	<p>Statements of Common Ground - 1</p> <p>A large number of draft SoCG were added to the examination at deadline 1 together with updates to those submitted with the application.</p> <p>The overview document [REP1-008] indicates that there are now 96 SoCG in progress (tables 1.1 and 1.2), with two of these finalised and signed. The ExA notes that a significant number of points within the majority of the SoCG set out that discussion is ongoing.</p> <p>In each of the SoCG where discussion is ongoing, the applicant is asked to:</p> <ul style="list-style-type: none"> Clearly set out at the beginning of each statement an 'at a glance' summary of the matters which are under discussion together with a deadline by which such matters are expected to be resolved. <p>The applicant is also asked to amend the summary tables in the overview document as follows:</p>

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> • Include both the name of the organisation as well as the location/ name of the development which the SoCG relates to (if relevant), such as the location/ name of the solar farm or housing proposal. • State whether the organisation is a statutory consultee, an Affected Person (AP), and whether they are a non-IP. • Number each of the SoCG in the table consecutively 1 to 96. • Include all examination library references. <p>The next versions of the overview document and SoCGs are expected at deadline 4. Notwithstanding this, the ExA requests an 'at a glance' summary table to include the above additions to the overview document to be submitted at deadline 3.</p>
GEN 1.19	The applicant Norfolk County Council Suffolk County Council Essex County Council	<p>Statements of Common Ground - 2</p> <p>The SoCG overview document [REP1-008] indicates that a SoCG with the Fire and Rescue Service for each county are not being produced, given that they have not responded to statutory consultation, however, may be captured as part of the County Councils' SoCG. No RRs have been submitted by the Fire and Rescue Services.</p> <ul style="list-style-type: none"> • Each of the County Councils are asked to clarify whether they have any comments on the proposed development in respect of their Fire and Rescue Service. • The applicant is asked to include such matters in the next version of the SoCG.
GEN 1.20	The applicant General Aviation Awareness Council British Gliding Association North Falls Offshore Wind Farm Limited Five Estuaries Offshore Wind Farm	<p>Statements of Common Ground - 3</p> <p>Table 1.3 of the SoCG overview document [REP1-008] sets out 30 potential SoCG which are not currently proposed or unlikely to be produced. The applicant is asked to review the need for SoCG with the following consultees, given that representations have been received in relation to their operations:</p> <p>Non-IPs:</p> <ul style="list-style-type: none"> • East Anglian Air Ambulance • Broomfield Hospital (Air Ambulance) • Civil Aviation Authority (CAA) (Safeguarding and Airfield Advisory Team) <p>IPs:</p> <ul style="list-style-type: none"> • General Aviation Awareness Council • British Gliding Association <p>The applicant is also asked to review the need for SoCG with North Falls and Five Estuaries. Whilst the ExA are aware that work underway on protective provisions is confidential until such point that terms are agreed, there are a number of other matters which affect the final design and co-ordinated approach to construction of these other NSIPs, which would benefit from being set out in a SoCG.</p>
GEN 1.21	The applicant All local authorities	<p>Legal Agreements</p> <p>A number of the LIRs refer to the need for legal agreements in order to secure a range of mitigation and compensation measures and packages in each local authority area.</p> <p>The applicant is asked to:</p> <ol style="list-style-type: none"> Provide a summary document/ tracker of all requests for agreements with local authorities including the type of agreement, what it relates to and how each would meet the relevant tests. Justify its intended use of unilateral undertakings in the instances where a bilateral (section 106) agreement would be preferable. Consider whether one local authority's request for a certain agreement would also be appropriate for the same to be applied in any (or all) of the other local authority areas. <p>All local authorities are invited to provide a list of and their understanding of the current status of any agreements which it has requested, together with a timescale for completion of any agreements which require sign off by the local authority.</p>
GEN 1.22	The applicant	<p>Option East 7</p> <p>ES chapter 3 Alternatives [APP-127] and the CPRSS [APP-356] refer to the Sea Link project and the Tilbury to Grain reinforcement project as being one of the three elements of the 'strategic solution and three-project approach' as set out in ES chapter 3 section 3.4 (the Eastern theme; 'Option East 7'). The Sea Link project is an NSIP currently in examination. Paragraph 3.4.18 of ES chapter 3 indicates that the Tilbury to Grain project received planning permission in March 2025.</p>

ExQ1	Question to:	Question:
		<p>The applicant is asked to clarify:</p> <ol style="list-style-type: none"> If any of the other projects included in Option East 7 are reliant on the proposed development proceeding. To what extent have the other projects affected the strategic assessment of alternatives, i.e. whether they represented a constraint on the consideration of the offshore 1 option for Norwich to Tilbury. In the event that all three projects are granted consent and are constructed concurrently, implications for wider cumulative effects such as construction traffic and socio-economic implications (noting that neither project is included in the cumulative assessment due to distance).
GEN 1.23	The applicant	<p>Dunton Hills Garden Village 1</p> <p>A number of IPs have made submissions in respect of the allocated site Dunton Hills Garden Village (DHGV), including Essex CC [RR-1083] and [REP1-161], Basildon BC [RR-0335] and Brentwood BC [RR-0391] and [REP1-150]. The site is included in the cumulative assessment [REFs] and the interrelationship report [REP1-134], and ES chapter 15 [APP-265] details this and other allocations on pages 115 and 116. These include North Billericay, Queens Park (AS1 Allocation) (Section G); DHGV (Section G); and Land West of West Mayne (Section G).</p> <p>The applicant is asked to provide a clear plan of a suitable scale which overlays the proposed development with the allocations and the DHGV approved masterplan (or outline plan), as well as other constraints including the existing gas pipeline and the Build Protect Design corridor.</p>
GEN 1.24	<p>The applicant</p> <p>BTSurveyors (for LIH Dunton Hills Limited)</p> <p>Essex CC</p> <p>Basildon BC</p> <p>Brentwood BC</p>	<p>Dunton Hills Garden Village 2</p> <p>The RRs and LIRs from Essex CC [RR-1083] and [REP1-161], Basildon BC [RR-0335] and Brentwood BC [RR-0391] and [REP1-150] make detailed comments regarding potential effects on the viability and delivery of the DHGV allocation which may be affected by the OHL infrastructure.</p> <p>Existing pylon infrastructure is in place on and around DHGV. Work no. 33 includes the replacement of part of an existing overhead distribution electric line. The works include removal of 1.9 kilometre (km) of existing pylons and OHLs (route PSC) and the installation of 1.6km of new underground distribution electric line, with a temporary diversion of the existing line. These works are shown on works plans section G (sheet 6 of 6) [APP-023] and section H (sheet 1 of 7) [APP-024]. However the submissions include limited consideration of the existing OHL which crosses the allocation, and the proposals by the applicant to remove and underground part of the existing electric lines.</p> <ol style="list-style-type: none"> The applicant and BTSurveyors (for LIH Dunton Hills Limited) are asked to clarify whether the other existing OHLs which runs westwards across the DHGV allocated site would remain in place or be undergrounded or diverted. The local authorities and BTSurveyors (for LIH Dunton Hills Limited) are asked to provide specific comment on Work no. 33, and clarify whether both existing OHLs were included in their assessment of viability of the DHGV proposals. The local authorities are asked to respond to the applicant's comments (response to RRs [REP2-023] and response to LIRs [REP2-030]). In particular regarding the ability to co-exist, the routing of the proposed OHL within a high pressure gas pipeline safety zone, the restrictions placed by existing development, and that the suggested alternative (an underground cable) would lead to direct loss of part of the DHGV development area. The local authorities are asked to provide a response to the applicant's commentary on the Savills Report and theoretical effects on gross development value as set out in paragraph 3.8.47 to 3.8.57 of the applicant's response to LIRs [REP2-030]. The local authorities and BTSurveyors for LIH Dunton Hills Limited are also asked to clarify updated timescales for a planning decision to be issued relating to application 21/01525/OUT, for reserved matters applications to be submitted, and for expected commencement (and phasing) of the DHGV development, so that the ExA is able to make a more informed review of cumulative construction effects.
GEN 1.25	<p>The applicant</p> <p>BTSurveyors (for LIH Dunton Hills Limited)</p> <p>Essex CC</p> <p>Basildon BC</p> <p>Brentwood BC</p>	<p>Dunton Hills Garden Village 3</p> <p>Clarify the location of the play area to the south eastern corner of DHGV site (as shown on in appendix 8 [RR-0421] and provide comment as to whether it is feasible for this area to be designed around or relocated within the proposed development when detailed plans are submitted.</p>
GEN 1.26	The applicant	<p>Assessment of cumulative effects</p> <p>The ExA notes that the interrelationship report [REP1-134] is a useful document however this does not form part of the ES. The ExA considers that the assessment of inter-project effects for certain issues in section 17.5 of ES Chapter 17 [APP-281] would appear quite cursory. Justify the assessment methodology you have used to assess inter-project cumulative effects in ES Chapter 17. In particular, explain how you have reached the conclusion that for certain areas of the proposed development, such as in the vicinity of the EACN substation and Tilbury North substation, you have reached the</p>

ExQ1	Question to:	Question:
		conclusion that the cumulative inter-project effects would be “negligible” and “not significant” for matters such as air quality, biodiversity, socio-economics, recreation and tourism, and health and wellbeing; with the noise effects assessed as being slight adverse within the 300 metre (m) zone of influence.
DES Design, parameters and other details of the proposed development		
DES 1.1	The applicant	<p>NESO Electricity Transmission Design Principles</p> <p>Provide an update on the development of the new ETDP, and if applicable provide a summary of how the proposed development accords (or does not) with those Design Principles.</p>
DES 1.2	The applicant	<p>Design and Access Statement</p> <p>Chapter 5 of the design and access statement [APP-353] details Good Design Process, with paragraph 5.3.29 stating “National Grid’s design principles are rooted in legal, safety, technical, cost effectiveness and policy frameworks. While there may be scope for aesthetic considerations, the overarching priority is the safe, secure, and efficient delivery of infrastructure, which significantly limits opportunities for design innovation especially in standard, non-protected locations”</p> <p>The ExA understands the restrictions based on legal, safety, technical and policy frameworks. However, why are opportunities for design innovation limited in ‘standard, non-protected locations’ as opposed to protected locations? Is it only cost effective to innovate in protected locations?</p>
DES 1.3	The applicant	<p>Independent design review</p> <p>The Design and Access Statement [APP-353] states in Appendix B that in the context of independent design review there is no intention to include design reviews post-consent (if consent is granted) as the project is “deemed to be achieving and meeting Good Design”.</p> <p>In addition to the above, the ExA note that a number of IPs have indicated the need for an independent design review to be secured as part of any DCO made. In the light of the applicant’s Design and Access Statement [APP-353], especially Appendix B – Internal Design Review Note, the ExA is not persuaded, on the basis of the evidence provided to date, that a non-independent design champion(s) would be adequate or that a full independent Design Review Panel for the Proposed Development is not required.</p> <p>Provide further justification for your view that independent design review is not needed for the proposed development. Refer in your reasoning to the Planning Inspectorate Guidance Note Advice on Good Design. The ExA also note that the development consent order for the Five Estuaries offshore wind farm included a provision within requirement 5 to ensure that the onshore substation for that project will be subject to an independent design review and this should be referred to in your reasoning.</p>
DES 1.4	The applicant	<p>Design Champion(s)</p> <p>Paragraph 5.6.8 of the Design and Access Statement [APP-353] states that a design champion will be appointed to provide independent oversight and will act as a critical friend. Explain how the appointed design champion will provide independent oversight. Detail in the Deadline 2 updated Design and Access Statement [REP2-020] is noted but the Development Design Champion appears to be from the existing project team and the question therefore remains.</p> <p>In the light of the above, explain how the role of a design champion will influence, in an enforceable manner, the design of the proposed development post making of a DCO; and how the design champion is to be secured within the DCO, should it be made.</p>
DES 1.5	The applicant	<p>Design Approach for Site Specific Infrastructure (DASSI) [APP-354]</p> <p>The DASSI [APP-354] seeks to justify the choice of Air Insulated Switchgear (AIS) for the proposed EACN substation rather than use Gas Insulated Switchgear (GIS).</p> <p>Are the proposed substations for the Five Estuaries and North Falls wind farms AIS or GIS? What technology is the Tarchon Interconnector likely to employ (AIS or GIS). Explain how the design choices for each of the substations are assimilated and how they will tie in together.</p>
DES 1.6	The applicant	<p>Holford Rules</p> <p>Set out how Holford Rule 1 been applied in designing the route of the proposed development, specifically for the following areas:</p> <ul style="list-style-type: none"> • Dedham Vale National Landscape • Waveney Valley • Great and Little Waltham • Mellis

ExQ1	Question to:	Question:
		Also provide further information on the application of Rule 4 for the route of the proposed development, including details of where the route crosses ridge lines.
DES 1.7	The applicant North Falls offshore wind farm Five Estuaries offshore wind farm	Horlock Rules – North Falls and Five Estuaries Were the Horlock rules applied to the proposed substations for North Falls and Five Estuaries? Do they take account of cumulative effects, and if so, explain how.
DES 1.8	The applicant	EACN The ExA note the details of the discussions between the proposed development and the two offshore wind farms of Five Estuaries and North Falls, specifically the details within the Interrelationship report [REP1-134]. This states that the projects are liaising to ensure compatibility with landscape mitigation. Provide a plan showing the three proposed substations and combined planting proposals at this stage and state how good design will be provided for cumulatively. Include the Tarchon Interconnector in the same plan or provide justification for not doing so. You may wish to combine your answer with your answer to question GEN1.14. In addition to the above, explain how the design of the EACN would be consistent with Paragraphs 4.7.5 & 4.7.6 of NPS EN-1, especially in the light of Essex CC's comment '...opportunity exists to ensure the appearance of any substantial structures across the proposal... are appropriate for the locations through innovative design and approach to external appearance.' ([RR-1083], paragraph 6.4.3). Also please explain how noise mitigation is to be incorporated into the proposed design of the EACN.
DES 1.9	The applicant All local authorities	Lighting of new and upgraded substations The ExA notes the rural context of the proposed EACN substation and notes that there is limited detail in relation to operational lighting in relation to this and other upgraded substations in the Design Approach for Site Specific Infrastructure (DASSI) [APP-354]. <ul style="list-style-type: none"> • Provide additional detail in terms of the height and type of any lighting installations and light contour plans. • Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity, and potential effects on ecology. If the applicant considers that an assessment is not required, provide a detailed explanation of your reasoning. Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not? Affected Local Authorities may also like to comment.
DES 1.10	The applicant	T-pylons (1) The ExA note that in [REP1-069] you imply that it is technically possible to use T-pylons in combination with standard steel lattice pylons, and whilst you have discounted their use, the ExA wish to explore this further: Therefore, please explain: <ul style="list-style-type: none"> • How the eight areas assessed were chosen and why other areas were not; what was the criteria for choosing these sections of the route for consideration and were any other stretches of the route considered for their use, and if not, why not? • Were they considered for the area around Ingatestone, and if not, why not? • Whether the use of both pylon types would be a simple hybrid solution or whether additional infrastructure is required between the two types of pylons. • If additional transition infrastructure is required, explain what this is and provide plans showing the appearance of these structures and where they would need to be located for each transition. • Are there any technical constraints to a more recessive colour being used (noting that they are generally light grey). In addition, provide visualisations to support your claim that T-pylons would not mitigate landscape and visual effects. Use some of the following VP's to illustrate this (worst-case scenario examples): <ul style="list-style-type: none"> • 1.07 to 1.12; 1.14, 1.15, 2.06 to 2.12; 5.04, 5.05, 6.13 to 6.16; 7.08, 7.09, 7.12
DES 1.11	The applicant	T-pylons (2) Provide further information on the decision to not utilise T-pylons. Specifically: <ul style="list-style-type: none"> • It is stated that Ofgem funding requires that the lowest cost acceptable design is taken forward rather than a more expensive design even if that design is perceived to reduce the level of effect. What and who defines 'acceptable' in this context?

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> The list of advantages of T-pylons does not include design benefits. Is there any evidence that the design of T-pylons is preferred in general to that of standard lattice pylons? Does the single construction/anchoring point of T-pylons have land use benefits? How has the reduced construction time and reduced footprint of T-pylons been assessed in the cost/benefit exercise?
DES 1.12	Tendring DC Essex CC	<p>Effectiveness of mitigation - EACN</p> <p>Are the relevant local authorities (Essex CC and Tendring DC) satisfied that the applicant's approach to mitigating the adverse effects of the EACN in the wider landscape would be effective. If not, what further design opportunities should the applicant explore in order to achieve the best possible design outcome?</p> <p>In responding to this question, you may also wish to consider other matters that could potentially influence design, such as noise effects for example. Other IPs are also invited to respond to this question, if they wish to contribute to this topic.</p>
DES 1.13	Thurrock BC	<p>Effectiveness of mitigation – Tilbury</p> <p>Are you satisfied that the applicant's approach to mitigating the adverse effects of the Tilbury substation in the wider landscape would be effective. If not, what further design opportunities should the applicant explore in order to achieve the best possible design outcome?</p> <p>In responding to this question, you may also wish to consider other matters that could potentially influence design. Other IPs are also invited to respond to this question, if they wish to contribute to this topic.</p>
DES 1.14	South Norfolk DC Norfolk CC	<p>Effectiveness of mitigation - Norwich</p> <p>Are the relevant local authorities (South Norfolk DC and Norfolk CC) satisfied that the applicant's approach to mitigating the adverse effects of the Norwich Main substation extension in the wider landscape would be effective. If not, what further design opportunities should the applicant explore in order to achieve the best possible design outcome?</p> <p>In responding to this question, you may also wish to consider other matters that could potentially influence design. Other IPs are also invited to respond to this question, if they wish to contribute to this topic.</p>
DES 1.15	Babergh DC Mid Suffolk DC Suffolk CC	<p>Effectiveness of mitigation - Bramford</p> <p>Are the relevant local authorities (Babergh DC, Mid Suffolk DC, Suffolk CC) satisfied that the applicant's approach to mitigating the adverse effects of the Bramford Main substation extension in the wider landscape would be effective. If not, what further design opportunities should the applicant explore in order to achieve the best possible design outcome?</p> <p>In responding to this question, you may also wish to consider other matters that could potentially influence design. Other IPs are also invited to respond to this question, if they wish to contribute to this topic.</p>
ALT Alternatives		
ALT 1.1	All local authorities	<p>Reasonable alternatives: policy and legislation</p> <p>The local authorities are invited to comment on their understanding of 'reasonable alternatives' in the context of NPS EN-1 paragraphs 4.3.22 to 4.3.19, and Regulation 14(2)(d) and paragraph 2 of schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). The local authorities are also requested to comment on paragraph 3.2.32 of ES chapter 3: 'Where options assessed do not meet the definition of 'reasonable alternatives' (such as certain offshore cable options that conflict with NPS policy preferences), these are included to address specific scoping requirements under Regulation 14(3) rather than as reasonable alternatives under Regulation 14(2)(d)'. The local authorities are asked, where they have suggested alternatives, if they would meet the definition of reasonable alternatives in the context of the policy and the EIA Regulations. Other IPs are also invited to comment on their understanding of reasonable alternatives, if they wish to do so.</p>
ALT 1.2	All local authorities	<p>Approach to options appraisal</p> <p>The local authorities are invited to review section 3.3 of ES chapter 3 [APP-127] and appendices 3.1 [APP-128] and 3.2 [APP-129] in respect of the applicant's approach to options appraisal, including the hierarchical assessment. They should provide comments where they disagree with any part of the approach (not the individual options considered; the approach only). This could form part of the SoCG.</p>
ALT 1.3	The applicant All local authorities	<p>Strategic options: Offshore 1</p>

ExQ1	Question to:	Question:
		<p>Many of the local authorities and a large number of IPs have expressed that they would prefer the offshore option as an alternative to OHL infrastructure between Norwich and Tilbury.</p> <p>Could the local authorities please clarify if they have reviewed the strategic options appraisal and the 2025 updates to the Strategic Options Backcheck and Review (SOBR) (including Appendix B: 2024 version, section 14) [APP-355] in relation to 'Offshore 1'. The ExA is aware of the local authorities' assessment of cost and timing as set out in the Hiorns Report as appended to the RR from Norfolk CC [RR-2753]. However the ExA seeks the views of local authorities in relation to the constraints (environmental, social and technical) which may affect the delivery of this option as set out in the SOBR (as set out in section 14 and summarised in table 15.2 of the SOBR). An update to this is provided in section 6 of the August 2025 SOBR [APP-355].</p> <p>Other IPs are also invited to provide comment should they wish to do so.</p> <p>In doing so, could the local authorities and any other IPs provide any additional comments they may have in relation to the applicant's reasoning for discounting Offshore 1 as a reasonable alternative.</p> <p>The applicant is asked to provide an update on the constraints noted in section 6 of the SOBR since August 2025 relating to Offshore 1 and connection at Tilbury.</p>
ALT 1.4	The applicant	<p>Contracted connections: the Essex Coast Generation Group</p> <p>Paragraphs 3.7.17 and 3.7.18 of the SOBR [APP-355] refer to National Grid's contracted connections for a total of 3,480 Megawatts (MW) of total new generation from the following energy projects (the 'Essex Coast Generation Group').</p> <ul style="list-style-type: none"> • North Falls Offshore Windfarm (1,000 MW by 2030) • Five Estuaries Offshore Windfarm (1,080 MW by 2030) • Tarchon Energy Limited Interconnector (1,400 MW By 2030) <p>At the time of writing, there has been no decision on the North Falls application, and the Planning Inspectorate's National Infrastructure Project webpage for Tarchon Interconnector indicates that submission of the application is expected in January 2028.</p> <p>The applicant is asked to:</p> <ol style="list-style-type: none"> a) Provide an update to whether it is feasible that any of the above projects would provide the expected amount of new energy generation by 2030, and if not, how any delays would affect its assessment of alternatives. b) Clarify the reasons for initial selection of the Tendring peninsula (and then for zone A) for the EACN together with the East Coast Generation Group. c) Provide details of the timing of the selection of the sites for the three projects in respect of the production of the strategic options in the Corridor and Preliminary Routeing Siting Study (CPRSS) in 2022, given that North Falls and Five Estuaries were not submitted to the Planning Inspectorate until 2024 and Tarchon Interconnector is yet to be submitted. <p>The applicant is also directed to ExQ1 GEN 1.20 which requests SoCGs with North Falls and Five Estuaries.</p>
ALT 1.5	The applicant	<p>Direct current underground cables</p> <p>The CPRSS [APP-356] sets out that direct current underground cables have advantages over alternative current (AC) cables in respect of the land-take required, but would require specialised cable infrastructure and above ground and permanent structures in the form of converter stations to be constructed which have financial as well as environmental costs. Testing of this option in the CPRSS was based on a whole-route solution in strategic options within the eastern theme, however it is unclear if this has been costed for the underground section of the proposed development through the Dedham Vale National Landscape (NL).</p> <p>The applicant is asked to provide a summary of the difference in costs between an AC and direct current option through the NL, with an indication of the potential location and scale of converter stations that would be required at each end of the cable route in order to connect up with the OHL as proposed.</p>
ALT 1.6	The applicant	<p>Reasonable alternatives: IP suggestions</p> <p>The reasonable alternatives which informed the 2023, 2024 and 2025 preferred draft alignment are set out in tables 3.15, 3.16 and 3.17 of ES chapter 3 [APP-127]. The applicant is asked to review whether any other reasonable alternatives in respect of specific sections of the route or location of substation or cable sealing end (CSE) infrastructure have materialised and been considered since production of the ES, after having reviewed the comments from IPs which put forward alternative suggestions which may differ from those already considered in tables 3.15, 3.16 and 3.17, including the following:</p> <ul style="list-style-type: none"> • Alternative routing around Chelmsford: the North-West and South-West of Chelmsford Parishes Group [RR-2765], [REP1-260], [REP1-261], [REP2-038] and other IPs • EACN at Ardleigh: Tendring DC [RR-3608], [REP1-182], [REP2-041], Ardleigh PC and Little Bromley PC [RR-0300], [REP1-145] and other IPs

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> Waltham Gap (numerous IPs) Dedham Vale: Villages Against Pylons [RR-3780], [REP1-282], [REP2-061] and other IPs
ALT 1.7	Norfolk CC Suffolk CC South Norfolk Council Mid Suffolk Council Natural England The applicant	<p>Waveney Valley alternative</p> <p>Reasonable alternatives considered in ES chapter 3 [APP-127] as part of the 2024 (table 3.16 p.89-90) and 2025 (table 3.17 p.106) preferred draft alignments set out the applicant's reasoning for rejection of the use of an underground cable through the Waveney Valley instead of an OHL and pylons. This includes the presence of sensitive peat habitats and paleoenvironmental remains, and hydrological impacts on Wortham Ling SSSI.</p> <ul style="list-style-type: none"> The local authorities are asked to provide comment, as these issues do not appear to have been covered in their LIRs. Natural England is asked to comment on the applicant's ecological considerations in its reasoning for rejection of the Waveney Valley (underground) alternative as set out in ES chapter 3. This should include comment on whether potential effects on peaty soils would constitute irreplaceable habitat loss. The applicant is asked to signpost the ExA to any pre-application consultation responses on such matters which led to its rejection of the Waveney Valley alternative.
ALT 1.8	The applicant	<p>Other site specific alternatives</p> <p>A number of IPs in their RRs have suggested moving small sections of the pylons and OHLs to reduce effects on their individual property, land or business, as well as certain landscape features. The applicant is asked to provide a table which sets out all such specific requests, and indicate whether such relocation is possible within the limits of deviation of the order limits. If not possible within the order limits, the applicant is asked to provide within the table a response to each IP which explains why such a relocation is not possible.</p>
ALT 1.9	All local authorities	<p>Limits of Deviation (LoD)</p> <p>A number of the local authorities' LIRs refer to the limits of deviation and the potential for the OHLs and pylons to move closer to sensitive receptors and listed buildings.</p> <p>Paragraph 3.2.28 of ES chapter 3 [APP-127] refers to the limits of deviation, noting that they retain flexibility to allow for necessary adjustment during detailed design and construction phases. It is stated that minor variations in specific pylon positioning or precise alignment within these limits are not treated as separate alternatives, as the assessment considers a worst-case scenario within the established parameters.</p> <p>The local authorities are invited to comment on this paragraph.</p>
AQ Air quality and emissions		
AQ 1.1	The applicant	<p>Air Quality - Outline Code of Construction Practice (CoCP) and Proposed Mitigation</p> <p>ES Chapter 7 at Section 7.6 sets out 'proposed mitigation', with paragraph 7.6.6 highlighting the outline CoCP contains relevant standard/ good practise measures relating to air quality. Under the heading 'Site Management', the ExA notes a "Record of all dust and air quality complaints, identifying cause(s), take appropriate measures to reduce emissions in a timely manner and record the measures taken" is listed as standard mitigation.</p> <p>The applicant is asked to:</p> <ol style="list-style-type: none"> Signpost where in the submitted documentation it is confirmed who will be responsible for undertaking the recording of these complaints. Who will be responsible for checking complaints are recorded correctly and have been acted upon. The appropriate measures undertaken were agreed and carried out in an acceptable manner. What mechanism is being proposed in relation to any enforcement action that may be required.
AQ 1.2	The applicant	<p>Air Quality - Monitoring mechanisms</p> <p>ES Chapter 7 paragraph 7.6.6 refers to monitoring mechanisms to be used in relation to air quality. The ExA notes the applicant has used the term 'Where possible' in relation to the commencement of baseline monitoring at least three months before work commences on site. This term is vague and unacceptable, as it has the potential to lead to doubt as to whether baseline monitoring will actually take place.</p> <p>Remove the use of this term and replace with a clearer statement, such as 'Baseline monitoring will commence at least three months before work commences on site'.</p>
AQ 1.3	The applicant	<p>Air Quality – Outline CoCP Appendix D – Dust Management Plan (DMP)</p> <p>Braintree DC in its LIR [REP1-148] considers further clarification and alignment are required between the air quality assessment and the outline CoCP,</p>

ExQ1	Question to:	Question:
		<p>particularly in relation to the siting and emissions control of non-road mobile machinery, to ensure mitigation commitments are robustly secure through clear and enforceable DCO requirements.</p> <p>Respond to these comments, including whether the documents mentioned above will be brought into alignment and how it is intended to ensure the mitigation commitments are secured through the DCO in a clear and enforceable way.</p>
AQ 1.4	All local authorities	<p>Air Quality - Development Plan documents and adopted standards/ expectations related to air quality that exceed Government targets?</p> <p>ES Chapter 7 at paragraph 7.2.19 lists the names of the key regional and local plan documents relevant to each individual county and local authority area. Each local authority is asked whether their development plan documents contain any standards or expectations related to air quality that exceed government targets? If so the ExA would ask for the relevant authority to confirm what those standards are and what formal consultation/ adoption processes those air quality standards/ expectations have been subject to.</p>
BIO Biodiversity, ecology and natural environment		
BIO 1.1	The applicant	<p>Criteria for ascribing importance/ value to biodiversity receptors</p> <p>In Table 8.5 of ES Chapter 8 [AS-026] you have stated that the criteria for a “County/Regional” Chartered Institute of Ecology and Environmental Management (CIEEM) level of importance that has a “Medium” value includes species or habitats listed in accordance with the requirements of the Natural Environment and Rural Communities (NERC) Act 2006. However, in the criteria for “Local” CIEEM importance and a “Low” value you also refer to s41 of the NERC Act, and to Red or Amber listed Birds of Conservation Concern and Red Data Book species as examples that a receptor “... is relatively common and widespread”.</p> <p>Explain your reasoning for this methodology, and justify why you consider impacts on, for example, Red and Amber listed bird species are considered to be of a low value and only of local importance.</p>
BIO 1.2	South Norfolk District Council	<p>Impacts on Roydon Fen County Wildlife Site (CWS)</p> <p>In your LIR [REP1-176] you have stated that alternatives/ avoidance measures at Roydon Fen CWS have not been sufficiently explored. Since the order limits for the proposed development appear to be just beyond the western boundary of this CWS, explain what avoidance measures should be undertaken.</p>
BIO 1.3	The applicant	<p>Meadow Wood nature reserve</p> <p>Norfolk Wildlife Trust in [RR-2756] and Norfolk CC in [REP1-173] have both raised particular concerns about the proposed pylon route between pylons 48 and 49 and the impact on the ancient wood pasture at Meadow Wood Nature Reserve (a candidate CWS). Comment on how the impacts on this site have been evaluated and what mitigation has been considered, for example alternative alignments that have been assessed that would be further away from Meadow Wood.</p>
BIO 1.4	The applicant	<p>Assessment of effects on species</p> <p>Table 8.23 of ES Chapter 8 [AS-026] provides an assessment of effects on ecology and biodiversity receptors during construction. For all species (both protected and notable) you conclude that “there would be an overall negligible magnitude of impact with no significant residual effects”. Table 8.23 specifically refers to these effects during construction. It is the ExA’s understanding that measures such as replacement planting and habitat creation would not generally take place until after construction had finished. Therefore, justify how you have arrived at your conclusion of an overall negligible impact for all species during the construction stage. Furthermore, explain how your assessment has taken account of any biodiversity deficit on species that might arise, for example on bat foraging and commuting, from the time taken between habitat removal and when any replacement planting would become fully established and therefore able to provide an equivalent biodiversity benefit.</p>
BIO 1.5	The applicant	<p>Bat tree roost surveys</p> <p>A number of LIRs from local authorities, for example Braintree DC in [REP1-148], Chelmsford City Council in [REP1-153], Essex CC in [REP1-161] and the joint LIR from Suffolk CC, Mid-Suffolk and Babergh DCs [REP1-178] have maintained significant concerns regarding the assessment methodology and the current level of survey effort for bat tree roosts. Set out your process and timeline for conducting further bat tree roost surveys, including an explanation for your focus on barbastelle when all bat species are protected. If further survey work is not going to be submitted during the course of this examination, explain how the ExA can be confident that the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) have been met.</p>
BIO 1.6	Natural England	<p>Bat tree roost survey coverage</p> <p>As indicated in paragraph 1.1.7 of the updated Bat Roost Report [AS-024] the scope of bat tree roost survey work has been agreed with Natural England by the applicant. Comment on the significant concerns regarding this matter that have been raised by a number of local authorities in their LIRs, for</p>

