



**ExQ1: 20 March 2026**  
**Chelmsford City Council (CCC): [REDACTED]**  
**RESPONSE**

For references to CCC's Local Impact Report (LIR), please refer to REP1-153

ExQ1	Question to:	Question:	CCC comments
<b>GEN General and cross-topic questions</b>			
GEN 1.1	The applicant All interested parties	<p><b>Responses to submissions by Interested Parties</b></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>	Noted.
GEN 1.2	The applicant All parties	<p><b>Artificial Intelligence</b></p> <p>The Planning Inspectorate issued <a href="#">updated guidance</a> 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>	<p>Noted.</p> <p>Chelmsford City Council (CCC) does not use AI.</p> <p>For the avoidance, CCC has not used AI to:</p> <ul style="list-style-type: none"> <li>• draft or substantially rewrite text</li> <li>• produce a summary or analysis</li> <li>• generate or alter images or videos</li> <li>• create content that goes beyond straightforward formatting or presentation</li> </ul>

<p>GEN 1.3</p>	<p>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>	<p><b>National and local planning policy compliance tracker</b></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 (<a href="#">Updated National Policy Statements</a>). 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>	<p>The compliance tracker is inaccurate.</p> <p>The following policies should be stated in full and not abbreviated:</p> <ul style="list-style-type: none"> <li>• Strategic Policy S1 – Spatial Principles</li> <li>• Strategic Policy S4 - Conserving and enhancing the natural environment</li> <li>• Strategic Policy S9 – Infrastructure requirements</li> <li>• Policy DM6 - New development in the Green Belt</li> <li>• Policy DM14 - Non designated heritage assets</li> <li>• Policy DM18 - Flooding / SUDs</li> </ul> <p>A number of policies are missing. These include</p> <ul style="list-style-type: none"> <li>• Strategic Policy S7 – The spatial strategy</li> <li>• Strategic Policy S8 – Delivering economic growth</li> <li>• Strategic Policy S10 – Securing infrastructure and impact mitigation</li> <li>• Policy DM7 - New buildings and structures in the Green Wedge</li> <li>• Policy DM8 - New buildings and structures in the rural area</li> <li>• Policy DM10 - Change of use (Land and buildings) and Engineering operations</li> <li>• Policy DM19 – Renewable and low carbon energy</li> <li>• Policy DM27 - Parking standards</li> </ul> <p>CCC's LIR (REP1-153) contains an up-to-date position regarding the status of adopted and emerging local and national planning policies.</p>
<p>GEN 1.4</p>	<p>All local authorities</p>	<p><b>Development plan documents and supplementary planning documents</b></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>	<p>The list is up to date and accurate, with the exception of the following documents:</p> <ul style="list-style-type: none"> <li>• Essex Coast RAMS</li> <li>• Great Baddow VDS</li> <li>• Stock VDS</li> <li>• Danbury Neighbourhood Plan 2024</li> <li>• South East Inshore Marine Plan</li> <li>• Planning Obligations SPD 2021</li> </ul> <p>Their omission does not change CCC's comments as set out in its LIR REP1-153.</p>

<p>GEN 1.6</p>	<p>All local authorities MOD Natural England Environment Agency Any IPs who wish to make comment</p>	<p><b>Critical national priority</b></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>	<p><b>Human health and public safety:</b></p> <p>CCC maintains concerns regarding the effects of the proposal upon human health and public safety.</p> <p>Please refer to CCC'S LIR (REP1 -153) relating to Air Quality, Health and wellbeing and Noise and Vibration.</p> <p><b>Defence:</b></p> <p>CCC defer to the Ministry of Defence and other relevant bodies on this matter.</p> <p><b>Irreplaceable Habitats:</b></p> <p>CCC is concerned that there is no reference to Irreplaceable habitats at Langley's Grade 1 listed house and garden.</p> <p>CCC refers to the comments raised by Essex County Council (ECC) Place services as included within its LIR (REP1-153).</p> <p><b>Flood Risk:</b></p> <p>CCC defers to ECC as Local Lead Flood Authority. Please refer to CCC'S LIR (REP1 -153).</p> <p><b>Green Belt:</b></p> <p>CCC's view is that the very special circumstances put forward by NGET do not justify the inappropriate development that the proposal would have on the Chelmsford section of the Green Belt. Please refer to CCC'S LIR (REP1-153) and comments to LUS1.12 below.</p> <p><b>SSSi:</b></p> <p>There are no SSSI's within Chelmsford that would be materially affected by the proposal.</p> <p><b>Nationally designated landscapes and heritage assets:</b></p> <p><b>Nationally designated landscapes:</b></p> <p>CCC disagrees with assumption that only proposals within a nationally designated landscape. Please refer to CCC'S LIR (REP1- 153)</p> <p><b>Nationally designated heritage assets</b></p>
----------------	--	---	---

			<p>CCC consider the proposal underestimates the impact upon many heritage assets. The greatest impacts are at the section of route between Little Waltham and Great Waltham, near to Langleys and its Registered Park and Garden, where the harm to the Great Waltham and Little Waltham Conservation Areas is underestimated, resulting in moderate effects, which are significant. Please refer to CCC's LIR (REP1-153)</p> <p>On archaeology Sections 7.2.56-57 of APP-085 consider Substantial harm to or loss of significance to Heritage Assets. Section 7.2.57 states that the project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets. The harm is considered necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. Based on our current knowledge of archaeological remains which may be impacted upon by the development there is agreement with the Applicant. However, clear outwaying of harm can only be demonstrated when an adequate level of information has been provided and the application has not submitted a sufficient level of information for this to be demonstrated with confidence.</p> <p><b>HRA:</b></p> <p>Please refer to CCC'S LIR (REP1-153), CCC has no specific comments.</p>
--	--	--	--

<p>GEN 1.17</p>	<p>All local authorities</p>	<p><b>Local impact reports – cumulative developments and the interrelationship report</b></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"> <li>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).</li> </ul> <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"> <li>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.</li> </ul>	<p><b>Cumulative developments:</b></p> <p>CCC has reviewed Appendix 17.2 (long list and short list) – Alt 172.2.10 and confirms that:</p> <p>CH2</p> <ul style="list-style-type: none"> <li>20/00001/MAS Strategic Growth Site North Of Woodhouse Lane, Broomfield, Chelmsford, Essex Masterplan for around 450 new homes, neighbourhood centre, early years and childcare facility, local open space and associated access and highway infrastructure including a new access into Broomfield Hospital.</li> </ul> <p>CH3</p> <ul style="list-style-type: none"> <li>This was superseded by application 00/02064/OUT Strategic Growth Site North Of Woodhouse Lane, Broomfield, Chelmsford, Essex Outline application for residential development for up to 512 dwellings including affordable housing and custom build homes (Use Class C3), Local Centre (Use Classes E, F.1 and F.2), formal and informal open space, and associated infrastructure. All matters reserved except for primary access</li> </ul> <p><b>Comment:</b> Application 26/00164/REM has been received and is under consideration for the reserved matters relating to the spine road.</p>
-----------------	------------------------------	---	---

			<p>CH8</p> <ul style="list-style-type: none"> <li>23/01583/FUL Strategic Growth Site 7A Moulsham Hall Lane Great L Fights Chelmsford Essex Hybrid planning application for EIA development to include: 1. Outline application with all matters reserved for residential development of up to 800 homes (Use Class C3), including affordable and self/custom-build homes; a Neighbourhood Centre comprising commercial, business and service (Use Class E) of which the anchor retail store is not more than 500sqm (GIA); medical services (Use Class E café), a children's nursery (Use Class E(f)) and a residential care home (Use Class C2) of up to 80 beds; a new primary school (Use Class F1); landscaping works, provision of strategic and local open space; biodiversity enhancements, all associated highways infrastructure, pedestrian, cycle, Public Right of Way (PRoW) and bridleway routes; drainage infrastructure and all associated ancillary works including services and utilities. 2. Full application for the principal means of vehicular access to the site, on site highways works, surface water attenuation basins and associated ancillary works including services and utilities.</li> </ul> <p><b>Comment:</b> The application remains under consideration.</p> <p>CH14</p> <ul style="list-style-type: none"> <li>21/00881/FUL Broomfield Hospital Hospital Approach Broomfield Chelmsford CM1 7ET Formation of highway connection north of Woodhouse Lane, closure of sections of Woodhouse Lane, provision of turning heads north of Woodhouse Lane and connection to existing highway drainage.</li> </ul> <p><b>Comment:</b> The decision was issued on 31/07/2025 subject to a S106 agreement.</p> <p>CH17</p> <ul style="list-style-type: none"> <li>21/02050/CM Land North East Of Greater Beaulieu Park Beaulieu Parkway Chelmsford CNEB: A single carriageway road between Roundabout 4 of the Beaulieu Park RDR1 and a new roundabout on the A131 at Chatham Green plus dualling of the existing A131 between Chatham Green and Deres Bridge roundabout. With one intermediate roundabout, 3 road overbridges and 1 pedestrian/cycle/horse overbridge. Together with other associated works and landscaping.</li> </ul> <p><b>Comment:</b> The County Council granted planning permission for the proposal on 4<sup>th</sup> April 2022. The conditions relating to the application are being discharged by the County Council.</p> <p>CH20</p> <ul style="list-style-type: none"> <li>21/02490/OUT Banters Field Main Road Great Leighs Chelmsford Essex Application for outline planning permission for the development of an</li> </ul>
--	--	--	--

			<p>integrated retirement community comprising up to 190 units (C2 use) with all matters reserved except for access.</p> <p><b>Comment: The application remains under consideration.</b></p> <p>CH22</p> <ul style="list-style-type: none"> <li>24/00695/FUL Land South East Of Banters Lane Business Park Banters Lane Great Leighs Chelmsford Construction of 105 residential dwellings including affordable housing and custom build housing (Use Class C3) and principal means of site access, provision of resident's and visitor car parking, open space including children's play space, a new shared pedestrian/cycle route, enhancements to existing routes, hard and soft landscaping, highways works, new drainage basin, and all associated infrastructure works</li> </ul> <p><b>Comment: The application remains under consideration.</b></p> <p>CH24</p> <ul style="list-style-type: none"> <li>23/01751/OUT Zone 2 Chelmsford Garden Community Beaulieu Parkway Chelmsford Outline planning consent for a mixed use Garden Community to be delivered in severable phases with all matters reserved (save for where full details are submitted for a new access junction from Beaulieu Parkway - RDR1) for residential development; mixed use development comprising employment, commercial, retail, leisure, community and education facilities; specialist residential accommodation for the elderly; serviced land for a travelling show people site; green and blue infrastructure including a new Nature Park, public open space and sports facilities; sustainable transport infrastructure including two active travel bridges crossing CNEB; new highways including part of the Northern Radial Distributor Road (NRDR); utility and infrastructure work; site restoration and preparation works and demolition of structures; and associated and ancillary development</li> </ul> <p><b>Comment: The application remains under consideration.</b></p> <p>CH26</p> <ul style="list-style-type: none"> <li>23/00124/OUT Zone 3 Chelmsford Garden Community Beaulieu Parkway Chelmsford Application for Hybrid planning permission at Powers Farm, Chelmsford; Outline Planning Permission with all matters reserved except means of accesses from/to the proposed NRDR. Residential development of up to 1250 units, which comprises market/affordable and single family rental (SFR) / Build to Rent (BTR). Provision of Discovery Park North which would include open space, landscaping, formal sports pitches, pavilion and associated car parking. Internal vehicular carriageways, footways, cycleways and all pedestrian routes with associated landscaping and green infrastructure. Phased development (each and every phase (and/or sub-phase) being a separate and severable part of the development. Detailed planning permission for two spine roads north/south carriageway(s), cycleway(s) and footway(s) from/to the proposed NRDR and one east/west spine road to Great</li> </ul>
--	--	--	--

