



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

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

Responses are due by deadline 3: Friday 10 April 2026

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

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

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

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

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

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



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

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

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

Download a copy of this Microsoft Word version of the ExA’s written questions, enter your answers and save the document using an appropriate file name. You can then submit the completed document by choosing ‘Make a comment’ and selecting ‘Upload files’.



Abbreviations used:

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



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



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

The Examination Library

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

It will be updated as the examination progresses.

Citation of questions

Questions in this table should be cited as follows:

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



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ExQ1	Question to:	Question:	Colchester City Council Response
GEN General and cross-topic questions			
<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>National and local planning policy compliance tracker 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. 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. 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. 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>As set out at 1.1.11 in REP1-133, Colchester City Council (CCC) are in the process of drafting a new Local Plan which has passed the consultation stage of the preferred options (Regulation 18). CCC has reviewed REP1-133 and in particular pages 384 to 411 which deals with a number of the Reg 18 preferred options policies and signposts the relevant section of the ES that deals with that theme. As set out in CCC's LIR, while the Council may not concur with the overall findings of the level of harm the applicant has noted, the Council considers the correct Reg 18 policies to have been reviewed by the applicant in REP1-113. The key point is one of weighting. Work is currently underway to produce a Regulation 19 plan but that is not at publication stage. It is not at a point where weight can be afforded to it. Therefore, very little to no weight should be afforded to the Regulation 18 policies listed in this section.</p>
<p>GEN 1.4</p>	<p>All local authorities</p>	<p>Development plan documents and supplementary planning documents 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>As set out above CCC are in the process of drafting a new Local Plan which has passed preferred options (Regulation 18) stage but is not at a point where weight can be afforded. Work on the Regulation 19 plan is ongoing. CCC would like to note that the Essex and Southend-on-Sea Waste Local Plan (adopted 2017) and the Essex Minerals Local Plan (adopted 2014) cover the CCC area but are Essex County Council plans and are not adopted by CCC. The list on page 42 states that the Tendring Colchester Borders Garden Community DPD is emerging, but it has been adopted. Great Tey have an adopted Neighbourhood Plan as of October 2024. Great Horkesley is classed as an 'emerging' Neighbourhood Plan and is 'in progress' but is not at a stage where there is a published draft to read.</p>
<p>GEN 1.5</p>	<p>The applicant Norfolk CC Suffolk CC Ipswich BC Colchester CC Thurrock Council</p>	<p>Local government reorganisation 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. The listed local authorities are asked to set out: a) any implications for their continuing involvement in the examination and how a consistent approach to their responses can be assured b) any implications for their role as a discharging authority post-consent, and whether any changes to the draft Development Consent Order (DCO) would be necessary</p>	<p>CCC has a good working relationship with the other authorities involved in this project and in the event of a merger of the north Essex area we are confident the relevant officer will be able to work together as we currently are. CCC are broadly aligned with both Braintree DC and Tendring DC and are in constant discussion with them. The timetable for this examination means that although the Essex LPAs have received the government 'minded to' letter, the DCO decision will be issued well ahead of vesting day in March 2028 and all LPAs will be discrete local authorities up to that day, even if they are working close together.</p>