ExQ1	Question to:	Question:
		example Braintree DC in [REP1-148] , Chelmsford City Council in [REP1-153] , Essex CC in [REP1-161] and the joint LIR from Suffolk CC, Mid-Suffolk and Babergh DCs [REP1-178] .
BIO 1.7	The applicant	<p>Badger setts and construction</p> <p>Table A8.15.2 of the updated Badger Report - Confidential [AS-042] indicates that a total of 231 badger setts are present in the survey area (order limits plus a 30m buffer), and this figure includes 48 main setts. As noted in Table A8.15.1 of [AS-042] if a main sett requires closure, mitigation must be provided usually involving the construction of an artificial sett along with proof of uptake by badgers. Notwithstanding paragraph 6.1.44 of the outline Landscape and Ecological Management Plan (outline LEMP) [AS-046], set out in more detail the process you would undertake, what is the timeline for this would be and explain how the ExA can be confident that, in any locations where main setts may require closure, sufficient time has been allowed for so that any necessary works would be fully completed and replacement setts occupied before construction commences.</p>
BIO 1.8	The applicant	<p>Badger sett near Roydon</p> <p>In [RR-3209] Mr Matthews contends that the proposed temporary haul road near the village of Roydon would go through a hedgerow that contains an active badger sett. This sett does not appear to have been identified in the updated Badger Report - Confidential [AS-042]. Comment on this and, if applicable provide an amendment to the Badger Report – Confidential that identifies this sett.</p>
BIO 1.9	The applicant	<p>Invasive Non-Native species</p> <p>Suffolk CC in its RR [RR-3520] makes reference to the need for a commitment to eradicating invasive non-native species (INNS) within the Order limits (instead of only preventing any spread of INNS). Comment on the practicality of this and whether, if successfully achieved, this could count as a potential compensation measure.</p>
BIO 1.10	The applicant Babergh District Council Mid Suffolk District Council	<p>Post-consent monitoring and assessment of effects</p> <p>Babergh DC in [RR-0314] and Mid Suffolk DC in [RR-2540] have questioned the assumption that post consent licences would ensure neutral or beneficial outcomes for protected species and consider that there would be limited post-mitigation monitoring to enable this to be assessed.</p> <ul style="list-style-type: none"> • To the applicant: Notwithstanding your response in [REP1-132], please respond to the concerns raised by Babergh DC and Mid Suffolk DC and explain how you have reached your assessment on this. • To Babergh DC and Mid Suffolk DC: Explain why you consider that additional post-consent monitoring is needed beyond anything that might be specified in the protected species licensing process.
BIO 1.11	The applicant	<p>Electrocution risk to birds</p> <p>Paragraph 2.10.4 of NPS EN-5 (2023) states that electrocution risk to birds can be reduced through the design of lattice steel tower crossarms, insulators and the construction of other parts of high voltage power lines. Explain how you have taken account of this in designing the proposed development, and whether these are preferable to T-Pylons in reducing incidences of bird strike.</p>
BIO 1.12	The applicant	<p>Assessment of bird mortalities</p> <p>In paragraph 8.5.57 of ES Chapter 8 [AS-026] you state that no specific surveys for wintering farmland birds have been undertaken as they are not considered to be at risk of collision. A number of IPs, including Pylons East Anglia Ltd in its attachments to [RR-2973] and Suzanne Bolwell-Davies in [REP1-480], have raised concerns about the survey effort for, and impacts on farmland birds, and on birds overall due to collisions with OHLs and electrocution risk. Respond to these concerns and expand on the reasons why you consider surveys for farmland birds are not required and, in the absence of such surveys, explain in more detail how you have assessed the potential impacts on bird mortalities for all species due to electrocution risks and collisions for areas/ species that have not been surveyed. Justify your conclusion in Table 8.24 of ES Chapter 8 [AS-026] that: "...collision risk and potential mortality in the absence of mitigation is considered to be a negligible effect in the medium term which is not significant", and that therefore there would be no residual operational effect?</p>
BIO 1.13	The applicant	<p>The use of bird diverters</p> <p>The ExA notes that bird diverters are proposed in two locations [APP-327]. Explain why these are not proposed in other locations where concentrations of birds may occur. What monitoring mechanism is in place in order to assess whether any other locations may need bird diverters installed in the future and how is the potential for such adaptive management secured in the draft DCO?</p> <p>Furthermore, what mechanism is in place for the monitoring of those locations where bird diverters are proposed? What adaptive management measures are proposed, such as additional mitigation or compensation, should monitoring indicate that bird diverters alone are insufficient to prevent significant impacts on local bird populations, and how is this currently secured in the draft DCO?</p>

ExQ1	Question to:	Question:
BIO 1.14	The applicant	<p>Pink-footed geese</p> <p>South Norfolk Council in its LIR [REP1-176] considers that a species management plan for pink-footed geese would be required due to vegetation removal and construction taking place during winter grazing periods. Comment on this and explain what mitigation measures are proposed for this species.</p>
BIO 1.15	The applicant	<p>Presence of white-clawed crayfish</p> <p>At OFH3 [EV7-001] and [EV7-002] and in [REP1-432] Mr Norman Stevens states that studies by the Norfolk Rivers Trust indicate the presence of white-clawed crayfish in the River Tas. Also, in [RR-1073] the Environment Agency notes that there are records of white-clawed crayfish on the River Tas (which is within the study area) and that they may be present where there are no recent records on the River Tas system and its tributaries. The ExA is aware that in paragraph 8.5.33 of ES Chapter 8 [AS-026] you have stated that desk studies revealed no records and field surveys revealed no presence of white-clawed crayfish in the Study Area. The ExA also notes that in N5 of [REP1-132] you have not specifically addressed the Environment Agency comments on this. Therefore please respond to Mr Stevens' and the Environment Agency's comments, explain whether a white-clawed crayfish licence from Natural England is likely to be required for any elements of the proposed development, and clarify how the potential presence of this species would affect the assessment conclusions you have reached in ES Chapter 8 [AS-026], including whether there are any ark sites nearby that might be affected. Please update Table 5.1 of the outline CoCP accordingly.</p>
BIO 1.16	Natural England	<p>Dormouse presence and hedgerow removal</p> <p>Are you satisfied that in areas where dormouse presence is confirmed, which will be subject to hedgerow removal, this would not result in a loss of function of suitable habitat, fragmentation of connectivity or severance of populations of dormouse?</p> <p>Also, are you satisfied that the mitigation timescales as set out by the applicant are appropriate to allow planting to establish to a level suitable for habitation by dormouse?</p>
BIO 1.17	The applicant	<p>Retention of dormouse habitat connectivity</p> <p>Are there any areas where trees and/ or hedgerows will be removed where dormice are currently present, where it will not be possible to reinstate vegetation due to planting restrictions from the OHL or above underground cables? If this scenario exists, how would you propose to retain habitat connectivity for dormouse?</p>
BIO 1.18	The applicant Natural England	<p>European protected species and licensing:</p> <p>Should the Order be made, the ExA notes that the applicant proposes further survey work for European protected species once the detailed design has been formulated. However, the ExA is also aware of the results of the existing surveys for species that confirm a presence in places within the relevant study areas for species including bats, water vole and otter.</p> <ul style="list-style-type: none"> To Natural England: The ExA notes the applicant's intention to obtain letters of no impediment (LONIs) from you. Provide an update on the current status of negotiations regarding all LONIs that are being sought and comment on whether you consider there to be any likely issues associated with, or impediments to, LONIs being issued for all relevant species. To applicant: Explain how the ExA can be assured that appropriate measures are in place at this stage in order to ensure that there would be no significant adverse effects on any European protected species.
BIO 1.19	The applicant	<p>Mitigation measures to protect fish</p> <p>In [RR-1073] the Environment Agency notes that the ES has not recorded the presence of brown trout in the River Ter even though the most recent surveys indicate its presence. The Environment Agency considers that measures should be included to ensure spawning periods and habitat are not disturbed during the construction of watercourse crossings in sections E to F. Furthermore, the Environment Agency has referenced work timing restrictions for other species as well eg for salmonid rivers. The ExA notes that you have responded to the Environment Agency's concerns in [REP1-132] and have cited Commitment B11 of the outline CoCP. However, as Commitment B11 contains the phrase "...where practicable", the ExA queries the likelihood of in-channel works still taking place during the spawning season. Explain your use of this tailpiece, consider additional wording in Commitment B11 that might provide extra reassurance to the Environment Agency on this matter and justify why your assessment of effects on fish in ES Chapter 8 [AS-026] would not need updating if this tailpiece is to remain with no additional wording provided for Commitment B11 of the outline CoCP.</p>
BIO 1.20	The applicant	<p>Assessment of effects on trees, hedgerows and woodland</p> <p>In the Hedgerows to be Removed or Managed Plans [APP-048] to [APP-055], both tree groups and hedgerows are classified as being either "removed", "affected managed", "potentially affected" or unaffected'. How and when will a decision on which trees and hedgerows will be "potentially affected" be made? In addition, how have the worst-case scenarios regarding the biodiversity impacts arising from "affected managed" and "potentially affected" measures for trees and hedgerows been assessed and accounted for in your mitigation, compensation and Biodiversity Net Gain (BNG) calculations?</p>

ExQ1	Question to:	Question:
		Also, as reported in, for example, page AB6 of the Applicant's Comments on RRs [REP1-132] it is currently envisaged (subject to detailed design) that 4 veteran trees would need to be lost. Signpost to where in table 8.23 of ES Chapter 8 [AS-026] an assessment of the residual effect on veteran trees has been made or provide this.
BIO 1.21	The applicant	<p>Assessment of tree removal at Local Wildlife Sites (LWS)</p> <p>Table 8.23 of ES Chapter 8 [AS-026] for some LWSs such as Great /Little Edney Woods, and Langley Deer Park states that: "some tree removal would be required to facilitate electrical clearances, but this would be minimal." Please explain why it is not possible to provide a worst-case scenario for these sites that would calculate the number of trees or area of woodland and other habitat that would be lost, since detailed figures have been provided for habitat loss for sites such as Buckingham Hill LWS. Since "some tree removal" is an unspecific term, explain how the ExA can be confident in the robustness of the impact assessment conclusions that have been drawn in Table 8.23 of ES Chapter 8 [AS-026]?</p>
BIO 1.22	The applicant	<p>Trees and OHLs</p> <p>Provide more detail on the measures that would need to be undertaken in regard to trees within and near to an OHL. For example, would all species of tree and shrub need to be removed within the entirety of the clearance zone that is referenced in paragraph 4.8.53 of ES Chapter 4 [APP-130] or are there any species that could be acceptable for retention in certain zones, eg outside of the main 40m wide clearance zone? Also, would the construction clearance zones for OHLs be maintained at the same widths once operational or would any native species of tree or shrub be acceptable within any of these areas in terms of post-construction planting or natural regrowth due to the height they would reach when fully mature or their root depth?</p>
BIO 1.23	The applicant	<p>Experience of delivery of mitigation and compensation at this scale</p> <p>Set out your experience of delivering/ contract letting for tree planting and other ecological mitigation and compensation works on the scale that is being proposed. How has learning from previous experience of submitting/ delivering NSIPs been incorporated into your considerations for managing the ecological mitigation and compensation for the proposed development?</p>
BIO 1.24	The applicant	<p>Assessment outstanding for hedgerows</p> <p>South Norfolk DC in [RR-3417] notes that an additional 53 hedgerows that were classified as being potentially important have not been surveyed. However, on AA13 of [REP1-132] you state that all hedgerows have been surveyed to inform the BNG assessment. Please comment on this in light of South Norfolk DC's comments, and if these 53 potentially important hedgerows remain unsurveyed, explain how this would affect the conclusions on significance you have reached in ES Chapter 8 [AS-026] and how this has been reflected in your mitigation, compensation and BNG considerations.</p>
BIO 1.25	Natural England	<p>Ancient woodland inventory</p> <p>In [RR-2658] you state that you will provide further advice on potential interactions of the proposed development with parcels of ancient woodland that have recently been added to the inventory. Natural England is asked to provide an update on this.</p>
BIO 1.26	The applicant	<p>Ecological Clerk of Works (ECoW)</p> <p>The outline CoCP [APP-300] refers to the role of ECoW. However, in their RRs and LIRs a number of local authorities have stated that the role of the ECoW lacks key details including the number of people in that role, their minimum level of qualification and membership of a relevant professional body, their decision-making authority, reporting hierarchy and monitoring protocols. Since this would appear to be a critical role(s) in ensuring the successful implementation of any post-consent mitigation, compensation and BNG provide further details on this including an organisational reporting structure and explain how this is to be secured in the draft DCO.</p>
BIO 1.27	The applicant	<p>Monitoring and compliance</p> <p>Table 6.1 of the outline CoCP [APP-300] provides details of a range of mitigation measures/ environmental commitments. However, under the headings "Monitoring" and "Compliance Date and Details" it is stated that these are "To be confirmed by the Main Works Contractor(s) if the Project is consented." The ExA considers that this statement does not provide the necessary degree of certainty as to when and how monitoring and compliance matters would be dealt with. Consequently, the applicant is requested to provide more specific details at this stage, as far as possible. This should include, where applicable, a statement that the relevant CoCP commitments need to be in place and be undertaken subject to the authorised details before any works can commence.</p>
BIO 1.28	The applicant	<p>Pre-construction surveys in 2026</p> <p>Paragraph 2.2.1 of the outline CoCP [APP-300] states that a number of pre-construction environmental surveys would be undertaken in 2026. What are these surveys, when in 2026 will they be undertaken and is it the applicant's intention that the results of these would be submitted into the Examination in sufficient time to allow for responses?</p>
BIO 1.29	The applicant	<p>Residual effects on fish species:</p>

ExQ1	Question to:	Question:
		Table 5.1 of the outline CoCP [APP-300] indicates that a permit/ authorisation for the translocation of fish is anticipated with the Environment Agency being the consenting agency. The ExA also notes that Table 8.11 of ES Chapter 8 [AS-026] details a number of watercourse catchments being of “Medium – County” value for certain fish species of conservation concern. However, Table 8.23 of ES Chapter 8 does not contain an assessment of residual effects on fish species, even though Table 8.11 lists the relevant Water Framework Directive catchments and the fish species of conservation concern that are present. Explain why this is and justify the adequacy of the ES if residual impacts on fish species have not been included despite translocation measures being likely.
BIO 1.30	The applicant	Avoidance measures and precautionary working methods Commitment Reference B01 in Table 6.1 of the outline CoCP [APP-300] states that: “reasonable avoidance measures and/or precautionary working methods may be developed under the consultation of the ECoW.” However, this statement appears imprecise and open to interpretation. Consequently, the applicant is requested to provide further details about when/ how such further measures would be developed, the process for consultation with the relevant organisations on such measures and how this is to be secured, managed and monitored once approved, including the consideration of adaptive management if so required.
BIO 1.31	The applicant	Reinstatement Planting Plan Commitment Reference B03 in the outline CoCP refers to a Reinstatement Planting Plan that is to be secured under R9 of the draft DCO. Is this the plan that would provide the finer details of the mitigation/ compensation areas and BNG proposals that are to be established? If so, then the applicant is requested to submit an indicative version of this plan, or signpost to where one has been provided, and to explain how it should/could interact with any Habitat Management and Monitoring Plan.
BIO 1.32	The applicant	Priority habitat construction exclusion zones Commitment Reference B07 in the outline CoCP [APP-300] for construction exclusion zones states that “A minimum buffer of 10m (where practicable) will be retained around priority habitats (including watercourses) ...” The applicant is requested to either signpost to where these “priority habitats” have been defined or explain what is meant by this term. In addition, the applicant is requested to explain what alternative measures would be undertaken if such 10 m exclusion zones are not practicable and how this has been factored into the assessment of effects in ES Chapter 8 [AS-026].
BIO 1.33	The applicant	Culvert method statements Commitment Reference B11 of the outline CoCP [APP-300] refers to the development of method statements to ensure that any culverts within watercourses would contain suitable measures to ensure the safe passage of animals. How are these method statements to be consulted upon, authorised and secured? Should there be specific wording in the draft DCO requiring their submission and should an outline version(s) of these be submitted into the Examination in order to inform the final version and so they can be included in the certified documents in schedule 19 of the draft DCO?
BIO 1.34	The applicant	Approval of tree surgery measures Explain why Commitment Reference B15 in the outline CoCP [APP-300] does not refer to any tree surgery measures needing to be approved in advance by the Arboricultural Clerk of Works, and to any measures that might affect either veteran trees or ancient woodland being subject to the prior approval of the relevant planning authority.
BIO 1.35	The applicant	Method statements for notable species Commitment Reference B16 of the outline CoCP refers to both protected and “notable” species. Confirm that in this context “notable” means that as defined in Footnote 1 of ES Chapter 8 [AS-026] and, if so, include a cross reference to that effect in the next iteration of the outline CoCP [APP-300]. What is the proposed determination, management and monitoring process for any method statements for notable species that might need to be produced? The applicant is requested to provide into the examination an example of a method statement for any such notable species.
BIO 1.36	The applicant	Exclusion zones Commitment Reference B17 in Table 6.1 of the outline CoCP [APP-300] refers to the provision of a 15m minimum exclusion zone from the edge of ancient woodland. How will this zone be demarcated and monitored to ensure that it remains in place whilst any construction works in the vicinity are ongoing?
BIO 1.37	The applicant	Opportunities for joint working/ interactions with other projects The ExA notes that in O35 of the Applicant’s Comments on Relevant Representations [REP1-132] in response to comments made by Essex CC you have referenced the landscape proposals for the proposed development being influenced by those for the neighbouring Five Estuaries and North Falls substation sites. Explain how your assessment of cumulative effects on biodiversity has been undertaken in this area where multiple NSIP projects could be undertaken at the same time. Set out in more detail the opportunities for joint working/ a co-ordinated approach to habitat creation, biodiversity

ExQ1	Question to:	Question:
		enhancement and management that you have pursued so far with the proponents of other significant developments, and how this will develop in the future should all schemes achieve consent. Also, in [REP1-250] (and elsewhere) Lower Thames Crossing Project has raised concerns about the location of the Tilbury North substation impacting on the nitrogen deposition and ancient woodland mitigation areas that are proposed in the made LTC DCO and which are noted by the applicant in Table 6.1 of [REP1-134] . The ExA understands that the applicant is in discussions with the Lower Thames Crossing Project on this matter. However, the applicant is requested to explain how any potential effects arising from the proposed development on these mitigation areas for LTC have been assessed in its consideration of inter-project cumulative impacts in ES Chapter 17 [APP-281] .
BIO 1.38	The applicant	<p>Local Nature Recovery Strategies</p> <p>Notwithstanding your comments in, for example, O34 of [REP1-132] that Local Nature Recovery Strategy areas would be considered as part of the off-site BNG selection process, explain how your proposed mitigation, compensation, enhancement and BNG measures have thus far had regard to the Local Nature Recovery Strategies that have now been produced by Essex CC, Norfolk CC and Suffolk CC.</p>
BIO 1.39	The applicant	<p>Ecology Working Group</p> <p>In paragraph 9.10 of their joint LIR [REP1-178] Suffolk CC, Mid Suffolk SDC and Babergh DC have raised the need for an Ecology Working Group to be instigated to allow for consultation and monitoring to be undertaken for any post-consent mitigation, compensation and BNG. Is it your intention to set up such a working group and if not, justify why not? If such a group is to be formed, then suitable wording should be inserted into the next version of the outline versions of the outline LEMP and outline CoCP.</p>
BIO 1.40	The applicant	<p>Application of the mitigation hierarchy</p> <p>Paragraph 5.4.42 of NPS EN-1 (2023) references the application of the mitigation hierarchy in regard to biodiversity and geological conservation interests. A number of IPs have referenced the need for the applicant to demonstrate that a strict adherence to the mitigation hierarchy has been followed. In paragraph 3.1.17 of its LIR [REP1-176] South Norfolk Council, in relation to the mitigation hierarchy, states that: "Further work is required to demonstrate that avoidance and minimisation measures have been fully explored. Compensation should only be considered where no reasonable alternatives exist." Therefore, respond to South Norfolk Council's comments and justify how you have fully applied the mitigation hierarchy in regard to priority habitats and species listed under section 41 of the NERC Act 2006.</p>
BIO 1.41	The applicant	<p>Proposals for mitigation, enhancement, compensation and BNG</p> <p>Notwithstanding your commentary in ES Chapter 5 [APP-135], at the moment it is unclear to the ExA precisely which measures the applicant considers to be mitigation (particularly any "Additional Mitigation" that is referenced in paragraphs 8.6.10 to 8.6.13 of ES Chapter 8 [AS-026]), and which would fall within the context of compensation, enhancement or BNG. For example, it would appear that within some of the proposed environmental areas there is a mixture of these.</p> <p>In order to ensure that there is no double counting of measures the applicant is requested to provide additional clarification as to which measures/ proposed habitat creation fall within each of the above categories. To ensure clarity and future ease of monitoring you are requested to provide this information in a single document that details the type and quantum of habitat types that are being lost and the type and quantum of habitats and measures for species that are being replaced/ developed, state where these new sites will be, and whether this will represent mitigation, compensation, enhancement or BNG. For linear features such as hedgerows this information should, as far as possible at this stage, be broken down into figures for each individual length of hedgerow that is proposed to be removed and figures for what is proposed to be re-planted at the original location or to be compensated for with planting elsewhere. Whilst the ExA appreciates that the full details might not be available until the detailed design stage, the applicant is requested to provide its best estimate prior to detailed design, based on what has been assessed in the ES.</p>
BIO 1.42	The applicant	<p>Measures to minimise loss of habitat</p> <p>South Norfolk DC in its RR [RR-3417] considers that some of the temporary work areas would appear to be "excessive in places". Please comment on this, including the scope for these areas to be reduced in size at the detailed design stage, and explain what measures you have taken to minimise the loss of trees and hedgerows in these locations, including the Tree Preservation Order (TPO) - designated veteran tree (TPO ref SN0697) that South Norfolk DC has referred to.</p>
BIO 1.43	The applicant	<p>Woodland planting</p> <p>In [RR-1138] the Forestry Commission has stated that ideally woodland planting should be in blocks of at least 5 hectares (ha) in size or to link to other existing woodland to create blocks of at least 5 ha. Provide details of the sizes of proposed woodland planting areas (or signpost to where such details are available) and explain how you have accounted for the comments of the Forestry Commission in designing your proposed woodland planting areas.</p>
BIO 1.44	The applicant	<p>Restoration measures at CWSs</p>

ExQ1	Question to:	Question:
	Suffolk Wildlife Trust	<p>In [RR-3522] Suffolk Wildlife Trust considers that restoration at Sproughton Park CWS, Fore and Busheys Grove CWS and Thrandeston Marsh CWS is of concern and that the aim should be to improve the habitat condition rather than just restore.</p> <ul style="list-style-type: none"> To Suffolk Wildlife Trust: What discussions have you had with the applicant over the restoration of these sites and what additional measures would you wish to see? To applicant: Comment on the concerns raised by Suffolk Wildlife Trust and explain whether the enhancement of these sites is being considered as a potential BNG option?
BIO 1.45	The applicant	<p>Long-term monitoring and management of BNG</p> <p>Explain how you propose to manage the process and the practical application of BNG measures over a time period of 30 years? In addition, since it would appear that the proposed environmental areas would potentially contain mitigation planting, compensation habitat and BNG habitat then clarify how all those elements would be monitored and managed in practice?</p>
BIO 1.46	The applicant	<p>Habitat management and monitoring plan</p> <p>Essex CC in its RR [RR-1083] states that a 30 year management and monitoring period should be secured for all BNG. In addition, Essex CC indicates that for all mandatory BNG proposals a Habitat Management and Monitoring Plan (HMMP) must be submitted to and approved by the LPA. Whilst the ExA notes the commitment to a 30-year period for BNG, the applicant is requested to provide an outline HMMP to be submitted for its BNG proposals and to explain why a requirement for the provision of a HMMP in accordance with the outline HMMP is not currently secured within the draft DCO.</p>
BIO 1.47	The applicant	<p>Approach to the provision of BNG, including off-site BNG</p> <p>As set out in Table 7.1 of its BNG Report [APP-299] the applicant proposes 1165.95 Off-site Biodiversity Units to achieve 10% BNG in terms of Area habitat Units. The ExA understands that off-site BNG requirements would be calculated following detailed design and the biodiversity metric being re-calculated. Consequently, no specific sites have been proposed as yet, although the ExA notes that paragraphs 6.1.6 and 6.1.7 of [APP-299] refer to the Waveney and Little Ouse Landscape Recovery Project (WaLOR) scheme and Market Weston Fen in Suffolk and that Essex Wildlife Trust has confirmed its intent to assist with the requirement for approximately 400 units in Essex. Provide an update on progress on the securing of off-site BNG, including confirmation that sufficient land would be available from commercially registered providers.</p> <p>Furthermore, in an attachment to [RR-2973] Pylons East Anglia Ltd raises concerns about the applicant's approach to BNG, including what it contends to be a lack of detailed plans and quantification to support the applicant's approach to BNG provision, and the absence of any meaningful assessment of ecosystem services. The applicant is requested to respond to the concerns raised by Pylons East Anglia Ltd.</p>
BIO 1.48	The applicant	<p>Failure rate for replacement planting</p> <p>Babergh DC in [RR-0314] and Mid Suffolk DC in [RR-2540] have stated that a failure rate should be factored in to compensation planting. The ExA notes that, as stated on page AB7 of [REP1-132], you have proposed a 3 to 1 ratio for replacement planting "for individual trees and individual trees within small groups". However, in [RR-0391] Brentwood BC states "replacement planting on a 3:1 basis is reinstatement, not compensation." Please comment on this and also explain what would constitute "small groups" of trees.</p>
BIO 1.49	Suffolk CC Babergh DC Mid Suffolk DC	<p>BNG and mitigation for breeding birds</p> <p>In your joint LIR [REP1-178] Suffolk CC, Babergh DC and Mid Suffolk DC have commented that mitigation for impacts on breeding bird populations should be provided in addition to BNG habitat creation or enhancement. Further to the applicant's response on page AB8 of the Applicant's Comments on Relevant Representations [REP1-132], set out what, if any, additional mitigation you would wish to see in this regard?</p>
HRA Habitats Regulations Assessment		
HRA 1.1	South Norfolk DC	<p>Norfolk Valley Fens Special Area of Conservation (SAC) and Floddon Common SSSI</p> <p>In [RR-3417] you have made reference to direct impacts on Norfolk Valley Fens SAC (and Floddon Common SSSI). Explain what you consider the direct impacts would be and how they would arise.</p>
CA Compulsory acquisition, temporary possession and land rights		
CA 1.1	The applicant	<p>Extent of land and persons affected by compulsory acquisition temporary possession and land rights</p> <p>To provide an overview of the extent of land subject to compulsory acquisition (CA) and temporary possession (TP) provide the details in the attached table. This should be regularly reviewed and updated at each deadline or confirmation provided that there are no changes.</p>

ExQ1	Question to:	Question:																																																																																											
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CA 1.2	The applicant	<p>Extent of order limits order lands and ‘white land’</p> <p>Confirm that all of the land within the Order Limits is needed for the construction, operation or maintenance of the proposed development and that the Order Lands only relates to the land or interests required to be Compulsorily Acquired or Temporarily possessed to implement the development. Such that the ‘white land’ is land required for the proposed development but over which no interests are required as these have already either been acquired or separate agreements have been concluded such that no CA or TP is required to facilitate the proposed development. Thus, ensuring the Order Limits are tightly drawn and do not include more land than is necessary or if such land is identified that is not required consider whether this should be removed from the Order Limits.</p>																																																																																											
CA 1.3	The applicant	<p>Schedule of affected persons objecting to CA or TP of their lands or rights</p> <p>Provide a schedule, in the form of a tracker, listing those APs who have objected to the CA or TP of their land or interests; similar in approach to the statutory undertakers tracker. This is proposed to extract those persons from the detailed Land Rights Tracker (LRT) on which the ExA will need to report to the Secretary of State and provide a schedule which can be used to track the progress of on-going discussions on those objections. The schedule should be in tabular form providing columns with Name of AP, The plots (separated into those subject to CA, CA of Rights and TP) in which they have an interest, the nature of their interest, a summary of the reasons for their objection (reference to RR, Written Representation (WR), etc.), the applicant’s response to the issues raised, a column to state the latest position and a final column providing a Red/ Amber/ Green (RAG) rating to give a visual indication of how likely the issues with the APs are to being resolved and whether objections would be withdrawn by the close of the examination. For certainty red means not likely to be resolved during examination; Amber means on-going discussion with potential to conclude; and Green means matters have been resolved and objection has been withdrawn. This schedule is to be updated at each subsequent deadline.</p>																																																																																											
CA 1.4	The applicant	<p>Crown land schedule</p> <p>The update on progress on crown land was helpful, but this would be usefully reformatted into a schedule table identifying the contact points and crown interest and identifying the plots (separated into those subject to CA, CA of Rights and TP) for each and noting on-going discussions and progress towards resolution. To be updated at each subsequent deadline.</p>																																																																																											
CA 1.5	The applicant	<p>Land rights tracker, statement of reasons, schedule of negotiations</p>																																																																																											

