

Question Reference	Question	South Norfolk District Council Response
GEN1.3	<p>National and local planning policy compliance tracker</p> <p>Since the policy compliance document submitted with the application [APP-086] was produced (1 April 2025) a number of local and national planning policies have been updated or newly issued. This includes the energy suite of National Policy Statements (NPS) EN-1, EN-3 and EN-5 (Updated National Policy Statements). The transition provisions set out in section 1.6 of NPS EN-1 (December 2025) apply to the application as it was accepted prior to publication of the revised policy. The updated NPS are capable of being important and relevant considerations in the decision-making process.</p> <p>The applicant submitted a policy compliance tracker [REP1-133] at deadline 1. It includes an assessment of the updated NPS alongside those which are designated, and a number of new insertions including the consultation draft National Planning Policy Framework (NPPF), local plan policies and neighbourhood plan policies.</p> <p>The listed relevant planning authorities and Parish Councils (PC) who have a newly adopted or emerging local plan and neighbourhood plan are invited to confirm that the policy compliance tracker is an accurate</p>	<p>The Greater Norwich Growth Board updated the GI strategy on 11 March 2025 which includes a Web App GNGI web app.</p> <p>The Norfolk Local Nature Recovery Strategy was published on 31st October 2025 along with the Norfolk Local Habitat Map. Both documents should be used to inform strategic habitat enhancements and creation (relates to B201 in the oCOCP).</p>

	<p>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>	
GEN1.4	<p>Development plan documents and supplementary planning documents</p> <p>All local authorities are asked to review the listed development plan documents (DPD) and supplementary planning documents (SPD) (including masterplans) as currently set out in the planning statement [APP-085] (paragraph 2.5.12) and provide any updates, setting out which have been adopted, updated, or are emerging since production of the planning statement.</p>	<p>SNDC note that the Newton Flotman Neighbourhood Plan was adopted 27th October 2025 and request that the South Norfolk Landscape Susceptibility in relation to Energy Generation, Storage, and Transmission SPD which was adopted in February 2026 be added to the list of adopted documents.</p>
GEN1.5	<p>Local government reorganisation</p> <p>Local elections are to take place in a number of the host local authorities on 7 May 2026, and many will be undergoing local government reorganisation and/ or devolution.</p> <p>The listed local authorities are asked to set out:</p> <p>a) any implications for their continuing involvement in the examination and how a consistent approach to their responses can be assured</p>	<p>On Wednesday 25th March 2026 it was announced that the preferred option for the unitary authorities in Norfolk was three new Unitary Councils, Greater Norwich, East Norfolk, and West Norfolk.</p> <p>Norwich to Tilbury is currently within the South Norfolk District Council and the Norfolk County Council however upon establishment of the new unitary authorities in 2028, this will be within the 'East Norfolk' authority.</p>

		<p>SNDC provide this comment solely for additional information and does not prejudice any points raised in Norfolk County Council's response.</p>
<p>GEN1.6</p>	<p>Critical national priority</p> <p>The planning statement [APP-085] references the need for the proposed development in the context of the urgent need for renewable energy generation within the UK, and in doing so, it refers to the presumption specifically in relation to critical national priority (CNP) infrastructure. Paragraph 4.2.7 of NPS EN-1 (2023) makes it clear that the CNP policy does not create an additional or cumulative need case or weighting for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. It will be given consideration by the ExA when making its recommendation to the Secretary of State, who will apply the CNP policy in its decision making specifically in reference to any residual impacts that have been identified.</p> <p>NPS EN-1 paragraph 4.1.7 notes that for projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. Paragraphs 7.2.7 to 7.2.28 of the</p>	<p>CWS 2348 Meadow Wood Nature Reserve</p> <ul style="list-style-type: none"> • The Planning Statement APP-085 refers to the Ancient Woodland and Veteran Tree Strategy. This strategy needs updating to reflect the recent designation of land adjacent to CWS 2072 Brick Kiln Lane, Bunwell Hill, as CWS 2348 Meadow Wood Nature Reserve which is likely ancient wood pasture. It was designated as a CWS in March 2026. The impact on irreplaceable habitat is significant. • It is acknowledged that the design has sought to avoid irreplaceable habitats (and SSSIs) but following the identification of potentially ancient wood pasture at the newly designated CWS 2348 Meadow Wood Nature Reserve the order limits of the DCO should now be re-visited and every effort made to avoid impacts (from the new OHL and undergrounding of the existing OHL) on the irreplaceable habitat now it has been identified. • It is requested that in the first instance consideration is given to undergrounding the OHL or amending the DCO corridor to avoid impacts. • Options proposed in section 4.4. of EN020027-000295-5.15 Design Development Report.pdf need to be re-visited and visualisations provided (based on topographical surveys and arboricultural

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.

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.

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)

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,

input) demonstrating how the design will avoid and minimise impacts.

- Undergrounding to the existing OHL also needs to be refined to avoid significant impacts to VG404.

Bespoke Mitigation

- NG proposal for additional and bespoke mitigation measures set out in 7.4 Outline Landscape and Ecological Management Plan Appendix B- Ancient Woodland and Veteran Tree Strategy are outline and subject to collaboration with the landowners which provides a high degree of uncertainty due to the exact details being brought forward at the Discharge of Requirement stage. It would be necessary for NG to review mitigation provided for the loss of veteran trees for other NSIPS and quantify what their proposal is.
- NG are also committed to maintain and monitor compensation for a minimum of 30 years however the 30-year period is not considered to be sufficient given the nature of the irreplaceable habitat, and therefore, NG should be responsible for maintenance/management of compensatory habitat for the lifespan of the proposal.

Surveys

- The arboricultural surveys are not complete so further veteran trees, and possibly ancient trees are likely within the order limits, and need to be considered in the [Ancient Woodland and Veteran Tree Strategy](#).