ExQ1	Question to:	Question:	Colchester City Council Response
		<p>The applicant: explain any changes to its ongoing dialogue with the affected local authorities and how it intends to deal with any changes in the draft DCO.</p>	<p>In terms of the DCO wording, 'relevant local authority/host local authority' should be used, encompassing both upper and lower LPAs and/or new unitary authorities and new strategic mayoral authorities.</p> <p>The current draft DCO [REP2-005] does not need substantive amendment to address LGR. Article 2 defines "relevant planning authority" and "relevant highway authority" by reference to the authority for the relevant area and, as a result of the recent revisions, includes "any successor in function"; Article 2(8) also makes clear that any statutory body referred to in the order includes the body's successor in respond of functions which are relevant to the Order.</p> <p>However, it would be sensible to tweak this drafting to refer to "any successor or successors in function", in case the relevant function is split across more than one successor.</p>
<p>GEN 1.6</p>	<p>All local authorities MOD Natural England Environment Agency Any IPs who wish to make comment</p>	<p>Critical national priority</p> <p>The planning statement [APP-085] references the need for the proposed development in the context of the urgent need for renewable energy generation within the UK, and in doing so, it refers to the presumption specifically in relation to critical national priority (CNP) infrastructure. Paragraph 4.2.7 of NPS EN-1 (2023) makes it clear that the CNP policy does not create an additional or cumulative need case or weighting for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. It will be given consideration by the ExA when making its recommendation to the Secretary of State, who will apply the CNP policy in its decision making specifically in reference to any residual impacts that have been identified.</p> <p>NPS EN-1 paragraph 4.1.7 notes that for projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. Paragraphs 7.2.7 to 7.2.28 of the planning statement [APP-085] sets out a summary of the potential residual impacts (non Habitats Regulations Assessment (HRA) impacts) which may remain after the mitigation hierarchy has been applied. These relate to the relevant exceptions listed in the CNP policy at NPS EN-1 paragraph 4.2.15: human health and public safety, defence, irreplaceable habitats, the achievement of Net Zero, and flood risk.</p> <p>Paragraph 4.2.17 of NPS EN-1 sets out that the Secretary of State will also take as a starting point that CNP infrastructure will meet a number of policy tests including in relation to green belt, sites of special scientific interest (SSSI), nationally designated landscapes and heritage assets.</p> <p>IPs are invited to review the applicant's consideration of CNP in the planning statement [APP-085] (in particular paragraphs 7.2.52 to 7.2.257) and the policy compliance tracker [REP1-133] (tables 1.4 and 1.5), and state if they agree with its approach, including in respect of the updated NPS published in December 2025 (which the ExA considers to be an important and relevant consideration in decision making)</p> <p>In particular the ExA requests all local authorities and the listed statutory consultees to provide comment on the policy tests on matters of human health and public safety,</p>	<p>Green Belt: No comment in respect of Green Belt as there is no green belt in the CCC area.</p> <p>SSSIs: No comment in respect of SSSIs.</p> <p>Designated landscapes: As set out in other question responses below, CCC are clear that as Per NPS-EN5 the Dedham Vale should have been "avoided altogether" and that '<i>Even residual risk is unlikely to be acceptable in planning terms</i>'.</p> <p>Heritage assets: CCC consider that further information to demonstrate how embedded mitigation informed final design choices, whether alternative alignments or pylon locations were fully explored and how the Applicant will guarantee that LoD will not result in operational impacts beyond those assessed is required.</p> <p>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. However, clear outweighing 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>Human health and public safety: CCC maintain concerns regarding long term impacts on public health and safety, including mental health and wellbeing. Please refer to the CCC LIR [REP1-156].</p> <p>Defence: Defer to the Ministry of Defence and other relevant bodies on the matter of defence.</p> <p>Irreplaceable habitats: The AIA should be used to inform the detailed design stage and micro-siting of all works, to further</p>