			<p>Belsteads Village. Drainage and sustainable urban drainage systems (SUDs) throughout the development with all associated engineering works including strategic ground reprofiling, stockpiling, and below ground works</p> <p><b>Comment:</b> The application remains under consideration.</p> <p>CH28</p> <ul style="list-style-type: none"> <li>21/01545/OUT Land North Of Warren House Roxwell Road Writtle Chelmsford Essex Outline application for Strategic Growth Site 2 comprising up to 880 new homes, primary school with co-located early years and childcare nursery, travelling showpersons site for five serviced plots, sports facilities including a pavilion/community centre, neighbourhood centre (including retail, community, healthcare, office and residential uses), plus associated landscaping and habitat creation, public open space and play facilities, roads and infrastructure (all matters reserved except access), together with a detailed scheme in the south east corner for Phase 1A comprising 311 no. houses plus associated roads, parking and infrastructure (Landscaping reserved for Phase 1A</li> </ul> <p><b>Comment:</b> The application remains under consideration</p> <hr/> <p><b>Interrelationship with other projects:</b></p> <p><b>NSIP</b></p> <p>Longfield Solar Farm (EN010118) 3.2.21 There is an overlap between the order limits of the Longfield Solar Farm and the Project at the northern extent of the solar farm site. The Applicant is proposing to modify an existing UK Power Networks PSB overhead line which will necessitate the creation of an access from Terling Hall Road, through Leylands Farm around the eastern edge of the site. It is not considered that the Project would materially impact on the function or use of the site</p> <p>CCC defers to Braintree District Council as the affected access extends through their administrative area.</p> <p>On non NSIP projects 3.3.30 Essex County Council - Chelmsford North East Bypass - Land North East of Greater Beaulieu Park Beaulieu Parkway Chelmsford (CH17 &amp; ECC11), CCC confirms the application reference details are correct. CCC defers to Essex County Council regarding the Applicant's summary of interactions.</p> <p>On table 6.1, details of the mitigation planting should be provided within the detailed LEMP for further consideration / agreement upon the construction of the development.</p>
--	--	--	--

<p>GEN 1.21</p>	<p>The applicant All local authorities</p>	<p><b>Legal Agreements</b> 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. The applicant is asked to:</p> <ul style="list-style-type: none"> <li>a) 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.</li> <li>b) Justify its intended use of unilateral undertakings in the instances where a bilateral (section 106) agreement would be preferable.</li> <li>c) 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.</li> </ul> <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>	<p>Norwich to Tilbury will have significant and lasting impact on the Chelmsford Administrative Area as a result of the Projects construction and visual presence.</p> <p>CCC would wish to see the Applicant engage positively with Local Authorities to secure and deliver an appropriate level of mitigation and/or compensation commensurate to the magnitude of impact.</p> <p>CCC through its Local Impact Report REP1-153 has identified a number of locally significant effects arising as a result of the construction and operation of the Project. CCC in conjunction with other local Authorities has commenced discussions with the Applicant regarding the nature and level mitigation to be delivered through a s106 legal agreement. to cover the following:</p> <p><b>BNG:</b></p> <ul style="list-style-type: none"> <li>• to deliver a 10% biodiversity net gain together with appropriate management and monitoring for at least 30 years within Essex</li> </ul> <p><b>Tree Planting – Replacement / Mitigation/ Compensatory:</b></p> <ul style="list-style-type: none"> <li>• to secure the deliver an ‘Off-Site Planting Delivery Scheme’ prepared in accordance with the Reinstatement Planting Plan pursuant to Requirement 9 of the Development Consent Order. The Reinstatement Planting Plan to for offsite tree planting to also cover any additional mitigation planting or compensatory planting.</li> </ul> <p><b>Skills Supply Chain Employment and Training:</b></p> <ul style="list-style-type: none"> <li>• to secure an Employment, Education, Skills and Supply Chain strategy for the project together with appropriate funding through a Section 106 agreement.</li> </ul> <p><b>Highways:</b></p> <ul style="list-style-type: none"> <li>• to require the Applicant to enter into a Framework Highways Agreement,</li> <li>• to require the Applicant to enter into a Developers Forum as a vehicle to coordinate construction activity associated with multiple development projects with the aim of minimising cumulative impacts.</li> <li>• to secure a financial contribution towards offsetting the additional “wear and tear” associated with the construction works</li> </ul> <p><b>Wellbeing &amp; PROW:</b></p> <ul style="list-style-type: none"> <li>• To secure a contribution towards improving the use of the PROW network</li> </ul> <p>The above matters are under discussion with the Applicant and a draft s106 agreement is being prepared with the intention of being finalised in time for Deadline 7. Updates will be reflected in the State of Common Ground to be submitted at Deadline 4.</p> <p>CCC has been approached by the Applicant regarding landscape compensation and the identification of locations that may benefit from additional planting. CCC will respond back to the ExA once these discussions have been concluded.</p> <p>CCC retains its previous comments set out in the LIR REP1-153 relating to the need for heritage mitigation and compensation and would welcome discussions</p>
-----------------	--	--	--

			regarding this. Other comments relating to Mitigation and Compensation as set out in CCC's LIR REP1-153 apply.
--	--	--	--

DES Design, parameters and other details of the proposed development			CCC comments
DES 1.2	The applicant	<p><b>Design and Access Statement</b></p> <p>Chapter 5 of the design and access statement <a href="#">[APP-353]</a> details Good Design Process, with paragraph 5.3.29 stating</p> <p><i>“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”</i></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>	<p>CCC considers that there is an opportunity for the Applicant to be innovative in the approach to design while ensuring the infrastructure remains safe and secure.</p> <p>The Applicant must follow a good design process to ensuring that the infrastructure proposed remains functional while realising the best local design outcomes</p>
DES 1.3	The applicant	<p><b>Independent design review</b></p> <p>The Design and Access Statement <a href="#">[APP-353]</a> 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 <a href="#">[APP-353]</a>, 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>	<p>CCC considers that design review should be undertaken for the Project especially within the Great and Little Waltham gap.</p>
DES 1.4	The applicant	<p><b>Design Champion(s)</b></p> <p>Paragraph 5.6.8 of the Design and Access Statement <a href="#">[APP-353]</a> 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 <a href="#">[REP2-020]</a> 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>	<p>To avoid conflict of interest, any design champion should be independent and appointed externally.</p>

DES 1.6	The applicant	<p><b>Holford Rules</b></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"> <li>• Dedham Vale National Landscape</li> <li>• Waveney Valley</li> <li>• Great and Little Waltham</li> <li>• Mellis</li> </ul> <p>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.</p>	<p>The Holford Rule 1 only relates to national designations. The Holford Rules appear to have been last updated in the 1990s and would seem to be at odds with current general national heritage policy and guidance. There is no reference within them high level national designations such Grade one listed buildings.</p> <p>CCC considers that national planning policy guidance should supersede the Holford Rules. Within Great &amp; Little Waltham, the scale of change would be large, and the effect would be major and significant (adverse), reducing to moderate and significant (adverse) within Little Waltham. The cumulative effect of multiple pylons and the continuous overhead linear nature of the Project, means that the collective impacts would create an overall significant adverse effect at both construction and operation.</p>
DES 1.9	The applicant All local authorities	<p><b>Lighting of new and upgraded substations</b></p> <p>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].</p> <ul style="list-style-type: none"> <li>• Provide additional detail in terms of the height and type of any lighting installations and light contour plans.</li> <li>• Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity, and potential effects on ecology.</li> </ul> <p>If the applicant considers that an assessment is not required, provide a detailed explanation of your reasoning.</p> <p>Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not?</p> <p>Affected Local Authorities may also like to comment.</p>	<p>There are no substations with on the Chelmsford administrative area.</p> <p>CCC agree these details are required.</p>
DES 1.10	The applicant	<p><b>T-pylons (1)</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>• 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?</li> <li>• Were they considered for the area around Ingatestone, and if not, why not?</li> <li>• 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.</li> <li>• 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.</li> <li>• Are there any technical constraints to a more recessive colour being used (noting that they are generally light grey).</li> </ul> <p>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):</p> <ul style="list-style-type: none"> <li>• 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</li> </ul>	<p>CCC reiterates its preference for the use of T pylons within the Waltham Gap as stated within its Local Impact Report REP1-153.</p> <p>The gap between Great and Little Waltham was not considered in detail for the use of T pylons, despite CCC requesting further consideration of the matter.</p> <p>The gap between Great and Little Waltham could reasonably considered to comprise a short straight area of overhead line.</p> <p>Aesthetically there is preference for its simplistic style and reduced permanent footprint.</p> <p>The height of the T pylon is comparable to the height of the proposed low height pylon and its width is narrower. In design terms, the T pylon structure would appear less bulky and squat and CCC would prefer this design approach to be used.</p> <p>There would be no material changes in construction methods. Despite requesting further details, CCC has not been provided with drawings to show how permanent accesses could be provided to each T pylon. Further design review of such approach would be required, plus potential for mitigation.</p>

			<p>On balance, the operational access constraints of the use of T pylons may be outweighed by the visual impact benefits of the proposal and lessened potential impact on heritage and conservation.</p> <p>In the case of the Waltham's, the concern here is the impact upon local views and the setting of the listed buildings and conservation area. The simplistic architectural design of the T pylon is preferable.</p> <p>CCC would be happy to work with the Applicant to deliver the use of T pylons with the Waltham gap if the ExA feel this is appropriate. CCC suggest that a planning requirement relating to the introduction of T pylons would be an appropriate mechanism to secure this.</p>
DES 1.11	The applicant	<p><b>T-pylons (2)</b> Provide further information on the decision to not utilise T-pylons. Specifically:</p> <ul style="list-style-type: none"> <li>• 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?</li> <li>• 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?</li> <li>• Does the single construction/anchoring point of T-pylons have land use benefits?</li> </ul> <p>How has the reduced construction time and reduced footprint of T-pylons been assessed in the cost/benefit exercise?</p>	<p>CCC considers that T pylons offer an opportunity to reduce the level of effect of the project and this should take precedence over any costing. The cost of a proposal is not a material planning consideration. CCC refers to its case for the use of T pylons as set out in its LIR REP1 -153.</p> <p>CCC reiterates that it prefers the use of T pylons and considers them to be a design benefit.</p>

ALT Alternatives		CCC comments
ALT 1.1	All local authorities	<p><b>Reasonable alternatives: policy and legislation</b></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)'.</p> <p>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.</p> <p>Other IPs are also invited to comment on their understanding of reasonable alternatives, if they wish to do so.</p>

The policy context for reasonable alternatives is set out at paragraphs 4.3.22 to 4.3.29 (not 4.3.19 which is presumably a typo) of NPS EN-1.

Taking each NPS EN-1 paragraph at a time:

Para 4.3.22 is clear that the weight that can be given to those alternatives lies in the hands of the decision maker. The assessment of alternatives must be proportionate and only alternatives that meet the need objectives of the proposed development need to be considered.

Whilst at 4.4.25 the applicant notes the 2024 update to the Strategic Options Backcheck and Review considered the ESO's East Anglian Network Study of March 2024, it is CCC's opinion that the Applicant scoped out alternatives set out in that report which by definition could have met the objectives of the proposed development. Instead, it only contains the Offshore 1 option but makes little reference to it.

Para 4.3.24 is only relevant to more discrete sites as it looks to retain them for future energy development.