	<p>sites of special scientific interest, nationally designated landscapes and heritage assets, as well as the HRA.</p>	<ul style="list-style-type: none"> • We are concerned that pre-commencement works can commence without the completion of arboricultural surveys or submission of an AMS and TPP to the LPA for approval. There is also no mechanism for securing compensatory planting or net gains for land affected by pre-commencement works. <p>EN020027-000201-7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy.pdf</p> <ul style="list-style-type: none"> • The strategy needs to consider each veteran tree individually (not group them together). Ancient trees also need considering if they are found because of further arboricultural surveys. • Any Impacts on irreplaceable habitat is unacceptable – the red line needs moving or horizontal directional drilling utilized. <p>Pre-commencement works</p> <ul style="list-style-type: none"> • While the Ancient Woodland and Veteran Tree Strategy will be discharged through Requirement 4 it does not apply to pre-commencement works. It is requested that an Ancient Woodland and Veteran Tree Strategy is provided which covers pre-commencement works and that • mechanisms are in place to ensure that arboricultural surveys are completed prior to the detailed design for the pre-commencement works, and that an AMS and TPP for the pre-
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		commencement works are prepared and submitted to the LPA for approval.
GEN1.11	<p>Norwich Main substation (Work No.1)</p> <p>The ExA noted on Unaccompanied Site Inspection (USI) 1 [EV1-002] that construction works relating to the extension of Norwich Main substation are well advanced.</p> <p>It is unclear where Work No.1 (b) to (e) are proposed within the existing substation and their illustrative design is not provided as it is for all other substations on the 'Design and layout plans subs and cables' [APP-041].</p> <p>The applicant is asked to clarify:</p> <ul style="list-style-type: none"> a) Have any of the proposed works listed under Work No.1 already taken place? b) Explain what current works are completed, under construction and are yet to be implemented at and around Norwich Main (South Norfolk Council and Norfolk CC are also invited to comment). <p>Clarify whether there will be any overlap with the completion of the construction of Hornsea 3 offshore wind farm grid connection and associated works including mitigation areas.</p>	<p>This question is aimed at the applicant. We could be helpful and say that the extension works to Norwich Main were granted under a TCPA Application reference (2024/1336) and SNDC can confirm that works have commenced.</p> <p>Current Schemes at Norwich Main can be seen in Appendix C of SNDC's LIR.</p>
GEN1.16	<p>Local impact reports (LIR) – navigation</p> <p>Colchester City Council [REP1-156] and South Norfolk DC [REP1-176] are asked to provide a contents page for their LIRs, for easier</p>	Sent via Email to PINS Case Officer.

	<p>navigation. This should include electronic page numbers against each section of the report and the list of appendices with corresponding page numbers.</p> <p>Suffolk CC/ Babergh DC/ Mid Suffolk DC are asked to insert page numbers against their list of annexes and appendices on pages 5 and 6 of their LIR [REP1-178].</p>	
<p>GEN1.17</p>	<p>Local impact reports – cumulative developments and the interrelationship report</p> <p>The LIRs from each local authority include details of other developments in their area to varying degrees of detail.</p> <p>Each local authority is asked to review ES chapter 17 (cumulative effects) appendix 17.2 (long list and short list of other developments) [APP-283] and figure 17.2 [APP-286], and confirm if the details provided by the applicant are accurate. Only those developments rated green in tables A17.2.2 to A17.2.14 (short listed developments) need to be checked.</p> <ul style="list-style-type: none"> All local authorities are asked to provide an update where relevant, which should include the current status of the application (whether and when consent has been granted and implemented). If any other major developments in your local authority area are not included, please provide details including planning reference, 	<p>SNDC advise that item DCO11 in Table A17.2.1 of document APP-283 is now at DCO pre-examination stage rather than pre-application.</p> <p>SNDC have the below updates to items already included in Table A17.2.1 of document APP-283.</p> <p>Item SN2 has been approved Item SN21 has been approved Item SN24 has been approved Item SN25 has been approved Item SN26 has been approved Item SN28 has been approved Item SN30 has incorrect application reference, should be 2024/3816 and this has been approved Item SN33 has been approved Item SN47 has been approved and is within the order limits.</p> <p>SNDC advise that the below applications have not been included and request that these are added to Table A17.2.1 of document APP-283.</p> <p>2021/1034: Land West of Ipswich Road, Keswick</p>