ExQ1	Question to:	Question:
		<p>The ExA notes the update of and explanation of changes to the LRT submitted at Deadline 2 [REP2-011] and that this is a work in progress which we are still in the process of reviewing. However, and notwithstanding the question above in relation to the 'Schedule of Affected Persons objecting to CA or TP of their Lands or Rights':</p> <ul style="list-style-type: none"> • please ensure that at Deadline 3 particular attention is given to ensuring that column AC (Objection Status) is updated. • Can the applicant confirm that the new second tab 'Engagement History' supplements but does not replace and is independent of the Statement of Reasons - Appendix B - Schedule of Negotiations, last submitted as an additional submission [AS-016]. Appendix B should remain as a separate schedule as an updated document through the examination, please ensure an update is provided at Deadline 3. (Also check the land interests are correctly named eg Arelion UK Limited is referred to as Arenlion UK Limited in schedule B which makes searching APs difficult). • With respect to column E on tab 2 explain what each of the categories represents. In that it would appear that some 1339 parties have not been issued with Heads of Terms (HoTs) and this includes 556 category 1 persons. Explain the reason why HoTs have not been issued to these persons. Also given the engagement history (column c) it would appear they were provided with a HoTs early engagement letter and therefore the issue of HoTs is assumed to be in relation to populated HoTs? Given the assurances around resources following Compulsory Acquisition Hearing 1, confirm this is not a resource issue and explain in greater clarity the nature of the categories and the inter-relationship and potential movement between them.
CA 1.6	The applicant	<p>Special category land schedule</p> <p>Provide a schedule, in the form of a tracker, to identify any special category land interests to which objections have been received this should identify the special category (open space, common land etc) and include the plot numbers (separated into those subject to CA, CA of Rights and TP), the nature of the interest, the APs, any representations received in relation to its CA/TP, the applicant's response to comments and an on-going position status. To be updated at each subsequent deadline.</p>
CA 1.7	The applicant	<p>Statutory undertakers schedule</p> <p>Include in the statutory undertakers tracker, provided at deadline 1 [REP1-142], a column to list the plots affected (separated into those subject to CA, CA of Rights and TP). The tracker should be kept up to date and updated at each subsequent deadline.</p>
CA 1.8	The applicant	<p>Minerals rights and quarries</p> <p>There are a number of SoCGs with parties who have interests in quarries and mineral extraction and approximately 40 IPs shown in the LRT with quarry land listed. A number of these parties state that mineral extraction will be sterilised and alternative routing of pylons is required to avoid this. For the avoidance of doubt,</p> <ul style="list-style-type: none"> • list the IPs who have rights for existing, working quarries • list the IPs who have rights for proposed mineral extraction • why some SoCG show negotiations not being held for a number of months and how the applicant proposes to conclude these negotiations and reduce the impact on these sites.
CA 1.9	The applicant	<p>Compulsory Acquisition of the Linford Household Waste and Recycling Centre</p> <p>In its LIR [REP1-187] Thurrock Council raise concerns in relation to the CA of the Linford Household Waste and Recycling Centre, see paragraph 6.17.1 for a summary of its position in this regard. Address the issues set out in section 6.17 of Thurrock's LIR and detail the applicant's position in relation to the issues raised and what further engagement and actions are to be undertaken.</p>
CA 1.10	Affected Persons	<p>Accuracy of the Book of Reference (BoR) and Land Plans</p> <p>Are any APs aware of any inaccuracies in the BoR [AS-018], Statement of Reasons (SoR) [APP-059] or Land Plans [AS-005] to [AS-012]. If so, please set out what these are and provide the correct details.</p>
CA 1.11	The applicant	<p>The scope and purpose of the CA Powers sought</p> <p>Please detail what would happen to rights acquired if and when the project, or elements of the project, were to be decommissioned and how is this secured in the draft DCO?</p>
CA 1.12	The applicant	<p>The scope and purpose of the CA Powers sought</p> <p>Please confirm that all matters ancillary to the development contained within schedule 5 of the PA2008 are included within the scope for the CA powers sought if relevant.</p>
CA 1.13	The applicant	<p>Whether there is a compelling case in the public interest for the CA of the land, rights and powers that are sought by the draft DCO.</p>

ExQ1	Question to:	Question:
		For the avoidance of doubt, what are all the factors that are regarded as constituting evidence of a compelling case in the public interest for the CA powers sought for this NSIP and where, giving specific paragraph references, are these set out in the submitted documentation?
CA 1.14	The applicant	<p>Funding statement - 1</p> <p>In the funding statement [REP1-004] a number of funding sources are detailed.</p> <ul style="list-style-type: none"> • Detail the amount from each funding source that is contributing to the total project cost. • In paragraph 3.2.6 you explain that the £60 billion 2024-2029 financial framework investment plan includes £7 billion underwritten rights issue, can you explain the funding stream for the remaining £53billion • Will funding will be required in the post-2029 framework and if so, how the ExA can be certain that funding will be available.
CA 1.15	The applicant	<p>Funding statement - 2</p> <p>Paragraph 3.2.14 of the funding statement [REP1-004] states that the project assessment needs to be submitted to OfGEM for a decision which will be following the conformation of the DCO, if given. Can you explain what the decision relates to, what makes up the project assessment and how the ExA can be assured that funding for CA will be available and when.</p>
CA 1.16	The applicant	<p>Funding statement - 3</p> <p>At Deadline 1 an updated cost estimate based on a 2025/26 cost base has been provided in the Funding Statement [REP1-004]. Provide a detailed breakdown of the cost estimate which should include inflation allowance as a value and a percentage of the project cost.</p>
CA 1.17	The applicant	<p>Funding statement - 4</p> <p>The funding statement [REP1-004] states that the £184.9 million estimate for CA and compensation is benchmarked and has a 10% contingency. A number of the RRs state they have been offered very low compensation or CA valuation.</p> <ul style="list-style-type: none"> • How can the ExA be certain that the applicant has included the full likely costs of CA and compensation, include mineral rights. • Taking these matters into account, how can the ExA be certain that the overall cost estimate is accurate, how does it compare with the expectations of the Treasury Green Book for estimates at this stage of design development and therefore overall, how can the ExA be certain that the total cost of the project can be met within the available funding. • The Funding Statement submitted at DL1 revised the project cost estimate to a 2025/26 baseline. The estimated cost of CA was also updated. Please explain the basis of the updated CA costs. It is notable that the increase in costs is minimal and the ExA needs to be reassured that the cost of all CA matters are adequately considered and can be met, please provide this reassurance.
CA 1.18	The applicant	<p>Funding statement – 5</p> <p>What is the applicant’s approach to blight claims and how can the ExA be assured that the allowance for blight is sufficient in the cost estimate and the costs can be met.</p>
CA 1.19	The applicant	<p>Funding statement – 6</p> <p>At ISH1, the ExA questioned the scheme cost estimate following the display of a slide in the applicants presentation titled ‘Approach to Alternative Methods of Electricity Transmission – Capital Cost Overview 2020/21’. The ExA’s request for further explanation of the estimate was provided in the applicant’s Written Summary of Oral Submissions and Response to Action Points for ISH1 [REP1-139].</p> <p>Table 7.19 on page 39, being an extract from the 2023 Strategic Options Backcheck and Review [APP-357], shows that the project cost estimate was derived from EAN4, being the preferred option from Norwich to Bramford all OHL, at an estimated cost of £355.3 million, plus EAS2, being the preferred option from Bramford to Tilbury with majority OHL and partial AC cable, at an estimated cost of £1,275.1 million. Together these two elements total £1.630.3 million. The ExA is unclear how this estimated cost then translated into the application Funding Statement [APP-063] as a project estimated cost of £895m, being shown in the above mentioned slide at ISH1 as the estimated cost of a wholly OHL for the total of options EAN4 and EAS2; the response at Deadline 1 does not sufficiently clarify such matters.</p> <p>The ExA notes that the updated Funding Statement at Deadline 1 [REP1-004] updates the estimate with a 2025/26 price base which is now approximately £1,200 million. Please clarify again, clearly, why the estimated cost that is calculated in the backcheck review and updated at Deadline 1 appears to be for the wholly OHL option. If this is an error, confirm what the updated cost including the underground element is and if that the higher cost is able to be met to ensure that CA funds will be available.</p>
CA 1.20	The applicant	General, detailed or other matters - 1

ExQ1	Question to:	Question:
		A number of RRs state that they have been sent paperwork with incorrect details, plans and plots. The applicant is asked to explain how the ExA and APs can be reassured that the applicant will correct these issues quickly and eliminate them going forward.
CA 1.21	The applicant	<p>General, detailed or other matters - 2</p> <p>A number of RRs state that with localised design changes, the impact on their land could be significantly reduced. What approach is the applicant taking to these suggestions and how can the ExA be assured that these alternative suggestions are being adequately considered and will be within the order limits and LoD.</p>
DCO Draft Development Consent Order		
DCO 1.G1	The applicant	<p>Development Consent Order – general 1</p> <p>A number of LIRs refer to many of the comments made by local authorities in previous responses with regard to the draft DCO [APP-056] not being taken into account, with no explanation offered. Respond accordingly.</p>
DCO 1.G2	The applicant	<p>Development Consent Order – general 2</p> <p>A number of local authorities in their RRs and LIRs note commitments in the outline CoCP include notification ‘as appropriate’. For example GH10, which as part of unexpected contamination protocols and post-consent ground investigations, includes such a notification. The ExA is concerned in regard to the vagueness of the term ‘as appropriate’ and whether this would meet the tests of preciseness and enforceability. It would also ask for clarification as to how such notifications will be secured through the draft DCO, how the notification procedure will operate in practice, what post-consent documentation the Applicant will submit in compliance with the procedures outlined in the outline CoCP?</p>
DCO 1.G3	The Applicant	<p>Development Consent Order – control documents</p> <p>Explain why the outline CoCP, outline CTMP, outline LEMP, outline materials and waste management plan; outline Public Rights of Way (PRoW) management plan and outline WSI Are not listed as control documents, similar to the made Bramford to Twinstead DCO. Additionally, explain why Norwich to Tilbury DCO has not included a Construction Environment Management Plan, Materials Management Plan or a Waste Management Plan.</p>
DCO 1.G4	The Applicant	<p>Unilateral undertaking</p> <p>Explain how the ExA can be satisfied that the longer-term ongoing monitoring and management measures (including adaptive management measures if required) will be accounted for in terms of any proposed off-site BNG that is to be determined following detailed design of the proposed development? A number of local authorities, for example Norfolk CC in [REP1-173] do not agree that a unilateral undertaking would be the appropriate mechanism for securing BNG commitments, due to concerns over monitoring, scrutiny and enforceability. Justify why you consider a unilateral undertaking would be appropriate.</p>
Articles		
DCO 1.A1	The applicant	<p>Articles (general) - 1</p> <p>There are several articles included within the draft DCO [APP-056] where deemed consent is granted in the event of a determining authority failing to notify the undertaker of its decision within a defined number of days. However, the same articles also set out consent must not be unreasonably withheld or delayed. The ExA question the need for both provisions within the relevant articles.</p> <p>The applicant is asked to review all instances where this occurs and amend as necessary. Should the applicant not consider amendments appropriate, the applicant should provide a full written justification as to why those amendments have not been undertaken.</p>
DCO 1.A2	The applicant Local Authorities Relevant statutory undertaker Other relevant determining body	<p>Articles (general) - 2</p> <p>Throughout the articles contained in the draft DCO [APP-056] the applicant has specified time periods within which a response is required from a determining body. That time period tends to be 28 days. A number of the local authorities have raised concerns in regard to the time period specified, but there does not appear to be a consensus as to an appropriate alternative time period. The ExA is also concerned as to such a short period being imposed, especially where a deemed consent is triggered where a determining body has failed to respond in the period specified.</p> <p>Applicant: Explain how you have reached the time period chosen (generally 28 days), including an explanation of your understanding of any processes the relevant determining bodies have to/ or are required go through. For example, your understanding of: any application validation period; any minimum consultation periods required with statutory or other bodies; any report writing periods; any committee or delegated cycles; and any decision issuing periods that may apply.</p> <p>All local authorities, relevant statutory undertaker and or other relevant determining body: provide a summary of any processes you are required to go through, including any time period in the number of days required to undertake that process. For example, any application validation process; any</p>

ExQ1	Question to:	Question:
		minimum consultation periods required with statutory or other bodies; any report writing periods; any committee or delegated cycles relevant; and any decision issuing periods that may apply.
DCO 1.A3	The applicant	Articles and Schedules (general) - 3 A number of RRs raise the issue of consistency in regard to the term 'day(s)' and 'business day(s)'. In the interests of consistency justify the two different terms or amend the draft DCO, as necessary.
DCO 1.A4	The applicant	Article 2 (Interpretation) (general) Braintree DC in its RR [RR-0383] and LIR [REP1-148] , considers a number of central documents, submitted as part of the application, are missing from the interpretations list and should be defined. These including, but are not limited to the CoCP, the Minerals and Waste Management Plan; and the Noise and Vibration Management Plan. Signpost your responses to these concerns or provide a response.
DCO 1.A5	The applicant	Article 2 (Interpretation) (design and layout Plans (elevations)) The ExA notes the definition of design and layout plans (elevations), as set out in article 2(1). However, it is concerned the definition has the potential to add a layer of confusion. Justify why there is a need for the interpretation of design and layout plans (elevations), as opposed to just defining the term 'design and layout plans – subs & cables'.
DCO 1.A6	The applicant	Article 2 (Interpretation) (maintain) Braintree DC in its RR [RR-0383] and LIR [REP1-148] , along with a number of other local authorities and statutory undertakers, considers the definition of "Maintain" needs to be clear with regard to who decides whether the maintenance would give rise to any materially new or materially different environmental effects. Signpost your responses to this matter or provide a considered response.
DCO 1.A7	The applicant All local authorities APs and IPs	Article 2 (Interpretation) (order land) The definition of 'Order land' is not sufficiently clear to ensure that land not required/ intended to be subject to CA or TP is appropriately excluded from articles pursuant to CA (articles 24 and 25) and TP (articles 27, 28 and 29). The consequence of the definition being unclear could result in allowing for the acquisition or temporary use of such land unintentionally. Should 'Class 8' (Uncoloured (White) Land), as set out in the SoR [APP-059] at Table 5.1 (Powers related to land acquisition and use being sought by the Project) be specifically defined and excluded in these articles or through the definition of 'Order land'?
DCO 1.A8	The applicant	Article 2 (Interpretation) (pre-commencement operations) - 1 Braintree DC in its RR [RR-0383] and LIR [REP1-148] considers this definition should be brought in line with the same definition in National Grid's (Bramford to Twinstead Reinforcement) DCO 2024, but should also exclude those operations which the relevant planning authority considers give rise to a materially new or different environmental effect. Signpost your responses to this matter or provide a considered response.
DCO 1.A9	The applicant	Article 2 (Interpretation) (pre-commencement operations) - 2 The ExA is concerned in regard to the range of works excluded from the meaning of 'Commence', by virtue of the definition of 'Pre-commencement operations'. This matter has been raised by a number of local authorities in their LIRs. The scope of the 'pre-commencement operations' is extensive and includes multiple additional elements not included in other made DCOs (for example the Bramford to Twinstead DCO). The effect of this has the potential to be wide ranging and not insignificant. a) Provide justification as to why the definition of 'pre-commencement operations' is so wide ranging and why additional elements have been incorporated over and above other made DCOs in terms of 'pre-commencement operations', especially the Bramford to Twinstead DCO. b) Clarify why the temporary display of advertisements would be required as part of pre-commencement operations. Please be clear in your reply in regard to what your meaning of advertisement is. For example do you mean an advertisement falling within the definition of an 'advertisement' as set out in Section 336(1) of the Town and Country Planning Act 1990 (as amended) or do you have an alternative meaning of the term.
DCO 1.A10	The applicant All local authorities	Article 2 (Interpretation) (Relevant Planning Authority) Norfolk CC in its RR [RR-2753] and its LIR [REP1-173] , as well as a number of other local authorities have raised concern over the definition of 'Relevant Planning Authority'. As the proposed development is a long linear scheme there will be multiple authorities involved. A number of requirements proposed use the phrase 'No stage of the authorised development may be commenced until... has been submitted to and approved by the relevant planning authority'. The ExA seeks greater clarity from both the applicant and all local authorities on the following:

ExQ1	Question to:	Question:
		<p>a) What constitutes a 'stage' of the authorised development. The ExA in asking this question notes the 'Works' are defined in schedule 1 and the proposed development has been divided into Sections A to H, covering a geographical split. It also notes image 4.1 of [APP-130] provides an indicative construction programme for the various sub-elements and there are different stages of the proposed development (the definition of have construction, operation and (potentially) decommissioning). Would these adequately cover the definition of a 'stage'?</p> <p>b) Which local authorities would be the relevant planning authorities for a particular stage, bearing in mind the length and size of the proposed development at that stage? For example what happens if more than one authority (such as a County Council and a Local Authority) is involved in discharging a requirement/ plan/ scheme for a particular stage and they disagree that the submission is adequate to allow for the development to commence?</p> <p>c) Consider a requirement for a 'stages plan' to be submitted in writing prior to commencement, for the written approval of the relevant determining body (similar to the provisions set out on the Brechfa Forest Connection Project DCO, the Brechfa Forest West Wind Farm DCO and the Richborough connection Project DCO), to approve the staging plan prior to commencement of works.</p> <p>The ExA invites suggestions as to any alternative wording and/ or solutions that would address the ExA's concerns in regard to the above-mentioned matters.</p>
DCO 1.A11	The applicant	<p>Article 2 (Interpretation) (temporary construction works) No such term is used in schedule 1 (Authorised Development). Review and amend as necessary.</p>
DCO 1.A12	The applicant	<p>Article 2 (Interpretation) (UKPN works) The ExA asks why it is necessary to reference Works Nos. 25 to 36 specifically.</p>
DCO 1.A13	The applicant	<p>Article 2 (Interpretation) – (Article 2(3)) The ExA notes article 2(3), especially the final sentence which reads “Unless otherwise specified in article 5 (LoD) and schedule 1 (Authorised Development), heights and depths in this Order or on the Work Plans are measured from the proposed final ground level”. In the interests of certainty, how is the 'proposed final ground level' known and where within the submitted application documentation is that term is specifically defined.</p>
DCO 1.A14	The applicant	<p>Article 4 (Maintenance of authorised development) Braintree DC in its RR [RR-0383] and LIR [REP1-148] seeks a mandatory obligation on the Undertaker: i) to maintain (ie 'shall'); ii) for decommissioning and iii) for removal of parts of the authorised development that become obsolete. Respond whether the above matters should be included within the article. Should these matters be provided for elsewhere within the draft DCO, the ExA would ask you to signpost where within the draft DCO they are located.</p>
DCO 1.A15	The applicant	<p>Article 5 (Limits of deviation) - 1 The limits of vertical deviation within the National Grid (Bramford to Twinstead Reinforcement) DCO 2024 is 4 metres. Please explain why the limits of vertical deviation differ between your draft DCO and those contained within the above mentioned Order. Justify as to why an additional 2 metres (resulting in a total limit of deviation vertically of 6 metres) is considered to be required in this instance.</p>
DCO 1.A16	The applicant Relevant local authorities	<p>Article 5 (Limits of deviation) - 2 Provide an update with regards to the potential for pylons TB140 to TB142 (inclusive) and TB238 to TB243 (inclusive) and whether an 18 metre vertical limit of deviation will be required, should a change from low height pylons to standard height pylons be required. The explanatory memorandum (EM) [APP-057] suggests the change will be known following consultation feedback and engagement with statutory stakeholders. Please provide an indication of when that consultation and engagement concludes and when a decision on these pylons being low height or standard height pylons will be finalised. In addition, the following wording has been used multiple times in this article "... to such extent the undertaker considers necessary or convenient", with two of those instances also including the word 'downwards'. In terms of precision and enforceability, the ExA raises concerns with the applicant in regard to the wording used and ask it be reviewed and amended, as may be necessary. In regard to the above concerns, the local authorities are invited to submit their views on this matter and request they submit alternative wording for consideration, should they wish.</p>
DCO 1.A17	The applicant	<p>Article 5 (Limits of deviation) - 3 The ExA notes article 5(4) and the explanation provided in the EM [APP-057] (paragraph 3.9.10). However, the ExA is concerned that such provision removes certainty from the proposed development in terms of the final height of the proposed pylons and would seek further justification, including reasoning and necessity, from the applicant in this regard. For example in what instance and in what location is it envisage article 5(4) would be utilised.</p>

ExQ1	Question to:	Question:
DCO 1.A18	The applicant	<p>Article 10 (Planning Permission and Other Consents)</p> <p>The ExA notes the applicant's position, as set out in the EM [APP-057] (Section 3.14) in regard to article 10, but seeks further justification for the necessity of including articles 10(2) and (3) in relation to this particular project.</p> <p>Additionally, in what instances would article 10(2)(b) apply, especially in terms of preventing enforcement action under the 1990 Act or the 2008 Act in relation to development carried out or used pursuant to the relevant planning permission or development consent outside the Order limits?</p>
DCO 1.A19	All local authorities statutory undertakers	<p>Article 11 (Street Works); Article 12 (Application of the Permit Schemes); Article 13 (Application of the 1991 Act)</p> <p>The ExA notes the explanation provided by the applicant in its EM [APP-057] with regard to these articles but seeks whether the relevant Street/ Highway Authorities and/ or any statutory undertakers have any further comments, as relevant to these articles beyond the submissions in their RRs, WRs, LIRs and Deadline 1 submissions. In responding to this question, a relevant street/ highways authority or statutory undertaker should list any relevant examination library reference and paragraph numbering of their former submissions that responded to these articles.</p>
DCO 1.A20	The applicant	<p>Article 11 (Street Works)</p> <p>Norfolk CC in its RR [RR-2753] seeks a Highways Side Agreement or Protective Provisions. Alternatively, it suggests article 11(1) Should be subject to Street Authority Consent, with articles 11(2) to 11(7) needing amending accordingly. Provide a response to these concerns.</p>
DCO 1.A21	The applicant	<p>Article 12 (Application of the permit schemes)</p> <p>The ExA notes article 12(8) but asks whether this is a duplication of appeal process?</p> <p>Additionally, what happens in the instance more than one appeal mechanism is used, in relation to the same matter being appealed, at the same time and whether there is a need to include something that prevents this occurring?</p>
DCO 1.A22	The applicant	<p>Article 14 (Power to alter layout, etc. of streets), Article 15 (Permanent stopping up of streets and public rights of way) and Article 16 (Temporary closure of streets and public rights of way)</p> <p>Norfolk CC in its RR [RR-2753] seeks a Highways Side Agreement or Protective Provisions. Alternatively, it suggests articles 14(1), 15(1) and 16(1) should be subject to Street Authority Consent. Provide a response to these concerns.</p>
DCO 1.A23	The applicant	<p>Article 14 (Power to alter layout, etc. of streets) and Article 17 (Access to works)</p> <p>Braintree DC in its RR [RR-0383] and LIR [REP1-148], along with a number of other County and Local Authorities, seeks notification, as a relevant Local Authority in relation articles 14(1) and 17(1). Provide a response to these concerns.</p>
DCO 1.A24	The applicant	<p>Article 16 (Temporary closure of streets and public rights of way)</p> <p>In article 16(1) you use the term 'reasonable time'. In the interests of precision, define this term.</p> <p>In addition to the above, Norfolk CC in its RR [RR-2753] considers other provisions which provide for consents should also explicitly state that reasonable conditions may be applied and this article should provide that any temporary diversion specified in column (4) of Part 1 or Part 3 of schedule 8 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way is temporarily stopped up, altered or diverted. Provide a response to these concerns.</p>
DCO 1.A25	The applicant	<p>Article 18 (Construction, alteration and maintenance of streets and other structures), Article 30 (Use of subsoil under or airspace over streets) and Article 39 (Power to override easements and other rights)</p> <p>No explanation has been provided in the EM [APP-057] in regard to articles 18(6), 30(5) or 39(6).</p>
DCO 1.A26	The applicant	<p>Article 21 (Protective works)</p> <p>Braintree DC in its RR [RR-0383] and LIR [REP1-148] considers relevant local authorities should be consulted where such works fall outside the Order limits to establish whether planning permission is required for those works. Provide a response to these concerns.</p>
DCO 1.A27	The applicant	<p>Article 22 (Authority to survey and investigate the land)</p> <p>This article would give power to enter onto "any land either shown within the Order limits or land which may be affected by the authorised development" and only requires 14 days prior notice to be given. The need for such a broad power and the short duration of any notification period needs to be clearly explained in the EM. Provide a clear explanation and for any precedent and/ or legal justification to be clearly set out.</p>
DCO 1.A28	The applicant	<p>Article 23 (Removal of Human Remains)</p> <p>Whilst noting your commentary in the EM [APP-057] in relation to DCOs that have included articles enabling the removal of human remains, as well as the justification for such an article in paragraph 3.27.6, the ExA, having reviewed the submitted application documents has not found any direct reference</p>

ExQ1	Question to:	Question:
		<p>to human remains or potential sites of human remains. As such the ExA would request you signpost it to where such matters are referenced in the submitted application documentation.</p> <p>Additionally, whilst the ExA is aware of similar articles related to the removal of human remains in other DCOs, it is equally aware that other similar articles have been removed from DCOs in recent decisions made by the Secretary of State, where limited or no reasoned justification has been provided during the examination of those submissions to substantiate their inclusion. (For example: the HyNet CO2 Pipeline Order 2024; The Sunnica Energy Farm Order 2024; The Gate Burton Energy Park Order 2024; and The Mallard Pass Solar Farm Order 2024).</p> <p>Clarify paragraph 3.27.6 of the EM [APP-057], as to why this article is considered to be necessary/ relevant to the development being sought and whether the article would be reasonable in all other respects.</p>
DCO 1.A29	The applicant	<p>Article 27 (Temporary use of land by National Grid)</p> <p>Article 27(5)(c) refers to schedule 10 of the draft DCO. Check the correct schedule is being reference and amend if required.</p>
DCO 1.A30	The applicant	<p>Article 29 (Temporary use of land for maintaining the authorised development) and Article 49 (Traffic regulations)</p> <p>Article 29(12) and article 49(7) refers to replacement or landscape planting where ‘the maintenance period’ means the period of five years. Like many of the local authorities, the ExA is concerned that 5 years for maintenance of replacement or landscape planting would be inadequate, especially for a development of this scale.</p> <p>Provide full justification as to the use of a 5 year period or review to maintenance period and amend as appropriate, providing a justification for that alternative period.</p>
DCO 1.A31	The applicant	<p>Article 31 (Disregard of certain interests and improvements) and Article 32 (Set-off for enhancement in value of retained land)</p> <p>No definition of the term ‘tribunal’ has been provided. Please define this term.</p>
DCO 1.A32	The applicant	<p>Article 34 (Time limit for exercise of authority to acquire land and rights compulsorily)</p> <p>Justify the necessity of including article 34(3) given that in the event of a legal challenge, this may give rise to uncertainty as to when CA powers will be exercised. The ExA also seeks clarification as to how this is consistent with the Human Rights Act 1998.</p>
DCO 1.A33	The applicant	<p>Article 44 (Statutory Undertakers)</p> <p>The ExA queries whether reference to other articles relevant to protective provisions (articles 46 and 54) should also be referenced in article 44(1). Review and amend as necessary.</p> <p>In addition to the above, and as relevant to article 44(1)(b), how is repositioning outside the order limits achievable? Are other rights, such as permitted development, or separate consent(s) required for such repositioning?</p>
DCO 1.A34	The applicant	<p>Article 45 (Apparatus and rights of statutory undertakers in stopped-up streets)</p> <p>The definition of ‘statutory undertaker’ in article 45(8) differs from the definition of ‘statutory undertaker’ set out in article 2(1). Review the definition in article 45(8) and amend as necessary.</p>
DCO 1.A35	The applicant All local authorities	<p>Article 48 (Defence to proceedings in respect of statutory nuisance)</p> <p>The DASSI [APP-354] is noted, however, the ExA is concerned with regard to this article in the absence of any finalised design of the proposed substations, especially in the light of ES chapter 14 (noise and vibration). The ExA seeks certainty that the resultant noise impacts arising from the substations will be adequately mitigated within the design of those substations.</p> <p>Explain how that certainty can be provided in the absence of any finalised design of the substations.</p> <p>All local authorities are also invited to provide their views in relation to article 48.</p>
DCO 1.A36	The applicant	<p>Article 49 (Traffic regulations)</p> <p>The references to Parts 1 and 4 of schedule 13, columns (1), (2) and (3), in this article appeared to be incorrect. Review these column numbers and amend as appropriate.</p> <p>In addition to the above, do the provisions of article 49(8) duplicate the requirements of article 49(4)(a)?</p>
DCO 1.A37	The applicant	<p>Article 50 (Felling or lopping)</p> <p>Braintree DC in its RR [RR-0383] and LIR [REP1-148] seeks advanced notice in regard to proposed works where trees are outside the order limits in regard to this article. Provide a response.</p>

ExQ1	Question to:	Question:
		In addition to the above, the ExA notes article 50(7) refers to paragraph (6) twice and questions whether the second reference to paragraph (6) is correct. Review and amend as necessary.
DCO 1.A38	The applicant	Article 51 (Trees subject to TPOs) Braintree DC in its RR [RR-0383] and LIR [REP1-148] seeks a definition off the term 'near' and requests advanced notice of proposed works to the relevant local authority, so it can seek to impose reasonable conditions. Provide a response.
DCO 1.A39	The applicant	Article 54 (Protection of interests) Explain why this is titled protection of interests and not protective provisions. Review and amend as necessary.
DCO 1.A40	The applicant	Article 56 (Safeguarding) - 1 The ExA notes article 56, especially the provisions in 56(4). The applicant should explain: a) What happens in the event of an application being withdrawn or refused by the relevant planning authority, statutory undertaker or other determining body? b) The use of the term 'all the final part of it' in article 56(7), as this appears imprecise. c) Why the term 'relevant planning authority' is required when it is already defined in article 2(1).
DCO 1.A41	Braintree DC	Article 56 (Safeguarding) - 2 In your LIR [REP1-148] at paragraph 16.2.35 you refer to article 56 (Safeguarding) placing an obligation on you, as relevant planning authority, to consult the undertaker in relation to future proposed development within the Order land before granting any new planning permission, and to register such an obligation as a local land charge. Please clarify the point you are making in regard to this article of the draft DCO.
DCO 1.A42	All local authorities, highway authorities and statutory undertakers	Article 58 (Application, disapplication and modification of legislative provisions) The ExA would ask for comments in regard to the disapplication and modification of certain public general legislation (See provisions set out in article 58(1) and the public general legislation listed at schedule 17 of the draft DCO), especially in regard to the Highways Act 1980 and the Land Drainage Act 1991.
DCO 1.A43	The applicant	Article 59 (Amendment to local legislation) What happens after article 59(4), in the event a 'person' is not satisfied with your response?
Schedules		
DCO 1.S1	The applicant	Schedule 1 (Authorised Development) - 1 Should associated development, listed on page 72 to 73, be placed under a separate heading, being 'Part 2 (Associated Development)'? In addition to the above, Braintree DC in its RR [RR-0383] have stated the final part of this definition should be brought in line with the definition of 'maintain' in article 2(1) and that schedules 3(1) and 3(4) should also be amended accordingly. Furthermore, it considers County and Local Authorities should be notified of works carried out for the avoidance of doubt. Provide a response in respect of these comments.
DCO 1.S2	The applicant	Schedule 1 (Authorised Development) - 2 A number of local authorities have commented on the wide drafting of the description of 'authorised development', including range of 'associated development' that affords significant latitude to the undertaker. They consider it is unclear who would be the arbiter of whether such works would be 'materially new' should a dispute arise. Comment on whether additional control over associated works, but currently unspecified works, should be included within the DCO. For example should additional wording, such as "...in the opinion of the relevant planning authority" to the final paragraph of the definition of 'associated development' on page 73 before the words ...'give rise to materially new....' be added and would such wording bring the text in line with schedule 3, paragraph 1(4)? In addition, how will relevant planning authorities be able to monitor works being carried out as 'associated development'. Is a mechanism being proposed for notifying the relevant planning authorities of such works?.
DCO 1.S3	The applicant	Schedule 3 (Requirements) – General The EM lacks detail ON requirements, particularly as regard to the appropriateness and relevance of the requirements listed to the proposed development which is significantly different to many previous DCOs. Prior precedents (although only described as "similar wording" rather than identical wording) have been cited, although their similarity to this scheme is not explained. Explain in detail why changes have been made to the requirements or provide a justification for the inclusion of the requirement.