			<p>Para 4.3.25 serves to 'mop up' alternatives that the decision makers considers to be important and relevant and thus allows the decision maker to take into account the alternatives the Local Authorities and IP's have noted, namely those in the then Energy Systems Operator's (ESO's) East Anglian Network Study of March 2024, and the Offshore 1 option set out in the 2025 Strategic Options Backcheck and Review.</p> <p>Para 4.3.26 allows the decision maker to not take into consideration alternative schemes that would not comply with the relevant NPS. But that is not the case here as a number of the options in the aforementioned ESO report along with Offshore 1 could be delivered in a manner that meets the requirements of the NPS.</p> <p>Para 4.3.28 rules out vague and immature proposals. However, those noted in the ESO report of March 2023 were neither vague nor immature as by inclusion in that report they clearly are realistic options. The same is the case for Offshore 1.</p> <p>Para 4.3.29 sets out how it can be the responsibility of a third party to evidence the suitability of an alternative that is tabled once the application is made. That is not the case here as the applicant was in possession of the ESO's March 2024 report at PEIR stage well before formal submission.</p> <p>The reasonable alternatives that the Local Authorities and IP's cited from the ESO report and the Applicants Offshore 1 do meet the tests for reasonable alternatives as set out in NPS EN-1 and the EIA Regulation as they stemmed from the Energy Systems Operator of the day and the applicant, and by definition are reasonable.</p> <p>The ESO were careful to ensure that the number of alternatives they assessed were workable and deliverable and at Para 5 of that report (page 20) the ESO sets out the preliminary assessment of the options in order to ensure they are workable. At Table 4 on Page 21 the Gate 1 assessment details this.</p> <p>The alternatives listed in the ESO report would meet the definition of 'reasonable alternatives', as would the applicant's Offshore 1.</p>
<p>ALT 1.2</p>	<p>All local authorities</p>	<p><b>Approach to options appraisal</b></p> <p>The local authorities are invited to review section 3.3 of ES chapter 3 <a href="#">[APP-127]</a> and appendices 3.1 <a href="#">[APP-128]</a> and 3.2 <a href="#">[APP-129]</a> 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>	<p>Paragraph 4.3.23 of NPS EN-1 (2023) states that the Secretary of State (the decision maker) should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development (which in this case is 2030-2031).</p> <p>Paragraph 4.3.28 of NPS EN-1 (2023) states alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.</p> <p>Paragraph 4.3.28 of NPS EN-1 (2023) also states that alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.</p>

			<p>The application includes an ES chapter specifically on 'alternatives' (APP-127). This chapter does not consider an exhaustive list of every theoretical alternative but focuses on so called "reasonable" alternatives consistent with Paragraph 4.3.22 of NPS EN-1 2023. The chapter clarifies that reasonable alternatives exclude "options with substantially different capacities, delivery timelines, or those that do not meet the Project's strategic objectives are not considered reasonable alternatives for the purposes of this chapter."</p> <p>Document APP-127 (Alternatives) sets out that all options are assessed against criteria including National Grid's statutory duties under the Electricity Act 1989 (including Section 9(2) duties to develop and maintain an efficient, co-ordinated and economical system of electricity transmission, and Section 38 and Schedule 9, duties to preserve natural beauty and mitigate environmental effects), the industry-standard Holford Rules for overhead line routing and Horlock Rules for substation siting, and the then-current policy framework including the 2011 versions of National Policy Statements EN-1 and EN-5.</p> <p>As part of the initial assessment of the routing, the Applicant reportedly considered other available options including inter alia increasing operating voltage, Alternating Current (AC) underground cable for the whole route, Direct Current (DC) underground cable and Offshore connections. However, these other options were discounted at an early stage for various reasons, but predominantly due to higher costs (relative to traditional pylons with targeted undergrounding as currently proposed).</p> <p>CCC acknowledges that, in accordance with NPS EN1, any alternative schemes would need to be delivered within a similar timescale to the proposed development. However, this must also be considered against the timescale of the actual need for network reinforcement</p> <p>CCC also recognises that there are cost options associated with the alternative schemes.</p> <p>CCC considers that alternative schemes to the proposed lattice pylons scheme, such as off-shore and High Voltage Direct Current (HVDC) undergrounding, should be explored in more detail to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme.</p> <p>CCC reiterate that its preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons. CCC recognises that this option would need to be delivered in a timely manner, and without risk to national net zero, renewable energy generation and decarbonisation targets and energy security</p> <p>CCC further notes that the approach undertaken regarding Options Appraisal is mainly based on the Applicants guidelines, rather than a specific Government based appraisal method.</p>
--	--	--	---

			<p>Preliminary Environmental Impact Report (PEIR) or other early environmental appraisal tools were not used to help to inform the acceptability of other alternative options.</p> <p>The use of the Holford Rules raises concern. They are unadopted and out of date. They do not reflect up to date planning policy and do not allow for local distinctiveness.</p> <p>The reliance on national, as opposed to local designations, means that the Project does not allow for local distinctiveness, nor consideration of the cumulative effects of the siting pylons and OHL near a number of locally designated features within close proximity to each other.</p> <p>This approach goes against the grain of general planning policy where proposals are considered on a case by case basis according to the best fit for their location.</p> <p>Further commentary will be provided within the SoCG as required.</p>
<p>ALT 1.3</p>	<p>The applicant All local authorities</p>	<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) <a href="#">[APP-355]</a> 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 <a href="#">[RR-2753]</a>. 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 <a href="#">[APP-355]</a>.</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>	<p>CCC confirms that it has reviewed the Strategic Options Backcheck and Review (SOBR) 2024, Appendix B, and the August 2025 update, alongside the applicant's alternatives assessments within ES Chapter 3 and the Design Development Report.</p> <p>These documents identify a series of environmental, technical and socio-economic constraints associated with Offshore Option 1, including the requirement for a long offshore HVDC cable route, associated marine ecological considerations, and challenges relating to landfall and converter station siting at Tilbury amidst wider Freeport and port-related development pressures.</p> <p>While CCC recognises these strategic-level constraints, it also notes that the appraisal of Offshore 1 remains relatively high-level, particularly when compared to the scale and permanence of the impacts that the proposed onshore overhead line would generate within Chelmsford including major landscape effects, heritage sensitivities and community impacts.</p> <p>CCC notes findings from the Hiorns Report indicating significant uncertainty in the generation background and suggesting that the need for reinforcement may be deferrable by up to five years without constraining offshore wind development. This raises questions over whether strategic offshore alternatives (including Offshore 1) have been explored with sufficient depth prior to dismissal.</p> <p>In light of this and given the potential for offshore options to reduce or avoid extensive onshore environmental and community impacts, CCC considers that further justification and updated sensitivity testing should be provided before concluding that Offshore 1 is not a reasonable alternative. CCC invites the Examining Authority to seek additional evidence from the Applicant and the National Energy System Operator (NESO) regarding the need case, offshore feasibility and converter station siting, consistent with the proportionate alternatives requirements of EN-1 and EN-5.</p>

<p>ALT 1.6</p>	<p>The applicant</p>	<p><b>Reasonable alternatives: IP suggestions</b></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"> <li>• 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</li> <li>• EACN at Ardleigh: Tendring DC [RR-3608], [REP1-182], [REP2-041], Ardleigh PC and Little Bromley PC [RR-0300], [REP1-145] and other IPs</li> <li>• Waltham Gap (numerous IPs)</li> <li>• Dedham Vale: Villages Against Pylons [RR-3780], [REP1-282], [REP2-061] and other IPs</li> </ul>	<p>CCC welcomes the further consideration of alternative routing, particularly for the Waltham Gap.</p>
<p>ALT 1.8</p>	<p>The applicant</p>	<p><b>Other site specific alternatives</b></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>	<p>CCC asks that consideration is given to the following receptors as listed within its LIR:</p> <p>TB124 – 120 m from Annex, Valentines, Boreham Road, Gt Leighs          TB124 - 158 m from Glebelands, Boreham Road, Gt Leighs          TB124 – 164 m from 3 Cole Hill Cottages, Boreham Road, Great Leighs (semi detached pair with Porchleigh Cottage)          TB138 – 156 m from Chatham Hall Bungalow, Chatham Hall Lane, Little Waltham          TB138 – 183 m from Albion House, Braintree Road, Little Waltham          TB141 – 72 m from Windmill House, Chelmsford Road, Great Waltham          TB141 – 117 m from The Red House, Chelmsford Road, Great Waltham          TB141 – 144 m from Little Bakers Cottage, Chelmsford Road, Great Waltham          TB141 – 183 m from 1 Lace Cottages Chelmsford Road Great Waltham (semi-detached pair with 2 Lace Cottages)          TB141 – 197.6 m from Sweet Briar, Chelmsford Road, Great Waltham          TB141 – 177.4 m from Corner Cottage Chelmsford Road, Great Waltham (semi-detached pair with Meadowview)          TB141 – 180 m from Larks Lodge, Larks Lane, Great Waltham          TB142 – 194 m from Balls Farm, Larks Lane, Great Waltham          TB142 – 187 m from Rievers, Larks Lane, Great Waltham          TB143 – 152 m from Balls Farm, Larks Lane Great Waltham          TB144 – 154 m from Rose Cottage, Larks Lane, Great Waltham          TB155 – 200 m from Springwood, Mashbury Road, Chignal St James          TB156 – 185 m from Springwood, Mashbury Road, Chignal St James          TB156 – 200 m from Brittons Hall Farm Mashbury Road, Chignal St James          TB162 – 185 m from The Haven, Roxwell Road, Writtle          TB162 – 182 m from Bylake Kennels, Roxwell Road, Writtle          TB169 – 147 m from Range Cottage, Ongar Road West, Writtle          TB171 – 140 from Annex at Halfway House, Highwood Road, Writtle          TB171 – 200 m from Caravan at Littlefield, Highwood Road, Writtle          TB174 – 190 m from Green Acre, Bumpsteads Farm, Margaretting Road, Writtle          TB174 – 197 m from Victors Croft, Nathans Lane, Writtle          TB175 – 191 m from The Willows, Nathans Lane, Writtle          TB179 – 200 m from Copfold Hall Farm, Writtle Road, Margaretting          TB180 – 180 m from Inner Lodge, Writtle Road, Margaretting          TB181 – 193 m from Hoopers, Ivy Barns Lane, Margaretting (semi detached pair with Ivy Barns)          TB182 – 169 from Marshalls Farm, Handley Green Lane, Margaretting          TB182 – 170 m from Handley Green Barn, Handley Green Lane, Margaretting</p>

			<p>TB182 - 187m from Handley Green House, Handley Green Margaretting                  TB192 – 131m from Buttsbury Hall farm, Ingatestone Road, Stock                  TB193 - 120 m from White Tyrells Cottages, Ingatestone Road, Stock</p>
<p>ALT 1.9</p>	<p>All local authorities</p>	<p><b>Limits of Deviation (LoD)</b>                  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.                  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.                  The local authorities are invited to comment on this paragraph.</p>	<p>CCC acknowledges the Applicant's need for engineering flexibility. Yet the limits of deviation allow a pylon to be sited anywhere within the red line.</p> <p>The Applicant states that only minor changes would take place, but there is no definition of 'minor' and changes and movement closer to a sensitive receptor or listed building would not be perceived by the occupant (or CCC itself in the case of a Listed Building) to be of a 'minor' change, irrespective of whether it has been considered within the Environmental Statement on a worse case basis.</p> <p>It is not clear how many pylons within the route would need to be moved within the red line boundary, but cumulatively, if a high number of pylons were moved, this may not be considered to be a non-material change.</p> <p>A Requirement for checking the movement of pylons within the limits of deviation route is needed to ensure that any repositioning of pylons does not cause material harm to affected receptors.</p> <p>It would be prudent, prior to submission that affected receptors within 200 metres of the pylon are notified in writing of such change and a site notice is displayed. Occupants should be asked to comment on the movement of such pylon and given 21 days to respond.</p> <p>The following wording is proposed:</p> <p>1) Where a pylon is proposed to be resited within the Limits of Deviation, no phase of the construction works to such pylon may commence until details of—                  (a) the layout;                  (b) scale (including height);                  (c) proposed finished ground levels;                  (d) external appearance;                  (e) consultation report containing details of occupants notified and a list of site notices and locations display</p> <p>and (i) programme for landscaping works, relating to that pylon have been submitted and approved by the relevant planning authority for that phase.</p> <p>2) The details submitted must accord with the outline design principles                  3) The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan.                  4) For the purposes of sub-paragraph (1), "commence" includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal.</p>