	<p>description, location, relevant dates, and current status (or development plan allocation details).</p> <p>Additionally a report on interrelationship with other infrastructure projects was submitted by the applicant at deadline 1 [REP1-134].</p> <p>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.</p>	<p>Reserved matters for the details of appearance, layout, scale and landscaping of the second phase (Phase 2) of the development comprising the construction of Units 5-7 (Use Classes B2/B8) and ancillary development of the scheme granted outline consent under application reference 2017/2794. In addition, discharge of Condition 8 (Units 5-7 only), Condition 9 (Units 5-7 only) and Condition 23 (Units 5-7 only) of the outline planning permission. Approved with Conditions</p> <p>2021/1035: Land West of Ipswich Road, Keswick Reserved matters for the details of appearance, layout, scale and landscaping of the third phase (Phase 3) of the development comprising the construction of Unit 2 - builders merchant (Use Class B8 plus ancillary trade counter) and associated development of the scheme granted outline consent under application reference 2017/2794. In addition, discharge of Condition 8 (Unit 2 only), Condition 9 (Unit 2 only) and Condition 23 (Unit 2 only) of the outline planning permission. Approved with Conditions</p> <p>2021/1036: Land West of Ipswich Road, Keswick Reserved matters for the details of appearance, layout, scale and landscaping of the fourth phase (Phase 4) of the development comprising the construction of Units 8-10 (Use Classes B2/B8) and associated development of the scheme granted outline consent under application reference 2017/2794. In addition, discharge of Condition 8 (Units 8-10 only), Condition 9 (Units 8-10 only) and Condition 23 (Units 8-10 only) of the outline planning permission. Approved with Conditions</p>
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		<p>Condition 23 (Units 15-20 only) of the outline planning permission. Pending Consideration</p> <p>2022/1344: Land East of Vincés Road, Diss Residential development with associated access, landscaping, surface water attenuation and parking. Approved with Conditions</p> <p>2022/1975: Land South of Rowden Way, Roydon Residential development with associated access and parking. Approved with Conditions</p> <p>2022/1976: Land West of Denmark Lane, Roydon Residential development with associated access, parking, landscaping and associated infrastructure. Approved with Conditions</p> <p>2022/2350: Ipswich Road, Dunston Installation of underground electrical connection and communication cables between Bloy's Grove Solar Farm and Norwich Main Substation, with Temporary Construction Compound and associated infrastructure. Application is accompanied by an environmental statement. Approved with Conditions</p> <p>2023/3574: Electricity Substation Park Road, Diss Installation of a solar farm comprising ground mounted solar panels; access tracks; string inverters; transformers; electrical connection compound; storage containers; underground cables and conduits; perimeter fence; temporary construction compound; and associated</p>
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		<p>infrastructure and planting scheme (part of cabling in South Norfolk District only). Approved with Conditions</p> <p>2024/1245: Phase 1 and West of A140, Norwich Road, Long Stratton Variation of condition 7 of 2018/0112 - amendments to house types and corresponding changes to layout and landscaping (phase 1 only). Approved with Conditions</p> <p>2024/1734: Land East of Main Road, Swardeston Variation of conditions of permission 2022/0867 (Construction and operation of Energy Balancing Infrastructure (EBI) comprising energy storage technology, to form up to two areas of modular or containerised structures. To include containerised or modular battery array, transformers and inverter area, switchgear and control room building(s), connection of EBI plant to the Hornsea Three Onshore Converter Station (ONCS), required access and internal roads, drainage systems, perimeter and internal fences, and required external lighting and lightning pylons. Development is located within the Hornsea Three ONCS area as consented by the Hornsea Project Three Offshore Wind Farm Development Consent Order (DCO) in December 2020. The application is accompanied by an environmental statement.)- Condition 2 - Approved Plans, Condition 4 - Construction Traffic Management Plan, Condition 6 - Drainage Strategy, Condition 7 - Code of Construction Practice, Condition 9 - Soft Landscape works, Condition 10 - Ecological Mitigation, Condition 11 - Tree Protection. Pending Consideration</p>
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		<p>Arboricultural Impact Assessment, (13) Archaeology & (15) FRA & SWDS. Pending Consideration</p> <p>2025/1150: Land North of Church Road, Aslacton Outline planning application with all matters reserved (except access) for the erection of up to 36 dwellings, including amenity space, landscaping and all associated infrastructure. Development Management Committee authorised approval subject to S106 and Nutrient Neutrality resolution.</p> <p>2025/1152: Land North of Hill Farm, Wacton Road, Fornsett St Peter The installation of a Battery Energy Storage System (BESS) including associated infrastructure and landscaping. Pending Consideration</p> <p>2025/1543: Park Road, Diss Erection of 3 storey, 66 bed care home for older people with associated landscaping, car parking and access. Pending Consideration</p> <p>2025/1689: Land North of the junction of Market Lane and Carr Lane, Great Moulton Erection of a Battery Energy Storage System (BESS) and associated infrastructure including access, drainage, landscaping and other incidental works. Pending Consideration</p> <p>2025/2275: Land East of Mulbarton Road, Keswick Construction and operation of a Battery Energy Storage System (BESS) and associated infrastructure including</p>
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		<p>battery container units, medium voltage stations, 400/132/33kV substation, 2 No. 33kV customer substation, DNO control room, storage and welfare containers, fire water pumphouse, water storage tank, CCTV cameras, fencing, security gates, access tracks, landscaping and attenuation pond. Pending Consideration</p> <p>2025/2789: Land East of Norwich Road, Tacolneston 15 No. residential dwellings with access road, open space, landscaping, drainage basin and other associated infrastructure. Pending Consideration</p> <p>2025/2930: Land off St Mary's Road, Long Stratton Development of 45 affordable residential dwellings together with associated public open space, landscaping, highways and engineering works. Pending Consideration</p> <p>2025/2952: Roadside Nurseries, Main Road, Swardston Demolition of former nursery buildings and application for full planning permission for the erection of 30 No. dwellings and associated infrastructure. Pending Consideration</p> <p>2025/3957: Land South of Swan Lane, Tharston Outline application (with all matters reserved except for vehicular access) for the construction of up to 103 dwellings together with new vehicular accesses, parking, public open space, play space, attenuation basins and enhanced landscaping. Pending Consideration</p>
GEN1.21	<p>Legal Agreements A number of the LIRs refer to the need for legal</p>	<p>In APP 323 Document: 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient</p>

	<p>agreements in order to secure a range of mitigation and compensation measures and packages in each local authority area.</p> <p>The applicant is asked to:</p> <ul style="list-style-type: none"> 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. b) Justify its intended use of unilateral undertakings in the instances where a bilateral (section 106) agreement would be preferable. 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. <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>Woodland and Veteran Tree Strategy Table 5.1 provides a list of compensation measures which includes provision for monitoring. Areas of new planting (compensation for impacts on irreplaceable habitat) will need securing via a S106 in perpetuity. Any monitoring reports relating to irreplaceable habitat should be secured via the DCO or the S106.</p> <p>To date, draft Heads of Terms have been provided by National Grid for BNG and Replacement Planting however nothing further has been submitted. To date, we have not received a draft S106 from National Grid for negotiation and agreement.</p>
DES1.9	<p>Lighting of new and upgraded substations</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</p>	<p>Not applicable to SNDC as there are no EACN substations proposed in the district.</p>

	<p>substations in the Design Approach for Site Specific Infrastructure (DASSI) [APP-354].</p> <ul style="list-style-type: none"> • Provide additional detail in terms of the height and type of any lighting installations and light contour plans. • Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity, and potential effects on ecology. If the applicant considers that an assessment is not required, provide a detailed explanation of your reasoning. <p>Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not? Affected Local Authorities may also like to comment.</p>	
DES1.14	<p>Effectiveness of mitigation - Norwich</p> <p>Are the relevant local authorities (South Norfolk DC and Norfolk CC) satisfied that the applicant's approach to mitigating the adverse effects of the Norwich Main substation extension in the wider landscape would be effective. If not, what further design opportunities should the applicant explore in order to achieve the best possible design outcome?</p> <p>In responding to this question, you may also wish to consider other matters that could potentially influence design. Other IPs are also</p>	<p>SNDC notes that the Norwich Main Substation extension already benefits from standalone planning permission under the Town and Country Planning Act (ref: 2024/1336) and therefore does not form part of the development proposed for consent within this DCO. As such, opportunities to revisit or modify the design, layout, or landscape mitigation for this element are inherently limited and considered fall outside the scope of the Examination.</p> <p>SNDC does note that the land surrounding Norwich Main is currently proposed for BNG mitigation for other consented schemes and remain concerned that land within the Environmental Area around Norwich Main</p>