ExQ1	Question to:	Question:
		<p>In the majority of cases, there does not appear to be any element within the requirements for what is secured to be maintain as approved thereafter for the duration of the lifetime of the Authorised Development or whatever alternative period of time. Review and amend, or provide explanation if not amended.</p> <p>Furthermore, there are several instances in requirement 4 where the use of the word 'substantially' occurs. Consider whether the use of this word would be precise, in the interests of clarity. Review and amend, or provide explanation if not amended.</p>
DCO 1.S4	<p>The applicant Environment Agency Anglian Water Any other relevant water company</p>	<p>Schedule 3 (Requirements) – General</p> <p>Anglian Water in its RR and D1 submission have indicated "...if non-domestic water supply is not agreed within the examination period... [it] would request the draft DCO includes a requirement for a water resources assessment to be submitted to the... [relevant] Planning Authority in consultation with the Environment Agency and relevant water company before construction progresses. The ExA requests i) the applicant provided its considered response to Anglian Waters request; and ii) the applicant, Anglian Water, the Environment Agency and any other relevant water company provides a form of wording for such a requirement, should the ExA consider the inclusion of such a requirement is necessary in the draft DCO.</p>
DCO 1.S5	<p>The applicant All local authorities</p>	<p>Schedule 3 – Requirement 1 (Interpretation) – Terms “discharging authority” and “start-up and close down activities”</p> <p>a) “discharging authority”: There are multiple examples throughout the draft DCO where terms such as ‘discharging authority’; ‘relevant planning authority’ and ‘relevant highways authority’ appear to be used interchangeably. This could lead to confusion and would ask the applicant and relevant local authorities for their views on this matter, including any suggestions, alternative wording or definitions within the interpretations section, that would prevent any such confusion.</p> <p>b) “start-up and close down activities”: Reference is made to the safety checking of plant and machinery, under (g), whilst reference to ‘safety checks’ is listed in (c). Are they not the same thing? Clarify and amend as necessary.</p>
DCO 1.S6	<p>The applicant</p>	<p>Schedule 3 – Requirement 2 (Time Limits)</p> <p>a) Provide further justification for the necessity of including requirement 2, sub-paragraphs (2) to (4), given, in the event of a legal challenge, this is likely to give rise to uncertainty as to when CA powers will be exercised. Clarify how this is consistent with the Human Rights Act 1998.</p> <p>b) The proposed development is required to be operational by 2031, therefore justify why 5 years is proposed for the commencement of development, with that time period beginning with the date on which the Order comes into force, as set out in requirement 2(1)?</p>
DCO 1.S7	<p>The applicant All local authorities</p>	<p>Schedule 3 – Requirement 3 (stages of the authorised development)</p> <p>requirement 3(1) specifies "...written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out..." The ExA would ask all local authorities, as well as any relevant discharging authorities whether seven days is an adequate period for such written notice and whether such written notice should be approved in writing by the relevant planning authority/ discharging authority?</p> <p>In addition to the above, should requirement 3(5) refer to sub-paragraph (2) and/ or (3)?</p>
DCO 1.S8	<p>The applicant All local authorities</p>	<p>Schedule 3 – Requirement 5 (archaeology)</p> <p>Braintree DC in its LIR [REP1-148] (section 10.9) has recommended changes to requirement 5, whilst Chelmsford City Council, Colchester City Council, and Essex CC in their LIR (LIRs [REP1-153]; LIR [REP1-156] and [REP1-161] respectively) all recommended amendments to the wording of requirement 5 and the inclusion of a new sub-paragraph.</p> <p>Additionally, Norfolk CC in its LIR [REP1-173] recommends amending the wording of requirement 5(1) and (4) and article 23 (Removal of human remains) so notification is required to be made to the relevant County/ Local Authority. In their joint LIR [REP1-178] Suffolk CC, Mid Suffolk DC and Babergh DC have recommended amendments to article 23 and to requirement 5 of the draft DCO.</p> <p>Historic England in its WR [REP1-191] has proposed an amendment to requirement 5 of the draft DCO and H04 of the outline CoCP to refer to consultation with Historic England.</p> <p>All local authorities, as well as the applicant, are invited to comment on all of these proposed changes (amendment to article 23 and schedule 3, requirement 5 of the draft DCO and to H04 of the outline CoCP).</p> <p>In addition, the applicant is requested to provide, for discussion purposes, a new draft of requirement 5 that, as far as possible, takes into account all of these requested changes and also is requested to provide a commentary on whether any of these proposed amendments sought by the various organisations would be incompatible with each other.</p>

ExQ1	Question to:	Question:
DCO 1.S9	The applicant	<p>Schedule 3 - Schedules and requirements, especially requirement 6 (design and layout plans)</p> <p>It is questioned whether the term ‘...in general accordance with...’ meets the relevant tests of precision and enforceability. Review the draft DCO and amend where this term has been used, or otherwise justify your reasoning.</p> <p>Additionally, requirement 6(2) specifies “The authorised development will not be in general accordance with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) gives rise to any materially new or materially different environmental effects from those identified in the environmental statement.” Requirement 1(4) already deals with this matter in that where an approval or agreement is required under the terms of any requirement... such approval or agreement may only be given where it has been demonstrated... that the subject matter of the approval or agreement... will not give rise to any materially new or materially different environmental effects from those identified in the ES.</p> <p>Clarify and amend, if required.</p>
DCO 1.S10	The applicant	<p>Schedule 3 - Requirement 7 (construction hours)</p> <p>A number of local authorities, along with a significant number of IPs, have raised concerns in regard to proposed construction, piling and heavy goods vehicle (HGV) delivery hours, which they consider excessive especially in the context of the rural locations affected by the proposed development. The ExA shares such concerns, especially bearing in mind:</p> <ul style="list-style-type: none"> i) the proposed construction/ percussive piling/ HGV delivery hours, are currently set out as 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays, Sundays, bank holidays and other public holidays ii) the proposed start-up and close-down provisions iii) the activities permitted outside core working hours iv) the duration of the construction programme <p>The applicant should clarify/ provide further justification for:</p> <ul style="list-style-type: none"> a) the proposed construction hours/ piling hours/ HGV delivery hours, including in relation to proposed start-up and close-down provisions b) the extensive list of activities that would be permitted outside core working hours c) an explanation of the implications in regard to the proposed construction timeline should it recommend to the Secretary of State reducing these hours (construction/ piling/ HGV delivery) to Monday to Friday 07:00–19:00 and Saturday 08:00- 13:00, with no working on Sundays, bank holidays and/ or other public holidays, or any variation of removing such days (ie just removing Sundays; just removing bank holidays and other public holidays and so on) d) the measures included in the draft DCO, or other management plans, that prevents the use of other forms of piling e) which restrictions apply to abnormal indivisible loads (AIL), as these would be excluded from the definition of ‘HGV’ as set out in requirement 1(1) and the fact they are potentially an operation excluded by requirement 7(4)(m) f) the complaints procedure in the event of a breach occurring
DCO 1.S11	Braintree DC	<p>Schedule 3 – Requirement 8 (Retention and removal of trees, woodland and hedgerows) - matters arising from the implementation of the Bramford to Twinstead DCO</p> <p>In your RR [RR-0383] you state that the Bramford to Twinstead DCO wording has caused difficulties. Provide examples of such difficulties you have encountered and provide your preferred wording for R8 of the draft DCO in terms of the need for due diligence.</p>
DCO 1.S12	The applicant	<p>Schedule 3 – Requirement 8 (Retention and removal of trees, woodland and hedgerows)</p> <p>The ExA asks why arboricultural protection measures, such as arboricultural method statements, tree protection plans and root protection areas are not clearly defined and being secured prior to construction as part of this requirement? Braintree DC along with other County/ Local Authorities consider that in the absence of such additional details, there is a risk that the scale of tree and hedgerow loss could exceed that currently assessed. As such they consider the acceptability of the arboricultural impacts of the scheme is dependent on the provision of further information, including delivery of tree retention, protection, and replacement planting, and the inclusion of such measures should be incorporated as a requirement and would be fundamental to delivery of acceptable mitigation.</p>
DCO 1.S13	The applicant	<p>Schedule 3 – Requirement 9 (Reinstatement Planting Plan) - replacement planting period and on-site BNG aftercare period</p> <p>A number of IPs have commented that your proposed 5-year replacement period for any trees or hedgerows planted as part of the reinstatement planting plan under R9(7) would be an insufficient time period due to the nature of the environment and erratic weather patterns in the locality, and a ten year aftercare period is recommended by, for example, Suffolk CC. Notwithstanding your response in [REP1-132] provide evidence to justify how a 5-year</p>

ExQ1	Question to:	Question:
		<p>period provides sufficient certainty that the replacement planting will be successful and that therefore the mitigation/ compensation effects you have assessed would be realised in practice.</p> <p>Also, a number of organisations such as Colchester City Council in [REP1-156], Braintree DC in [REP1-148] and Essex CC in [REP1-161] have argued that in cases where this 5 year period cannot be extended due to landowner agreements then an evidence-based planting failure rate should be factored in to any planned mitigation in order to ensure that the predicted outcomes in the ES can be achieved. Respond to this.</p> <p>Furthermore, the ExA understands that, as stated in paragraph 3.5.9 of the BNG Report [APP-299] and as referenced in [REP1-132] there would be a 30-year aftercare period for BNG on-site habitat for the Environmental Areas. Clarify the position in terms of the aftercare period for any other on-site BNG outside of the proposed Environmental Areas, for example reinstated hedgerows and priority watercourses that would be upgraded to one condition higher.</p>
DCO 1.S14	The applicant	<p>Schedule 3 - Requirement 9 (Reinstatement Planting Plan) – monitoring</p> <p>The outline LEMP, Appendix B at Table 5.1 of [APP-323] explains the outline mitigation hierarchy for veteran trees and under compensation states there will be commitments to maintain and monitor “compensation areas” for a minimum of 30 years. Whilst it is acknowledged that this figure is within the outline LEMP, it is not reflected in the draft DCO under requirement 9. This refers to reinstatement planting plans and sub-section (7) refers to monitoring and replacing for a period of five years. The ExA would ask what exactly you mean by the term 'compensation areas'; how they have been defined in the plans submitted as part of the application documentation; and how are they to be secured in the draft DCO. requirement 9 of the draft DCO should be updated to reflect the status of compensation that is proposed for impacts on veteran trees.</p>
DCO 1.S15	The applicant	<p>Schedule 3 - BNG commitments</p> <p>The ExA notes that BNG is not defined in the draft DCO, and none of the requirements in schedule 3 of the draft DCO make specific reference to the BNG baseline and measures that are contained in the BNG Report [APP-299] and which are referenced in other documents you have submitted. Whilst the ExA is aware that the BNG Report [APP-299] is intended to present an initial calculation of how BNG could be achieved, it is not a certified document in schedule 19 of the DCO. Justify why a specific reference to securing BNG is not contained in the draft DCO as either a requirement or within a separate schedule. Furthermore, explain how the ExA can rely upon the BNG measures that are set out in [APP-299] actually being undertaken if they are not adequately defined and secured in the draft DCO.</p>
DCO 1.S16	The applicant	<p>Schedule 3 – Requirement 9 (Reinstatement Planting Plan)</p> <p>requirement 9(7) addresses what happens in the event of any trees or hedgerows planted, as part of an approved reinstatement planting plan, being removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased. However, what monitoring period/ replacement procedure applies in regard to any trees or hedgerows replaced under requirement 9(7)?</p>
DCO 1.S17	The applicant	<p>Schedule 3 – Requirement 10 (Reinstatement schemes)</p> <p>Braintree DC in its LIR [REP1-148], along with other County and Local Authorities have raised concerns related the strength/ enforceability of some of the requirements. For example, Braintree’s LIR [REP1-148] (paragraph 12.5.10) requests requirement 10 (Reinstatement Schemes) be strengthened to ensure temporary haul routes are required to be removed following completion of construction and for full reinstatement of the land to take place. The ExA seeks the applicant’s response to these matters and would ask for it to generally review all requirements as to the standard tests, especially the tests of precision and enforceability.</p>
DCO 1.S18	The applicant	<p>Schedule 3 – Requirement 14 (Control of Development under Work Nos. 19 and 21 to 24)</p> <p>The clarity and reasonableness of this requirement is questioned, given it allows the applicant to construct either the works specified in column (2) or (3) in the table set out below the requirement. Please provide further justification for the inclusion of this requirement and explain how you consider it is consistent with and meets the relevant tests for the imposition of such a requirement.</p>
DCO 1.S19	<p>The applicant</p> <p>All local authorities</p> <p>All discharging authorities</p>	<p>Schedule 4 – (Discharge of requirements) - 1</p> <p>The government published its response to the Nuclear Regulatory Review 2025 on 13 March 2025, in its document ‘Building our nuclear nation: government response to the Nuclear Regulatory Review 2025’. The ExA draws attention to: i) it is seeking to accelerate “...efforts to ensure the planning system more effectively enables both low-carbon energy projects and infrastructure as a whole...”; and ii) its response to Recommendation 30, where it indicates this includes “...establishing a new unit within DESNZ to coordinate post-consent discharge functions for nuclear power and electricity network projects.”</p> <p>In the light of the above document and a clear statements from the government regarding its intention in related to post-consent discharge, the applicant and discharging authorities are asked to:</p> <p>a) Provide comments on the above publication in respect of post-consent discharge functions.</p>

ExQ1	Question to:	Question:
		b) Consider if the current drafting of schedule 4 in the draft DCO [APP-056] is an appropriate approach to the post-consent discharge of requirements, or whether schedule 4 of the draft DCO [APP-056] should take a similar approach to that set out in schedule 2, Part 2 of The A122 (Lower Thames Crossing) Development Consent Order 2025 ?
DCO 1.S20	The applicant	<p>Schedule 4 – (Discharge of requirements) - 2</p> <p>Fees referenced at schedule 4 sub-paragraph 3(1)(b) must be updated to ensure any fee payable remains in line with latest planning fee guidance at the time the discharge of requirement submission is made and should reflect the fact the fees increase on the 1 April each year. The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023 permits planning fees in England to increase automatically by the rate of inflation, capped at 10%, every 1 April.</p> <p>Additionally, clarify what is meant by the term ‘per request’. For example does it mean that all discharge of requirement requests applied for/ made in one letter/ application, or does it apply to each individual discharge of requirement request/ submission contained in such a letter/ application?</p>
DCO 1.S21	The applicant	<p>Schedule 7 (Streets or Public Rights of Way to be Permanently Stopped Up)</p> <p>The ExA notes Little Bromley 7 and Little Bromley 15 have no substitute or diversions to be provided. The table states ‘PRoW is truncated by widened highway’. Please clarify whether these PRoW (Little Bromley 7 and Little Bromley 15) will remain open and in use or does the truncation result in the whole of these PRoW (Little Bromley 7 and Little Bromley 15) being stopped up?</p>
DCO 1.S22	The applicant	<p>Schedule 9A - works for the Protection of United Kingdom Oil Pipeline (UKOP) apparatus</p> <p>The ExA questions the use of the numbering of this schedule (schedule 9A). It is the only instance a suffix has been used, rather than maintaining a purely numerical approach to the schedule numbering.</p> <p>In addition to the above, this article appears to be incomplete. The ExA requests the full text for this article be provided and the draft DCO is updated accordingly.</p>
DCO 1.S23	The applicant	<p>Schedule 12 (Not Used)</p> <p>Why is schedule 12 (Not Used) not being used? There is no explanation given in the EM [APP-057]. If there is no good reason as to why this schedule is not in use all subsequent schedules should be renumbered accordingly to avoid a schedule not being used. The ExA asks the applicant to provide further justification as to why schedule 12 is not in use in the draft DCO.</p>
DCO 1.S24	The applicant	<p>Schedule 16 – protective provisions – general</p> <p>A number of statutory undertakers are seeking specific protective provisions within the DCO and that negotiations in relation to these protective provisions are ongoing with those statutory undertakers. The applicant is asked to:</p> <ol style="list-style-type: none"> Enter the draft protected provisions into the draft DCO. Provide a list of all IPs and APs the applicant is negotiating protective provisions with. This should include an update on the status of the negotiations and an indication when those protective provisions will be included within the draft DCO.
DCO 1.S25	The applicant	<p>Schedule 19 – certified documents - 1</p> <p>Braintree DC in its RR [RR-0383] and LIR [REP1-148], considers the supplemental environmental statements submitted should be added to the list of certified documents. Provide a response to this request.</p>
DCO 1.S26	The applicant	<p>Schedule 19 – certified documents - 2</p> <p>Article 2(1) refers to Design and Layout Plans (Elevations), but there is no reference to these plans in this schedule related to certified documents. The ExA is concerned the reference to Design and Layout Plans – Subs & Cables in this schedule could lead to confusion. Justify why there is no reference to the design and layout plans (elevations), as detailed in article 2(1) in this schedule, or amend the schedule as necessary.</p>
DCO 1.S27	The applicant	<p>Schedule 19 – certified documents - 3</p> <p>In schedule 19 of the draft DCO [APP-056] the outline CoCP [APP-300] is included as a certified document but the Appendices (Appendices A to H [APP-301] to [APP-308]) have not been listed as certified document. The ExA notes that in Part 1, 2 Interpretation of the draft DCO the definitions for the outline CoCP and outline LEMP do include “(together with its appendices)” in the definition. However, to aid clarity and avoid the potential for any future confusion, should references be included to “and all appendices” for all certified documents that contain appendices?</p>
HE Historic environment		
HE 1.1	The applicant	NPS EN-1 (2023) and CNP

ExQ1	Question to:	Question:
		<p>Paragraphs 11.2.8-11.2.11 of ES Chapter 11, Historic Environment [APP-208] sets out and quotes government policy on energy infrastructure and CNP. The applicant is asked to set out:</p> <ol style="list-style-type: none"> How such policy is applicable in this case to a proposal which would cause acknowledged harm to numerous heritage assets. How the mitigation hierarchy has been met and complied with in the case of harm to heritage assets.
HE 1.2	The applicant	<p>ES Chapter 11, Historic Environment – methodology</p> <p>Table 11.3 of ES Chapter 11 [APP-208] contains the heritage values assessment criteria. Provide further information over how Conservation Areas are split between ‘High’ and ‘Medium’ value/sensitivity.</p>
HE 1.3	The applicant	<p>ES Chapter 11, Historic Environment – historic landscape characterisations (HLC)</p> <p>Provide further information and justification for the categorisation of HLCs, including:</p> <ol style="list-style-type: none"> Why the HLC subtypes of ancient woodland and former medieval deer parks are defined as ‘low value’. What value is assigned to areas of ‘informal parkland’ (“designed ornamental landscapes laid out around a ‘great’ or ‘grand’ house in the post medieval period”) in the study area? What value is assigned to ‘pre 18th century unenclosed common arable’ HLC subtype? Are all HLC types low or negligible value aside from ‘formal style parliamentary enclosure’?
HE 1.4	The applicant Historic England	<p>ES Chapter 11, Historic Environment – embedded mitigation</p> <p>Paragraph 11.6.4 of Chapter 11 [APP-208] states that lower height pylons are proposed for the section of OHL that passes between Great Waltham and Little Waltham conservation areas to reduce visibility of the alignment from various heritage assets.</p> <p>To the applicant:</p> <ul style="list-style-type: none"> What is the cost or technical difference between the lower height and ‘standard’ height pylons? Why are the lower height pylons not chosen for a more extensive part of the route, or indeed all of it? Has undergrounding or T-pylons been considered for the same stretch of route – and if not, then why not? Various relevant representations raise concerns over the use of the lower height pylons considering that their more squat nature would have more of an impact locally. Respond to such concerns. <p>The detail in table 3.16 and 3.17 of ES Chapter 3 [APP-127] is noted in respect to the above queries.</p> <p>To Historic England</p> <ul style="list-style-type: none"> Provide your views on the effectiveness (or otherwise) of the lower height pylons for this area and any other comments you may wish to make on this matter.
HE 1.5	The applicant	<p>Historic Environment Baseline Report [APP-209] - Appendix A</p> <ul style="list-style-type: none"> Kings Farmhouse (1266530) doesn’t appear or is significantly obscured on page 25 of the document. Consider and amend if necessary. The listed building Bragg (1267411) does not appear to be on page 28 of the document. Consider and amend if necessary.
HE 1.6	The applicant	<p>Harm to heritage assets</p> <p>The proposed development is assessed to cause ‘negligible’ harm to various heritage assets along the route. Confirm if this equates to less than substantial harm in line with NPS EN-1 (2023) paragraph 5.9.30.</p>
HE 1.7	The applicant	<p>Level of harm to heritage assets</p> <p>Provide further information over how the ES considers whether the proposed development would cause a mid or a lower less than substantial harm including:</p> <ol style="list-style-type: none"> What differentiates between the two levels of harm assigned? What would an upper, or a high level, of less than substantial harm look like?
HE 1.8	The applicant	<p>Weighting to be given to harm to multiple assets</p> <p>It is acknowledged in the ES that harm would be caused to a considerable number of heritage assets by the proposed development. Does this lead to a cumulative level of harm, and if so how might this be considered in the scope of the project? Justify your answer.</p>
HE 1.9	All local authorities	Applicant’s assessments:

ExQ1	Question to:	Question:
		<p>Unless you have provided agreement or otherwise in your LIR, for your area of jurisdiction please state whether you are in agreement with the applicant's assessment of:</p> <ol style="list-style-type: none"> Designated and Non-Designated Heritage Assets to be scoped out of further assessment as set out in ES Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The levels of harm assessed, for the construction phase and the operation and maintenance phase, as described in ES Appendix 11.7 – Assessment of Harm to Designated Heritage Assets [APP-215]. The levels of harm assessed in relation to Non-Designated Heritage Assets (NDHA), as described in ES Chapter 11 [AS-068].
HE 1.10	The applicant	<p>Limits of deviation</p> <p>Numerous councils in their Local Impact Reports (LIRs) raise concerns over the LoD and the effect that any subsequent movement in proposed pylons may have on the significance of nearby heritage assets. The contents of Commitment GG34 in the outline CoCP is noted in this respect [APP-300] but this appears primarily to address archaeological and other concerns (with the odd exception). Set out:</p> <ol style="list-style-type: none"> Whether changes to the LoD were considered in the overall heritage harm assessment. In relation to those heritage assets that, through your assessments in [APP-215], would be subject to a mid-less than substantial level of harm during both construction and operation, explain the options available to you to reduce the vertical and horizontal LoD in the vicinity of those assets. If you consider there to be none, provide evidence of the constraints to support this position. The potential changes in levels of harm that could occur to heritage assets along the route were pylons and OHLs to be sited closer, and/or be taller. Any subsequent changes in the level of heritage harm which may occur as a result of such movement. Whether GG34 should and will be expanded in the light of the above. Whether more certainty should and can be given to the location of pylons in the vicinity of heritage assets.
HE 1.11	The applicant	<p>Vibration effects on listed buildings</p> <p>In your comments on RRs [REP1-132] inadequate detailed information was provided in response to the RR's that specifically mentioned vibration effects likely to be experienced at specific addresses, due in general to the lack of foundations at these properties.</p> <p>ES Chapter 14 – Noise and Vibration [APP-256] notes at paragraph 14.2.27 five structures of buildings where there is the potential for damage due to construction vibration. However, whether these are listed buildings is not noted, neither is there a separate table that deals with potential vibration effects on historic buildings that are unlikely to have standard (or any) foundations.</p> <p>The applicant is asked to:</p> <ol style="list-style-type: none"> Cross reference the list of listed buildings with the initial vibration study and indicate whether there are any listed buildings (whether scoped in or out of the listed buildings assessment) that fall within any of the categories shown to be at risk (negligible to significant) without mitigation. Provide additional information in order to more fully understand the potential impacts on these properties Cross reference this information with any RR's that specifically mention this as an issue.
HE 1.12	All local authorities Historic England	<p>Heritage visualisations - 1</p> <p>A range of heritage visualisations are provided [APP-350] and [APP-351].</p> <p>All local authorities and Historic England are asked to confirm:</p> <ol style="list-style-type: none"> Agreement with the viewpoints chosen to reflect any potential impacts on heritage assets. In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from?
HE 1.13	The applicant	<p>Heritage visualisations - 2</p> <p>The ExA have concerns over the following heritage visualisations [APP-350] and [APP-351]. Provide a response addressing such concerns or submit additional visualisations:</p> <ul style="list-style-type: none"> HE2i Church of St Remigius. Of limited use to assess effect on setting of Church from Waveney Valley. Hedge in way and photograph almost from underneath proposed pylons. HE2ii Church of St Remigius. Of limited use; hedge in the way. Standing to the north of the Church would provide a more useful indication of visibility. HE4 Coney Byes. Position of viewpoint makes full effect on setting of heritage asset difficult to ascertain. HE7 Langleys. Viewpoint dominated by heritage asset and seemingly not very well chosen to assess effect on setting.