ExQ1	Question to:	Question:	Colchester City Council Response
		defence, irreplaceable habitats, flood risk, green belt, sites of special scientific interest, nationally designated landscapes and heritage assets, as well as the HRA.	reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees Flood risk: Please refer to the CCC LIR [REP1-156]. The HRA: No comment
GEN 1.16	Colchester City Council South Norfolk DC Suffolk CC Babergh DC Mid Suffolk DC	Local impact reports (LIR) – navigation Colchester City Council [REP1-156] and South Norfolk DC [REP1-176] are asked to provide a contents page for their LIRs, for easier navigation. This should include electronic page numbers against each section of the report and the list of appendices with corresponding page numbers. 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].	This has been completed and has been sent under separate cover to avoid delay. Thank you to the ExA's support team for the help with that.
GEN 1.17	All local authorities	Local impact reports – cumulative developments and the interrelationship report The LIRs from each local authority include details of other developments in their area to varying degrees of detail. 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. <ul style="list-style-type: none"> All local authorities are asked to provide an update where relevant, which should include the current status of the application (whether and when consent has been granted and implemented). If any other major developments in your local authority area are not included, please provide details including planning reference, description, location, relevant dates, and current status (or development plan allocation details). Additionally a report on interrelationship with other infrastructure projects was submitted by the applicant at deadline 1 [REP1-134]. <ul style="list-style-type: none"> All local authorities are also asked to review the non-NSIP projects listed in section 3.3 and table 6.1 of the report and confirm if the application reference details are correct and that the applicant's summary of interactions between each project is reasonable, together with any other comments you wish to make on the report. 	CCC has checked tables A17.2.2 to A17.2.14 and fig 17.2 and confirm it is generally accurate but application 250545 on page 118 has been resolved to be approved by planning committee. The legal agreement is being drafted, and the decision will be issued in the coming weeks. In addition, a planning application at Foxes Corner, Halstead Road, Ref 251310 for 250 dwellings has now been resolved to be approved by planning committee. The legal agreement is being drafted, and the decision will be issued in the coming weeks. This does not appear in the table and the site is close to the order limits in the Aldham Parish. Apart from the missing application noted above, regarding REP1-134 3.3, only para 3.3.25, the wetland creation scheme is listed for the CCC area. This is the correct application. The same is true for table 6.1.
GEN 1.21	The applicant All local authorities	Legal Agreements 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: <ol style="list-style-type: none"> Provide a summary document/ tracker of all requests for agreements with local authorities including the type of agreement, what it relates to and how each would meet the relevant tests. Justify its intended use of unilateral undertakings in the instances where a bilateral (section 106) agreement would be preferable. Consider whether one local authority's request for a certain agreement would also be appropriate for the same to be applied in any (or all) of the other local authority areas. 	Norwich to Tilbury will have significant and lasting impact on Essex as a result of the projects construction and visual presence. CCC would therefore 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. The matter of compensation is currently under discussion with the applicant. CCC through its Local Impact Report [REP1-156] 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 of mitigation to be delivered through a s106 legal agreement to cover the following:

ExQ1	Question to:	Question:	Colchester City Council Response
		<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>i) BNG i) to deliver a 10% biodiversity net gain together with appropriate management and monitoring for at least 30 years within Essex</p> <p>ii) Tree Planting – Replacement / Mitigation/ Compensatory i) to secure the delivery of 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 for offsite tree planting to also cover any additional mitigation planting or compensatory planting.</p> <p>iii) Skills Supply Chain Employment and Training i) to secure an Employment, Education, Skills and Supply Chain strategy for the project together with appropriate funding through a Section 106 agreement.</p> <p>v) Highways i) to require the Applicant to enter into a Framework Highways Agreement, ii) 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. iii) to secure a financial contribution towards offsetting the additional “wear and tear” associated with the construction works</p> <p>vi) Wellbeing & PROW i) To secure a contribution towards improving the use of the PROW network</p> <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. 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>
DES Design, parameters and other details of the proposed development			
DES 1.9	The applicant All local authorities	<p>Lighting of new and upgraded substations The ExA notes the rural context of the proposed EACN substation and notes that there is limited detail in relation to operational lighting in relation to this and other upgraded substations in the Design Approach for Site Specific Infrastructure (DASSI) [APP-354].</p>	<p>CCC agree sufficient detail pertaining to lighting is needed due to the scale of the EACN and the distance from the Dedham Vale National Landscape as darks skies are an important feature of the NL. The scale of the EACN has the potential to cause significant</p>