	<p>invited to respond to this question, if they wish to contribute to this topic.</p>	<p>substation will be subject to future development pressures. No provision has been made to facilitate future connections within the landscaping plan so we foresee land upon which NG hope to deliver part of their BNG commitment being subject to ongoing disturbance which will compromise the quality of the habitats provided and make enforcement difficult. It is suggested that habitats within this area are not counted as part of the BNG commitment.</p>
<p>ALT1.1</p>	<p>Reasonable alternatives: policy and legislation</p> <p>The local authorities are invited to comment on their understanding of 'reasonable alternatives' in the context of NPS EN-1 paragraphs 4.3.22 to 4.3.19, and Regulation 14(2)(d) and paragraph 2 of schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). The local authorities are also requested to comment on paragraph 3.2.32 of ES chapter 3: 'Where options assessed do not meet the definition of 'reasonable alternatives' (such as certain offshore cable options that conflict with NPS policy preferences), these are included to address specific scoping requirements under Regulation 14(3) rather than as reasonable alternatives under Regulation 14(2)(d)'.</p> <p>The local authorities are asked, where they have suggested alternatives, if they would meet the definition of reasonable alternatives in the</p>	<p>SNDC have no comments to make.</p>

	<p>context of the policy and the EIA Regulations. Other IPs are also invited to comment on their understanding of reasonable alternatives, if they wish to do so.</p>	
ALT1.2	<p>Approach to options appraisal The local authorities are invited to review section 3.3 of ES chapter 3 [APP-127] and appendices 3.1 [APP-128] and 3.2 [APP-129] in respect of the applicant's approach to options appraisal, including the hierarchical assessment. They should provide comments where they disagree with any part of the approach (not the individual options considered; the approach only). This could form part of the SoCG.</p>	SNDC have no comments to make.
ALT1.3	<p>Strategic options: Offshore 1 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. Could the local authorities please clarify if they have reviewed the strategic options appraisal and the 2025 updates to the Strategic Options Backcheck and Review (SOBR) (including Appendix B: 2024 version, section 14) [APP-355] in relation to 'Offshore 1'. The ExA is aware of the local authorities' assessment of cost and timing as set out in the Hiorns Report as appended to the RR from Norfolk CC [RR-2753]. However the ExA seeks the views of local authorities in relation to the constraints</p>	SNDC have no comments to make.

	<p>(environmental, social and technical) which may affect the delivery of this option as set out in the SOBR (as set out in section 14 and summarised in table 15.2 of the SOBR). An update to this is provided in section 6 of the August 2025 SOBR [APP-355].</p> <p>Other IPs are also invited to provide comment should they wish to do so.</p> <p>In doing so, could the local authorities and any other IPs provide any additional comments they may have in relation to the applicant's reasoning for discounting Offshore 1 as a reasonable alternative.</p> <p>The applicant is asked to provide an update on the constraints noted in section 6 of the SOBR since August 2025 relating to Offshore 1 and connection at Tilbury.</p>	
ALT1.7	<p>Waveney Valley alternative</p> <p>Reasonable alternatives considered in ES chapter 3 [APP-127] as part of the 2024 (table 3.16 p.89-90) and 2025 (table 3.17 p.106) preferred draft alignments set out the applicant's reasoning for rejection of the use of an underground cable through the Waveney Valley instead of an OHL and pylons. This includes the presence of sensitive peat habitats and paleoenvironmental remains, and hydrological impacts on Wortham Ling SSSI.</p> <ul style="list-style-type: none"> • The local authorities are asked to provide comment, as these issues do 	<p>SNDC accepts the Applicant's reasoning for the rejection of the Waveney Valley Alternative (undergrounding the powerline through this sensitive valley), as noted in 6.3 ES Chapter 3 - Alternatives [APP-127]. The technical challenges of delivering undergrounding through the Waveney Valley, in particular because of the complex and difficult geology proved incompatible with the use of horizontal directional drilling, this has meant that this option could not, according to the Applicant, be delivered. SNDC therefore have no further comment to make.</p>

	<p>not appear to have been covered in their LIRs.</p> <ul style="list-style-type: none"> Natural England is asked to comment on the applicant's ecological considerations in its reasoning for rejection of the Waveney Valley (underground) alternative as set out in ES chapter 3. This should include comment on whether potential effects on peaty soils would constitute irreplaceable habitat loss. <p>The applicant is asked to signpost the ExA to any pre-application consultation responses on such matters which led to its rejection of the Waveney Valley alternative.</p>	
ALT1.9	<p>Limits of Deviation (LoD)</p> <p>A number of the local authorities' LIRs refer to the limits of deviation and the potential for the OHLs and pylons to move closer to sensitive receptors and listed buildings.</p> <p>Paragraph 3.2.28 of ES chapter 3 [APP-127] refers to the limits of deviation, noting that they retain flexibility to allow for necessary adjustment during detailed design and construction phases. It is stated that minor variations in specific pylon positioning or precise alignment within these limits are not treated as separate alternatives, as the assessment</p>	SNDC have no comment to make.