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> • HE11 Church of St James, Marks Tey. Unclear why viewpoint not from north side of Church. • HE14 White Notley. Query over whether viewpoint is the most appropriate from the Conservation Area. • HE21 Elm Farmhouse. Viewpoint does not appear to show effect on setting. VP including the heritage asset would be more useful. • HE22 Tacolneston. Query over whether viewpoint is the most appropriate from the Conservation Area. • HE24 Church of St Mary's Washbrook. Query over whether viewpoint is the most appropriate from the heritage asset. • HE25 Ardleigh. Query over whether viewpoint is the most appropriate from the Conservation Area. • HE26 Fordstreet. Query over whether viewpoint is the most appropriate from the Conservation Area. • HE33 Mellis. Query over whether viewpoint is the most appropriate from the Conservation Area. • HE34 Finningham. Query over whether viewpoint is the most appropriate from the Conservation Area. Is there a view to the east rather than to the south east? • HE35 Creeting Hall. View from inside garden with substantial screening; viewpoint from footpaths nearby could better show effect on setting.
HE 1.14	The applicant	<p>Fairstead CSE Compounds</p> <p>Table 3.12 of ES chapter 3 [APP-127] details the decision-making process when considering options and alternatives for the Fairstead CSE compounds. The preferred option seems to have been chosen for a large part on the fact that it addresses conflict with “multiple game shooting”. However, the ExA note that this option has adverse impacts on the Grade II listed Westocks Farm, by moving the OHL to around 300m from the heritage asset and that the Alternative Northern Route was ruled out because of a similar proximity issue to Westock's Farm.</p> <p>Provide further justification for this decision, explaining the rationale and decision-making process taken between the competing issues of game shooting (and providing more detail on this matter) and a heritage asset, which are defined in the NPPF as being an irreplaceable resource.</p>
HE 1.15	The applicant	<p>Historic England written representation 1</p> <p>ES Chapter 11 – Historic Environment [AS-068] provides a precis of the high-value designated heritage assets in each section of the development. Historic England have provided their detailed response at deadline 1 [REP1-191] and the ExA note several assets, either designated or non-designated, where Historic England has either requested further assessment of an asset, or have disagreed with your assessment.</p> <p>The applicant is asked to respond to the Historic England representation, in particular with regard to the following assets:</p> <p>Historic England disagreement with the assessment of harm:</p> <ul style="list-style-type: none"> • St Regimus Church, Roydon (Grade I) • St Mary's Parish Church, Fairstead (Grade II*) • Newney's Farmhouse, Ranks Green (Grade II*) • Hylands Park (RPG Grade II*) • Hylands (Grade II*) <p>Historic England agree with the overall assessment of harm, but suggest additional assessment or views should be considered:</p> <ul style="list-style-type: none"> • Tacolneston Conservation Area • Bush Hall (NDHA) • St Mary's Church Burgate (Grade II*) • Mellis Conservation Area • Moat Yard Plantation, Mellis • Creeting Hall (Grade II*) • Badley Church Green Conservation Area • Parish Church of St Margaret and Catherine, Aldham (Grade II*) • Feeringbury Manor (Grade II*) • Broomfield Conservation Area • Former Parish Church of St James, Chignall St James (Grade II*) • Chobbings Farmhouse (Grade II*) • Ingatestone Hall (Grade I) and associated buildings

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> St Clere's Hall, Stanford Le Hope (Grade II*)
HE 1.16	The applicant	<p>Historic England written representation 2</p> <p>In its submission [REP1-191] Historic England concluded, in relation to NPS EN-1 (2023): "We do not consider 5.9.26 has however been appropriately address in the application in particular the section that relates to the 'the desirability of sustaining and...enhancing the significance of heritage assets...'. Whilst we appreciate mitigation other than through design changes is challenging, we consider more could be done by the applicant to consider the communities with affected heritage assets and how the applicant can foster and support community led approaches to heritage".</p> <p>The concern regarding the communities affected is also raised in several RR's and WR's.</p> <p>The applicant is requested to respond to this conclusion, in particular to note the ways in which you can consider the communities with affected heritage assets and how you will ensure the most appropriate mitigation hierarchy.</p>
HE 1.17	Pylons East Anglia Ltd	<p>Pylons East Anglia written representation 1</p> <p>The ExA acknowledge the concerns of Pylons East Anglia [REP1-267] regarding the number of heritage assets scoped out of the applicant's assessment. It would be useful to the ExA if you were able to provide a comprehensive list of those assets that have, in your professional advisors' opinion, been erroneously scoped out, and the reasons for your decisions, although please note that this does not need to be as comprehensive as the case studies you have provided.</p> <p>Furthermore, it would be useful to the ExA for your advisors to provide a list of those assets that have been assessed, but they disagree with the assessment made, and why. Again, this need not be as comprehensive as the case studies provided.</p>
HE 1.18	The applicant	<p>Pylons East Anglia written representation 2</p> <p>The ExA notes the response to [REP1-267] at D2 [REP2-029] which states that the representation is the re-submission of a document prepared in response to the 2024 statutory representations which states that the use of High-Voltage Direct Current (HVDC) undergrounding should be explored further to minimise heritage harm, and provides a response with financial and costs information.</p> <p>Notwithstanding this, the ExA notes that the representation contains various views over the methodology used for the assessment of heritage and archaeological assets and provides a number of case studies to highlight perceived errors within this methodology. Respond to such points and case studies.</p>
HE 1.19	The applicant	<p>Assessed harm to heritage assets</p> <p>The ExA have visited various heritage assets on its unaccompanied site inspections. The following assets are assessed in ES Chapter 11 [APP-208] as undergoing mid less than substantial levels of harm during construction but lower harm during operation of the proposed development. Provide additional justification for such views on the following assets:</p> <ul style="list-style-type: none"> Kenningham Hall Piggery (Dower House) & Barn, Flordon Hall Elm Farmhouse (1373558) Spring Farmhouse The Dower House Moat Farmhouse Stables Moat Farmhouse Hascot Hill Farmhouse East Gores Farmhouse Barn East Gores Farmhouse Newneys Farmhouse Barn Newneys Farmhouse Porters Farmhouse Monk's Farm Cottages Sturgeons House Wardropers Farmhouse Wayletts Forge Cottage

ExQ1	Question to:	Question:
		The list above does not indicate that the ExA agree with other assessments of heritage harm in the ES.
HE 1.20	The applicant	Roydon Hall and Barn 30m northwest These two heritage assets have been assessed in ES Appendix 11.7 – Assessment of Harm to Designated Heritage Assets [APP-215] (pages 53, 54, 235, 236). However, the title indicates that they are both Grade II* and the text states Grade II. Update and confirm whether this affects your assessment.
HE 1.21	The applicant	Heritage Asset no. 1493299 This heritage asset (name unknown) is shown on page 22 of ES Figure 11.2 – Designated Heritage Assets Assessed in the ES Chapter [APP-217] but is not assessed in ES Appendix 11.7 – Assessment of Harm to Designated Heritage Assets [APP-215]. Confirm the name and update ES Appendix 11.7.
HE 1.22	The applicant	Bulphan WWII bombing decoy This heritage asset is shown on page 40 of ES Figure 11.2 – Designated Heritage Assets Assessed in ES chapter 11 [APP-217] but is only assessed in ES appendix 11.7 – Assessment of Harm to Designated Heritage Assets [APP-215] in relation to operation and maintenance and has not been assessed in relation to construction phase. Update ES Appendix 11.7 to include construction effects.
HE 1.23	The applicant	Windmill House The ExA noted on their visit the prominence of Windmill House, at Minnow End across the Chelmer Valley from Chathamhall Lane. Provide an assessment (or signpost to an assessment) of any harm that the proposed development would cause to this non designated heritage asset.
HE 1.24	The applicant	Gladwins Farmhouse Provide an assessment (or signpost to an assessment) of any harm that the proposed development may cause to this Grade II listed heritage asset.
HE 1.25	The applicant	Creeting Hall, Mid Suffolk ES Chapter 11 [APP-208] states that Creeting Hall is a Grade II Listed Building. Confirm if the Hall is graded II or II* and amend if necessary
HE 1.26	The applicant	Church of St Remigius, Roydon The ExA visited Roydon and have viewed the viewpoints provided for the Church of St Remigius. It was noted that the Church stands on the north side of the Waveney valley with clear views across the valley, including where the proposed pylons would be located. Provide further justification for the view that the effect upon the Church from the proposed development in operation will be minor/negligible.
HE 1.27	The applicant	Newneys Farmhouse, Braintree ES Chapter 11 [APP-208] states that Newneys Farmhouse is a Grade II Listed Building. Confirm if the Farmhouse is graded II or II* and amend if necessary.
HE 1.28	The applicant	Southwoods Farm, Chelmsford ES Chapter 11 [APP-208] considers that the effect on Southwoods Farm will be significant during construction but not during operation. It is noted however that the effect upon the separately listed Barn at Southwoods Farm is considered significant for both construction and operation. Provide further justification for the findings of harm on Southwoods Farm.
HE 1.29	The applicant	Church of St Mary, Buttsbury The listing status for the Church is defined differently in separate parts of ES Chapter 11 [APP-208] as either Grade II or II*. Confirm the current status and amend if necessary.
HE 1.30	The applicant	Dunton Hall ES Chapter 11 [APP-208] considers that the effect on Dunton Hall will be significant during construction but not during operation. It is noted however that the effect upon the adjacent Church of St Mary (1122253) is considered significant for both construction and operation. Provide further justification for the findings of harm on Dunton Hall.
HE 1.31	The applicant	Rivenhall Place The Grade II* listed Rivenhall Place is assessed as being impacted with a lower level of less than substantial harm during both construction and operation. The ExA viewed the heritage asset and its setting from local public rights of way during a site visit and notes the heritage viewpoints from this location. <ul style="list-style-type: none"> Provide further justification for your assessment of the harm that would be caused to this asset, bearing in mind the status of the property (in listing terms) and the purposely designed setting to the asset.

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> Consider the cumulative effects of the proposed development and the permitted solar farm to the heritage asset.
HE 1.32	The applicant	<p>The Gables, Darrow Lane, Snow Street</p> <p>Roydon PC state [RR-3204] that National Grid have purchased the above heritage asset and that the asset has deteriorated since this time. Please confirm if this is the case, if so has the property been purchased as part of the proposed development scheme and what the intentions are for the listed building. The ExA note that the property has been assessed as undergoing a mid level of less than substantial harm during construction and lower harm during operation.</p>
HE 1.33	The applicant	<p>Parish church of St Mary the Virgin, Fairstead</p> <p>The ExA noted this Grade I listed church on its visits, which has a clear aspect to the north towards the proposed pylon lines (this view is partially shown on Viewpoint 5.08 [APP-348]). Confirm your findings of harm to this heritage asset from the proposed development for the operational stage.</p>
HE 1.34	The applicant	<p>Highfields Farmhouse and Coney Byes, West Bergholt</p> <p>The ExA noted these Grade II listed heritage assets on its visits. Both assets would appear to have reasonably clear views to their south and west respectively over a reasonably steep sided valley in which the pylons are proposed to be sited. Your assessment of harm to these assets consider that both will have a lower less than substantial harm caused to their significance from the proposed development. Provide further justification for this assessment.</p>
HE 1.35	The applicant	<p>Dunton Hills Garden Village</p> <p>Provide further information regarding the effects of the proposed development on the DHGV Master Plan and key principles in relation to nearby heritage assets.</p>
HE 1.36	The applicant	<p>Mid less than substantial harm – mitigation details</p> <p>Several Councils request full details of mitigation to any heritage assets assessed to be affected with a ‘mid level’ of Less than Substantial harm to their significance</p> <p>Provide such details (including standard, embedded and any additional mitigation if appropriate) or provide such justification for not doing so.</p>
HE 1.37	The applicant	<p>Mitigation</p> <p>Many Council LIRs refer to the issue of mitigation, noting that for many heritage assets mitigation of any adverse effects caused by the proposed development is effectively not possible or achievable. Such comments also refer to the potential for separate mitigation funds or agreements. Respond to such comments.</p>
HE 1.38	The applicant	<p>Non designated heritage assets (NDHA)</p> <p>Many submitted LIRs raise concerns over the consideration given to NDHAs in ES Chapter 11 [APP-208]. While noting the responses submitted at Deadline 1, provide further information and justification for the treatment of NDHAs in your assessment of heritage harm, and how this accords with paragraph 5.9.31 of NPS EN-1 (2023).</p>
HE 1.39	All Essex local authorities	<p>Protected Lanes</p> <p>Please provide further evidence relating to the protected lanes in your respective administrative areas which would in your opinion be negatively impacted by the proposed development, including evidence over why they should be considered as NDHA.</p>
HE 1.40	South Norfolk DC	<p>South Norfolk Local impact report</p> <p>Page 17 of your LIR [REP1-176] states that you consider that harm to heritage assets in the District may be greater than identified in some instances for operational impacts. Please confirm which assets you are referring to in this context.</p>
HE 1.41	The applicant Tendring DC	<p>Tendring Local Impact Report</p> <p>To Tendring DC:</p> <ul style="list-style-type: none"> Page 49 of your LIR [REP1-182] states in paragraph 15.6 that in Ardleigh certain heritage assets will encounter adverse effects during construction, effects with you consider to be underestimated. The assets include “several Grade II farmsteads”. Please confirm which farmsteads you are referring to in this context. Paragraph 15.4 notes that listed cottages adjacent to Little Bromley war memorial are plausibly at risk from vibration. Please confirm which cottages. <p>To the applicant</p>

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> Respond to the specific vibration point for Little Bromley heritage assets.
HE 1.42	The applicant	<p>Outline Code of Construction Practice</p> <p>For the following commitments in the outline CoCP [APP-300]:</p> <ul style="list-style-type: none"> H04: Respond to the comment/suggestion from Braintree DC in its LIR [REP1-148] H06: Expand on the definition of suitable 'replacement' features or justify why not
HE 1.43	The applicant	<p>Amount of archaeological survey information available</p> <p>A number of local authorities in their LIRs, for example Braintree DC [REP1-148], Colchester City Council in [REP1-156], and Suffolk CC, Mid Suffolk DC and Babergh DC in [REP1-178] and Historic England in its WR [REP1-191] have raised concerns about the amount of archaeological survey work and evaluation that has been undertaken so far, including outside of the 'priority areas', and consider there to be a significant shortfall. The ExA notes the flow diagram of the Written Scheme of Investigation (WSI) process that is set out in the outline Archaeological Mitigation Strategy (AMS) and outline WSI [APP-328] and also that, as stated in the applicant's Comments on RRs [REP1-132] the phase 2 stage of the geophysical survey and trial trenching will continue in 2026. Having regard to paragraphs 5.9.11 and 5.9.12 of NPS EN-1 (2023) the applicant is requested to justify its approach to the incomplete provision of archaeological evaluation at this stage.</p> <p>As indicated in the updated ES Chapter 11 [AS-068] it would appear that 30% of the phase 2 areas have now had geophysical survey work completed. However, the applicant is requested to either clarify, or to signpost to where it has been clearly set out, exactly how much of all the proposed archaeological geophysical survey work and trial trenching work within any of the order limits has now been carried out (and had the results submitted), and how much is still left to be undertaken and/ or have the results submitted.</p> <p>Also, the ExA is uncertain whether or not any of the results of the proposed 2026 evaluation work would be undertaken and submitted within the Examination period. The applicant is therefore requested to provide a more detailed timeline for all of its further proposed archaeological survey work to indicate what is to be undertaken and when. This should include a proposed timeline for the submission of all final reports and the archiving/ dissemination of information resulting from all outstanding archaeological evaluation work.</p>
HE 1.44	The applicant	<p>Understanding of the archaeology in the River Stour area</p> <p>In its WR [REP1-191] Historic England considers that further survey work is required in order to understand the complex of archaeology that exists on both sides of the River Stour and the potential paleoenvironmental deposits within the river itself. In paragraph 6.6 of [REP1-191] Historic England states that, in relation to the River Stour: "We are seeking contingency allowed for expected high value discoveries." Therefore, the applicant is requested to set out what archaeological evaluation and mitigation measures are proposed for this location and explain how these are to be secured in the draft DCO.</p>
HE 1.45	The applicant	<p>Adequacy of the outline Archaeological Mitigation Strategy and outline Written Scheme of Investigation (outline AMS/ outline WSI)</p> <p>Various local authorities in their RRs and LIRs, for example Colchester City Council in [REP1-156] and Historic England in [REP1-191], have stated their belief that the outline AMS/ outline WSI [APP-328] is not adequate in its current form and requires amendments. Explain your progress on discussions with the local authorities and Historic England on this matter and clarify when an amended version of the outline AMS/ outline WSI, as referenced by Norfolk CC in [REP1-173] and as stated in the applicant's Response to RRs [REP1-132], will be submitted into the examination.</p>
HE 1.46	The applicant	<p>Engagement with Suffolk CC</p> <p>In [RR-3520] Suffolk CC commented that as it currently stands the submitted outline AMS/ outline WSI [APP-328] does not meet national standards and requirements 5 of the draft DCO does not provide adequate protection. In light of the additional archaeological information you submitted, dated January 2026 and submitted into the examination on 2 February 2026 [AS-068] to [AS-083], comment on Suffolk CC's concerns, state whether you have been in recent discussions with Suffolk CC over this matter and what the outcomes of any such discussions have been.</p>
HE 1.47	The applicant	<p>Reliability of geophysical survey data</p> <p>Essex CC in its LIR [REP1-161] has noted that "... the reliability of the geophysical survey to detect archaeological features has been demonstrated to be inconsistent." Essex CC goes on to consider that this could be due to the sandy nature of the local soils.</p> <p>Comment on Essex CC's views on the reliability of the geophysical survey work in detecting archaeological features and explain how any unreliability in geophysical data been accounted for in assessing areas for trial trenching and in drawing your conclusions on the assessment of effects on archaeology in ES Chapter 11 [AS-068].</p>
HE 1.48	The applicant	<p>Assessment of residual effects on archaeology</p>

ExQ1	Question to:	Question:
		<p>With potential issues over the complete reliability of geophysical survey information in some locations, some of the identified priority areas still to be fully surveyed and evaluated, and significant stretches of the route of the proposed development not having been surveyed at all, explain how at this stage you can be confident in your assessments of residual effects that are set out in section 11.7 of ES Chapter 11 [AS-068].</p> <p>Furthermore, in the Secretary of State's decision letter for the Five Estuaries offshore wind farm, dated 17 December 2025, it was stated that: "The Secretary of State considers preservation by record does not amount to mitigation of harm for archaeological remains...". Comment on the implications of this for your assessment of the significance of effects in ES Chapter 11 [AS-068].</p>
HE 1.49	The applicant	<p>Evaluation versus mitigation</p> <p>Comment on Norfolk CC's contention in [RR-2753] that your submitted archaeological assessment methodology needs to make a clearer distinction between pre-consent work which the NPPF labels as 'evaluation' and post-consent work which is usually termed as 'mitigation'.</p>
HE 1.50	The applicant	<p>Article 23: removal of human remains:</p> <p>Respond to the comments raised in the joint LIR from Suffolk CC, Babergh DC and Mid Suffolk DC [REP1-178] regarding article 23 of the draft DCO (Removal of human remains) [APP-056], whilst also having regard to recent made Orders where this article has been deleted from the ExA's recommended DCO by the Secretary of State. (Also see question DCO 1.A28).</p>
HE 1.51	The applicant	<p>Full discharge of requirement 5</p> <p>At what stage of the proposed development do you consider that all elements of requirement 5 of the draft DCO [APP-056] would be fully discharged? Explain why an additional sub-paragraph to requirement 5 has not been provided that references the need for final approval from the relevant planning authority, in consultation with Historic England, of a completion report so as to enable the full discharge of requirement 5 (subject to any ongoing maintenance or decommissioning measures).</p>
HW Health and wellbeing		
HW 1.1	The applicant	<p>Time periods' effect on health and wellbeing</p> <p>ES chapter 10 [APP-192] at paragraph 10.7.31 in relation to residual effects during construction in respect of landscape and townscape it is concluded that the magnitude of effect is low because construction activities are likely to be short term. It is stated this is 4 years but intermittent. What evidence is there to suggest an impact over 4 years would be less impactful on mental health and wellbeing? The stress over what would appear a significant period of time could potentially be impactful and the intermittency may indeed add to that if it is not time limited in short discreet time periods and then does not return. Explain your reasoning for this conclusion and add detail around what you mean by intermittent.</p>
HW 1.2	The applicant	<p>Clarity in Environmental Statement</p> <p>ES chapter 10 [APP-192] at paragraph 10.7.146 in relation to the perception of health risk from electric and magnetic fields (EMFs) what is the basis of the statement: "The majority of the general population is considered to be of low sensitivity (i.e. they have a high ability to adapt to change and could be described as 'a community whose outlook is predominantly ambivalence with some concern')." The suggestion the communities' outlook is predominantly ambivalent appears to underplay the level of concern expressed in the representations to date. Explain the factors that have been taken into account and the judgements taken to provide the basis for this statement.</p>
HW 1.3	The applicant	<p>Communication strategy and electric and magnetic fields</p> <p>ES chapter 10 [APP-192] Table 10.16 sets out the Impacts on mental health and wellbeing relating to perceptions of EMFs during operation (and maintenance) and identifies protective factors for mental health and potential impacts and mitigation. In relation to Control and Participation factors it is stated these could be enhanced through the dedicated programme of communication and scientific information from National Grid relating to EMFs. The reference of Paragraph 10.7.146 does not appear to be correct. This should be corrected.</p> <p>Assuming the reference is to paragraph 10.7.145 this references a website and EMF helpline. If the purpose is to lessen anxiety through the provision of more accessible and accurate information this should be included as an active mitigation with information actively put into the public domain and actively signposted specifically in relation to this scheme during the construction and operation of the proposed development. Could this be achieved through commitments in the communication strategy? If so, provide some wording to cover the commitments and add to the CoCP and appropriate annex as is suggested in paragraph 10.7.149 but where no commitments have been provided or secured through the DCO. This should also include how communications would be undertaken for harder to reach parties including those who may not have access to digital means and to address inequalities created through language.</p>
HW 1.4	The applicant	<p>Estimated maximum field strengths at sensitive receptors</p>

ExQ1	Question to:	Question:
		The EMF Compliance Report [APP-330] paragraph 6.2.12 states “Although not required for assessing compliance, the graphs presented above can be used to estimate the maximum fields at any given distance from the line.” Provide the estimated maximum field strengths for the closest residential/ sensitive receptors, indicating the distances to the lines. As this may also assist with the perception of health effects and wellbeing arising from EMFs which are scoped in.
HW 1.5	The applicant	<p>Written Representation from Helen Dorothy Keeler</p> <p>Respond specifically to the WR from Helen Dorothy Keeler [REP1-367] including comment on the issues raised and references cited to the scientific papers and whether any of these raise issues that would materially affect or provide justification to depart from the Government’s adopted policy position in the designated NPS EN-5 (2023).</p>
HW 1.6	The applicant	<p>OFH comments and subsequent post hearing submissions of Dr Anna Magee</p> <p>Respond specifically to the OFH comments and subsequent post hearing submissions of Dr Anna Magee [REP1-335] including comment on the issues raised and references cited to the scientific papers and whether any of these raise issues that would materially affect or provide justification to depart from the Government’s adopted policy position in the designated NPS EN-5 (2023).</p>
HW 1.7	The applicant	<p>Compliance with threshold values and optimum phasing</p> <p>The EMF Compliance Report [APP-330] states that the proposed development will be compliant with the government position in NPS EN-5 (2023) and will meet the threshold values and will be designed to ensure optimum phasing. The outline CoCP [APP-300] at Table 6.1 Mitigation measures / environmental commitments Commitment reference GG02 states “The Project design will be compliant with the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2024), including the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines (1998).” Whilst this states “the project design” will be compliant it does not appear to provide a commitment to implement that. The ExA is concerned as to whether the wording of the commitment is sufficiently robust; this should be reworded to ensure the proposed development will be constructed to ensure compliance and/ or should be specifically secured through the DCO.</p>
HW 1.8	The applicant Brentwood BC	<p>Brentwood Borough Council’s local impact report – protected characteristics and complex sensory needs</p> <p>Paragraph 6.45 of Brentwood Borough Council’s Local Impact Report [REP1-150] notes it “...has received representations indicating that some households within the Haverings Grove and Rayleigh Road corridor include individuals with protected characteristics and complex sensory needs, where noise, vibration, unexpected traffic conditions and sudden acoustic stimuli can cause acute distress. These households report that prolonged construction activity, including extended working hours and associated traffic behaviours, would disproportionately affect their wellbeing and daily functioning. Given the Public Sector Equality Duty, [the Council] ...considers that vulnerable residents in this locality warrant particular regard within the DCO’s mitigation framework, including the need for targeted measures to minimise disturbance.”</p> <ul style="list-style-type: none"> • For the applicant, to what extent have you had regard to individuals with protected characteristics in considering health and wellbeing, stress and anxiety? Explain how this has been considered and detail where this is explained. What additional measures have you sought to employ to minimise disturbance on individuals with protected characteristics and complex sensory needs and what further measures can be employed? • For Brentwood Borough Council, what are the targeted measures to minimise disturbance, you reference that you are seeking from the applicant?
HW 1.9	The applicant	<p>Colchester City Council’s local impact report – assessment of health and wellbeing</p> <p>Paragraph 9.42 of Colchester City Council’s LIR [REP1-156] identifies a number of actions the Council suggests the applicant needs to undertake to address its concerns with the assessment of health and wellbeing. These include:</p> <ul style="list-style-type: none"> • Updated assessment incorporating October 2025 Index of Multiple Deprivation (IMD) and Lower Layer Super Output Area (LSOA) level data for Colchester. • Integration of local health and wellbeing strategies and Integrated Care System Joint Forward Plans. • Inclusive engagement measures for language-vulnerable communities. • Consideration of cumulative mental health impacts through Mental Wellbeing Impact Assessment workshops. • A robust Health and Wellbeing Monitoring Framework with enforceable commitments. <p>The applicant is requested to respond to each of the requests identified, taking account of the justification and background in the preceding paragraphs of the LIR and provide commentary on how these can be addressed including the information and assessment requested or explain why it is not necessary.</p> <p>Note: Your response to updating the IMD, as set out in [REP1-132] is noted. However, the ExA would ask what evidence has been put forward to substantiate there is no need to update the document with the most up to date data. In the absence of adequate evidence, you must revisit the relevant chapter of the ES and address any changes as a result of the IMD being updated. (Also see question SET 1.1 below).</p>

ExQ1	Question to:	Question:
HW 1.10	The applicant	<p>Essex CC's local impact report – inadequacies in baseline for health and wellbeing</p> <p>Essex CC's LIR [REP1-161] at paragraph 4.9.24 concludes that the baseline in the ES in respect of health and wellbeing is not sufficiently granular, underestimates vulnerability and does not meet NPS EN-1's expectation to assess how projects may impact different populations differently. It is further noted that in its relevant representation [RR-1083] the County Council had requested granular LSOA analysis and renewed deprivation data to prevent underassessment of effects on vulnerable groups (see paragraph 4.9.23 of Essex CC's LIR).</p> <p>Explain why the deficiencies in data have not been addressed, whether it is your intention to do so and, if not, justify why it is not necessary explaining why there is not a potential underestimation of effect on vulnerable groups.</p>
HW 1.11	The applicant	<p>Essex CC's local impact report – linguistic vulnerabilities</p> <p>Essex CC [REP1-161] raises the issue of linguistic vulnerability, deprivation domain differences and disability prevalence not being linked to impacts. Furthermore, concerns are also expressed about the treatment of mental health prevalence. Explain how you have taken account of these issues and what mitigation or communication strategies are secured through the DCO or communication strategies. If no such strategies exist set out how you will secure such strategies, or if it is considered such strategies are not required explain and justify your position. See question HW 1.3 which also references communication strategies.</p>
HW 1.12	The applicant	<p>Essex CC's local impact report – mitigation and other benefits</p> <p>Essex CC seeks various mitigation and other benefits including in relation to skills and training, community benefits fund that invests in community benefits active travel support for mental health resilience and village enhancements. Without such additional mitigation Essex CC considers several health impacts should be reviewed to ensure there is not an underestimation or unassessed impacts.</p> <p>Explain what benefits the applicant is committed to provide and how this is secured including whether there will be a community benefit fund and how that would operate. If the applicant does not intend to secure any of these commitments explain and justify why they are not necessary. See question HW 1.11 above and HW 1.13 and HW 1.14 below.</p>
HW 1.13	The applicant	<p>Suffolk CC's, Babergh DC's and Mid Suffolk DC's joint local impact report – mental health monitoring</p> <p>Paragraph 17.3 of Suffolk CC's Joint LIR [REP1-178] notes "The absence of dedicated mental health monitoring limits the ability to identify, respond to and mitigate emerging adverse impacts, particularly for those living closest to the works and for vulnerable groups with fewer options for respite" This further underlines the concerns raised by Essex CC. This is further expanded upon in the following paragraphs in the LIR. The applicant is requested to provide a mental health monitoring plan with appropriate thresholds and potential mitigations if adverse impacts are forth coming. See question HW 1.11 and 1.12 above and HW 1.14 below.</p>
HW 1.14	The applicant	<p>Tendring DC's local impact report – communications and complaint resolution</p> <p>At paragraph 14.7 of its LIR [REP1-182] Tendring DC states that "During operation, the ES accepts perceived EMF risks may affect wellbeing but again offers no additional mitigation beyond generic information measures. Given project clustering and the EACN proximity to Tendring communities, this is inadequate." At paragraphs 4.19 and 4.20 specific commitments related to psychological support and EMF communications and Community Liaison and Complaints resolution are suggested, amongst others, The applicant is requested to specifically address these issues and confirm whether it considers them appropriate and if so set out how they will be secured and if not explain and justify its position. See also questions HW 1.11 - 1.14 and HW 1.3.</p>
HW 1.15	The applicant	<p>Thurrock Council local impact report – cumulative effects and public health</p> <p>Thurrock Council in its LIR [REP1-187] raises concerns in relation to the approach of the ES to cumulative effects and public health see paragraphs 6.8.3 – 6.8.45 for a summary of its position. Concerns are also raised in relation to mental health workshops not being undertaken, eg paragraph 6.8.42. Respond to the issues raised setting out how any further mitigation could be introduced and secured to address the concerns, what additional analysis has been undertaken to address the matters and if no further mitigation or assessment is deemed necessary explain and justify your position.</p>
LUS Land use and soils, green infrastructure		
LUS 1.1	The applicant	<p>Written submissions on agriculture issues</p> <p>Several WRs submitted at Deadline 1 seek responses to outstanding queries regarding:</p> <ul style="list-style-type: none"> • Impact on individual farms • Impact on individual farming practices