AQ Air quality and emissions			CCC comments
AQ 1.4	All local authorities	<p><b>Air Quality - Development Plan documents and adopted standards/ expectations related to air quality that exceed Government targets?</b></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>	The Chelmsford Local Plan 2013 – 2036 does not contain any standards or expectations related to air quality that exceed government targets.
BIO Biodiversity, ecology and natural environment			CCC comments
BIO 1.5	The applicant	<p><b>Bat tree roost surveys</b></p> <p>A number of LIRs from local authorities, for example Braintree DC in <a href="#">[REP1-148]</a>, Chelmsford City Council in <a href="#">[REP1-153]</a>, Essex CC in <a href="#">[REP1-161]</a> and the joint LIR from Suffolk CC, Mid-Suffolk and Babergh DCs <a href="#">[REP1-178]</a> 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>	CCC welcomes this clarification.
BIO 1.6	Natural England	<p><b>Bat tree roost survey coverage</b></p> <p>As indicated in paragraph 1.1.7 of the updated Bat Roost Report <a href="#">[AS-024]</a> 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 example Braintree DC in <a href="#">[REP1-148]</a>, Chelmsford City Council in <a href="#">[REP1-153]</a>, Essex CC in <a href="#">[REP1-161]</a> and the joint LIR from Suffolk CC, Mid-Suffolk and Babergh DCs <a href="#">[REP1-178]</a>.</p>	CCC welcomes this clarification.
BIO 1.20	The applicant	<p><b>Assessment of effects on trees, hedgerows and woodland</b></p> <p>In the Hedgerows to be Removed or Managed Plans <a href="#">[APP-048]</a> to <a href="#">[APP-055]</a>, 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>	CCC welcomes this clarification.
		Also, as reported in, for example, page AB6 of the Applicant’s Comments on RRs <a href="#">[REP1-132]</a> 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 <a href="#">[AS-026]</a> an assessment of the residual effect on veteran trees has been made or provide this.	

BIO 1.21	The applicant	<p><b>Assessment of tree removal at Local Wildlife Sites (LWS)</b></p> <p>Table 8.23 of ES Chapter 8 <a href="#">[AS-026]</a> 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 <a href="#">[AS-026]</a>?</p>	<p>CCC welcomes this clarification and reiterates its preference to understand the worse case scenario.</p> <p>Given that Langley Deer Park is a registered park and garden CCC would expect that full details are provided in accordance with this national designation.</p>
BIO 1.22	The applicant	<p><b>Trees and OHLs</b></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 <a href="#">[APP-130]</a> 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>	CCC welcomes this clarification.
BIO 1.23	The applicant	<p><b>Experience of delivery of mitigation and compensation at this scale</b></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>	CCC welcomes this clarification.
BIO 1.26	The applicant	<p><b>Ecological Clerk of Works (ECoW)</b></p> <p>The outline CoCP <a href="#">[APP-300]</a> 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>	CCC welcomes this clarification.
BIO 1.31	The applicant	<p><b>Reinstatement Planting Plan</b></p> <p>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.</p>	CCC welcomes this plan.
BIO 1.32	The applicant	<p><b>Priority habitat construction exclusion zones</b></p> <p>Commitment Reference B07 in the outline CoCP <a href="#">[APP-300]</a> 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 <a href="#">[AS-026]</a>.</p>	CCC welcomes this clarification.
BIO 1.36	The applicant	<p><b>Exclusion zones</b></p> <p>Commitment Reference B17 in Table 6.1 of the outline CoCP <a href="#">[APP-300]</a> 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?</p>	CCC welcomes this clarification.

BIO 1.39	The applicant	<p><b>Ecology Working Group</b></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>	CCC welcomes the formation of an Ecology Working group.
BIO 1.41	The applicant	<p><b>Proposals for mitigation, enhancement, compensation and BNG</b></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>	CCC welcomes this clarification.
BIO 1.43	The applicant	<p><b>Woodland planting</b></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>	CCC agrees in principle with the Forestry Commission comments.
BIO 1.47	The applicant	<p><b>Approach to the provision of BNG, including off-site BNG</b></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 recalculated. 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>	CCC welcomes the assistance of the Essex Wildlife Trust.
BIO 1.48	The applicant	<p><b>Failure rate for replacement planting</b></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>	CCC agrees that a failure rate should be applied.

DCO Draft Development Consent Order			CCC comments
DCO 1.G3	The Applicant	<p><b>Development Consent Order – control documents</b></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>	CCC welcomes this clarification.
DCO 1.G4	The Applicant	<p><b>Unilateral undertaking</b></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 <a href="#">[REP1-173]</a> 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>	CCC welcomes this clarification.
DCO 1.A2	<p>The applicant</p> <p>Local Authorities</p> <p>Relevant statutory undertaker</p> <p>Other relevant determining body</p>	<p><b>Articles (general) - 2</b></p> <p>Throughout the articles contained in the draft DCO <a href="#">[APP-056]</a> 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 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.</p>	<p>CCC is a Discharging Authority on the Longfield Solar Farm DCO EN010118, which has a discharging timeframe of 10 weeks.</p> <p>CCC is aware that Suffolk County Council have produced a response to this question and defers to their response. Their response indicates that a timeframe of 56 days is necessary.</p> <p>In CCC's experience as a Discharging Authority for Longfield Solar Farm DCO, the areas that take time to process a Requirement include the following:</p> <ul style="list-style-type: none"> <li>• Requirement validation</li> <li>• Requirement consultation (21 days)</li> <li>• Report writing and consideration of consultation comments.</li> <li>• Reconsultation.</li> </ul> <p>CCC reiterates that the need for reasonable timeframes is not about delaying the Project. It about making sure that CCC has sufficient time to undertake all of the necessary processes and statutory functions.</p> <p>CCC has a good working relationship on Longfield Solar Farm and is happy to provide further examples and best practice on this where required.</p> <p>From experience, complicated technical discharges relating to numerous plans and documents, requiring considerable consultee input, Officer assessment and administration support take time.</p> <p>There is no mechanism for reconsultation within the current NSIP requirement discharge process and CCC is dependent upon the Applicant as to whether they will allow it or not. Should an Applicant refuse re-consultation, the remaining options are to refuse or withdraw the Requirement resulting in untimely delay and further administration.</p> <p>Where additional information is needed, the Applicant needs time to prepare the submission, then CCC needs to receive it, reconsult and await the consultation</p>

			<p>comments. This takes time and can impact upon the consideration of the requirement.</p> <p>CCC would prefer to be given appropriate and reasonable time to deal with the requirements, without asking for additional extensions of time requiring further administration.</p> <p>Should this DCO be granted, it is critical that CCC has the appropriate means and time to do so.</p>
DCO 1.A9	The applicant	<p><b>Article 2 (Interpretation) (pre-commencement operations) - 2</b></p> <p>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.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>	CCC welcomes clarification.
DCO 1.A10	The applicant All local authorities	<p>Article 2 (Interpretation) (Relevant Planning Authority)</p> <p>Norfolk CC in its RR <a href="#">[RR-2753]</a> and its LIR <a href="#">[REP1-173]</a>, 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:</p> <ul style="list-style-type: none"> <li>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 <a href="#">[APP-130]</a> 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'?</li> <li>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?</li> <li>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.</li> <li>d)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.</li> </ul>	<p>The definition of "stage" in Schedule 3, para 1 is circular in that it is preferable to a scheme of works submitted by the Applicant to [x] relevant planning authority.</p> <p>The stages are set by details submitted by the Applicant. It is unclear how the "stages" correlates with "Works". It may be that each element of "Works" – i.e. "Work No. 1" is its own stage with the relevant planning authority/authorities referable in turn. The Applicant needs to clarify and define as its not clear.</p> <p>Where there is "deadlock" between parties this can be resolved by the use of "an appointed person" (see e.g. Art 55 dDCO and Schedule 4, paragraphs 4 and 5) or arbitration (see e.g. art 62 and Schedule 16, Part 4, paragraph 12).</p> <p>CCC consider that this would be preferable to the above, providing clarity/certainty if the Application is allowed."</p> <p>In CCC's experience, defined works lend themselves to the physical complements of a Project, such as Solar Farm site, substation, underground cabling, whilst the stages provide the timing and the detailing for undertaking the works within and may include pre construction, construction, operation etc, with phasing / staging broken down further as necessary.</p> <p>To ensure a manageable discharge of requirement process, CCC considers that the works should be broken into geographical areas (sections) according to the current LPA administrative areas, with high level documentation geographically themed at geographical County level.</p>

			<p>This would make transition under Local Government Reorganisation (LGR) more simple to deal with, as each of the affected Discharge Authorities could continue to deal with their current workloads and requirements. Roles that were previously undertaken by County Council such as Highways, could in theory, continue geographically at local level</p> <p>Currently Chelmsford is blended into sections F and G which is ambiguous. Chelmsford is proposed to be merged with Brentwood (and Maldon) as part of LGR, but section G also includes Basildon whom would be in a different administrative area upon LGR. CCC considers the phases need to relate to each Authority.</p> <p>A phasing plan is required to advise when requirements will be submitted and how they relate to each administrative area.</p>
DCO 1.A16	The applicant Relevant local authorities	<p><b>Article 5 (Limits of deviation) - 2</b></p> <p>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) <a href="#">[APP-057]</a> 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.</p> <p>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.</p> <p>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>	<p>CCC expects LVIA assessment to reflect this deviation and for the project description to be updated to inform the visual envelope of maximum parameter. We expect an updated ZTV and the study area to respond appropriately to the finding of the revised ZTV.</p> <p>CCC considers that precise wording and clarification on the consultation and notification process is needed.</p> <p>The memorandum relates to consultation only, but it does not follow that the consultation responses will be taken into account and incorporated.</p> <p>CCC suggests that a formal process is needed and suggests a requirement process would be best suited to facilitate this process.</p> <p>The following requirement wording is suggested</p> <p>Great Waltham and Little Waltham – Pylons TB140 – 142 (inclusive)</p> <p>1) No phase of the construction works to pylons TB140 – TB142 (inclusive) may commence until details of—</p> <ul style="list-style-type: none"> <li>(a) the layout;</li> <li>(b) scale (including height);</li> <li>(c) proposed finished ground levels;</li> <li>(d) external appearance;</li> <li>(e) hard surfacing materials;</li> <li>(f) Consultation Report advising of the change to the pylon height</li> </ul> <p>and (i) programme for landscaping works, relating to Pylons TB140 – TB142 (inclusive) have been submitted and approved by the relevant planning authority for that phase.</p> <p>2) The details submitted must accord with the outline design principles</p>

			<p>3) The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan.</p> <p>4) For the purposes of sub-paragraph (1), “commence” includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal.</p>
DCO 1.A17	The applicant	<p><b>Article 5 (Limits of deviation) - 3</b></p> <p>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>	CCC welcomes clarification.
DCO 1.A26	The applicant	<p><b>Article 21 (Protective works)</b></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>	Agreed.
DCO 1.A35	The applicant All local authorities	<p><b>Article 48 (Defence to proceedings in respect of statutory nuisance)</b></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> <p>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</p>	<p>There are no substations proposed within the CCC administrative area. CCC has no comments to make.</p> <p>CCC refers to its comments made in the LIR (REP -0153) regarding construction hours and other matters and expects these to be incorporated into the DCO as appropriate.</p>
DCO 1.A38	The applicant	<p><b>Article 51 (Trees subject to TPOs)</b></p> <p>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.</p>	Welcomes clarification.
DCO 1.A42	All local authorities, highway authorities and statutory undertakers	<p><b>Article 58 (Application, disapplication and modification of legislative provisions)</b></p> <p>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.</p>	<p>Hedgerow regulations</p> <p>In principle CCC has no objections to the Hedgerow Regulations being disapplied, provided that alternative mechanisms exist to secure details of their removal, such as within the LEMP or other such document. This is based on our experience on Longfield Solar Farm, which required compliance with the Regulations DCO ref resulting in untimely and duplication of other Acts.</p> <p>CCC defers to the other relevant authorities with regard to the other matters.</p>