	<p>considers a worst-case scenario within the established parameters. The local authorities are invited to comment on this paragraph.</p>	
AQ1.4	<p>Air Quality - Development Plan documents and adopted standards/ expectations related to air quality that exceed Government targets? 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>	<p>Not applicable to SNDC as there is no specific policy in the local development management plans regarding air quality.</p>
BIO1.2	<p>Impacts on Roydon Fen County Wildlife Site (CWS) In your LIR [REP1-176] you have stated that alternatives/ avoidance measures at Roydon Fen CWS have not been sufficiently explored. Since the order limits for the proposed development appear to be just beyond the western boundary of this CWS, explain what avoidance measures should be undertaken.</p>	<p>National Grid have since amended the order limits to avoid Roydon Fen CWS.</p>
HRA1.1	<p>Norfolk Valley Fens Special Area of Conservation (SAC) and Flordon Common</p>	<p>Paragraphs 9.5, 9.6, and 9.7 of [RR-3417] raises concerns about indirect impacts due to the proximity of the proposed works to the watercourse – risk include</p>

	<p>SSSI In [RR-3417] you have made reference to direct impacts on Norfolk Valley Fens SAC (and Flordon Common SSSI). Explain what you consider the direct impacts would be and how they would arise.</p>	<p>pollution, changes in ground water or deposition of dust (see 6.17 REP2 -015 Outline code of Construction Practice notes there is potential to discharge surface water to watercourses and abstract water which could impact the SSSI. Mitigation measures are listed in Table 6.1 of the oCOCP but these are secured via Requirement 4.</p> <p>There is no mechanism to secure mitigation for pre-commencement works. We refer to our earlier comments on lack of control of pre-commencement works of Appendix D, Paragraph 3.2.1 of SNDC's LIR.</p>
DCO1.A2	<p>Articles (general) - 2 Throughout the articles contained in the draft DCO [APP-056] the applicant has specified time periods within which a response is required from a determining body. That time period tends to be 28 days. A number of the local authorities have raised concerns in regard to the time period specified, but there does not appear to be a consensus as to an appropriate alternative time period. The ExA is also concerned as to such a short period being imposed, especially where a deemed consent is triggered where a determining body has failed to respond in the period specified. Applicant: Explain how you have reached the time period chosen (generally 28 days), including an explanation of your understanding of any processes the relevant</p>	<p>Receipt and Validation of Discharge of Requirement Application (SNDC have a service standard of 3 working days target for validation of its applications).</p> <p>Formal Consultation with statutory, technical consultees and other bodies as set out in the Requirement are sent once the application has been made valid. This is for 30 days in line with EIA development however, the Council frequently gets requests from external statutory, technical consultees for additional time to provide a formal response.</p> <p>Case Officer to assess, review consultee responses, and prepare and issue formal decision notice (as SNDC have delegated powers which enable us to do this without the need for Committee approval). This would be a minimum of 5 working days following the expiry of the consultation period should there be no objections from the consultees.</p>

	<p>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>In order to accommodate this, SNDC refer you to our Relevant Representation with our request for a minimum of 56 days.</p>
DCO1.A7	<p>Article 2 (Interpretation) (order land) The definition of 'Order land' is not sufficiently clear to ensure that land not required/ intended to be subject to CA or TP is appropriately excluded from articles pursuant to CA (articles 24 and 25) and TP (articles 27, 28 and 29). The consequence of the definition being unclear could result in allowing for the acquisition or temporary use of such land unintentionally. Should 'Class 8' (Uncoloured (White) Land), as set out in the SoR [APP-059] at Table 5.1 (Powers related to land acquisition and use</p>	<p>Any ambiguity in the definition of "Order land" increases the risk that land within South Norfolk beyond what is genuinely necessary for the project could be unintentionally affected by CA/TP powers. Therefore, the definition of "Order land" should be tightened.</p>

	<p>being sought by the Project) be specifically defined and excluded in these articles or through the definition of 'Order land'?</p>	
DCO1.A10	<p>Article 2 (Interpretation) (Relevant Planning Authority) Norfolk CC in its RR [RR-2753] and its LIR [REP1-173], as well as a number of other local authorities have raised concern over the definition of 'Relevant Planning Authority'. As the proposed development is a long linear scheme there will be multiple authorities involved. A number of requirements proposed use the phrase 'No stage of the authorised development may be commenced until... has been submitted to and approved by the relevant planning authority'. The ExA seeks greater clarity from both the applicant and all local authorities on the following:</p> <ul style="list-style-type: none"> a) What constitutes a 'stage' of the authorised development. The ExA in asking this question notes the 'Works' are defined in schedule 1 and the proposed development has been divided into Sections A to H, covering a geographical split. It also notes image 4.1 of [APP-130] provides an indicative construction programme for the various sub-elements and there are different stages of the proposed development (the definition of have construction, operation and (potentially) decommissioning). Would 	<p>SNDC make the following comments:</p> <ul style="list-style-type: none"> a) SNDC have no comments to make on the stages of the development proposed. b) In our experience, the discharge of the requirements are submitted to the Local Planning Authority and to date this has not caused an issue. c) SNDC have no comments to make on a requirement for the submission of a stages plan.

	<p>these adequately cover the definition of a 'stage'?</p> <p>b) Which local authorities would be the relevant planning authorities for a particular stage, bearing in mind the length and size of the proposed development at that stage? For example what happens if more than one authority (such as a County Council and a Local Authority) is involved in discharging a requirement/ plan/ scheme for a particular stage and they disagree that the submission is adequate to allow for the development to commence?</p> <p>c) Consider a requirement for a 'stages plan' to be submitted in writing prior to commencement, for the written approval of the relevant determining body (similar to the provisions set out on the Brechfa Forest Connection Project DCO, the Brechfa Forest West Wind Farm DCO and the Richborough connection Project DCO), to approve the staging plan prior to commencement of works.</p> <p>The ExA invites suggestions as to any alternative wording and/ or solutions that would address the ExA's concerns in regard to the above-mentioned matters.</p>	
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DCO1.A16	<p>Article 5 (Limits of deviation) - 2</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) [APP-057] suggests the change will be known following consultation feedback and engagement with statutory stakeholders. Please provide an indication of when that consultation and engagement concludes and when a decision on these pylons being low height or standard height pylons will be finalised.</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>	Not applicable to SNDC as the referenced pylons are not in South Norfolk.
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DCO1.A19	<p>Article 11 (Street Works); Article 12 (Application of the Permit Schemes); Article 13 (Application of the 1991 Act)</p> <p>The ExA notes the explanation provided by the applicant in its EM [APP-057] with regard to these articles but seeks whether the relevant Street/ Highway Authorities and/ or any statutory undertakers have any further comments, as relevant to these articles beyond the submissions in their RRs, WRs, LIRs and Deadline 1 submissions. In responding to this question, a relevant street/ highways authority or statutory undertaker should list any relevant examination library reference and paragraph numbering of their former submissions that responded to these articles.</p>	<p>Not applicable to SNDC as at the present point in time this would fall under Norfolk County Council in their capacity as Local Highway Authority.</p>
DCO1.A35	<p>Article 48 (Defence to proceedings in respect of statutory nuisance)</p> <p>The DASSI [APP-354] is noted, however, the ExA is concerned with regard to this article in the absence of any finalised design of the proposed substations, especially in the light of ES chapter 14 (noise and vibration). The ExA seeks certainty that the resultant noise impacts arising from the substations will be adequately mitigated within the design of those substations. Explain how that certainty can be provided in the absence of any finalised design of the substations. All local authorities are also invited to provide their views in relation to article 48.</p>	<p>SNDC's Response to Article 48:</p> <p>1, a, i – If the works is being undertaken in accordance with the conditions set down in a Section 60 or Section 61 then the no enforcement actions could be pursued as there would be a defence under the Control Of Pollution Act 1974. This means that it is imperative that the conditions fully address this issue at this stage.</p> <p>1, a, ii – This is not acceptable as the noise levels are modelled and do not accurately represent the real-world noise impact. As such a mechanism needs to be in place whereby the LA can have some authority over the development to ensure that additional mitigation measures can be required if the actual noise environment proves different from that modelled. As a general rule, a LA would not prosecute if the developer was actively</p>