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> • loss of agricultural land • movement of individual pylons within the Order limits. <p>Please ensure that your response to these WRs speaks to the individual points raised, properly referenced and in sufficient detail to enable for IPs to understand your position on their specific concerns.</p>
LUS 1.2	The applicant Natural England Pylons East Anglia Limited All local authorities	<p>Best and most versatile agricultural land (BMV) and soils - 1</p> <p>It would appear from Paragraph 6.4.7 of the ES that detailed Agricultural Land Classification (ALC) survey was undertaken on approximately 1,011 ha (representing 54% of the proposed survey areas within the Order Limits). Predictive ALC grading was then carried out where it was not possible to undertake a detailed ALC survey. Given the coverage of actual survey work how much confidence can be placed on the applicants response on acid soils in document 8.4.6 page 22 that ‘the detailed 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 sulphate soils within the surveyed areas’. As being a representative conclusion that can be applied across the whole Order Limits as they are not all ‘surveyed areas’.</p>
LUS 1.3	The applicant	<p>BMV and soils - 2</p> <p>At OFH1 (part 2) Pylons East Anglia Ltd spoke about the potential presence of acid sulphate soils and referred to the report submitted with their RR [RR-2973] by Dr David Dent.</p> <p>In Dr Dent’s report, he notes: “The correct test for an acid sulphate soil is soil reaction (pH below 4,) iron hydroxide precipitation in drainage water and straw yellow mottles of jarosite in the soil itself. But in the case of potential acid sulphate soils (i.e. not yet disturbed and, therefore, not yet acid) it is necessary to, incubate soil samples for three months in oxidising conditions, recording soil reaction before and after. Alternatively, apply hydrogen peroxide and record to resulting soil reaction. A potential acid sulphate soil will have an initial pH in the normal range and certainly greater than 4.0, but a pH below 3.5 after incubation or peroxide treatment. No chemical analyses of soil samples are reported in the National Grid documentation other than reaction to hydrochloric acid to assess carbonates”.</p> <p>Explain your methodology for testing and identification for acid sulphate soils.</p>
LUS 1.4	Natural England All local authorities Pylons East Anglia Limited	<p>BMV and soils - 3</p> <p>To what extent are the mitigation measures proposed by the applicant in the outline CoCP (measures GH02 and GH08) sufficiently robust to address issues should acid sulphate soils be encountered during construction.</p>
LUS 1.5	The applicant	<p>BMV and soils - 4</p> <p>Paragraph 12.5.6 of Braintree DC’s LIR [REP1-148] identifies an anomaly with regard to the ALC grade derived for the total area of agricultural land between that surveyed and the predictive model. Explain the different figures and the differences in how they are reported and which should be relied on.</p>
LUS 1.6	The applicant	<p>BMV and soils - 5</p> <p>Paragraph 12.6.7 of Braintree DC’s LIR [REP1-148] proposes that Paragraph 1.7.3 of the outline CoCP Appendix C Outline Soil Resource Plan (APP-303) should be altered to state that soil stripping operations must not be started until the ground has a full dry day and the soil moisture criteria set out in Annex B have been met to allow the restarting of soil handling operations. They are concerned that there is a high likelihood that the soil will still be in a plastic state after one full dry day. It is further noted that there is a paragraph later in the section that allows the handling of wet soils in exceptional circumstances so this would cover it if there is an urgent critical requirement to handle soils when they are plastic. The applicant is requested to amend the CoCP Appendix C to accommodate the request. If it is proposed not to make the amendment please explain why not and address how potential plasticity would be addressed.</p>
LUS 1.7	The applicant	<p>BMV and soils - 6</p> <p>Paragraph 12.6.4 of Braintree’s LIR [REP1-148] notes that “For measure AS02 contained within the CoCP (APP-300): ‘Land required temporarily for construction will be returned to its former agricultural use / condition or a use / condition as discussed with the landowner, where practicable’. There is no specific reference to ensure land is returned to its baseline ALC grade. The Outline Soil Resource Plan details what the reinstatement and monitoring requirements should be to ensure land is returned to its former condition. The inclusion of this measure would mean that any land parcel will need to have a pre-construction soil assessment carried out so that the soil condition is known. The use of the predictive ALC grade or baseline data from the desk study would not be suitable”.</p>

ExQ1	Question to:	Question:
		Provide clarity that land will be returned to its baseline ALC grade and ensure that appropriate commitments are included to require pre-construction soil assessments are to be undertaken to provide a suitable baseline. Where it is not proposed to return soils to their baseline ALC grade explain why not and how this potentially impacts the conclusions as to the scale of effect.
LUS 1.8	The applicant Suffolk CC	<p>BMV and soils - 7</p> <p>Suffolk CC's Joint LIR [REP1-178], at paragraph 5.30 notes that BMV land would require reinstatement to the same or greater soil quality. Appropriate mitigation for severed or sterilised remaining land is necessary. Field drainage systems should be replaced as required after construction and decommissioning.</p> <ul style="list-style-type: none"> • Suffolk CC: confirm if the mechanisms in the draft DCO and other control documents provide them with the assurance that these matters are adequately secured, if not explain what other specific measures would be required and how these can be secured. • The applicant: comment on whether these matters are secured in the draft DCO and signpost where or whether further commitments are to be introduced to address the matters.
LUS 1.9	The applicant	<p>BMV and soils - 8</p> <p>To what extent and how has BMV been taken account in the route alignment identification process, including in respect of the identification of the locations for the EACN substation, other substations and CSEs and how has the applicant sought to avoid BMV or at least use the lowest value ALC land.</p>
LUS 1.10	The applicant	<p>Green Belt - 1</p> <p>Paragraphs 7.3.519 and 7.3.521 in the applicant's Planning Statement states that National Grid's position is that the proposed OHLs are engineering operations (and therefore, may be considered appropriate development in the Green Belt) and that the proposed CSE compounds and Tilbury North substation constitute inappropriate development in the Green Belt. However, the designated NPS EN-1 (2023) notes that energy infrastructure projects may comprise 'inappropriate development' and cross refers to the NPPF. Paragraph 154 of the NPPF advises that development in the Green Belt is inappropriate unless one of a number of exceptions applies. Exception h) refers to other forms of development, including engineering operations, but is clear that exception is "...provided they preserve its openness and do not conflict with the purposes of including land within it." Therefore, to benefit from the exception and not be inappropriate development an engineering operation must preserve the openness of the Green Belt and Not conflict with the purposes of land within it. The planning statement does not appear to include an assessment of the potential effects of the proposed development on the openness and purposes as required in this context to justify the reliance on the exception.</p> <p>On this basis the applicant should fully explain how the transmission lines and pylons benefit from the exception h) ii in paragraph 154.</p> <ul style="list-style-type: none"> • As reference is made to other schemes including Yorkshire Green provide a comparison table to show the length of line included in the Green Belt, the number of pylons and other features that are within the green belt for each of the schemes to demonstrate the comparability of the schemes. • Reference should be made to how much of the proposed works related to restringing etc and small adjustments to pylon locations. • Comment on why it is reasonable to disaggregate the proposed development into constituent parts to make an assessment of whether the development is inappropriate and why consideration should not be given to the proposed development as a whole and whether it amounts to inappropriate development. • Comment on the comments on the LIRs from Local Authorities which conclude the development is inappropriate.
LUS 1.11	The applicant	<p>Green Belt - 2</p> <p>In terms of other works that would be associated with the proposed development in the Green Belt, construction compounds and haul road works although temporary have the potential to impact on the Green Belt. These works could include mounding of soil, stripping of soil, temporary hoarding and fencing, site accommodation within compounds and so on. Detail the extent of land take and the duration of time that such construction works would impact on the Green Belt and assess whether this would be engineering operations and whether they would benefit from the appropriate exception and the impact on the Green Belt in association with the other permanent elements.</p>
LUS 1.12	Chelmsford CC Brentwood BC Basildon BC Thurrock Council	<p>Green Belt - 3</p> <p>Comment on the applicant's position with regard to lines and pylons being not inappropriate development in the Green Belt and whether you disagree with the proposition and why.</p>
LUS 1.13	The applicant	<p>Green Belt - 4</p>

ExQ1	Question to:	Question:
		Does the applicant consider that policies in the NPPF related to the Grey Belt are relevant in the consideration of the proposed development, and if so explain your reasoning.
LUS 1.14	All local authorities	<p>Green infrastructure and open space - 1</p> <p>Appendices B1, B2 and B3 to the applicant's Planning Statement [APP-085] contain tables and assessment of the projects impact on open spaces.</p> <ul style="list-style-type: none"> Do the host local authorities agree with the assessment and conclusions reached in table B.1, if not explain your reasoning and justification for your conclusions. Do Colchester City Council agree with the conclusions and assessment of fishing provision within Ardleigh and if not explain your reasoning and justification. Do Thurrock Council agree with the applicant's assessment of the impacts of pylons in Maple Park and if not explain your reasoning and justification.
LUS 1.15	The applicant	<p>Green infrastructure and open space - 2</p> <p>Paragraph 4.11.8 of Essex CC's LIR [REP1-161] 1. recommends various measures to ensure that Green Infrastructure is properly integrated into the mitigation and delivery of the proposed development these include:</p> <ul style="list-style-type: none"> Secure a Green Infrastructure Strategy within the DCO or Landscape Strategy to ensure multifunctional benefits, habitat connectivity, and climate resilience. Mandate +10% BNG for all habitats, with a Biodiversity Gain Plan approved prior to commencement and robust monitoring/reporting obligations within the DCO. Align all mitigation and compensation measures with Local Nature Recovery Strategy priorities, including habitat creation and species corridors. Extend maintenance periods for planting and Green Infrastructure features to ensure long-term success (minimum 10 years for landscaping or reset five-year maintenance period upon replanting failed plants; 30 for BNG areas). Strengthen compensation provisions, including a minimum 3:1 ratio for priority habitats delivered within Essex. <p>Respond to each of the recommendations explaining how it can be addressed and providing any necessary updated documents. If you consider any of the recommendations are not necessary explain and justify your position.</p>
LUS 1.16	The applicant	<p>Food security</p> <p>Whilst consideration has been given to agricultural land and BMV land lost there is no detailed assessment on how this would potentially affect food production, an issue raised by a number of IPs. Provide a breakdown of the land use by arable and livestock providing details of crop and animal by area across the order limits. This should be contextualised against figures for the county, region and nationally to illustrate the amount of productive land that would be lost during construction and operation and whether this would have a material effect on food production in any of the areas.</p>
LV Landscape and visual		
LV 1.1	The applicant	<p>ES Chapter 13, landscape and visual: parameters</p> <p>Paragraph 13.4.20 of [APP-226] gives key parameters for assessment and assumptions, and states that habitat removed during construction would be largely reinstated, with a 3:1 replacement ratio for individual trees and trees within groups. It is stated that replanting will be prioritised within the Order Limits but that offsite provision may be required.</p> <p>Where will offsite provision be required for reinstatement planting and how will this be secured?</p>
LV 1.2	The applicant	<p>ES Chapter 13, landscape and visual: embedded mitigation</p> <p>Paragraph 13.6.4 of [APP-226] contains a number of embedded mitigation measures.</p> <ul style="list-style-type: none"> Bullet point 2 notes that existing 132kV OHLs north of Flowton and north of Mellis are to be undergrounded. Why can the proposed lines not be undergrounded instead? Bullet point 3 states that the use of full line tension gantries at CSE compounds means that the use of bulkier terminal pylons can be avoided. Provide a visual representation of the two separate technologies.
LV 1.3	The applicant	<p>ES Chapter 13, landscape and visual: residual effects</p> <ul style="list-style-type: none"> Paragraph 13.7.4 of [APP-226] states that a full summary of effects on Landscape Character Areas and Landscape Character Types is provided in Table A13.2.73 of Appendix 13.2. However, this table number appears wrong. Check and amend if necessary.

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> Paragraph 13.7.5 states that a full summary of effects on visual receptors is provided in Table A13.3.80 of Appendix 13.3 [APP-229]. However, this table number appears wrong and the actual table is not listed in the list of tables at the start of that document. Check and amend if necessary.
LV 1.4	The applicant	<p>ES Chapter 13, landscape and visual: monitoring</p> <p>Paragraph 13.8.1 of [APP-226] states that habitats reinstated after construction would be monitored/managed for a five year period to ensure their successful establishment and regrowth. Provide further justification for this length of time.</p>
LV 1.5	The applicant	<p>ES Chapter 13, landscape and visual: limits of deviation</p> <p>Paragraph 13.9.4 of [APP-226] notes that the movement of pylons up to 50 metres (laterally) or anywhere along the proposed alignment (longitudinally) could result in changes to landcover including the temporary loss of vegetation during construction.</p> <p>Provide additional information regarding the longitudinal LoD in relation to:</p> <ol style="list-style-type: none"> what circumstances may lead to a longitudinal change of position how could this limitless deviation be managed what additional controls will be put in place to ensure no greater impact will occur how will any greater impacts be mitigated
LV 1.6	The applicant	<p>Landscape and visual methodology</p> <p>In ES Appendix 13.1– Landscape and Visual Methodology [APP-227], you state that:</p> <p>“Recognition of the value of a view is determined with reference to... whether it is recorded as important in relation to heritage assets (such as designed views recorded in citations of Registered Parks and Gardens (RPG) or views recorded as of importance in Conservation Area Appraisals or Neighbourhood Plans)”. However, in ES Chapter 13 Landscape and Visual [APP-226] under Regional and Local policy, no neighbourhood plans or conservation area appraisals are noted as source material.</p> <p>It is understood from the Roydon PC WR [REP1-175] several views are protected under policy 16 of the Diss and District Neighbourhood Plan, October 2023.</p> <p>Ensure that all relevant neighbourhood plans, RPG description and conservation area appraisals are considered and any relevant references provided.</p>
LV 1.7	The applicant	<p>The visual baseline and assessment</p> <p>The Visual Baseline and Assessment [APP-229] includes a precis summary of effects for the Visual Receptor Areas but not for the assessment of effects on routes. There is no explanation for the choice of viewpoints on these routes and whether or not they reflect the worst-case scenario point/s; where a major adverse (significant) effect is identified. There are no visualisations for St Edmunds Way or National Cycle Route 50, even though major adverse (significant) effects are assessed during construction and operation.</p> <p>Whilst it is acknowledged that PRow within the 3km study area are shown on the Visual Receptors and Viewpoints plan [REP1-066], indication of the routes assessed would be a useful addition, such as in different colours for walking/cycling routes, and labelled with the route name.</p> <p>Provide the following updates:</p> <ol style="list-style-type: none"> A tabular summary of the assessment of the effects on routes from [APP-229] A written explanation of the choice of viewpoints Additional viewpoints (at worst-case scenario points) for St Edmunds Way and National Cycle Route 50 An updated Visual Receptors and Viewpoints plan that indicates the routes assessed [REP1-066]
LV 1.8	The applicant	<p>Residential visual amenity assessment (RVAA): Tables A13.4.3 and A13.4.14 - 1</p> <p>At Table A13.4.3 you have provided the assessment of properties within the 200m study areas (steps 2 and 3) and whether they trigger the requirement for step 4 assessment. You have also included a column on whether the lateral and/or vertical LoD could affect the magnitude of effect. There are 24 instances where the response to ‘Step 4 Triggered?’ is No, but the LoD could affect the magnitude of effect, as indicated by a Yes in this column.</p> <p>In the interests of exploring the worst-case scenario, please included these properties in an updated Stage 4 assessment. Please also ensure that visualisations for these properties are included.</p>
LV 1.9	The applicant	<p>Residential visual amenity assessment : Tables A13.4.3 and A13.4.14 - 2</p> <p>In Table A13.4.3 [APP-233] & [APP-234], where Step 4 is triggered and the response to whether the lateral and/or vertical LoD could affect the magnitude of effect is Yes, the ExA would expect additional assessment of this matter within Table A13.4.5. However, in Table A13.4.5 the possible improvement or</p>

ExQ1	Question to:	Question:
		worsening of the effect due to movement within the LoD is not assessed and the response to the question "Would the latitudinal, longitudinal or vertical LoD affect the RVAT result, assuming a worst-case scenario?" is, in every case, No. Update the Table to show how this has been concluded, providing additional visualisations where necessary.
LV 1.10	The applicant	<p>Residential visual amenity assessment - visualisations</p> <p>The wireframe viewpoints provided in the RVAA [APP-233] and [APP-234] are useful to give a general understanding of the proximity of the pylons to any residential dwellings and it is noted that these are provided in accordance the Landscape Institute Technical Guidance Note (LI TGN) 2/19. However, this guidance note also allows for the type and nature of visualisations to vary depending on the project circumstances. The ExA would find it useful to have photo-montage visualisations of the properties that are included in the Stage 4 assessment to better understand the baseline views, including any existing foliage, wirescape and buildings.</p> <p>Provide these by Deadline 4, 12 May 2026.</p>
LV 1.11	The applicant	<p>Residential visual amenity assessment – heritage assets</p> <p>Whilst it is acknowledged that this assessment [APP-233] and [APP-234] is primarily associated with landscape and visual effects, it also provides useful information when assessing the setting of heritage assets.</p> <p>Cross reference the RVAA with the lists of heritage assets and add a column to indicate which dwellings are also listed buildings, and their grades.</p>
LV 1.12	The applicant	<p>Residential visual amenity assessment – Braintree DC LIR</p> <p>In its LIR, Braintree DC [REP1-148] notes that the RVAA [APP-233] & [APP-234] examined visual effects on 10 no. groups or individual properties within its district and that of these, two were identified as potentially experiencing effects that may breach residential visual amenity (E7 West Ford Farm Cottage and E8 Whiteheads Farm). In both instances, the Step 4 assessment concluded that amenity would not be breached. However, the Council are concerned about the visual amenity of E7 and E8 taking into account LOD. In the case of E7 and E8, the OL is adjacent to their residential boundaries.</p> <p>Provide additional assessment based on the worst-case scenario in relation to the possible LoD.</p>
LV 1.13	The applicant	<p>ES Appendix 13.5 National Landscape Assessment Study - 1</p> <p>The study [APP-235] explains how the proposed Wenham Grove and Great Horkesley CSE compounds, and the EACN substation, have been excluded from the assessment of effects on the National Landscape (Dedham Vale) due to the zone of theoretical visibility images indicating that very few publicly accessible locations within 3km of the proposed infrastructure exist.</p> <ol style="list-style-type: none"> Publicly accessible locations change over time. Are there many areas which may be privately owned but are still in the NL where visibility of the stated infrastructure would be possible? If so provide a commentary on such areas Has an assessment within this study of the potential cumulative effects of infrastructure around Ardleigh taken place (including but not limited to the EACN, and potential Five Estuaries and North Falls substations) upon the NL? If not provide one.
LV 1.14	All local authorities	<p>ES Appendix 13.5 National Landscape assessment study - 2</p> <p>The study [APP-235] concludes that: <i>"In conclusion, the Project would result in significant adverse effects on the special qualities of the Dedham Vale National Landscape during construction. However, during operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be minor and not significant (adverse)"</i> (paragraph 13.3.8)</p> <p>The local authorities are asked whether they agree with this conclusion and provide reasoning if you do not.</p>
LV 1.15	The applicant	<p>National Landscapes - duty to seek to further the purposes report - 1</p> <p>Provide responses to the following queries on the above report [APP-120]:</p> <ol style="list-style-type: none"> Provide any update on the adoption of the Dedham Vale NL and Stour Valley Project Area Management Plan 2026-2031, and update the Report [APP-120] if necessary. Consider the relevance of otherwise of the results of the Manningtree Station Judicial Review to the proposed development and update the report if necessary, providing justification if not. Please explain further the conclusions outlined in paragraph 4.5.4 over the disbenefits of routing around the NL. Explain why the construction swathe for trenchless crossing locations is considerably wider than that required for open cut trenches (200m v 120m) Clarify which option has been chosen for the River Stour crossing west of Stratford St Mary. It is a little unclear whether a single crossing has been selected or not. In relation to the CoCP and the outline and final versions of this document, provide further information over the phrase 'substantially in accordance' and what this means in practice (paragraph 5.3.4).

ExQ1	Question to:	Question:
		g) Provide further information over the 'PJ Line' and the stated initial feasibility study. When is the study to be produced and will it be submitted to the Examination?
LV 1.16	The applicant Suffolk CC	National Landscapes - duty to seek to further the purposes report - 2 Appendix A of the report [APP-120] proposes a sum of £2,426,752 to be paid to the County Council to deliver benefits and to enhance the NL and its setting. To both parties: a) Explain how this sum has been calculated. b) Give your views on whether this sum should be indexed. c) Does this sum provide mitigation for the project?
LV 1.17	Suffolk CC Essex CC	National Landscapes - duty to seek to further the purposes report - 3 The Report [APP-120] concludes that the mitigation hierarchy has been applied in accordance with national policy. Please confirm whether you agree with this conclusion and provide reasoning if not.
LV 1.18	The applicant	Mitigation Several local authorities raise concerns over mitigation measures, both in terms of language and terminology used, and also the principal of mitigation which in many cases may not be effectively possible or achievable. In particular: <ul style="list-style-type: none"> Mitigative planting should not fall into the category of 'additional mitigation' or compensation and is instead required and necessary mitigation. The proposed time length for maintenance and after care for replacement/reinstatement landscaping is inadequate. Mitigation in many cases is not possible or achievable and so under the mitigation hierarchy compensation is required. Compensation packages should be put in place as part of a package to offset landscape and visual effects of the proposed development. Respond to such concerns.
LV 1.19	The applicant	Landscape designations Several local authorities note that county, district and local level landscape designation was not government policy in the late 1990s and 2000s, and Valued Landscape Assessments have not been carried out at a district or local level to replace local landscape designation. Concern is raised that this in turn has leads to the value of local landscapes not being recognised and harm to landscape not being minimised. Respond to such concerns.
LV 1.20	The applicant	Holford rules Holford Rule No 6 states that in a county which is flat and sparsely planted, keep high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'. Is there a risk that in following such a rule the adverse landscape effects of OHLs and pylons are in fact spread out over a larger area and maximised (particularly in generally flat countryside) instead of concentrating harm along corridors?
LV 1.21	The applicant	Landscape Institute Technical Guidance Note 02/21 Assessing landscape value outside national designations The use of the above guidance as part of the landscape assessment methodology is noted. Several local authorities note their concerns that this note has been used at a character area rather than looking at the details of the landscape value, which could result in downplaying of specific qualities. Respond to such concerns. Did the use of the Guidance Note and the landscape value assessment affect the alignment of the proposed overhead line route at all, or did it come too late in the process to meaningfully impact the route? If it did affect the alignment, then please outline how it did and provide examples.
LV1.22	All local authorities	Landscape visualisations – 1 The local authorities are asked whether: <ul style="list-style-type: none"> You agree with the viewpoints in the visualisations [APP-343] to [APP-349] chosen to reflect any potential impacts on landscape. In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from?
LV1.23	The applicant	Landscape visualisations - 2 The ExA have concerns over the following landscape visualisations within [APP-343] to [APP-349]. Please provide a response addressing such concerns or submit additional visualisations: <ul style="list-style-type: none"> 1.14 PRoW south of Bressingham Road. View to north east of limited use. Would a viewpoint from further south along the footpath be more useful? 2.09 PRoW Dandy Corner. Only wireframe provided when seems to indicate that the pylons would be clearly visible.

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> • 2.23 Road south of Elm Pollard, west of Wickham Skeith. Viewpoint from underneath pylons of very limited use to show effect landscape. • 2.40 A1120, Forward Green. Only wireframe provided when seems to indicate that the pylons may be visible. • 3.21 Barn Lane, Little Bromley. Query over whether the best available viewpoint. Large hedge/trees and image quite dark. • 4.08 Fordham. Only wireframe provided when seems to indicate that the pylons would be clearly visible. • 4.17 Lodge Lane, Colchester. Only wireframe provided when seems to indicate that the pylons would be clearly visible. • 4.23 Great Tey Road. Only baseline photographs provided, no visualisations. • 5.03 Rivenhall Place, Silver End. Only baseline photographs provided, no visualisations. • 5.10 PRoW near Coggeshall Hall. Only baseline photographs provided, no visualisations, appears to be very close to pylons. • 5.15 Essex Way near Troy's Hall. Only baseline photographs provided, no visualisations. • 6.07 A414 south of Writtle. Only wireframe provided when seems to indicate that the pylons may be visible. • 6.09 The Causeway, Edney Common. Viewpoint does not appear very chosen, with large hedge at close quarters. • 6.10 St Peter's Way, east of Milgreen Common. Only wireframe provided when seems to indicate that the pylons may be visible. • 6.20 PRoW, Chignal St James. View to south west has hedge/bush at very close quarters. • 7.01 Ingatestone Road, Buttsbury. Location of viewpoint from church parking area not the best siting. • 7.02 Old Church Lane, Mountnessing Hall. Would a viewpoint from a PRoW behind the Hall & Church provide a more useful view encompassing heritage assets? • 7.12 Ingatestone Road near White Tyrells. Only wireframe provided when seems to indicate that the pylons would be very clearly visible.
LV 1.24	The applicant	<p>Local impact reports – comments on visualisations and visual assessments</p> <p>Several of the local authorities' in their LIRs have commented on the visualisations and visual assessments. The ExA expect the applicant to respond to these points in full but have noted the following specific queries. Respond to such concerns or show where a detailed response has been made.</p> <p>Brentwood BC [REP1-150]:</p> <ul style="list-style-type: none"> • Brentwood BC considers that adverse impacts relevant to the open and rural nature of the borough will extend up to 1.5km, particularly in relation to Visual Receptor Area (VRA) G1 Ingatestone & Fryerning (significant adverse effects on PRoW and heritage settings) and VRA G4 Ingrave & Herongate (major adverse effects on Thorndon Country Park and DHGV). • Viewpoint (VP) 7.07 - wireline does not convey actual impacts, use photomontages • VP 7.06 - location poorly chosen <p>Chelmsford CC [REP1-153]:</p> <ul style="list-style-type: none"> • Chelmsford CC considers there are still considerable gaps in the provision including: VRA F9 Edney Common: (Longer distance views) and VRA F6 Chelmsford Northwest (Longer distance views) The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRoW network in particular. In VRA D2 Little Horkesley and Wormingford. Chelmsford CC suggests that effects on visual receptors may be significant adverse between 1-2km of the Project and additional viewpoint assessments and visualisations are needed to demonstrate this. <p>In terms of the visualisations, it notes:</p> <ul style="list-style-type: none"> • VP 7.10 location behind a hedgerow, better views could have been chosen. • VP 7.12 wireline does not convey actual impacts, use photomontage <p>Colchester CC [REP1-156]. Colchester CC considers there are still considerable gaps in the provision of visualisations including in VRA C12 Ardleigh); VRA D3 Great Horkesley and Horkesley Heat); VRA D10 Copford and VRA E3 Kelvedon. The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRoW network.</p> <p>In terms of the visualisations, it notes:</p> <ul style="list-style-type: none"> • VP 4.08 wireline does not convey actual impacts, use photomontages • VP 4.17 wireline does not convey actual impacts, use photomontages • VP 4.22 needs at least to have a wireframe • VP 4.28 needs at least to have a wireframe <p>Tendring DC [REP1-182]:</p>

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> Tendring DC states that the setting of the National Landscape extends well beyond the statutory boundary. In particular, the northern plateau edge above the River Stour is integral to the perception of a wide, rural, tranquil panorama and maintains Constable-country associations. The proposed concentration of pylons and supporting infrastructure in this location would introduce strong vertical and repetitive engineered lines, erode the visual quietness and aesthetic simplicity essential to the NL's special qualities, and generate permanent discordant elements in cross-valley views. <p>Joint LIR for Suffolk CC, Babergh DC, Mid Suffolk DC [REP1-178]:</p> <ul style="list-style-type: none"> The Councils consider that there is potential for significant visual effects beyond the 3km study area, for example where there are particularly sensitive visual receptors and where topography allows more far-reaching views, and that there may also be additional viewpoints closer to the scheme that should have been assessed to demonstrate the effects are minor. Such gaps in the provision occur in VRA B1 Wortham, VRA B3 Mellis, VRA B4 Finningham and Gislegham, VRA B6 Stowupland, VRA B11 Barking and Willisham and VRA C4 Chattisham. The Council's note that the shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects, particularly on the PRoW network. The Councils also note that for visual receptors in particularly sensitive locations and/or in close proximity to the route, the potential changes within the proposed LoD could result in significant changes in visual effects and that these potential changes in effects should have been discussed or at least highlighted within the assessment. <p>Essex CC [REP1-161] (appendix I):</p> <ul style="list-style-type: none"> Respond to the overall comment that the sensitivity of receptors and significant effects have been downplayed. Respond to the many queries regarding both landscape and visual effects in this appendix, using the paragraph numbers as references.
LV 1.25	The applicant	<p>Babergh DC, Mid Suffolk DC and Suffolk CC's local impact report - 1</p> <p>Respond to the following suggestions raised by the Council's joint LIR [REP1-178]:</p> <ul style="list-style-type: none"> An opportunity arises for biodiversity net and historic landscape gains west of Wickham Skeith Pylons of a lesser height should be considered in the Mellis area, and photomontages produced The overhead alignment should be moved to the west of Creeting Hall between RG161 and 167 Undergrounding of existing 132kV lines should take place to the south side of Gipping River.
LV 1.26	Babergh DC Mid Suffolk DC Suffolk CC	<p>Babergh DC, Mid Suffolk DC and Suffolk CC's Local impact report - 2</p> <p>Your LIR [REP1-178] states that there is only one viewpoint outside of 3km in Suffolk and that potential exists for more than this. Please provide further information over possible locations.</p>
LV 1.27	Norfolk CC	<p>Norfolk CC LIR</p> <p>In your LIR [REP1-173] you note several concerns/outstanding objections to landscape and visual matters.</p> <p>Regarding the applicants D1 and D2 responses are you satisfied with the responses received to the questions you raised in:</p> <ul style="list-style-type: none"> Paragraph 11.2 (aftercare period for reinstatement planting and detailed monitoring)? Paragraph 11.2 (additional compensation and landscape led restoration projects within the Waveney Valley)? Paragraph 10.8 (construction near water courses)? Paragraph 10.9 (insufficient definition of temporary construction works)? <p>If not, please indicate in full areas that you still consider require addressing.</p>
LV 1.28	The applicant	<p>Coordinated masterplans</p> <p>In their LIR, Babergh DC, Mid Suffolk DC and Suffolk CC [REP1-178] request that coordinated masterplans be produced covering landscape, ecology, archaeology and rights of way in highly affected areas – suggesting that plans are produced for Bramford, Burstall and the Gipping and Waveney Valleys. The ExA consider there is merit in this request and ask that coordinated masterplans are produced for the following areas, and that built heritage is also included in the plans:</p> <ul style="list-style-type: none"> Gipping Valley Waveney Valley (including Snow Street, Roydon, Roydon Fen and Wortham Ling) Burstall & Bramford Ardleigh & Little Bromley Colne Valley (including Fordham, Ford Street, Aldham)