DCO 1.S7	The applicant All local authorities	<p><b>Schedule 3 – Requirement 3 (stages of the authorised development)</b> 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>	<p>CCC consider that seven days is insufficient time. No reference is given to working days meaning that this time could be less accounting for weekends and bank holidays.</p> <p>CCC agrees that requirement 3 (5) should refer to both sub paragraphs 2 and 3.</p>
DCO 1.S8	The applicant All local authorities	<p><b>Schedule 3 – Requirement 5 (archaeology)</b></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>	<p>CCC defers to ECC archaeology – see ECC response.</p>
DCO 1.S10	The applicant	<p><b>Schedule 3 - Requirement 7 (construction hours)</b></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"> <li>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</li> <li>ii) the proposed start-up and close-down provisions</li> <li>iii) the activities permitted outside core working hours</li> <li>iv) the duration of the construction programme</li> </ul> <p>The applicant should clarify/ provide further justification for:</p> <ul style="list-style-type: none"> <li>a) the proposed construction hours/ piling hours/ HGV delivery hours, including in relation to proposed start-up and close-down provisions</li> <li>b) the extensive list of activities that would be permitted outside core working hours</li> <li>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)</li> </ul>	<p>CCC welcomes clarification.</p>

		<ul style="list-style-type: none"> <li>d) the measures included in the draft DCO, or other management plans, that prevents the use of other forms of piling</li> <li>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)</li> <li>f) the complaints procedure in the event of a breach occurring</li> </ul>	
DCO 1.S12	The applicant	<p><b>Schedule 3 – Requirement 8 (Retention and removal of trees, woodland and hedgerows)</b></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>	CCC welcomes clarification.
DCO 1.S13	The applicant	<p><b>Schedule 3 – Requirement 9 (Reinstatement Planting Plan) - replacement planting period and on-site BNG aftercare period</b></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 <a href="#">[REP1-132]</a> provide evidence to justify how a 5-year 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 <a href="#">[REP1-156]</a>, Braintree DC in <a href="#">[REP1-148]</a> and Essex CC in <a href="#">[REP1-161]</a> 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 <a href="#">[APP-299]</a> and as referenced in <a href="#">[REP1-132]</a> there would be a 30year 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>	CCC welcomes clarification.

DCO 1.S15	The applicant	<p><b>Schedule 3 - BNG commitments</b></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>	CCC considers a specific requirement should be required.
DCO 1.S16	The applicant	<p><b>Schedule 3 – Requirement 9 (Reinstatement Planting Plan)</b> 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>	CCC welcomes clarification.
DCO 1.S17	The applicant	<p><b>Schedule 3 – Requirement 10 (Reinstatement schemes)</b></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>	CCC welcomes clarification.
DCO 1.S18	The applicant	<p><b>Schedule 3 – Requirement 14 (Control of Development under Work Nos. 19 and 21 to 24)</b></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>	CCC welcomes clarification.
DCO 1.S19	The applicant All local authorities All discharging authorities	<p><b>Schedule 4 – (Discharge of requirements) - 1</b></p> <p>The government published its response to the Nuclear Regulatory Review 2025 on 13 March 2025, in its document ‘<a href="#">Building our nuclear nation: government response to the Nuclear Regulatory Review 2025</a>’. 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> <ol style="list-style-type: none"> <li>Provide comments on the above publication in respect of post-consent discharge functions.</li> <li>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 <a href="#">The A122 (Lower Thames Crossing) Development Consent Order 2025</a>?</li> </ol>	<p>A)</p> <p>CCC is aware of similar NSIP consenting schemes being undertaken by Government departments.</p> <p>Irrespective of whom has responsibility for discharging the requirement, CCC would expect to be consulted at pre-application stage on the details of the requirement, to allow for comments to be provided on the acceptability of the submission documents, to avoid on-going additional information requests once a requirement is in for discharge.</p> <p>A PPA and resourcing would be required to undertake requirement discharge.</p> <p>CCC would expect the Applicant to enter into individual discussions to develop a proposal for the discharge of requirements such that they complement CCC’s current processes and timeframes.</p> <p>Should this be unacceptable to the Applicant, then there may be merit in exploring how the proposal operated by DESNEZ would operate.</p>

			<p>B)</p> <p>CCC notes that the Lower Thames Crossing DCO has been given an eight-week period for discharging requirements, which is considered acceptable. The process also enables extension of the timeframe where further information is required (21 (1) (b)). There is also time (3) to request additional time for consultation responses.</p> <p>In respect of requests for further information a timeframe of 28 days is given for consultees to respond (23 (1) (b) refers)</p> <p>CCC considers the extended timeframes to be helpful and allow full consideration of the requirements.</p> <p>The current proposed discharge process is given 28 days which CCC has previously stated to be unacceptable.</p> <p>Part two (2) is unworkable. The requirement states that</p> <p>(2) If the relevant authority considers further information is necessary and the Requirement does not specify that consultation with a requirement consultee is required, the relevant authority must, within 5 days of receipt of the application, notify the undertaker in writing specifying the further information required</p> <p>The process fails to include time to register and consider the application, request consultation responses, receive consultation response and review and consider such information.</p> <p>Moreover, the time specified is not working days and thus could include weekends and bank holidays. Should this approach be applied over the Easter bank holiday weekend, there would be only one day to undertake this process. This is unreasonable.</p> <p>Please see comments to DCO 1.A2</p> <p>Overall CCC prefers the approach to discharge the requirements as set out in the Lower Thames Crossing.</p>
DCO1.58			<p>ECC Place Services provides a response on behalf of Essex County Council, Chelmsford and Colchester City Councils (Braintree response provided separately) with regard to requested changes to Requirement 5(4) and an additional sub stage 5(5).</p> <p>Changes to 5(4) were requested to provide clarity between two stages of fieldwork. One stage requires the completion of the archaeological evaluation and geophysical survey which has been undertaken prior to and throughout the DCO application. This stage of works needs to be distinct from the programme of mitigation which would be devised following the completion of all archaeological and geoarchaeological evaluation which is covered by substage 5(1). A detailed WSI is requested for fieldwork carried out under 5(4) rather than carrying out the works under the Outline Archaeological Management Strategy (OAMS) and Outline written scheme of Investigation (OWSI).</p>

			<p>The current OAMS/OWSI (APP-328) is not yet agreed, in addition it does not provide details on the location of fieldwork required to complete the evaluation stage which would be required following consent to ensure agreement on the coverage and locations of evaluation areas. Section 5.3.42 in the OAMS and OWSI makes reference to the provision of a detailed WSI, “the scope and location of additional trial trenching will be described in a DWSI.”</p> <p>The archaeological consultants for the Applicant have suggested that a revised version of the OAMS/OWSI may be available for deadline 4, this would then need to be reviewed by all authorities and Historic England. Final agreement on this control document cannot be assumed. The Applicant makes reference to the Bramford to Twinstead scheme as a basis of using the OAMS and OWSI for post consent pre-commencement work which is not correct. The OWSI for Bramford to Twinstead was not agreed by the relevant authorities prior to gaining consent. The document was not considered sufficient to discharge any requirements. The consequences of not gaining agreement on the control document are now being realised through extensive negotiations for fieldwork elements and lengthy delays in discharge of requirements. It is likely this has caused a significant time and cost implications for the project.</p> <p>5(5) An additional sub paragraph would enable full discharge of the requirement for each stage or sub-stage and provide more control over the timing and delivery of post excavation reports. As stated above the OAMS and OWSI are yet to be agreed and cannot be assumed to be agreed at consent, the addition of a separate requirement to produce and submit a post excavation assessment for agreement between all parties will allow the document to be live and reflect any changes that may have happened since consent which could continue over a timescale of years. This would facilitate the consideration of any changes that may occur with current research aims, objectives, outreach and publication which could not be fully realised in the control document.</p>
--	--	--	---

HE 1.4	The applicant Historic England	<p><b>ES Chapter 11, Historic Environment – embedded mitigation</b></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"> <li>• What is the cost or technical difference between the lower height and ‘standard’ height pylons?</li> <li>• Why are the lower height pylons not chosen for a more extensive part of the route, or indeed all of it?</li> <li>• Has undergrounding or T-pylons been considered for the same stretch of route – and if not, then why not?</li> <li>• 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.</li> </ul> <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"> <li>• 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.</li> </ul>	CCC have previously responded to this matter. See CCC LIR REP1-153 especially paragraphs 8.56 – 8.59.
--------	-----------------------------------	---	---

HE 1.6	The applicant	<p><b>Harm to heritage assets</b> 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>	CCC welcomes clarification.
HE 1.7	The applicant	<p><b>Level of harm to heritage assets</b> Provide further information over how the ES considers whether the proposed development would cause a mid or a lower less than substantial harm including: a) What differentiates between the two levels of harm assigned? b) What would an upper, or a high level, of less than substantial harm look like?</p>	CCC welcomes clarification
HE 1.8	The applicant	<p><b>Weighting to be given to harm to multiple assets</b> 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>	CCC welcomes clarification.
HE 1.9	All local authorities	<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: a) 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 <a href="#">[APP-209]</a>. b) 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 <a href="#">[APP-215]</a>. The levels of harm assessed in relation to Non-Designated Heritage Assets (NDHA), as described in ES Chapter 11 <a href="#">[AS-068]</a>.</p>	<p>CCC consider that the harm to designated heritage assets is underestimated in some instances and that NDHAs are not adequately assessed.</p> <p>See CCC LiR (REP1 -153) pages 59-68.</p> <p>Details of the harm to designated heritage assets are repeated here, for all other harm, please refer to the extensive consideration in the LIR.</p> <ul style="list-style-type: none"> <li>• <a href="#">Brickfields</a> (1122129, identified as Bishops Hall Cottage) is a small C17/C18 thatched roof cottage. Its rural setting makes a moderate contribution to its significance. Its heritage value of medium is agreed. It is not agreed that its setting does not include the development consent area. The woodland screening to the south partly mitigates the impact, but not fully. It is considered there would be a low impact, resulting in a minor effect.</li> <li>• <a href="#">Goodmans Farmhouse</a> (1122135) and <a href="#">Barn</a> (1171336) – medium impact on setting (rather than low), due to the considerable change to the rural landscape with which it is historically associated with, existing trees do not fully mitigate the impacts, particularly in winter months. Resulting in a moderate effect, which is significant.</li> <li>• <a href="#">Stonage Farmhouse</a> (1172474) and <a href="#">Barn</a> (1122042) – low level of harm not agreed – medium level due the change to the rural setting with which the buildings are historically associated, existing trees do not fully mitigate the impacts, particularly in winter months, resulting in a moderate effect, which is significant.</li> <li>• <a href="#">Chatham Hall</a> (1338512) - low level of harm not agreed – medium level due the change to the rural setting, existing trees do not fully mitigate the impacts, particularly in winter months, as demonstrated in viewpoints HE8c and 16.16, resulting moderate effect, which is significant.</li> <li>• <a href="#">Church of St Mary and St Laurence</a> (1122058) Great Waltham is excluded. It is not agreed the setting does not extend to the order limits. The wider rural setting of the village is part of how the church is experienced and there are important views of the church tower from the north/northwest/northeast where the proposed pylons would be visible as a distant backdrop (as shown in visualisation HE15e), which would impact on how it is experienced as a rural village church. Due to the screening and distance the impact would be low to an asset</li> <li>• <a href="#">Rose and Crown, Great Waltham</a> (1122116) – low impact on setting (rather than negligible) resulting in a minor effect, due to change to rural setting with partial screening.</li> </ul>