		<p>working with them to reduce the noise impact that their activities are producing.</p> <p>1, a, iii – This is covered by the Best Practical Means defence within the Control of Pollution Act 1974 - where as long as the developer is doing everything, they can, using the techniques which would cause the least impact then prosecution would not be sought.</p> <p>1, a, iv – This is covered by the Best Practical Means defence within the Control of Pollution Act 1974 - where as long as the developer is doing everything, they can, using the techniques which would cause the least impact then prosecution would not be sought.</p> <p>1, b, i & ii – These conditions have the propensity to cause a statutory nuisance which cannot be resolved. The proposed noise levels which will be in the CoCP will be based at least partially on modelled noise levels. As such some allowance should be given to allow for unforeseen circumstances. This is written to protect the operational phase of the project which will last for decades, as such the levels of adverse impact which would be experienced need to be capable of being controlled where they depart from the modelled impacts.</p> <p>2 – This will lead the LAs to require significantly higher levels of noise mitigation at the outset than would normally be required due to their inability to require or enforce changes to the mitigation measures after the requirement has been discharged.</p>
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		<p>3 – This would not be needed as any S60 or S61 would be based on the CoCP and any other information which has been provided.</p> <p>4 – This is attempting to make the development immune to being served with an abatement notice under the Environmental Protection Act. This is unacceptable, as the LA must have recourse to deal with statutory nuisance issues without impediment.</p> <p>The fundamental problem is the noise is only predicted; the conditions are not robust enough if the noise departs from the predictions and environmental nuisance could then occur with no ability to enforce or require mitigations.</p>
DCO1.A42	<p>Article 58 (Application, disapplication and modification of legislative provisions) The ExA would ask for comments in regard to the disapplication and modification of certain public general legislation (See provisions set out in article 58(1) and the public general legislation listed at schedule 17 of the draft DCO), especially in regard to the Highways Act 1980 and the Land Drainage Act 1991.</p>	<p>Not applicable to SNDC as at the present point in time this would fall under Norfolk County Council in their capacity as Local Highway Authority and Lead Local Flood Authority.</p>
DCO1.S5	<p>Schedule 3 – Requirement 1 (Interpretation) – Terms “discharging authority” and “start-up and close down activities”</p> <p>a) “discharging authority”: There are multiple examples throughout the draft DCO where terms such as ‘discharging authority’;</p>	<p>In light of Local Government Reorganisation, SNDC considers that the requirements should be worded such that the discharging authority is the Local Planning Authority due to the fact that whatever the makeup of the new unitary council’s, there will always be a local planning authority which futureproofs the wording of the requirements.</p>

	<p>'relevant planning authority' and 'relevant highways authority' appear to be used interchangeably. This could lead to confusion and would ask the applicant and relevant local authorities for their views on this matter, including any suggestions, alternative wording or definitions within the interpretations section, that would prevent any such confusion.</p> <p>b) "start-up and close down activities": Reference is made to the safety checking of plant and machinery, under (g), whilst reference to 'safety checks' is listed in (c). Are they not the same thing? Clarify and amend as necessary.</p>	
DCO1.S7	<p>Schedule 3 – Requirement 3 (stages of the authorised development)</p> <p>Requirement 3(1) specifies "...written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out..." The ExA would ask all local authorities, as well as any relevant discharging authorities whether seven days is an adequate period for such written notice and whether such written notice should be approved in writing by the relevant planning authority/ discharging authority?</p>	<p>SNDC considers the 7-day notification requirement insufficient for effective oversight of pre-commencement operations. SNDC considers 10 working days to be more appropriate to enable the Council's internal and external communication processes.</p> <p>SNDC agrees that the drafting is unclear. Requirement 3(5) should be amended to correctly reference the relevant sub-paragraph(s) to avoid procedural ambiguity and ensure clarity for both NG and the discharging authorities.</p>

	<p>In addition to the above, should requirement 3(5) refer to sub-paragraph (2) and/ or (3)?</p>	
<p>DCO1.S8</p>	<p>Schedule 3 – Requirement 5 (archaeology)</p> <p>Braintree DC in its LIR [REP1-148] (section 10.9) has recommended changes to requirement 5, whilst Chelmsford City Council, Colchester City Council, and Essex CC in their LIR (LIRs [REP1-153]; LIR [REP1-156] and [REP1-161] respectively) all recommended amendments to the wording of requirement 5 and the inclusion of a new sub-paragraph.</p> <p>Additionally, Norfolk CC in its LIR [REP1-173] recommends amending the wording of requirement 5(1) and (4) and article 23 (Removal of human remains) so notification is required to be made to the relevant County/ Local Authority. In their joint LIR [REP1-178] Suffolk CC, Mid Suffolk DC and Babergh DC have recommended amendments to article 23 and to requirement 5 of the draft DCO.</p> <p>Historic England in its WR [REP1-191] has proposed an amendment to requirement 5 of the draft DCO and H04 of the outline CoCP to refer to consultation with Historic England.</p> <p>All local authorities, as well as the applicant, are invited to comment on all of these proposed changes (amendment to article 23 and schedule 3, requirement 5 of the draft DCO and to H04 of the outline CoCP).</p> <p>In addition, the applicant is requested to provide, for discussion purposes, a new draft of</p>	<p>SNDC have no comment to make.</p>