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> • Great & Little Waltham • Ingatestone & Buttbury • Hutton/ Mountnessing/ Havering's Grove
LV 1.29	The applicant	<p>Waveney Valley</p> <p>Provide further justification for the route and method chosen for traversing the Waveney Valley south of Roydon. Include in your justification consideration of other pylon methods where relevant and applicable, such as shorter pylons or T-pylons, and the potential impact of such methods in terms of landscape impacts. The contents of ES Chapter 3 [APP-127] are noted by the ExA regarding other reasons for choice of OHL over undergrounding in this location.</p>
LV 1.30	The applicant	<p>Outline landscape and ecology management plan</p> <p>Respond to the following queries regarding the outline LEMP [AS-046]:</p> <ol style="list-style-type: none"> a) Provide clarification on tree and vegetation protection during pre-commencement works. b) Will the mitigation hierarchy for veteran trees be agreed with relevant local authorities? c) Provide further detail regarding minimised working widths for the protection of hedgerows. d) Where works are temporary will traffic management be utilised instead of tree/vegetation removal? (for example in instances of low visibility for haul road junctions). If so, how would this be controlled and secured? e) Provide further detail and definition of any potential nighttime working and attendant lighting measures.
LV 1.31	The applicant	<p>ES Appendix 13.6 – arboricultural impact assessment - veteran trees</p> <p>The ExA note that this document presents the findings of the Arboricultural Impact Assessment [APP-236] and that four veteran trees are proposed for removal, with a further 15 noted as being impacted (managed) by the project. Figure A13.6.1 notes the position of these trees, all of which appear to be affected because they are on the centre line within the order limits; the line chosen to represent the position of the OHL. Further information relating to the survey of veteran trees is within the outline LEMP Appendix B [APP-323].</p> <p>Paragraph 5.4.53 of NPS EN-1 (2023) states ‘The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.’</p> <p>The mitigation hierarchy for veteran trees (Table 7.1 in the outline LEMP [AS-046]) states, as a first principal, that the design should be refined in order to avoid the buffer zones of veteran trees.</p> <p>In light of the NPS paragraph and mitigation hierarchy:</p> <ol style="list-style-type: none"> a) What is the justification for the loss of four veteran trees? b) What is the justification for the impact on 15 veteran trees? c) Why has an alternative route within the Order limits not been explored so that the loss of veteran trees, and the impact to others, could be altogether avoided? d) Using the Order limits and LoD, what options are there for retaining these trees?
LV 1.32	The applicant	<p>Outline LEMP Appendix B – ancient woodland and veteran trees - compensation</p> <p>This document [APP-323] outlines the principal measures that are required to help avoid, minimise, and compensate for the potential ecological effects of the Project on ancient woodland and veteran trees. Regarding Veteran trees, it notes the mitigation hierarchy as avoid, minimise, rectify and compensate, with compensation noted for trees being removed/managed. In Appendix D, Table D1, seven trees are proposed for compensation. Four of these (T298, T328, T329 and t560) are those identified as being removed and two (T61 and T107) are identified for pruning. T62 does not appear on either the removal or pruning list; please explain why this tree is proposed for compensation.</p>
LV 1.33	The applicant	<p>ES Appendix 13.6 – arboricultural impact assessment – TPOs</p> <p>Para 13.5.10 of ES Appendix 13.6 [APP-236] states 26 TPO trees are affected by the project and that schedule 14 provides details. Schedule 14 of the draft DCO only provides details of the trees and not the justification for their removal.</p> <p>Provide a table that shows the TPO trees/ groups of trees, their size and category, their location, whether their removal is proposed for construction only purposes (i.e. haul road locations) and the justification for their removal, given the Order limits and LoD.</p>
LV 1.34	The applicant	<p>ES Appendix 13.6 – arboricultural impact assessment – replacement planting</p>

ExQ1	Question to:	Question:
	All local authorities	<p>Paragraph 13.5.13 of ES Appendix 13.6 [APP-236] states that National Grid has committed to a 3:1 tree replacement ratio for individual trees and small groups of trees. It further notes that you would prioritise such replanting within the Order limits, although offsite provision may be required.</p> <p>The outline LEMP [AS-046] states (paragraph 9.3.6) that discussion is ongoing with landowners and third parties regarding the provision of offsite tree planting and that an offsite planting delivery scheme will be provided to the relevant Local Planning Authorities for their information, which provides details of the offsite provision.</p> <ul style="list-style-type: none"> • Applicant - What constraints are there to replanting within the Order limits and under what circumstances may the need for offsite provision be triggered? • All local authorities – Is the provision of an offsite planting delivery scheme document acceptable to you? Do you have any comments on what it should contain and/or when it should be provided to be most useful to you? How could such details be secured?
LV 1.35	The applicant	<p>Outline LEMP – replacement planting</p> <p>Whilst the commitment to 3:1 tree replanting is secured within the outline LEMP [AS-046], there are no outline details of the proposed planting, in terms of maturity of trees, types, mix etc in the outline LEMP or its Appendices. It is noted that requirement 9 of the draft DCO allows for the reinstatement plan to be agreed with the relevant planning authority prior to stages of the development being brought into operational use, however the ExA wishes to understand how the Year 15 visualisations can be considered to be accurate without an understanding of the maturity of replacement planting.</p>
LV 1.36	The applicant	<p>Arboricultural issues raised by the LIRs - general</p> <p>Several LIRs raised general arboricultural issues that align with the ExA’s concerns relating to this topic. These include, but are not limited to:</p> <ul style="list-style-type: none"> • Inadequate detail within the Arboricultural Impact Assessment and associated plans. • Arboricultural Impact Assessment has not been produced in accordance with BS:5837:2012. • An underrated risk of loss to trees and hedgerows. • Requirement 8 needs strengthening to secure arboricultural method statements, tree protection plans and due diligence. • Proposed mitigation for loss of Veteran trees does not comply with NPS EN-1 (2023). • Draft Arboricultural method Statement should be provided to demonstrate that the proposed mitigation is appropriate. • Details of the proposed replacement of Veteran Trees should be provided to ensure these are appropriate. • Lack of clarity in the Arboricultural Impact Assessment as to why Veteran trees need to be removed. • The outline CoCP should include a Tree Protection Monitoring Plan with inspection intervals, reporting lines, and remedial protocols. <p>The ExA expects these comments will be addressed in the applicant’s responses to the LIRs but note that we require detailed responses to the issued raised in relation to arboriculture and veteran trees.</p>
LV 1.37	The applicant	<p>Arboricultural issues raised by the LIRs - specific</p> <p>Specific comments raised in the LIR that require addressing are:</p> <ul style="list-style-type: none"> • Colchester CC [REP1-156] notes that the replanting strategy does not align with local plan policy. It requires a Colchester-specific canopy cover assessment in line with its local plan policy (paragraphs 12.275 to 12.278). • South Norfolk DC [REP1-176] notes that proposed changes to the route would result in a potential impact to a) a veteran oak with a trunk circumference of 5.22m, adjacent to RG33, and b) numerous veteran and ancient trees and woodland in the vicinity of pylons RG48 and RG49. <p>Provide your response to these specific comments.</p>
MW Minerals and Waste		
MW 1.1	Norfolk CC Suffolk CC Essex CC Thurrock Council	<p>Minerals safeguarding - 1</p> <p>Taking account of the impact of the project on existing and proposed mineral sites, do you consider:</p> <ul style="list-style-type: none"> • the proposed development has sufficiently taken account of the need to safeguard mineral resources • the proposed development complies with your current and/ or emerging plans. If not, what further mitigation measures do you consider are required.
MW 1.2	The applicant IPs with quarrying interest	<p>Minerals safeguarding - 2</p> <p>Following construction, please detail what minerals extraction would be able to be undertaken below operational power lines and in the immediate vicinity of pylons, detailing various scenarios and restrictions for differing pylon heights and types.</p>

ExQ1	Question to:	Question:
MW 1.3	The applicant	<p>Martells Quarry, Ardleigh</p> <p>The interrelationship report [REP1-134] refers to proposed extensions to the existing Martells Quarry (sand and gravel extraction). The LoD in this area of the Order limits have allowed for flexibility in the proposed development and to reduce sterilisation of the potential silica sands mineral site. The draft SoCG with Martells Mineral Site A85 & A86 [REP1-097] appears to indicate that discussions between the applicant and SRC Group are ongoing despite an initial meeting held in November 2023, and that SRC Group appear to be unaware of the “alternative scenario” that has been summarised in ES Chapter 4 [APP-130]. Provide a timeline for your future discussions with SRC Group and respond to its comments that minerals sterilisation has the potential to extend into the route of the OHLs and would also lead to void sterilisation, together with a full response to [RR-3333].</p>
MW 1.4	The applicant	<p>Use of on-site minerals - 1</p> <p>In its LIR [REP1-178] at paragraph 15.41, Suffolk CC states that any minerals which are extracted on site during the course of construction should be used in the construction of the proposed development where possible. Please detail the anticipated percentage of material for construction which will be used from minerals won from within the order limits.</p>
MW 1.5	The applicant	<p>Use of on-site materials - 2</p> <p>Please give full details of the expected treatment, disposal method and location for the haul road material once they are decommissioned. How can the ExA be confident that the principle of the waste hierarchy will be adhered to and imported material, and therefore waste, will be minimised.</p>
MW 1.6	The applicant Essex CC	<p>Minerals resource at Lowleys Farm</p> <p>Brett Aggregates Ltd in its Deadline 1 submission [REP1-210] has raised concerns about the potential impacts on its minerals prospect site at Lowleys Farm. As it currently stands, Brett Aggregates Ltd contends that the route for the proposed development would run through the middle of the mineral scheme and over its deepest point. The applicant and Essex CC are requested to respond to the concerns raised by Brett Aggregates Ltd. Furthermore, the applicant is also requested to clarify what, if any, scope exists for the route to be altered to mitigate the impacts on this minerals resource that have been raised by Brett Aggregates Ltd. The applicant should also explain the reasons for the order limits detail to the east and south of TB128 to TB133 which appears to extend towards the eastern limits of Lowleys Farm with no indication of the works which will be undertaken within the area between the proposed line of pylons and Lyonshall Wood.</p>
MW 1.7	The applicant	<p>Recycling of waste materials</p> <p>In Table 2.1 of the outline Site Waste Management Plan [APP-302] you cite the use of a crushing machine to break up pylon foundations. Clarify how and where any recycling of inert materials would take place, for example are crushing and screening facilities proposed for any of the construction compounds. If so, how have the effects arising from these activities been accounted for in the relevant Chapters of the ES?</p>
NV Noise and vibration		
NV 1.1	The applicant	<p>Noise general</p> <p>ES Chapter 14 [APP-256] quotes NPS EN-5 (2023) paragraph 2.9.35, which states “Hum is only likely to occur during rain when rates of rainfall exceed 1 millimetre/ hour. Hum is a sound consisting of a single pure tone or tones. The ExA would ask the applicant to advise at what Hz the hum (single pure tone or tones) will resonate at (will this be in the audible range)? Whilst the ExA notes this matter was scoped out as part of the EIA Scoping Opinion [APP-297], based on predictions how often is a hum, consisting of a single pure tone or tones, likely to occur?”</p>
NV 1.2	The applicant	<p>Operational noise of the EACN and Tilbury North Substations</p> <p>ES Chapter 14 [APP-256] paragraph 14.4.30 refers to the operational noise of the EACN and Tilbury North Substations as being indicative based on current design information. This paragraph explains detailed assessment of operational noise from the proposed substations would be undertaken as part of the design phase, along with any specific mitigation measures that may be required at that time.</p> <p>The ExA is concerned regarding the applicant’s choices in this regard, especially in relation to timings of when such work will be undertaken, based on the evidence currently before it contained in ES Chapter 14 (Noise and Vibration) [APP-256] (ie indicative BS4142 assessments (without mitigation) contained in Appendix 14.3 (EACN Substation Operational Noise Assessment) at table A14.3.5 and Appendix 14.4 (Tilbury North Substation Operational Noise Assessment) at table A14.4.5).</p> <p>The ExA seeks either:</p> <ol style="list-style-type: none"> Further justification, including a timeline, as to why the detailed design of these substations, including the detailed assessment of operational noise from the proposed substations, should not be being undertaken now in order to provide informed mitigation and design choices with a view to reducing potential resultant noise impacts on noise sensitive receptors.

ExQ1	Question to:	Question:
		<p>or</p> <p>b) The provision of full design details of the EACN and Tilbury North Substations, including the detailed assessment of operational noise from the proposed substations.</p>
NV 1.3	The applicant	<p>Noise general/ precision - 1</p> <p>ES Chapter 14 [APP-256]. There are multiple examples of the use of terms like 'would' and 'shall' in relation to something being undertaken, to be done or provided (ie Section 14.4 (paragraphs 14.4.13, 14.4.30, 14.4.38 and 14.4.40); Section 14.6 (Paragraphs 14.6.4, 14.6.5, 14.6.6 NV11 to NV14 (inclusive) and NV14, 14.6.12 and 14.6.15) and Section 14.8 (this list is not exhaustive)). These terms should be replaced with the term 'shall' or a word of equivalent meaning in order to avoid any doubt.</p>
NV 1.4	The applicant	<p>Noise general/ precision - 2</p> <p>A number of County and Local Authorities raise concerns related to construction noise at Noise Sensitive Receptors (NSR). Braintree DC in its LIR [REP1-148] suggests a more precautionary, enforceable framework should be secured within in the draft DCO, including:</p> <ul style="list-style-type: none"> i) revised core working hours (See question DCO 1.S9) ii) a 50 dB limit during start-up and close-down at the nearest NSRs iii) restrictions on all piling activities (not percussive piling only) iv) targeted and defined temporal restrictions, where residual significant effects remain <p>The ExA considers that in the absence of such measures there would be a clear risk that construction noise impacts at NSRs could give rise to significant adverse effects that have not been adequately mitigated. Please review the draft DCO accordingly or justify why such measures are not necessary to be included in the draft DCO.</p>
NV 1.5	The applicant Relevant local authorities	<p>Use of use of triple Araucaria conductors or alternative technology</p> <p>Throughout ES Chapter 14 [APP-256] reference is made to the use of triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons).</p> <p>In the event of alternative technology being used, as opposed to the use of the use of triple Araucaria conductors on part or all of the route, should a mechanism be included to ensure that alternative technology is of the same or better standard in relation to noise on standard lattice pylons. In the event a mechanism should be used, what form should the mechanism take (ie should it be a requirement within the DCO), should there be a need to agree to the alternative technology and should there be a discharging and appeal authority?</p> <p>In addition to the above, the ExA notes ES Chapter 7 paragraph 7.9.4 Refers to pylons TB140 to TB142 (inclusive) to the south of River Chelmer being low height pylons. However, this paragraph also refers to feedback that was received during consultation in 2025 and certain technical details being refined. This paragraph states " as a result, flexibility has been retained to allow for the installation of standard lattice pylons in this area instead." However, the ExA notes ES Chapter 14 (Noise and vibration) states a low noise conductor system will be used. Can the applicant confirm, should the design change in relation to pylons TB140 to TB142 (inclusive) to standard lattice pylons, or any other form of pylon, be necessary the low noise conductor system will be used as part of those pylons?</p>
NV 1.6	The applicant	<p>Construction of pylon foundations/ non-percussive piling methods</p> <p>ES Chapter 14 [APP-256] paragraph 14.6.6 at NV23 advises "For the construction of pylon foundations, non-percussive piling methods will be used where practicable". The ExA is concerned about the use of the wording ' where practicable'. It asks are there any locations near NSRs, where percussion is to be used in relation to construction techniques and how can it be certain the impact of noise sensitive receptors will be adequately mitigated during construction generally, but especially related to the construction of the pylon foundations?</p>
NV 1.7	The applicant Relevant local authorities	<p>Compaction activities and potential for damage due to construction vibration</p> <p>ES Chapter 14 [APP-256] paragraph 14.7.27 to 14.7.30 (inclusive) indicates there are five structures or buildings where there is potential for damage due to construction vibration from potential compaction activities. It also indicates: i) the identified locations will be reviewed by the main contractor in their specific detailed assessments, prior to the start of work with mitigation measures put in place, where required, to avoid potential significant effects; and ii) will review all works locations to determine whether any other buildings or structures may be affected by vibration from construction activities. However, no further details are provided.</p>

ExQ1	Question to:	Question:
		The ExA is concerned in regard to the absence of the further details in regard to both i) and ii) above and seeks the views of both the applicant and Relevant County/ Local Authorities in this regard. Should there be a formal mechanism requiring the further details and mitigation to be submitted and approved. What form should such a mechanism take (ie should it be a requirement within the DCO)? Should there be a need to agree the additional mitigation measures to avoid potential significant effects.
NV 1.8	The applicant	<p>Significant observed adverse effect level</p> <p>ES Chapter 14 [APP-256] paragraphs 14.7.31 to 14.7.36 (inclusive) indicates a large adverse magnitude of impact on link PAR 30 - Bentley Road, which has sixteen NSRs within 50 metres of the route and notes the effects at these noise sensitive receptors have the potential to be significant, in the absence of mitigation. Of these sixteen, one property, Jasmine Cottage, is noted as having a large magnitude of adverse impact and notes the absolute noise level would be above the construction noise Significant Observed Adverse Effect Level, principally due to the small distance between the property and carriage way. The ExA is concerned as to the lack of adequate proposed mitigation in regard to PAR 30 – Bentley Road and the sixteen noise sensitive receptors, especially Jasmine Cottage. The vague reference to the outline CTMP and the inclusion of temporary speed limits may serve to reduce construction traffic noise appears weak. In the light of these concerns, the ExA asks what the applicant is going to do in regard to this impact, as it considers being vague or silent on this matter to be unacceptable.</p>
NV 1.9	The applicant	<p>Construction traffic noise assessment</p> <p>ES Appendix 14.2 (Construction Traffic Noise Assessment) at Paragraph 14.4.7 advises “...the effects of noise can be adequately mitigated...” The ExA considers this should read ‘will be’. Please review and amend as required.</p>
NV 1.10	The applicant	<p>EACN Substation operational noise assessment - 1</p> <p>ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259] at paragraph 14.6.1 refers to surveys conducted as part of the Five Estuaries and North Falls Substation noise assessment, as detailed in the Five Estuaries Resultant specific noise level at NSR Offshore Wind Farm ES (volume 6, part 6, annex 9.1 (Onshore Airborne Noise Based Noise Survey (Five Estuaries Offshore Wind Farm Limited, 2024). Paragraph 14.6.2 advises “Due to potential cumulative effects of the three projects, it has been agreed with Tendring DC that the projects would be assessed against the same baseline...”</p> <p>Signpost where in the submitted application documents the Five Estuaries Offshore Wind Farm ES (volume 6, part 6, annex 9.1 (Onshore Airborne Noise Based Noise Survey (Five Estuaries Offshore Wind Farm Limited, 2024) and the relevant surveys can be located or you provide this information.</p>
NV 1.11	The applicant	<p>EACN Substation operational noise assessment - 2</p> <p>ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259] at table A14.3.7 (Potential mitigation options related to the EACN). The ExA is concerned you are only identifying indicative/ potential mitigation options, especially in the light of the potential noise impact arising from the EACN. As such it seeks confirmation as to what mitigation options are to be selected (ie all mitigation identified or one or more mitigations, but not all); whether they are practicable and reasonable, meeting Best Available Technique. Please note the ExA is concerned in regard to the use of Best Practical Means in this instance.</p>
NV 1.12	The applicant	<p>EACN Substation operational noise assessment - 3</p> <p>ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259], table A14.3.8 (Resultant Specific Noise Levels at NSR (With Mitigation)). The ExA notes the findings within this table but would seek clarification as to how you have reached these conclusions. For example are you using all of the potential mitigation options identified or are you using one, such as specifically suggesting the use of acoustic enclosure, or more than one of the potential mitigation options but not all? Please clarify.</p>
NV 1.13	The applicant All local authorities	<p>EACN and Tilbury North Substations operational noise assessment</p> <p>ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259] and ES Appendix 14.4 (Tilbury North Substation Operational Noise Assessment) [APP-260]. The ExA is concerned with the reference to ‘reasonably practicable’ (also referred to as Best Available Technique Not Entailing Excessive Cost (BATNEEC)) in both documents. This is due to ‘reasonably practicable’ and BATNEEC including an element of cost within the assessment. The ExA considers any mitigation used must achieve the outcome intended, as set out in tables 14.3.8 and 14.4.8 respectively, and Best Available Technique (BAT), not BATNEEC, should be employed and secured within the DCO.</p> <p>The ExA seeks the views of both the applicant and local authorities in this regard. Should there be a formal mechanism requiring BAT? What form should such a mechanism take (ie should it be a requirement within the DCO) and, if so, who should the details be submitted to and who is responsible for discharging those conditions?</p>

ExQ1	Question to:	Question:
NV 1.14	The applicant	<p>Tilbury North Substation operational noise assessment</p> <p>ES Appendix 14.4 (Tilbury North Substation Operational Noise Assessment) [APP-260]. Image A14.14.1 (Operational Noise Baseline Information) contains two noise sensitive receptors marked as R3, please confirm this is an error and the noise sensitive receptor R3 located to the west should read R2 (High House Lane, Chadwell Saint Mary). In addition to the above, the ExA notes the noise monitoring locations P1 (Brentwood Road, Orsett) and P3 (Walton's Hall Road, Linford) are located further away than NSRs R1 (Brentwood Road, Orsett) and R3 (Buckingham Hill Road). As such we question whether those locations and their results are representative of the noise sensitive receptors at those locations. In the light of this, the ExA would question the validity of the documents conclusions in the absence of information explaining any calculations employed. More information is needed by way of explanation.</p>
PRoW Public Rights of Way		
PRoW 1.1	Norfolk CC Suffolk CC Essex CC Thurrock Council	<p>PRoW general - 1</p> <p>Please provide a schedule of proposed amendments to the outline PRoW Management Plan, highlighting matters that you consider are not acceptable and require amending and what you consider those amendments should be.</p>
PRoW 1.2	Norfolk CC Suffolk CC Essex CC Thurrock Council	<p>PRoW general - 2</p> <p>ES Chapter 16 [APP-039] paragraph 16.4.15 details the PRoW user surveys carried out. Confirm that these baseline surveys are accepted and if not, why not.</p>
PRoW 1.3	The applicant	<p>PRoW general - 3</p> <p>The outline PRoW Management Plan [APP-039] details indicative durations of impact in table 8.3. How can the ExA be assured that these indicative durations are realistic and how will you and your main works contractor ensure that duration of impact is minimised.</p>
PRoW 1.4	The applicant	<p>ES chapter 15 table 15.24 (residual construction effects on ProW within the local study area) - 1</p> <p>The receptors listed on page 84 include PRoW W-418/031/0 and W-418/058/0. However, these PRoW are not listed under the heading residual construction effects.</p> <p>Review and amend as necessary.</p>
PRoW 1.5	The applicant	<p>ES chapter 15 table 15.24 (residual construction effects on PRoW within the local study area) - 2</p> <p>The PRoW listed in this section tend to provide a clear indication of the duration of the relevant works. However, there are a number of instances where the term "duration of works" is listed against a PRoW within the table without any clarification. In those instances does duration of the works mean the entire works across the construction period or does it just refer to the works detailed in that section (for example W-392/046/0 specifies "...drainage system for the duration of the works.", whilst Great and Little Leighs 40 specifies "...to facilitate a temporary drainage system for the duration of the works.").</p> <p>Clarify and amend as required.</p>
PRoW 1.6	The applicant	<p>ES chapter 15 table 15.24 (residual construction effects on PRoW within the local study area) - 3</p> <p>PRoW Little Bromley 13, 14 and 15 all note the permanent closure of a part of the PRoW, with the closures ranging from 5 to 10 metres in length. The ExA would ask for clarification in regard to these permanent closures and whether they are due to road alterations that reduce the amount of PRoW at these locations. Should this not be the case, please explain in more detail the permanent closure of the relevant parts of these PRoW.</p>
PRoW 1.7	The applicant	<p>ES chapter 15 table 15.24 (Residual construction effects on PRoW within the local study area) - 4</p> <p>Page 98 refers to 'The rest of the PRoW within the limits (Section A to Section H)' being temporarily closed with managed access and that safe passage will be allowed throughout for the PRoW users, with a very low magnitude of impact. However, no specific details of these PRoW have been provided. Provide a full list and relevant details as to the PRoW affected by the temporary closures you are referring to under this heading.</p>
PRoW 1.8	The applicant	<p>ES chapter 15 table 15.25 (residual construction effects on promoted routes (circular walks, long distance walking and cycling routes) within the local study area).</p> <p>'Receptor' 'Angles Way (Section A)' refers to the route being temporarily closed for the duration of works to facilitate the haul road access. It does not</p>

ExQ1	Question to:	Question:
		<p>refer to that PRow being diverted. However, within the same paragraph in regard to the working area for the overhead conductor stringing works reference is made to the route being temporarily closed and diverted to facilitate those specific works.</p> <p>Clarify whether there will be any diversion of 'Angles Way (Section A)' related to facilitating the hall road access?</p> <p>In addition to the above, there are several other instances where the term 'duration of works' occurs in this table, albeit not all related to facilitating haul road access. These include in relation to the John Ray Walk (Section E); the White Notley Circular Walk (Section E), the Pleshsy Castle – Great Waltham loop from Little Waltham (Section F) (This list is not exhaustive).</p> <p>Clarify if you are referring to the duration of the entire works or just the works detailed under the heading of the specific 'Receptor'.</p>
PRoW 1.9	The applicant	<p>ES chapter 15 table 15.30 (residual operations (and maintenance) effects).</p> <p>Table 15.30 lists under the heading 'Receptor' 'Other PRow within the Order Limits (Sections A to Section H)'. For clarity, provide a full list of these other PRow and the level of sensitivity relevant to each PRow.</p>
PRoW 1.10	Essex CC	<p>Mitigation for all PRow routes that cross or enter the highway network along the primary access routes.</p> <p>Essex CC in its RR [RR-1083] refer to mitigation for all PRow routes that cross or enter the highway network along the Primary Access Routes. Can you clarify what mitigation measures you are seeking in this regard and how such mitigation should be secured. In responding to this question please bear in mind relevant tests (eg where such mitigation to be secured by requirement would it meet the relevant tests (necessity, relevant to planning; relevant to the development permitted; enforceability; precision; and reasonable in all other respects))?</p>
PRoW 1.11	The applicant Essex CC	<p>Permanently stopping up and diversions of PRow.</p> <p>Essex CC raises concern regarding proposals to include permanently stopping up and diversions of PRow, albeit no specific details have been provided at this stage. It raises concerns around the impact on the PRow network and seeks more surety on the design and protection of rights ([RR-1083], Paragraph 6.5.11).</p> <p>The applicant and Essex CC are asked for an update on these matters and any discussions taking place between them.</p>
SS Safety and security		
SS 1.1	The applicant	<p>Bramford substation</p> <p>Detailed resilience, security and continuity concerns have been raised by Burstall Parish Council [REP1-151] and Mr William Petersen [REP1-495] over the scale and size of the Bramford substation site given the concentration of nationally critical energy infrastructure at the site, which would be added to by the proposed development. Respond to such concerns in detail, including reference to EN-1 and EN-5 where relevant.</p>
SS 1.2	The applicant	<p>Security risks</p> <p>A range of security issues have been highlighted as a possible risk by a number of IPs in relation to the OHLs and substations, including vulnerability to attack (for example by drones), and the resilience in areas where there is a concentration of energy infrastructure. NPS EN-1 (2023) section 4.16 recognises that there may be national security implications for critical energy infrastructure. Can the applicant respond to these points, clearly setting out the security considerations for the proposed development and which may result from the concentration of other UK energy infrastructure in the surrounding East Anglia area.</p>
SS 1.3	The applicant	<p>Emergency services – access and community safety</p> <p>Having regard to concerns raised by a number of IPs and from the emergency services (see for example [RR-1087], [RR-3519] and [AS-063]), can the applicant clearly explain what further mitigation measures would be taken to ensure emergency service access and community safety, including in relation to air ambulances, during all stages of development, and how these measures are proposed to be secured. This should include consideration of cumulative impacts with other projects, and whether any measures are proposed to be shared with other projects.</p>
SS 1.4	Suffolk Constabulary Essex Police	<p>Emergency services – mitigation</p> <p>Please review and provide comments on the applicant's response to your submissions at OFH1 [REP1-140] and [REP2-023], in particular regarding your requests for proposed mitigation beyond what is set out in the outline CoCP appendix E (community engagement and public information) [APP-305] and the outline construction traffic management plan [APP-309] (including an incident management plan).</p>
SS 1.5	Norfolk Constabulary Suffolk Constabulary	<p>Emergency services – legal agreement justification</p>

ExQ1	Question to:	Question:
	Essex Police East of England Ambulance Service NHS Trust	The police forces and ambulance service are also asked to provide further justification for their request for a planning obligation (such as a section 106 agreement) and what they would seek to be included in such an agreement, including how it would meet the relevant policy tests (including regulation 122 of the Community Infrastructure Levy Regulations 2010). Whilst this question is directed at those who have made a request for a legal agreement, Norfolk Constabulary are also invited to respond should they wish to do so.
SS 1.6	The applicant	ES Appendix 15.2 review of aviation impact Respond to the following queries on the review [APP-267]: <ul style="list-style-type: none"> The review states that it “draws upon the findings of Alan Stratford and Associates Ltd”. Provide such findings or justification for not doing so. Provide definitions for ‘Option A’, ‘Option B’, ‘IR04’, and ‘IR05’ in Table A15.2.1 Table A15.2.4 refers in the ‘Assessment Summary’ to various paragraphs for Brook Farm, Chase Farm, Priory Farm, Raydon Wings, Thurrock, and Tibenham. However, these paragraph references appear incorrect. Please check and confirm.
SS 1.7	The applicant Defence Infrastructure Organisation	Wattisham Station Provide an update on the following issues: <ol style="list-style-type: none"> The effect of the proposed development upon the East 2 WAM Network Statutory Technical Safeguarding Zone, including both the disruption of the microwave link and the impact of any lateral tolerance changes to proposed pylons and OHLs. The results of the required recent assessments to consider the vertical and lateral limits of variation proposed in the siting and design of lattice towers as well as for crange or temporal structures that may be used during construction in the statutory aerodrome safeguarding zone Confirmation of the mechanism/ how it will be secured in the DCO, or otherwise, to ensure that the proposed development will be submitted for inclusion on lower airspace chart, should consent be granted and how the Defence Infrastructure Organisation will be notified in advance of the deployment of cranes or temporal tall or narrow profile structures 50 metres or greater in height, including details of any aviation warning lighting with which they may be fitted.
SS 1.8	The applicant Tibenham Aerodrome Norfolk Gliding Club	Tibenham Aerodrome The submitted final SoCG [REP1-105] appears to still have many matters not agreed, with no matters showing as agreed. Furthermore, the applicant’s deadline 2 response [REP2-029] to Norfolk Gliding Club’s WR [REP1-254] appears to not fully deal with the Gliding Club’s concerns and provides more of a general response. To the applicant <ul style="list-style-type: none"> Provide a more detailed response to [REP1-254] specifically responding to the issue of the Tibenham Aerodrome’s 5km circular safeguarding zone and what this means in practice, both for the proposed development and for the operation of the Aerodrome with the proposed development in place. To the applicant and Norfolk Gliding Club <ul style="list-style-type: none"> Provide any update to the previous SoCG [REP1-105] or when updates are likely to arise.
SS 1.9	The applicant	ES Appendix 15.2 review of aviation impact and Raydon Wings The review [APP-267] states that the proposed development will result in a “minor penetration of the Inner Horizontal Surface (IHS)”. Table A15.2.9 notes that CAP168 compliance for take-off and landing is “partial” in both instances. <ol style="list-style-type: none"> Provide further information on the safety or otherwise of using an aerodrome with a minor penetration of the Inner Horizontal Surface. Is it possible to achieve ‘partial’ compliance of CAP168 and what does this mean in practice for the users of the aerodrome and their safety?
SS1.10	The applicant	General Aviation Awareness Council representation Provide a detailed response to the above representation [REP2-050].
SS1.11	The applicant	Priory Farm Provide a detailed response to the RR from Priory Farm Aviators, including any details or information on an updated SoCG.
SS1.12	The applicant Chase Farm	ES Appendix 15.2 review of aviation impact and Chase Farm The review states in paragraph 15.4.8 [APP-267] that engagement with Chase Farm is ongoing to assess possible solutions to the conflict between the proposed development and the Chase Farm aerodrome – or to agree closure.