			<ul style="list-style-type: none"> <li>• <a href="#">Lace cottage, Great Waltham</a> (1122117) – medium impact (not low) due to change to rural setting with limited screening, resulting in a moderate effect, which is significant.</li> <li>• <a href="#">Great Waltham Conservation Area</a> (CA55) – There would be notable harm to the setting of the Conservation Area by erosion of its rural setting which makes a considerable contribution to its significance, resulting a medium level of harm (not low), which would amount to a moderate effect, which is significant.</li> <li>• <a href="#">Little Waltham Conservation Area</a> (CA56) – There would be notable harm to the setting of the Conservation Area by erosion of its rural setting which makes a considerable impact on its significance, resulting a medium level of harm (not low), which would amount to a moderate effect, which is significant.</li> <li>• <a href="#">Balls Farmhouse</a> (1305428) – high impact on setting (rather than medium) due the comprehensive change to the rural landscape setting (i.e. see viewpoint HE16) which it is historically associated with and makes a considerable contribution to its setting, resulting in a major/moderate effect, which is significant.</li> <li>• <a href="#">1 and 2 Larks Lane, Great Waltham</a> (122083). low impact (rather than none) due to impact rural setting, resulting in a minor effect.</li> <li>• <a href="#">Vault West of Partridge Green Farm</a> (1306289) – considerable to change to the sense of an isolated rural setting, giving a medium impact on setting (rather than low), resulting in a medium effect which is significant.</li> <li>• <a href="#">Coptfold Hall Barn</a> (1247784) – medium impact (rather than low) due to impact on the rural setting with which the asset is historically associated, even with partial screening by adjacent modern farm buildings, resulting a moderate effect, which is significant.</li> </ul> <p>On archaeology:</p> <p>a- relates to above ground heritage assets so will be responded to by Historic Buildings</p> <p>b same for above ground and Historic England are the statutory consultees for scheduled monuments so they will comments on SMs</p> <p>c For archaeological remains this is discussed in the LIR. The level of harm cannot be fully realised until intrusive archaeological investigations are complete and results provided for review.</p>
--	--	--	--

HE 1.10	The applicant	<p><b>Limits of deviation</b></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 <a href="#">[APP-300]</a> but this appears primarily to address archaeological and other concerns (with the odd exception). Set out:</p> <ol style="list-style-type: none"> <li>a) Whether changes to the LoD were considered in the overall heritage harm assessment.</li> <li>b) In relation to those heritage assets that, through your assessments in <a href="#">[APP-215]</a>, 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.</li> <li>c) 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.</li> <li>d) Any subsequent changes in the level of heritage harm which may occur as a result of such movement.</li> </ol>	<p>CCC welcomes this clarification. Variations in alignment or height could notably increase heritage impacts.</p>
---------	---------------	---	--

		<p>e) Whether GG34 should and will be expanded in the light of the above.</p> <p>f) Whether more certainty should and can be given to the location of pylons in the vicinity of heritage assets.</p>	
HE 1.11	The applicant	<p><b>Vibration effects on listed buildings</b></p> <p>In your comments on RRs <a href="#">[REP1-132]</a> 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 <a href="#">[APP-256]</a> 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"> <li>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.</li> <li>Provide additional information in order to more fully understand the potential impacts on these properties</li> <li>Cross reference this information with any RR's that specifically mention this as an issue.</li> </ol>	CCC welcomes clarification.
HE 1.12	All local authorities Historic England	<p><b>Heritage visualisations - 1</b></p> <p>A range of heritage visualisations are provided <a href="#">[APP-350]</a> and <a href="#">[APP-351]</a>.</p> <p>All local authorities and Historic England are asked to confirm:</p> <ol style="list-style-type: none"> <li>Agreement with the viewpoints chosen to reflect any potential impacts on heritage assets.</li> <li>In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from?</li> </ol>	CCC consider the viewpoints give an adequate representation of the impacts in the agreed locations.
HE 1.13	The applicant	<p><b>Heritage visualisations - 2</b></p> <p>The ExA have concerns over the following heritage visualisations <a href="#">[APP-350]</a> and <a href="#">[APP-351]</a>. Provide a response addressing such concerns or submit additional visualisations:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>HE4 Coney Byes. Position of viewpoint makes full effect on setting of heritage asset difficult to ascertain.</li> <li>HE7 Langleys. Viewpoint dominated by heritage asset and seemingly not very well chosen to assess effect on setting.</li> </ul>	CCC welcome clarification. CCC agrees that view HE7b is of limited value.

		<ul style="list-style-type: none"> <li>• HE11 Church of St James, Marks Tey. Unclear why viewpoint not from north side of Church.</li> <li>• HE14 White Notley. Query over whether viewpoint is the most appropriate from the Conservation Area.</li> <li>• HE21 Elm Farmhouse. Viewpoint does not appear to show effect on setting. VP including the heritage asset would be more useful.</li> <li>• HE22 Tacolneston. Query over whether viewpoint is the most appropriate from the Conservation Area.</li> <li>• HE24 Church of St Mary's Washbrook. Query over whether viewpoint is the most appropriate from the heritage asset.</li> <li>• HE25 Ardleigh. Query over whether viewpoint is the most appropriate from the Conservation Area.</li> <li>• HE26 Fordstreet. Query over whether viewpoint is the most appropriate from the Conservation Area.</li> <li>• HE33 Mellis. Query over whether viewpoint is the most appropriate from the Conservation Area.</li> <li>• 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?</li> <li>• HE35 Creeting Hall. View from inside garden with substantial screening; viewpoint from footpaths nearby could better show effect on setting.</li> </ul>	
HE 1.15	The applicant	<p><b>Historic England written representation 1</b></p> <p>ES Chapter 11 – Historic Environment [<a href="#">AS-068</a>] 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 [<a href="#">REP1-191</a>] 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"> <li>• St Regimus Church, Roydon (Grade I)</li> <li>• St Mary's Parish Church, Fairstead (Grade II*)</li> <li>• Newney's Farmhouse, Ranks Green (Grade II*)</li> <li>• Hylands Park (RPG Grade II*) • Hylands (Grade II*)</li> </ul> <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"> <li>• Tacolneston Conservation Area</li> <li>• Bush Hall (NDHA)</li> <li>• St Mary's Church Burgate (Grade II*)</li> <li>• Mellis Conservation Area</li> <li>• Moat Yard Plantation, Mellis</li> <li>• Creeting Hall (Grade II*)</li> <li>• Badley Church Green Conservation Area</li> <li>• Parish Church of St Margaret and Catherine, Aldham (Grade II*)</li> <li>• Feeringbury Manor (Grade II*)</li> <li>• Broomfield Conservation Area</li> <li>• Former Parish Church of St James, Chignall St James (Grade II*)</li> <li>• Chobbings Farmhouse (Grade II*)</li> <li>• Ingatestone Hall (Grade I) and associated buildings</li> </ul>	CCC welcomes clarification.

HE 1.19	The applicant	<p><b>Assessed harm to heritage assets</b></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"> <li>• Kenningham Hall</li> <li>• Piggery (Dower House) &amp; Barn, Flordon Hall</li> <li>• Elm Farmhouse (1373558)</li> <li>• Spring Farmhouse</li> <li>• The Dower House</li> <li>• Moat Farmhouse</li> <li>• Stables Moat Farmhouse</li> <li>• Hascot Hill Farmhouse</li> <li>• East Gores Farmhouse</li> <li>• Barn East Gores Farmhouse</li> <li>• Newneys Farmhouse</li> <li>• Barn Newneys Farmhouse</li> <li>• Porters Farmhouse</li> <li>• Monk's Farm Cottages</li> <li>• Sturgeons House</li> <li>• Wardropers Farmhouse</li> <li>• Wayletts</li> <li>• Forge Cottage</li> </ul>	This clarification is welcomed.
HE 1.23	The applicant	<p><b>Windmill House</b></p> <p>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.</p>	CCC consider that there would be a high level of harm to the setting of Windmill House NDHA, see CCC LiR (REP1-153), page 66.
HE 1.28	The applicant	<p><b>Southwoods Farm, Chelmsford</b></p> <p>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.</p>	CCC welcomes this clarification. CCC agree with the applicant's assessment of permanent impacts being lower for Southwoods Farmhouse than the farm buildings due to the tree screening present.
HE 1.29	The applicant	<p><b>Church of St Mary, Buttsbury</b></p> <p>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.</p>	Church of St Mary, Buttsbury (1264434) is Grade II* listed <a href="#">Church of St Mary, Stock - 1264434   Historic England</a>
HE 1.37	The applicant	<p><b>Mitigation</b></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>	<p>CCC consider that the schemes mitigation is inadequate. See CCC LiR (REP1- 153).</p> <p>Mitigation and/or compensation measures should be required via the legal agreement.</p>
HE 1.38	The applicant	<p><b>Non designated heritage assets (NDHA)</b></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>	CCC welcomes clarification. CCC consider that NDHAs are not adequately represented in the historic Environment evidence base, see CCC LiR (REP1-153).

<p>HE 1.39</p>	<p>All Essex local authorities</p>	<p><b>Protected Lanes</b> 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>	<p>CCC adopted Local Plan (2020) policy DM14 for non-designated heritage assets supporting text notes that Protected Lanes will be treated as NDHAs. Protected Lanes are identified in ECC's studies, which form part of the Local Plan evidence base.</p> <p><a href="#">2009 Protected Lanes Report</a></p> <p>CCC sets out its position on harm to protected lanes in the LIR (REP-153), page 57, paragraph 8.190, page 61 paragraphs 8.205 and 8.206 refer. These advise that Larks Lane (Great Waltham) is agreed to be of low value, but it is considered there would be a medium impact on its significance because the pylon routes influences much of the length of the lane and how it is experienced in a rural landscape, resulting in a minor effect.</p> <p>Goodmans Lane and Paulk Haul Lane (Great Leighs) are considered to be of medium value because they have considerable character, a high degree of surviving features (scoring highly on the ECC protected lanes assessment - 22 and 21 respectively, 14 being the threshold for protected lane status) and have group value with the designated heritage assets at Hole Farm and Goodmans Farm. A notable amount of the experience of the assets would be affected -the impact is medium, therefore resulting in a moderate effect, which is significant.</p> <p>Additionally, the Protected Lanes within Essex were assessed by the Historic Environment Team of Place Services (Essex County Council) on behalf of the districts using a methodology which included desk-based research and field survey. The lanes were assigned a score based on diversity, historic integrity, archaeological potential and aesthetic value. Where a threshold score was achieved the lane was adopted as a Protected Lane. Protected Lanes are identified as non-designated heritage assets through the districts relevant Strategic Policies.</p> <p>Stage 1 of the criteria for a Protected Lane was to meet a threshold score for historic integrity, if a lane fails to score 2 for integrity it did not proceed to the next stage. A score of 2 related to "Moderate improvements or loss to historic fabric of the lane (excluding significant hedgerow loss)"</p> <p>Where there will be direct physical impact to the lane, for instance through groundworks associated with undergrounding, then the integrity of the lane may be impacted through removal of historic components of the lane such as roadside greens or banks etc. and possible 'improvements' such as kerbing, inspection pits, markers etc. Should the physical works required equate to moderate improvements or loss of historic fabric then the lane could fail to meet the threshold for historic integrity and not meet the criteria for a Protected Lane.</p> <p>Further lanes may be impacted to a lesser degree in the area of overhead lines due to groundworks associated with infrastructure for the new overhead line and pylons which could lower the score for other criteria such as aesthetic value, biodiversity (where hedgerows may need to be removed) as well as historic integrity where physical works may be required. Where the score may be reduced due to the installation and presence of the overhead lines and pylons in the vicinity of the lane the lane may no longer meet the criteria of a Protected Lane.</p> <p>These include: Chelmsford: Boreham Lane Rd, Great Leighs (CHLLANE 4)</p>
----------------	------------------------------------	--	--