	<p>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>	
DCO1.S19	<p>Schedule 4 – (Discharge of requirements) - 1</p> <p>The government published its response to the Nuclear Regulatory Review 2025 on 13 March 2025, in its document 'Building our nuclear nation: government response to the Nuclear Regulatory Review 2025'. The ExA draws attention to: i) it is seeking to accelerate "...efforts to ensure the planning system more effectively enables both low-carbon energy projects and infrastructure as a whole..."; and ii) its response to Recommendation 30, where it indicates this includes "...establishing a new unit within DESNZ to coordinate post-consent discharge functions for nuclear power and electricity network projects."</p> <p>In the light of the above document and a clear statement from the government regarding its intention in related to post-consent discharge, the applicant and discharging authorities are asked to:</p> <ul style="list-style-type: none"> a) Provide comments on the above publication in respect of post-consent discharge functions. b) Consider if the current drafting of schedule 4 in the draft DCO [APP-056] is an appropriate approach to the post- 	<p>SNDC notes that National Grid met jointly with all Local Planning Authorities on 27 March 2026 to discuss the proposed approach to the discharge of Requirements. At this stage, insufficient information has been provided on how the discharge process will operate in practice, including expected responsibilities, sequencing, and the interface with the future DESNZ team.</p> <p>In the absence of this necessary detail, the SNDC is not yet in a position to make a substantive or definitive comment on the drafting or operation of the relevant DCO provisions.</p> <p>However, the SNDC understands from National Grid that the intention is to commence work on discharging Requirements immediately post-consent, and that this may occur before the DESNZ discharging authority arrangements are formally established. Clarity on governance, communication routes, timescales, and decision-making responsibilities will therefore be essential.</p> <p>SNDC looks forward to receiving further information from National Grid as discussed and will provide a full and</p>

	<p>consent discharge of requirements, or whether schedule 4 of the draft DCO [APP-056] should take a similar approach to that set out in schedule 2, Part 2 of The A122 (Lower Thames Crossing) Development Consent Order 2025?</p>	<p>informed response once that material is available. At present, the proposals are unacceptable because they are premature for this project, given that the Government has not yet even indicated whether they will accept the recommendations made.</p>
HE1.9	<p>Applicant's assessments: Unless you have provided agreement or otherwise in your LIR, for your area of jurisdiction please state whether you are in agreement with the applicant's assessment of:</p> <ul style="list-style-type: none"> 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 [APP-209]. 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 [APP-215]. <p>The levels of harm assessed in relation to Non-Designated Heritage Assets (NDHA), as described in ES Chapter 11 [AS-068].</p>	<p>The Examining Authority is referred to SNDC's Relevant Representation where the council's position is set out in detail.</p>
HE1.12	<p>Heritage Visualisations – 1 A range of heritage visualisations are provided [APP-350] and [APP-351].</p>	<p>SNDC remains concerned that the viewpoints provided for St Remigius do not adequately represent the church's setting or the visual impact of the proposed pylons.</p>

	<p>All local authorities and Historic England are asked to confirm:</p> <ul style="list-style-type: none">a) Agreement with the viewpoints chosen to reflect any potential impacts on heritage assets.b) In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from?	<p>For HE2i, the pylons will lie very close above and slightly forward of the viewpoint and are therefore likely to appear more imposing than suggested by the current photographic angle.</p> <p>For HE2ii, there are additional positions within the churchyard where pylons and wires would be more visible. These views are important because the churchyard forms part of the asset's immediate context and contributes to the way its significance is experienced.</p> <p>We note the proposal for an additional heritage viewpoint to the north of the church and consider it important that this also includes the listed war memorial, to assess interrelated views of both listed structures and their shared historic associations.</p> <p>SNDC also notes the Applicant's explanation that heritage viewpoints would not duplicate landscape viewpoints, and that landscape viewpoints should also be referred to when assessing heritage effects. In this regard, VP1.22e is useful for understanding the impact of pylons on the setting of the church and its relationship with the valley.</p> <p>SNDC additionally have concerns regarding viewpoint HE21 (Elm Farmhouse). The principal impact on the setting will be experienced when approaching from the east along Fundenhall Road. While SNDC acknowledge the safety limitations for roadside photography due to the constrained verge, the council asks whether alternative photographic methods could be used to capture this key approach view.</p>
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HE1.40	<p>South Norfolk Local impact report Page 17 of your LIR [REP1-176] states that you consider that harm to heritage assets in the District may be greater than identified in some instances for operational impacts. Please confirm which assets you are referring to in this context.</p>	<p>These are set out in Paragraph 6.16 of SNDC's Relevant Representation as below.</p> <ul style="list-style-type: none"> - Church of All Saints, Tibbenham: Moderate adverse significance of effect (significant); mid less than substantial harm; - Church of St Remigius: Moderate adverse significance of effect (significant); Mid less than substantial harm; - Kenningham Hall: Moderate adverse significance of effect (significant); mid less than substantial harm; - Elm Farmhouse: Moderate adverse significance of effect (significant); mid less than substantial harm; - Manor House: Moderate adverse significance of effect (significant); mid less than substantial harm; - Heywood Manor: Moderate adverse significance effect (significant); mid less than substantial harm; - Flordon Hall: Moderate adverse significance of effect (significant); High less than substantial harm; - Manor Farmhouse: Minor adverse significance of effect (not significant); Mid less than substantial harm.
LUS1.2	<p>Best and most versatile agricultural land (BMV) and soils - 1 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</p>	<p>SNDC have no comment to make</p>

	<p>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>	
LUS1.4	<p>BMV and soils - 3 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>	SNDC have no comment to make
LUS1.14	<p>Green infrastructure and open space - 1 Appendices B1, B2 and B3 to the applicant’s Planning Statement [APP-085] contain tables and assessment of the projects impact on open spaces.</p> <ul style="list-style-type: none"> • Do the host local authorities agree with the assessment and conclusions reached in table B.1, if not explain your reasoning and justification for your conclusions. • Do Colchester City Council agree with the conclusions and 	SNDC agree with the assessment and conclusions.