ExQ1	Question to:	Question:
		Provide an update on this matter, including any further discussions over a potential reorientated runway and OHL realignment and, in the alternative, what form or agreement could or could not be reached on closure of the aerodrome, and detail any socio-economic effects this may have.
SET Socio-economics, tourism and recreation		
SET 1.1	The applicant	<p>English index of multiple deprivation</p> <p>The ExA notes ES Chapter 15 (Socio-economics, Recreation and Tourism) [APP-265] refers to the English IMD. Table 15.7 (Deprivation ranking by geographical area within the Wider Study Area) of the Chapter sets out the 'Average Rank in IMD 2019'. However, the ExA notes the IMD was updated in October 2025. Your response to updating the IMD, as set out in [REP1-132] is noted. However, the ExA would ask what evidence has been put forward to substantiate there is no need to update the document with the most up to date data.</p> <p>In the absence of adequate evidence, please revisits the Chapter of the ES and address any changes as a result of the IMD being updated. The reassessment should also seek to identify vulnerable and sensitive receptors and any implications this may have on the findings and conclusions set out in this Chapter. Additionally, the ExA request the inclusion of more granular LSOA information to reveal any localised deprivation, where health inequalities are most acute.</p>
SET 1.2	The applicant	<p>Study commissioned by Scottish Renewables entitled 'house prices: impact of Beaully Denny grid infrastructure' (BiGGAR Economics, 2024).</p> <p>ES Chapter 15 [APP-265] at paragraph 15.3.7 refers to a study commissioned by Scottish Renewables in relation to the operation of the Beaully-Denny power line entitled 'house prices: impact of Beaully Denny grid infrastructure' (BiGGAR Economics, 2024). The ExA asks you to:</p> <ol style="list-style-type: none"> signpost where this document has been provided in the application submission or provide this document. In either case provide a synopsis of the findings of the document; and advise whether any similar study has been undertaken in relation to the impact on non-residential properties, whether in relation to the Beaully-Denny power line or other similar development. If such a study or studies have been undertaken please signpost where that information has been submitted into the examination or provide that study, along with a synopsis of the findings.
SET 1.3	The applicant	<p>Key parameters for assessment and assumptions</p> <p>ES chapter 15 [APP-265] at Paragraph 15.4.7 (Key Parameters for Assessment and Assumptions) indicates a number of assumptions based on National Grids previous experience of similar projects. For example construction workers who travel to the area (ie non local workers) the assumption is made that such workers would spend an average of £65 per day on accommodation, food and other local services. Furthermore, in terms of visitor accommodation bed space, the assumption is made that non local workers would use camping and caravan sites 50%; stay in short term let's 20%; would using hotels/ bed and breakfast facilities 20% and 10% would commute from home into the area. Please signpost where within the submitted documentation National Grids assumptions are evidenced (ie – what schemes constitutes National Grids previous experience of similar projects and what is the evidence that demonstrates the assumptions made) or provide such documentary evidence.</p>
SET 1.4	The applicant	<p>Mitigation measures - 1</p> <p>The ExA notes ES chapter 15 [APP-265] at paragraph 15.6.11 refers to mitigation measures detailed in other relevant chapters of the ES as may be appropriate to social economics, recreation and tourism. Please confirm all mitigation measures have been provided in one central location and that central location is contained in the outline CoCP at Table 6.1(mitigation measures/environmental commitments). Should this not be the case, please advise where a single list of all mitigation measures can be located within the existing application documentation or provide a comprehensive list of all mitigation measures.</p>
SET 1.5	The applicant Relevant local authorities	<p>Mitigation measures - 2</p> <p>The ExA notes the use of the term 'where practicable' in relation to proposed mitigation and is concerned as to the vagueness of this term.</p> <p>Applicant - justify the use of this term in each instance or amend the proposed mitigations accordingly.</p> <p>Relevant County and Local Authorities – The ExA seeks your views in regard to the use of this term and your suggestions in regard to any alternative forms of wording.</p>
SET 1.6	The applicant	<p>Key parameters for assessment and assumptions</p> <p>ES chapter 15 [APP-265] at paragraph 15.7.3 (Local economy) indicates assumptions related to Project Costs based on National Grids previous experience of similar projects. For example National Grid is assuming 65% would be spent on civil engineering works, with the remainder spent on plant and equipment. Signpost where within the submitted documentation National Grids assumptions are evidenced. (ie – what schemes and what is the evidence that demonstrated the assumptions made).</p>
SET 1.7	The applicant	<p>Potential residual construction effects on built and other assets - 1</p>

ExQ1	Question to:	Question:
		ES chapter 15 [APP-265] at table 15.22 (potential residual construction effects on built and other assets) makes a number of assumptions in relation to 'Residual Construction Effects'. For example statements such as "business is not anticipated to be fully affected during construction"; and "Access to the business would be maintained during construction, air quality and noise affects would be mitigated". Signpost to the evidence justifying these assumptions or provide evidence.
SET 1.8	The applicant	Potential residual construction effects on built and other assets - 2 ES chapter 15 [APP-265] at table 15.22 (Potential Residual Construction Effects on Built and Other Assets) and table 15.23 (Residual Construction Effects on Recreational Land) indicate individual discussions with land owners are to be undertaken or are under separate discussion. Provide updates in regard to each instance where you have advised separate discussions are ongoing and provide evidence of those discussions, including matters being discussed; whether agreement has/ has not been reached and how such agreements have been or intended to be secured.
SET 1.9	The applicant	Potential construction effects on planning and development - 1 ES chapter 15 [APP-265] at table 15.23 (Residual Construction Effects on Recreational Land) in relation to 'Receptor' 'Mellis Common (Section B)' states "...road verges are not considered to have a functional recreational purpose; no direct impact is anticipated on recreational use." Direct to the legislation/ case law that confirms your statement.
SET 1.10	The applicant	Potential construction effects on planning and development - 2 ES Chapter 15 [APP-265] at table 15.26 (potential construction effects on planning and development) contains multiple examples of sensitivity expressed as 'ranging from low to high' or '...low to medium'. However, the ExA is unable to tell which planning application/ development falls within which sensitivity category. Please review and amend clearly marking the sensitivity against each individual development.
SET 1.11	The applicant	Potential construction effects on planning and development - 3 ES Chapter 15 [APP-265] at table 15.26 (potential construction effects on planning and development) makes several references under the heading of residual construction effects to potential severance being anticipated to be mitigated during construction. However it provides no detail other than vague reference to the outline CoCP in regard to how the applicant intends to mitigate such severance. Provide a clear explanation of the applicants intention in this regard or sign post where the specific detail in the application documentation can be located.
SET 1.12	The applicant	Potential construction effects on planning and development - 4 ES Chapter 15 [APP-265] at table 15.26 (potential construction effects on planning and development) under the heading 'Receptor' 'Planning Applications within Mid Suffolk (Section B) refers to 14 planning applications with potential to overlap the project construction programme. However in the penultimate paragraph for this 'Receptor' it refers to the magnitude of impact on the remaining 13 planning applications. Clarify this discrepancy.
SET 1.13	The applicant	Potential construction effects on planning and development - 5 ES Chapter 15 [APP-265] at table 15.26 (potential construction effects on planning and development) under the heading 'Receptor' 'Planning Applications within Thurrock (Section H) refers to and lists 10 planning applications with potential to overlap the project construction programme. However, applicant at table 15.31 (Potential Operational (and Maintenance) effects on planning and development) lists planning application 20/01297/CV as having a potential physical overlap with the order limits, but this planning application is not detailed in table 15.26. There are several instances within the table as a whole where planning applications are listed in table 15.31 but not listed in table 15.26. Review, clarify and amend as necessary.
SET 1.14	The applicant Essex CC ARU Writtle Anglia Ruskin University Writtle College Ltd All other Interested Parties	Concerns of ARU Writtle, Anglia Ruskin University and Writtle College Limited At Deadline 1 ARU Writtle, Anglia Ruskin University and Writtle College Limited [REP1-200] highlighted concerns regarding the statutory safeguarding of children and physical collision risks between horses and construction vehicles and between pedestrians and construction vehicles. This issue was raised under the heading of socio economic effects, but could be attributed to other headings, such as Transport and Traffic for example. The ExA seeks written submissions, supported by evidence, from all IPs in regard to these matters that sets out their concerns/ position in regard to these matters. The ExA would especially request submissions from the above named educational establishments, Essex CC and the applicant.
SET 1.14	The applicant	Concerns of the Essex International Scouts and Guides Jamboree The ExA notes the draft SoCG related to the Essex International Jamboree [REP1-078] and the submissions made by Essex Scouts and Guides [RR-1089] , [REP1-233] , [REP1-234] and [REP2-045] . It especially notes the concerns regarding the impact of the proposed development on the Essex International Scouts and Guide Jamboree and the fact the SoCG submission to date is not considered to "... reflect verbal discussions and is not agreed by the Essex International Scouts and Guide Jamboree."

ExQ1	Question to:	Question:
		<p>The ExA is concerned with these allegations, especially the allegations: i) National Grid has failed to substantively address the specific concerns raised in regard to the Jamboree, especially the operational implications of placing transmission infrastructure within the centre of the event site not being addressed; ii) National Grids failing to recognise the true impact of their scheme; and iii) the proposed development "...threatens the future of this significant international youth event." This list of concerns is not exhaustive.</p> <p>The ExA requires a full and considered response to all the concerns raised in regard to the Essex International Jamboree and asks how you intend to resolve the matters being raised.</p>
SET 1.15	The applicant	<p>Social value opportunities</p> <p>Essex CC in its RR [RR-1083] and LIR [REP1-161], as well as other local authorities, are seeking the proposed development to deliver significant beneficial socio-economic effects to host communities, including in relation to social value and community benefits. Concerns relate to associated social value opportunities around skills, training, and future employment not being fully assessed by the applicant.</p> <p>The applicant is asked to signpost where in the submitted application documentation it expressly details the social value and community benefits it is proposing, which accords with the 2025 government guidance, or provide such evidence.</p> <p>Clarification is also sought as to how such benefits arising from the proposed development would be secured, should the DCO be made.</p>
TT Traffic and transport		
TT 1.1	The applicant	<p>Baseline data - 1</p> <p>What assumptions were made in the Transport Assessment (TA) [APP-333] about the sourcing of construction materials and what are the most likely sources of materials for construction. What impact would the choice of supply sources have on the delivery routes if they were to be different from the assumptions made and how can the ExA be confident that the final sources of construction materials and use of associated routes would not lead to traffic and transport effects greater than or different from those assessed in the ES.</p>
TT 1.2	The applicant	<p>Baseline data - 2</p> <p>What assumptions were made in the TA [APP-333] about the disposal of materials at the end of the construction and dismantling process, especially with regard to stone from access tracks and haul roads. How can the ExA be confident that the agreed disposal points and the use of associated construction routes would not lead to traffic and transport effects greater than those assessed in the ES.</p>
TT 1.3	The applicant	<p>Baseline data - 3</p> <p>Confirm that the baseline traffic flow data, growth factors and trip generation data has been accepted and agreed as appropriate by all highway authorities. If not, please explain what matters are not agreed and how it is proposed to conclude on these outstanding matters and by when.</p>
TT 1.4	The applicant	<p>Baseline data - 4</p> <p>Both Norfolk CC in its LIR [REP1-173] and National Highways in its RR [RR-2657] state that personal injury collision data has been used from 2019 and 2021-2023 which includes periods of Covid-19 restrictions and lockdowns. Please provide an update to this data with a full 5 year period excluding data between March 2020 and September 2021. National Highways in paragraph 4.2.13 of their RR also request that causation factors of the road layout should be detailed when assessing the personal injury collision data, the application are asked to provide this.</p>
TT 1.5	The applicant	<p>Baseline data - 5</p> <p>a) Explain how the geographic extent of traffic assessment has been determined.</p> <p>b) Explain what roads have been excluded which may potentially be used.</p>
TT 1.6	The applicant	<p>Baseline data - 6</p> <p>In their LIR Suffolk CC [REP1-178] at paragraph 12.137 question if predicted peak HGV movements are one way or two way. Confirm which this is.</p>
TT 1.7	The applicant	<p>Baseline data - 7</p> <p>It is being suggested by Local Authorities that working times on Saturday afternoon, Sundays and Bank Holidays should not be part of the core working hours. If this change were to be made in the draft DCO, detail the impact this would have on the forecast traffic modelling.</p>
TT 1.8	The applicant	<p>Baseline data - 8</p> <p>The applicant's response to RRs [REP1-132] confirms that it will provide additional information to National Highways to support assessment of the proposals and the impact on the strategic road network.</p>

ExQ1	Question to:	Question:
		The applicant is asked to confirm: That these will be provided through the examination in addition to being supplied to National Highways. Specify when this information will be supplied to allow National Highways and the ExA to consider them with sufficient time within the examination.
TT 1.9	National Highways	Baseline data - 9 In the applicants response to RRs [REP1-132] in reply to your request for microsimulation modelling (paragraph 4.2.29 of your RR [RR-2657]) it considers the local junction modelling undertaken to be proportionate. Please can you confirm if you now accept this in light of further meetings which the applicant has detailed.
TT 1.10	The applicant	Baseline data - 10 In the applicants response to RRs [REP1-132] it details in response to National Highways RR paragraph 4.3 that the main works contractor is aware of the trip generation figures assumed for the traffic modelling and does not anticipate they will increase. What assurances can you give the ExA that this will not change and if it does, how does the draft DCO allow for reassessment and approval from highway authorities. Also explain what measure are in place to monitor this during the construction phase and what measures will be used if traffic is in excess of that forecast.
TT 1.11	The applicant	Baseline data - 11 What percentage of HGV movements are related to the import and removal of haul road material. Explain what measures you are taking to reduce the haul road construction depth or use of alternatives and what further options you are considering to further reduce imported material and in doing so reduce the number of HVG movements.
TT 1.12	The applicant	Junction and link capacity - 1 There are a number of junctions which are predicted to be overcapacity and for which mitigation has not been agreed with the local highway authority. Please detail which junctions remain with mitigation to be agreed and the status of negotiations in this regard.
TT 1.13	The applicant	Junction and link capacity - 2 In their LIR [REP1-161] Essex CC state at paragraph 4.5.68 that they consider junction mitigation for two sites should be mitigated by AM peak traffic restrictions. Provide details and modelling to show how this would reduce the predicted increased queue lengths, or update the ExA on further discussions held with Essex CC.
TT 1.14	The applicant	Junction and link capacity - 3 In their LIR [REP1-173] Norfolk CC state that there are a number of junctions and links on Primary Access Route (PAR) 8 which cause concern about the suitability of this as an access route when PAR9 is an alternative. Please explain the need for both PAR8 and PAR9 and whether PAR8 could be removed or usage reduced.
TT 1.15	The applicant	Abnormal indivisible loads - 1 Please confirm if all AIL routes have been agreed with NH and the LHAs to ensure the suitability of highway infrastructure, including assets such as structures, drainage, horizontal and vertical alignment. Please detail any routes and matters which are not agreed and the process for resolving these matters within the examination period.
TT 1.16	The applicant	Abnormal indivisible loads - 2 Please explain if there is likely to be change to, or additional AIL routes during or after the examination. Please also detail if AIL routes and assumption on plant and vehicle types will be subject to change from your construction partners or not. In all cases of a potential change to AIL routes, please detail how these will be agreed with relevant authorities for approval and how this is secured in the draft DCO.
TT 1.17	The applicant Suffolk Constabulary Essex Police Norfolk Constabulary	Abnormal indivisible loads - 3 Please confirm the status of negotiations regarding the resourcing of police support for AIL matters. This may be referenced to our question SS 1.5.
TT 1.18	The applicant	Cumulative impacts In their LIR [REP1-178], Suffolk CC raise concerns about the potential for overlapping construction times for the Bramford to Twinstead project and the proposed development. Please explain what assumptions have been made in considering the cumulative effects of these two construction projects and how the ExA can be assured that no overlap and cumulative impact will be seen.

ExQ1	Question to:	Question:
TT 1.19	The applicant	Cumulative impacts How is it proposed to practically manage cumulative impacts with other projects with regard to issues such as peak time construction traffic on similar or nearby routes.
TT 1.20	National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council Suffolk Constabulary Essex Police	Cumulative impacts Are there any specific impacts from other projects which you consider could cause additional impacts and risk to the proposed development and do you consider these have these been addressed adequately by the applicant?
TT 1.21	The applicant	Traffic regulation orders and other agreements - 1 National Highways in their RR [RR-2657] state that they require agreements for both overhead and underground crossings. Please explain the current status of these agreements and how the completion of them is secured in the draft DCO.
TT 1.22	The applicant	Traffic regulation orders and other agreements - 2 National Highways in their RR [RR-2657] state that the need for a number of Temporary Traffic Regulation Orders (TTROs) were not known to them. Please confirm if this has been addressed and if not, what is outstanding to be discussed.
TT 1.23	The applicant	Traffic regulation orders and other agreements - 3 In their LIR [REP1-161] Essex CC state that they have not agreed to the TTROs listed in schedule 13 of the draft DCO. Please explain the status of agreement of the TTROs with the relevant local highway authorities.
TT 1.24	The applicant	Road safety There are a number of railway level crossings within or in the vicinity of the PAR, please detail the status of approvals from Network Rail in regard to capacity and safety at these and what further mitigation measures may be required for any crossing where approval may be outstanding.
TT 1.25	The applicant	Highway layout and design - 1 In its LIR [REP1-178] Suffolk CC state that they are not able to fully assess the suitability of new highway access points to be as there are no vertical alignment details provided. Please detail the progress with vertical alignment design and confirm if the order limits and other measures required at new access points fully account for the vertical alignment requirements at all access locations from the public highway.
TT 1.26	The applicant	Highway layout and design - 2 Please detail your haul road design and options strategy and detail how the ExA can be assured that the use of public highway for construction traffic has been minimised. The applicant should highlight any PARs which it considers are sub optimal but believes there are no alternatives to that which has been proposed.
TT 1.27	The applicant	Highway layout and design - 3 A number of people in their RRs detailed concerns regarding access to private drives and property. Please confirm that all access to private property will be maintained during the construction and operation phases, or if this is not the case, explain what properties will be affected and what measures there will be to mitigate this.
TT 1.28	National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council	Walking, cycling and horse-riding – 1 Please confirm if you consider there are any outstanding parts of your highway network that require a Walking, Cycling and Horse-riding assessment review. If so, please list these and give the status of discussions with the applicant regarding this.
TT 1.29	The applicant	Walking, cycling and horse-riding - 2 In their RRs [RR-1190] ; [RR-1205] ; and [RR-1189] students at Chelmer Valley High School state that due to the closure of local roads and paths, walking and cycling access to Chelmer Valley School will be compromised and more hazardous alternatives will be needed. This concern is repeated by a

ExQ1	Question to:	Question:
		number of other RRs. Please explain if this location is covered in a walking, cycling, riding assessment report and if not, whether it should be; also give consideration and explain if a strategy is required for this school and other similar locations.
TT 1.30	The applicant	Walking, cycling and horse-riding – 3 In the TA [APP-333] the applicant lists the various routes on the national cycle network which will be impacted, please explain, or signpost the ExA to the mitigation measures proposed to ensure these national routes remain available and safe for users.
TT 1.31	The applicant	Walking, cycling and horse-riding - 4 What is the mitigation approach to safety of pedestrians, cyclists and horse riders on the public highway on PARs, please detail how this will ensure the safety of these users and how is it secured in the draft DCO.
TT 1.32	The applicant	Mitigation - 1 Chapter 16 of the ES [APP-271] states that vehicle movements during peak hours will be minimised through car sharing and ensuring movements for certain worker types are restricted. Please explain how this will be secured contractually with your construction partners and how this will be monitored, enforced and reported and issues rectified.
TT 1.33	The applicant	Mitigation - 2 Chapter 16 of the ES [APP-271] states that for a number of links and junctions that will potentially have capacity issues, monitoring of these will take place during the works. Please explain how this monitoring will be reviewed and by who and who will decide if and what further mitigation will be required and in what timeframe. Please also comment on what remediation measures are likely to be used if junctions or links are seen to require intervention. How is this secured in the draft DCO.
TT 1.34	The applicant	Mitigation -3 NPS EN-1 (2023) states that sufficient HGV parking, layup and driver facilities should be made available to avoid overspill and damage to the public highway from improper use. Please detail how it is expected that HGV management will ensure that there is limited impact on the local highways and environment and how this will be managed, monitored and corrective action taken if necessary during construction.
TT 1.35	The applicant	Outline construction traffic management plan - 1 The outline Construction Traffic Management Plan (CTMP) [APP-309] states that a significant mitigation measure will be a driver information pack. Please provide information on what the pack will contain and explain how this will be presented to drivers and how you can be assured that all construction drivers will have seen, read and understood the details to ensure the desired mitigation effects will be seen. Will this pack also be provided to all delivery drivers prior to driving to the sites, if so how will this be managed in practice taking account of the potential number of different drivers and companies. How is this matter secured in the draft DCO.
TT 1.36	National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council	Outline construction traffic management plan - 2 For the avoidance of doubt, please detail any matters in the outline CTMP [APP-309] which you consider requires amending and your proposed amendment. This could be in the form of a schedule or tracked changed version of the outline CTMP.
TT 1.37	The applicant	Bus services The TA [APP-333] states that there are no expected changes to bus services on the 22 PARs which have been identified as having one or more buses operating on them and that there will be minimal delays to any bus service. How can the ExA be assured that construction work and any forecast increase in traffic volumes will not have an impact on service provision and how is the need to mitigate impact on bus services secured in the draft DCO.
TT 1.38	National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council	Statements of common ground In the SoCG with National Highways [REP1-048] a number of statements suggest that you are awaiting further information following requests to allow you to further consider the applicant submission. Please can you state if this additional information is now available to you and if not, what timescales you require to ensure an adequate response to any outstanding matters or concerns. Please can all local highway authorities address this same question.

ExQ1	Question to:	Question:
WE 1.1	The applicant	<p>Norfolk CC LIR</p> <p>In its LIR [REP1-173] Norfolk CC note several concerns and outstanding objections to hydrology, land drainage and flood risk. In particular, it raises questions relating to the following:</p> <ul style="list-style-type: none"> • Gaps in the ES and Flood Risk Assessment (FRA) (paragraphs 10.1 and 10.2) • Construction near watercourses (paragraph 10.8) • Insufficient definition of temporary construction works (paragraph 10.9) <p>Please ensure you provide responses that directly answer these queries.</p>
WE 1.2	The applicant	<p>Flood risk assessment - 1</p> <p>In Appendix B of the FRA [APP-331], floodplain storage loss has been calculated for pylons located within floodplains. However, the same calculation does not appear to have been carried out for the underground trenchless crossings (north and south) of the River Stour. Please explain why this calculation has not been made or is not required.</p>
WE 1.3	The applicant	<p>Flood risk assessment - 2</p> <p>In its RR [RR-2973] Pylons East Anglia provided an independent technical examination of Flood Risk Validity and the ES chapter 12 [APP-221]. This report raised several questions, which do not appear to have been answered in your Deadline 1 documents, that relate to:</p> <ul style="list-style-type: none"> • Scour Assessment: Provide confirmation that pylon foundations in Flood Zone 3 have been designed to withstand local scour during the 1% AEP + CC event, given the lack of velocity modelling. • Haul Road Transparency: Provide a "blockage scenario" assessment for temporary culverts on ordinary watercourses to ensure haul roads do not increase flood risk to third parties if culverts become occluded. • Tilbury North Routing: Provide hydraulic calculations proving that the box culvert at Tilbury North Substation will not accelerate flow conveyance to the detriment of downstream receptors. • CoCP Tightening: Remove the phrase "where practicable" from Commitment W07 regarding the storage of materials in Flood Zone 3, replacing it with a strict prohibition on storing loose or hazardous materials in the functional floodplain. • River Tas and River Wid require detailed modelling. <p>Respond to the points above, either through signposting existing submissions if this information has been provided, or updated reports.</p>
WE 1.4	The applicant	<p>Flood risk assessment - 3</p> <p>In its LIR [REP1-161] at paragraph 4.7.21, Essex CC state that Essex has a rain fall climate change allowance of 45% and request the applicant confirm parameters with the Environment Agency. Please confirm if this allowance is part of your FRA considerations and if not, why not.</p>
WE 1.5	The applicant	<p>Flooding concerns</p> <p>A number of individual RRs from property owners highlight a concern regarding increased risk of flooding, some citing known issues that could see an increased risk of localised flooding to property. Please explain how you are addressing these individual concerns and provide a schedule of specific location-by-location responses to all RRs and consultation responders who have raised property flooding as a concern, stating the communication status and how mitigation is secured in the draft DCO.</p>
WE 1.6	The applicant	<p>Surface water - 1</p> <p>In their LIRs, the Lead Local Flood Authorities (LLFA) request the production and implementation of a construction surface water drainage strategy to be secured in the draft DCO, which Norfolk CC states has precedent in DCOs. Please explain your consideration of this suggestion.</p>
WE 1.7	The applicant	<p>Surface water - 2</p> <p>Please confirm if all surface water runoff from construction sites and permanent works will be managed in line with Sustainable Drainage Systems guidance and will be designed to ensure there is no impact on third party land and down-stream catchment. State how this is secured in the draft DCO.</p>
WE 1.8	The applicant	<p>Surface water - 3</p> <p>A number of LLFAs have commented that they have residual concerns about the management of surface water, for example in its LIR [REP1-161] at paragraph 4.7.25, Essex CC state that the LLFA '<i>...retains certain concerns that have not been addressed from previous discussions and that have been set out in consultation responses, without feedback or discussion from the Applicant. This uncertainty gives cause for concern for the project</i>'. Explain</p>

ExQ1	Question to:	Question:
		how the ExA can be assured that the concerns of LLFAs regarding surface water are being adequately addressed and will be resolved by the close of the examination.
WE 1.9	The applicant	Surface water - 4 In its RR [RR-3792] the Water Management Alliance note that any surface water to be discharged into watercourses they are responsible for will need consent. Please confirm how this is secured in the draft DCO and if agreement has been reached on the consenting process.
WE 1.10	The applicant	Certified documents In its LIR [REP1-161] at paragraph 4.7.26, Essex CC state they are concerned that the draft DCO, draft schedule of requirements and EM do not highlight the existing flood risk, the need for managing this risk and/ or the presence of overland flows. They continue to suggest that the FRA and the Surface Water Management Strategy documents should be listed as 'certified document' of the draft DCO and that a Construction Environmental Management Plan is drafted to control works that affect ordinary watercourses/drainage channels, surface water drainage, and the control of pollutants. Please comment on this proposal.
WE 1.11	The applicant	Outline CoCP - 1 In the outline CoCP [APP-300] commitment W07 states that in flood zone 3 work will be laid out in accordance with the sequential test. The ExA and certain LLFAs believe this does not provide sufficient clarity on what is intended. Please explain what this means and provide a reworded commitment to ensure clarity.
WE 1.12	The applicant Affected persons	Outline CoCP - 2 In the outline CoCP [APP-300] commitment W04 states that active private water supplies will be identified through landowner discussions and appropriate measure will be considered during construction to protect these. To the applicant: <ul style="list-style-type: none"> • Do you consider that you have identified all private water supplies • If not, how do you propose to do such • Is there an agreed action plan for private water supplies with owners once they have been identified, and what is the process for agreement to the plan if so • The ExA consider that it not sufficiently robust to state that measures will be 'considered'. Please propose a reworded commitment that gives greater assurance of intervention and protection of private water supplies. To affected persons: <ul style="list-style-type: none"> • Please state if you have a private water supply which has not been detailed to the applicant or if you have given details but not received a response regarding this.
WE 1.13	The applicant Holton St Mary Parish Council	Holton St Mary Parish Council comments In its WR, Holton St Mary PC [REP1-168] notes that drainage works are planned from the haul road into a stream on the west of Sandpits Lane, just to the north of Dewlands Farm. Its notes that the area is rich in wildlife habitat and that otters have been recorded in the area and that the stream proposed for the run-off is prime otter habitat. The PC note that it has not seen any documentation of the ecological impacts of this run-off; or the impacts on river health. Provide an ecological impact analysis of the proposal for this area and, if there are no reasonable alternatives, propose forms of mitigation that might be employed, such as water capture and/or filtration. Holton St Mary PC – Please provide evidence regarding the stream on the west of Sandpits Lane, just to the north of Dewlands Farm, and your statement that the area is rich in wildlife habitat and the stream, where the run-off is proposed, is prime otter habitat where otters have been recorded.
WE 1.14	The applicant	Anglian Water In its WR, Anglian Water [REP1-199] indicate that a Water Resource Assessment template is with the applicant for completion. Please advise if this has been completed and/or at which deadline it will be submitted.
WE 1.15	The applicant	Waterways and navigation In its RR [RR-3637] the Maritime and Coastguard Agency request the applicant confirms whether any of rivers within the order limits or affected by the proposed development fall within the jurisdiction of a statutory harbour authority or local navigation authority. Confirm if this is the case. If so, please provide the ExA a full response to the questions raised and statements made by the Maritime and Coastguard Agency in their RR.

ExQ1	Question to:	Question:
WE 1.16	The applicant	Affinity Water In its RR [REP1-197] Affinity Water state that they own and operate Ardleigh reservoir. What are the remaining issues which are giving rise to Affinity Water maintaining their objection and what progress is being made to resolve these matters.