			<p>Park Hall Lane (CHLLANE 36)                  Goodmans Lane (CHLLANE 38)                  Larks Lane, Great Waltham (CHLLANE 17)                  Newney Green, Writtle (CHLLANE 21)</p> <p>To mitigate any loss and disruption to the Protected Lanes the Applicants include a section on Protected Lanes (Section 7.9) in the LEMP (Revision C- REP2-019) and have made changes, as requested in ECC's Local Impact Report, to H06 in the Code of Construction Practice (Revision B – REP2-015). Where possible they aim to minimise disruption from physical works and maintain elements of the Protected Lane. Where removal of historic fabric and features is required, this will have a direct impact on the historic integrity of the lane.</p>
--	--	--	---

HW Health and wellbeing			CCC comments
HW 1.1	The applicant	<p><b>Time periods' effect on health and wellbeing</b>                      ES chapter 10 <a href="#">[APP-192]</a> 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>	CCC welcomes clarification
HW 1.5	The applicant	<p><b>Written Representation from Helen Dorothy Keeler</b>                      Respond specifically to the WR from Helen Dorothy Keeler <a href="#">[REP1-367]</a> 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>	Response welcomed.
HW 1.12	The applicant	<p><b>Essex CC's local impact report – mitigation and other benefits</b>                      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.                       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>	CCC welcomes the mitigation and other benefits
LUS Land use and soils, green infrastructure			CCC comments

LUS 1.2	The applicant Natural England Pylons East Anglia Limited All local authorities	<p><b>Best and most versatile agricultural land (BMV) and soils - 1</b></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>	CCC defer to Natural England. CCC is aware that they have a relevant team with regard to soil management and resourcing.
LUS 1.4	Natural England All local authorities Pylons East Anglia Limited	<p><b>BMV and soils - 3</b></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>	CCC defer to Natural England. CCC is aware that they have a relevant team with regard to soil management and resourcing.
LUS 1.10	The applicant	<p><b>Green Belt - 1</b></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"> <li>• 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.</li> <li>• Reference should be made to how much of the proposed works related to restringing etc and small adjustments to pylon locations.</li> <li>• 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.</li> <li>• Comment on the comments on the LIRs from Local Authorities which conclude the development is inappropriate.</li> </ul>	CCC welcomes clarification.

<p>LUS 1.12</p>	<p>Chelmsford CC Brentwood BC Basildon BC Thurrock Council</p>	<p><b>Green Belt - 3</b> 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>	<p>CCC disagrees with the Applicants position that the lines are pylons are not inappropriate within the Green Belt.</p> <p>In its Planning Statement, the Applicant makes the case that the proposed overhead lines (both new and existing as modified and reconducted) would comprise an engineering operation which benefits from the exception in NPPF para 154, meaning that the works would not constitute inappropriate development in the sense of NPPF para 153.</p> <p>CCC considers that the overhead lines and pylons comprise structures that do not fall within the categories listed within para 153.</p> <p>Therefore, they are inappropriate development which is harmful by definition and Very Special Circumstances (VSC) will be needed to clearly outweigh the harm by definition and any other harm identified.</p> <p>In Chelmsford, there would be approximately 32 pylons sited within the Green Belt which is not insignificant.</p> <p>As stated within CCC's Local Impact Report (REP1-153), from a spatial element, the Project would introduce substantial development into the area in terms of ground cover and built form that would diminish the openness of the Green Belt spatially.</p> <p>The proposed new pylons would introduce very sizeable new structures into the landscape. Whilst the steel lattice design of the pylons would allow views through the structures, their presence collectively and in linear layout would nonetheless result in prominent new features in the landscape.</p> <p>Visually, the landscapes that would be affected by the Project are often undeveloped, rural landscapes where intervisibility can be quite high due to being either large scale flat or gently undulating landscapes or where the scale and height of the pylons and overhead wires mean the effect is an industrialisation of the countryside.</p> <p>Even where existing landscape features or proposed planting may be capable of reducing the effect on Green Belt openness from a visual perspective, CCC considers there can be no doubt that by their very presence, the considerable number of new pylons would have a substantial spatial effect which would undermine openness.</p> <p>The Project would conflict with the purposes of including land within the Green Belt. In terms of encroachment, the Project would place a large number of pylons (32) and associated infrastructure within an extensive number of fields within the countryside. Although maintaining some separation between them, the pylons and associated infrastructure would fundamentally alter the appearance of the fields and landscape that they would be sited within it. These would alter from a sequence of open green spaces to spaces accommodating large, industrialised development that would result in encroachment, in contradiction of a Green Belt purpose.</p> <p>There would be adverse effects on openness as a result of the temporary construction works associated with the Proposed Development.</p>
-----------------	--	---	--

			<p>The Project would have an adverse effect on Green Belt openness and would conflict with the purpose of the Green Belt to safeguard the countryside from encroachment.</p> <p>As a consequence, the Proposed Development would be inappropriate development in the London Green Belt. Inappropriate development is, by definition, harmful to the Green Belt. In accordance with NPS EN-1 and the NPPF, inappropriate development should not be approved except in very special circumstances.</p> <p>This approach was taken with regard to the consideration of the Yorkshire Green pylon proposal EN020024 which confirmed that the presence of overhead lines and pylons comprised inappropriate development.</p>
LUS 1.14	All local authorities	<p><b>Green infrastructure and open space - 1</b></p> <p>Appendices B1, B2 and B3 to the applicant's Planning Statement <a href="#">[APP-085]</a> contain tables and assessment of the projects impact on open spaces.</p> <ul style="list-style-type: none"> <li>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.</li> <li>Do Colchester City Council agree with the conclusions and assessment of fishing provision within Ardleigh and if not explain your reasoning and justification.</li> <li>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.</li> </ul>	<p>In principle CCC raises no objection to the assessments and conclusions relating to Green Infrastructure and open space. These are listed as OS/64 – OS/85. However, it has the following comments to make:</p> <p>OS/64 – River Ter &amp; Woodland north of Goodmans Lane – Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological monitoring / mitigation to apply.</p> <p>OS/65 – Lowleys Farm Meadow and River Ter - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological monitoring / mitigation to apply</p> <p>OS/66 – Lyonshall Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood.</p> <p>OS/67 – Stonage Wood – Acceptable buffer zones should apply and ecological monitoring / management to take place.</p> <p>OS/68 – Sheepcotes Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood.</p> <p>OS69 – Langleys Deer Park – Extensive comments have been made within the LIR (REP – 153), pages 35 and 39 and paragraphs 8.45, 8.60-08.61 regarding the heritage, ecological and arboricultural implications. Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Deer Park.</p>

			<p>OS/70 – Sparrowhawk Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply.</p> <p>OS/71 – Bedford Playing Fields – Should the siting of the proposal change, such that interaction occurs, CCC expects further consideration of the matter and mitigation to be applied.</p> <p>OS/72 – Border Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply.</p> <p>OS/73 – Bushy Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood.</p> <p>OS/74 – Scout Jamboree Site – CCC disagrees with national Grids view that the project would limit the Scout Jamboree from taking place on this site. See CCC's LIR (REP-153) page 100, paragraph 8.490. Permanent effects on the site should be considered and mitigated as appropriate to ensure that the Jamboree can continue to take place unhindered by the Project.</p> <p>OS/75 - Reclaimed Landfill Park, Chignall St James (Former Roxwell Quarry Restoration Site) and River Can – appropriate mitigation should be applied to ensure that the proposed haul road is not harmful. Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply.</p> <p>OS/76 – Roxwell Road and Writtle Brook - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply.</p> <p>OS/77 – Tutney Pond - Should the siting of the proposal change, such that interaction occurs, CCC expects further consideration of the matter and mitigation to be applied.</p> <p>OS/78 – Lady Grove - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood.</p> <p>OS/79 – Great / Little Edney Woods - appropriate mitigation should be applied to ensure that the proposed haul road is not harmful. Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply.</p>
--	--	--	--

			<p>OS/80 – Writtle Park Wood – CCC welcomes the additional planting of this site.</p> <p>OS/81 – James’ Spring - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood.</p> <p>OS/82 – Handley Green - appropriate mitigation should be applied to ensure that the proposed haul/access road is not harmful. Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood.</p> <p>OS/83 – Bushey Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood.</p> <p>OS/84 – Osbournes Wood - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. CCC remains concerned that suitable buffers can be installed and requests further information and details to clarify the exact location and siting of the pylons with regard to the Wood.</p> <p>OS/85 – Stock Brook - Comments relating to tree removal and tree loss apply. CCC expects suitable replacement to be provided and ecological mitigation to apply. Effects on the watercourse should be mitigated.</p>
LV Landscape and visual		CCC comments	
LV 1.1	The applicant	<p><b>ES Chapter 13, landscape and visual: parameters</b></p> <p>Paragraph 13.4.20 of <a href="#">[APP-226]</a> 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>	CCC welcomes tclarification.
LV 1.4	The applicant	<p><b>ES Chapter 13, landscape and visual: monitoring</b></p> <p>Paragraph 13.8.1 of <a href="#">[APP-226]</a> 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>	<p>Further to the effects of climate change and recent hot summers, CCC is concerned that a timeframe of five years may not be sufficient.</p> <p>In CCC's experience, sometimes older year 4/5 year trees may need to be helped during a dry summer. This is an impact of climate change.</p> <p>CCC considers that regard should be had to the replacement of habitats beyond five years to ensure that habitats continue to survive and become established.</p>

LV 1.14	All local authorities	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?	<p>The Dedham Vale national landscape does not affect the Chelmsford Administrative Area.</p> <p>CCC defers to ECC Place Services regarding any other comments on this matter.</p> <p>Place Services explain that they do not agree. The effect identified at construction on the special qualities of the National Landscape will remain extant at operational phase with permanent physical structures.</p> <p><u>See NPPF:</u></p> <p>15. Conserving and enhancing the natural environment Paragraphs 187 to 201.</p> <p>189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads 66 . The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas</p> <p>190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development 67 other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:</p> <p>(a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</p> <p>(b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and</p> <p>(c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</p> <p><u>Section 85 of the CROW Act</u></p> <p>The s.85 duty to seek to further the purpose of conserving and enhancing the natural beauty of AONBs applies to the full range of development management decision-making, including considering applications for outline, full and reserved matters, listed building consent, applications for works to protected trees, and prior notifications, along with enforcement work on planning breaches.</p>
LV 1.17	Suffolk CC Essex CC	<p><b>National Landscapes - duty to seek to further the purposes report - 3</b></p> <p>The Report <a href="#">[APP-120]</a> 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.</p>	<p>High level mitigation hierarchy has been applied to an extent in accordance with national policy. However, the level of mitigation remains to be agreed and we request the inclusion of proportionate compensation for a NSIP.</p>

LV 1.18	The applicant	<p><b>Mitigation</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>Mitigative planting should not fall into the category of 'additional mitigation' or compensation and is instead required and necessary mitigation.</li> <li>The proposed time length for maintenance and after care for replacement/reinstatement landscaping is inadequate.</li> <li>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.</li> </ul> <p>Respond to such concerns.</p>	CCC awaits the Applicants response.
LV 1.19	The applicant	<p><b>Landscape designations</b></p> <p>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.</p>	CCC awaits the Applicants response.
LV 1.20	The applicant	<p><b>Holford rules</b></p> <p>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'.</p> <p>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?</p>	CCC welcomes clarification.
LV1.22	All local authorities	<p><b>Landscape visualisations – 1</b></p> <p>The local authorities are asked whether:</p> <ul style="list-style-type: none"> <li>You agree with the viewpoints in the visualisations <a href="#">[APP-343]</a> to <a href="#">[APP-349]</a> chosen to reflect any potential impacts on landscape.</li> <li>In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from?</li> </ul>	<p>Information on the acceptability of the viewpoints and the need for additional visualisations has been provided within CCC's LIR (REP1–153)</p> <p>Generally, the viewpoint assessments are welcomed, but there are still considerable gaps in the provision including VRA F9 Edney Common (Longer distance) and VRA F6 Chelmsford North-West (Longer distance) The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRow network in particular.</p> <p>Further visualisations have been requested from locations beyond the 3km study area where appropriate and areas identified within the ZTV.</p>
LV1.23	The applicant	<p><b>Landscape visualisations - 2</b></p> <p>The ExA have concerns over the following landscape visualisations within <a href="#">[APP-343]</a> to <a href="#">[APP-349]</a>. Please provide a response addressing such concerns or submit additional visualisations:</p> <ul style="list-style-type: none"> <li>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?</li> <li>2.09 PRow Dandy Corner. Only wireframe provided when seems to indicate that the pylons would be clearly visible.</li> <li>2.23 Road south of Elm Pollard, west of Wickham Skeith. Viewpoint from underneath pylons of very limited use to show effect landscape.</li> <li>2.40 A1120, Forward Green. Only wireframe provided when seems to indicate that the pylons may be visible.</li> </ul>	CCC welcomes clarification.