	<p>assessment of fishing provision within Ardleigh and if not explain your reasoning and justification.</p> <ul style="list-style-type: none"> 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. 	
LV1.14	<p>ES Appendix 13.5 National Landscape assessment study - 2</p> <p>The study [APP-235] concludes that: <i>"In conclusion, the Project would result in significant adverse effects on the special qualities of the Dedham Vale National Landscape during construction. However, during operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be minor and not significant (adverse)"</i> (paragraph 13.3.8)</p> <p>The local authorities are asked whether they agree with this conclusion and provide reasoning if you do not.</p>	Not applicable to SNDC as there is no designated national landscape.
LV1.22	<p>Landscape visualisations – 1</p> <p>The local authorities are asked whether:</p> <ul style="list-style-type: none"> You agree with the viewpoints in the visualisations [APP-343] to [APP-349] chosen to reflect any potential impacts on landscape. In your opinion are additional visualisations required, and if so from which assets and where should the 	South Norfolk District Council (together with Norfolk County Council) responded to the proposed viewpoints within Section A as part of the pre-examination process. Some adjustments were made in response to comments made. South Norfolk District Council is not in a position to propose any additional viewpoints at this time but is happy to review any required by the Examining Authority.

	visualisations be taken from?	
LV1.34	<p>ES Appendix 13.6 – arboricultural impact assessment – replacement planting</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"> • Applicant - What constraints are there to replanting within the Order limits and under what circumstances may the need for offsite provision be triggered? • All local authorities – Is the provision of an offsite planting delivery scheme document acceptable to you? Do you have any comments on what it should contain and/or when it should be provided to be most useful to you? How could such details be 	<p>The provision of an offsite planting delivery scheme raises several concerns:</p> <ul style="list-style-type: none"> • It is not clear how 3:1 ratio will be provided for small groups of trees as the number of trees within the group are not quantified. It is also unclear what constitutes a ‘small group’. • Similarly, where low quality and very low quality trees have not been recorded individually (13.3.8 APP-236 Volume 6 ES 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA (Final Issue A) (includes Annex C Tree Schedule)) it is unclear how the 3:1 ratio will be quantified • It is not clear where the offsite areas will be provided, or how they would be secured (and for how long) (e.g. secured in perpetuity via a S106), or monitored (would monitoring report be provided to the LPA). Ideally the offsite planting delivery scheme areas should be adjacent to/close to the area impacted which would go some way to compensating for impacts from fragmentation. At the present time they could be located anywhere • It is proposed that some trees will be ‘coppiced to ground’ – these should also be included in the 3:1 ratio as coppicing will effectively kill most trees. • The 3:1 ratio also needs to apply to pre-commencement works. • There is further uncertainty as some trees/groups of trees are identified as being ‘potentially affected’. At what point will this uncertainty be

	<p>secured?</p>	<p>clarified and how will the numbers be reported to ensure 3:1 compliance?</p> <ul style="list-style-type: none"> • Whilst mitigation is not simply a matter of numbers, three for one is acceptable for the replacement of unremarkable trees (that is not veteran or ancient) if their successful establishment can be guaranteed
<p>NV1.5</p>	<p>Use of use of triple Araucaria conductors or alternative technology</p> <p>Throughout ES Chapter 14 [APP-256] reference is made to the use of triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons). 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</p>	<p>This can be secured by a requirement such as the one below.</p> <p><u>No change of plant or equipment without consent</u></p> <p>No plant or equipment of any kind shall be changed on the site without precise details of the equipment being submitted to and approved in writing by the local planning authority. This shall be supported as necessary by a Noise Impact Assessment to validate that there will be noise change in the noise environment.</p> <p>This will need to be discharged via the LPA.</p>

	<p>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>NV1.7</p>	<p>Compaction activities and potential for damage due to construction vibration 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</p>	<p>The preferred mechanism would be to place a requirement in the DCO which requires that two levels be imposed at all vulnerable receptors</p> <ul style="list-style-type: none"> • with a lower action level of 0.3mm/s. • and a stop vibration level of 1mm/s. <p>This is quite common on development site, including DCOs, with the 0.3mm/s being the generally accepted limit of detection by humans and 1mm/s being the point when nuisance can be considered to be starting This would then be supported by a suitably worded requirement, requiring the submission of details of the predicted vibration levels and what mitigation measures would be utilised to ensure that the vibration levels would be maintained.</p>

	<p>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>	<p><i>Construction vibration LOAEL and SOAEL</i></p> <p>11.4.17. The LOAEL for construction vibration is 0.3 mm/s (Peak Particle Velocity PPV) which may be just perceptible in residential environments.</p> <p>11.4.18. The SOAEL for construction vibration is 1.0 mm/s (PPV) which is the level that is likely to cause complaint but can be tolerated if prior warning and explanation has been given to residents.</p>
NV1.13	<p>EACN and Tilbury North Substations operational noise assessment</p> <p>ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259] and ES Appendix 14.4 (Tilbury North Substation Operational Noise Assessment) [APP-260]. The ExA is concerned with the reference to ‘reasonably practicable’ (also referred to as Best Available Technique Not Entailing Excessive Cost (BATNEEC)) in both documents. This is due to ‘reasonably practicable’ and BATNEEC including an element of cost within the assessment. The</p>	<p>Not applicable to SNDC as there are no EACN substations proposed in the district.</p>

	<p>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>	
SET1.5	<p>Mitigation measures - 2</p> <p>The ExA notes the use of the term ‘where practicable’ in relation to proposed mitigation and is concerned as to the vagueness of this term.</p> <p>Applicant - justify the use of this term in each instance or amend the proposed mitigations accordingly.</p> <p>Relevant County and Local Authorities – The ExA seeks your views in regard to the use of this term and your suggestions in regard to any alternative forms of wording.</p>	SNDC have no comments to make