		<ul style="list-style-type: none"> <li>• 3.21 Barn Lane, Little Bromley. Query over whether the best available viewpoint. Large hedge/trees and image quite dark.</li> <li>• 4.08 Fordham. Only wireframe provided when seems to indicate that the pylons would be clearly visible.</li> <li>• 4.17 Lodge Lane, Colchester. Only wireframe provided when seems to indicate that the pylons would be clearly visible.</li> <li>• 4.23 Great Tey Road. Only baseline photographs provided, no visualisations.</li> <li>• 5.03 Rivenhall Place, Silver End. Only baseline photographs provided, no visualisations.</li> <li>• 5.10 PRow near Coggeshall Hall. Only baseline photographs provided, no visualisations, appears to be very close to pylons.</li> <li>• 5.15 Essex Way near Troy's Hall. Only baseline photographs provided, no visualisations.</li> <li>• 6.07 A414 south of Writtle. Only wireframe provided when seems to indicate that the pylons may be visible.</li> <li>• 6.09 The Causeway, Edney Common. Viewpoint does not appear very chosen, with large hedge at close quarters.</li> <li>• 6.10 St Peter's Way, east of Milgreen Common. Only wireframe provided when seems to indicate that the pylons may be visible.</li> <li>• 6.20 PRow, Chignal St James. View to south west has hedge/bush at very close quarters.</li> <li>• 7.01 Ingatestone Road, Buttsbury. Location of viewpoint from church parking area not the best siting.</li> <li>• 7.02 Old Church Lane, Mountnessing Hall. Would a viewpoint from a PRow behind the Hall &amp; Church provide a more useful view encompassing heritage assets?</li> <li>• 7.12 Ingatestone Road near White Tyrells. Only wireframe provided when seems to indicate that the pylons would be very clearly visible.</li> </ul>	
--	--	--	--

LV 1.28	The applicant	<p><b>Coordinated masterplans</b></p> <p>In their LIR, Babergh DC, Mid Suffolk DC and Suffolk CC <a href="#">[REP1-178]</a> 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"> <li>• Gipping Valley</li> <li>• Waveney Valley (including Snow Street, Roydon, Roydon Fen and Wortham Ling)</li> <li>• Burstall &amp; Bramford</li> <li>• Ardleigh &amp; Little Bromley</li> <li>• Colne Valley (including Fordham, Ford Street, Aldham)</li> <li>• Great &amp; Little Waltham</li> <li>• Ingatestone &amp; Buttsbury</li> <li>• Hutton/ Mountnessing/ Havering's Grove</li> </ul>	<p>CCC welcome the request for a masterplan to be provided for Great and Little Waltham and ask that it is consulted on this, together with other stakeholders.</p> <p>CCC queries how the masterplan would be enforced / used? Could a requirement be created to ensure that details are submitted to CCC for review and consideration and the works are carried out in accordance with the masterplan /any other variations?</p>
---------	---------------	---	--

<p>LV 1.31</p>	<p>The applicant</p>	<p><b>ES Appendix 13.6 – arboricultural impact assessment - veteran trees</b></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]. 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> <ul style="list-style-type: none"> <li>a) What is the justification for the loss of four veteran trees?</li> <li>b) What is the justification for the impact on 15 veteran trees?</li> <li>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?</li> <li>d) Using the Order limits and LoD, what options are there for retaining these trees?</li> </ul>	<p>CCC welcomes clarification.</p>
<p>LV 1.33</p>	<p>The applicant</p>	<p><b>ES Appendix 13.6 – arboricultural impact assessment – TPOs</b></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>	<p>CCC welcomes clarification.</p>
<p>LV 1.34</p>	<p>The applicant</p> <p>All local authorities</p>	<p><b>ES Appendix 13.6 – arboricultural impact assessment – replacement planting</b></p> <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"> <li>• Applicant - What constraints are there to replanting within the Order limits and under what circumstances may the need for offsite provision be triggered?</li> </ul> <p>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?</p>	<p>CCC together with the other Host Authorities is currently negotiating the terms of the proposed offsite planting with the Applicant with a view to forming a S106 to secure the planting.</p> <p>In principle CCC welcomes the proposed 3:1 replacement tree planting ratio, but acknowledges this is very limited and has several concerns.</p> <p>A fixed ratio of 3:1 is not considered appropriate for all replacement planting and should respond to the specific details of planting lost.</p> <p>Mechanisms need to be set up to deal with specific matters including the loss of veteran trees / ancient woodland, which by definition are irreplaceable. A Veteran Oak would require far greater replacement than a smaller sapling.</p> <p>The replacement is also subject to stock availability in the UK.</p> <p>Consideration should also include Landscape Character and ecological habitat creation.</p> <p>In the event that off site planting is proposed and new sites are required, CCC queries whether monies would be provided for the funding of the purchase of offsite locations for the siting of trees? There are constraints with land ownership, appropriate location and long-term retention and management.</p>

			Monitoring programmes such as those undertaken for Minerals and Waste sites <i>could</i> secure this but difficult to manage.
--	--	--	---

<b>NV Noise and vibration</b>	<b>CCC comments</b>
-------------------------------	---------------------

NV 1.4	The applicant	<p><b>Noise general/ precision - 2</b></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 <a href="https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-001656-Braintree-District-Council.pdf">[REP1]</a> suggests a more precautionary, enforceable framework should be secured within in the draft DCO, including: 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> <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>	CCC welcomes the measures proposed by Braintree District Council.
NV 1.5	The applicant Relevant local authorities	<p><b>Use of use of triple Araucaria conductors or alternative technology</b></p> <p>Throughout ES Chapter 14 <a href="#">[APP-256]</a> 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>	<p>CCC would welcome clarification of this matter. should there be a need for alternatives to the use of triple Araucaria conductors, there should be certainty that the alternative is of the same or better in relation to noise levels.</p> <p>It is unclear how the triple Araucaria conductors compare to the low noise conductor systems? Are noise levels within a low height conductor system lower than those used within a triple Araucaria system?</p> <p>In the event that pylons TB140 – TB142 are increased in height to standard lattice height pylons, or any other type of pylon, CCC consider the lowest noise generating conductor system should be used.</p> <p>CCC propose that details of the conductor system are submitted to CCC by requirement prior to first use.</p> <p>Great Waltham and Little Waltham – Pylons TB140 – 142 (inclusive)</p> <p>1) No phase of the construction works to pylons TB140 – TB142 (inclusive) may commence until details of—</p> <p>(a) the design, specific and acoustic attenuation of the conductor system relating to those pylons</p> <p>have been submitted and approved by the relevant planning authority for that phase.</p> <p>2) The details submitted must accord with the outline design principles</p>

			<p>3) The works must be carried out in accordance with the approved details including those set out in the approved construction environmental management plan.</p> <p>4) For the purposes of sub-paragraph (1), “commence” includes remedial works in respect of any contamination or other adverse ground conditions and site clearance involving vegetation removal.</p>
NV 1.7	The applicant Relevant local authorities	<p><b>Compaction activities and potential for damage due to construction vibration</b></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> <p>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.</p>	No comments. None of the affected buildings / structures listed are within the CCC administrative area.
NV 1.13	The applicant All local authorities	<p><b>EACN and Tilbury North Substations operational noise assessment</b></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 a 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>	This is not applicable to CCC as the substations are not located within its administrative area.

ExQ1	Question to:	Question:	CCC comments
PRoW	Public Rights of Way		CCC comments

PRoW 1.8	The applicant	<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>	Please note typo in Pleshey.
----------	---------------	--	------------------------------

SS Safety and security		CCC comments	
SS 1.5	Norfolk Constabulary Suffolk Constabulary Essex Police East of England Ambulance Service NHS Trust	<p><b>Emergency services – legal agreement justification</b></p> <p>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).</p> <p>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.</p>	CCC raises no objection to an appropriately justified planning obligation for support for Emergency Services.

SET Socio-economics, tourism and recreation		CCC comments	
SET 1.3	The applicant	<p><b>Key parameters for assessment and assumptions</b></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>	CCC remains concerned that there is insufficient hotel accommodation within the Chelmsford administrative area, particularly when accounting for the cumulative effects of the development with other proposals.
SET 1.5	The applicant Relevant local authorities	<p><b>Mitigation measures - 2</b></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>	<p>CCC considers a definition of the term should be provided.</p> <p>An alternative form of wording could be “where reasonable”, with a definition of what constitutes reasonable being appended to the DCO, or when relating to specific details, within the relevant documents containing details of the proposed mitigation.</p>

SET 1.14	The applicant Essex CC ARU Writtle Anglia Ruskin University Writtle College Ltd All other Interested Parties	<p><b>Concerns of ARU Writtle, Anglia Ruskin University and Writtle College Limited</b></p> <p>At Deadline 1 ARU Writtle, Anglia Ruskin University and Writtle College Limited <a href="#">[REP1-200]</a> 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.</p> <p>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.</p>	<p>CCC has met with ARU Writtle and the Applicant to discuss this matter and acknowledges ARU's concerns.</p> <p>CCC ask that ARU's detailed concerns regarding safeguarding and collision risks are taken in to account.</p> <p>CCC suggests that specialist advice is obtained separately from the relevant regulatory bodies with regard to the acceptability of accessing the site through College grounds.</p> <p>To avoid such conflicts, CCC suggests that an alternative route be found within the locality.</p> <p>Should no route be found, further requirement and clarify is needed on the level and the nature of the use of the access through the College. It would helpful if this was provided by the Applicant during the examination.</p> <p>In the event that details are not forthcoming, CCC recommends that a requirement relating to the operation and use of the access through the College is submitted to and approved in writing by the LPA in consultation with the highway authority. These arrangements should be shared with ARU Writtle prior to submission of the requirement.</p>
SET 1.14	The applicant	<p><b>Concerns of the Essex International Scouts and Guides Jamboree</b></p> <p>The ExA notes the draft SoCG related to the Essex International Jamboree <a href="#">[REP1-078]</a> and the submissions made by Essex Scouts and Guides <a href="#">[RR-1089]</a>, <a href="#">[REP1-233]</a>, <a href="#">[REP1-234]</a> and <a href="#">[REP2-045]</a>. 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."</p> <p>The ExA is concerned with these allegations, especially the allegations: i) National Grid has failed to substantively addressed 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>	<p>CCC welcomes the ExA's note of this matter and welcomes its attempt to seek clarification</p>

<b>TT Traffic and transport</b>	<b>CCC comments</b>
---------------------------------	---------------------

TT 1.19	The applicant	<p><b>Cumulative impacts</b></p> <p>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.</p>	<p>CCC awaits the Applicants response.</p>
TT 1.29	The applicant	<p><b>Walking, cycling and horse-riding - 2</b></p> <p>In their RRs <a href="#">[RR-1190]</a>; <a href="#">[RR-1205]</a>; and <a href="#">[RR-1189]</a> 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</p>	<p>CCC would welcome a strategy being created for the school and other locations as appropriate. CCC would recommend that the Applicant consults Chelmer Valley High School on this.</p>