ExQ1	Question to:	Question:	Colchester City Council Response
		<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. <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>light glow if illuminated. The Institution of Lighting Professionals (2023) Guidance Note 08/23: Bats and Artificial Lighting At Night should be a steering document for the substation's lighting design.</p>
ALT Alternatives			
ALT 1.1	All local authorities	<p>Reasonable alternatives: policy and legislation</p> <p>The local authorities are invited to comment on their understanding of 'reasonable alternatives' in the context of NPS EN-1 paragraphs 4.3.22 to 4.3.19, and Regulation 14(2)(d) and paragraph 2 of schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). The local authorities are also requested to comment on paragraph 3.2.32 of ES chapter 3: 'Where options assessed do not meet the definition of 'reasonable alternatives' (such as certain offshore cable options that conflict with NPS policy preferences), these are included to address specific scoping requirements under Regulation 14(3) rather than as reasonable alternatives under Regulation 14(2)(d)'.</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>	<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.</p> <p>Para 4.3.24 is only relevant to more discrete sites as it looks to retain them for future energy development.</p> <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>

ExQ1	Question to:	Question:	Colchester City Council Response
			<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>Therefore, 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 therefore by definition are reasonable. 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. Therefore the alternatives listed in the ESO report would meet the definition of 'reasonable alternatives', as would the applicant's Offshore 1.</p>
ALT 1.2	All local authorities	<p>Approach to options appraisal</p> <p>The local authorities are invited to review section 3.3 of ES chapter 3 [APP-127] and appendices 3.1 [APP-128] and 3.2 [APP-129] in respect of the applicant's approach to options appraisal, including the hierarchical assessment. They should provide comments where they disagree with any part of the approach (not the individual options considered; the approach only). This could form part of the SoCG.</p>	<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</p>

ExQ1	Question to:	Question:	Colchester City Council Response
			<p>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 EN-1, 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>

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			<p>The reliance on national, as opposed to local designations, means that the proposals do not allow for local distinctiveness, nor consider the cumulative effects of the siting of 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>Strategic options: Offshore 1</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) [APP-355] in relation to 'Offshore 1'. The ExA is aware of the local authorities' assessment of cost and timing as set out in the Hiorns Report as appended to the RR from Norfolk CC [RR-2753]. However the ExA seeks the views of local authorities in relation to the constraints (environmental, social and technical) which may affect the delivery of this option as set out in the SOBR (as set out in section 14 and summarised in table 15.2 of the SOBR). An update to this is provided in section 6 of the August 2025 SOBR [APP-355].</p> <p>Other IPs are also invited to provide comment should they wish to do so.</p> <p>In doing so, could the local authorities and any other IPs provide any additional comments they may have in relation to the applicant's reasoning for discounting Offshore 1 as a reasonable alternative.</p> <p>The applicant is asked to provide an update on the constraints noted in section 6 of the SOBR since August 2025 relating to Offshore 1 and connection at Tilbury.</p>	<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 CCC including the major landscape effects, heritage sensitivities and other impact as set out in the CCC LIR [REP1-156].</p> <p>The Council further 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, which 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. The Council therefore 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>

ExQ1	Question to:	Question:	Colchester City Council Response
ALT 1.9	All local authorities	<p>Limits of Deviation (LoD)</p> <p>A number of the local authorities' LIRs refer to the limits of deviation and the potential for the OHLs and pylons to move closer to sensitive receptors and listed buildings. Paragraph 3.2.28 of ES chapter 3 [APP-127] refers to the limits of deviation, noting that they retain flexibility to allow for necessary adjustment during detailed design and construction phases. It is stated that minor variations in specific pylon positioning or precise alignment within these limits are not treated as separate alternatives, as the assessment considers a worst-case scenario within the established parameters.</p> <p>The local authorities are invited to comment on this paragraph.</p>	<p>CCC understand the need for limits of deviation on a scheme of this scale and complexity but highlight that in certain situations bringing the alignment away from the centre line potentially brings it even closer to receptors. CCC are particularly concerned about residential receptors. For example (but not limited to), Hines Close in Aldham where the alignment passes close to a residential cul-de-sac. The proposed LoD in theory could result in the pylon alignment sitting directly next to these residential receptors to the detriment of the residents.</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 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. Residents 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> <ol style="list-style-type: none"> 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— <ol style="list-style-type: none"> (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 (f) programme for landscaping works, relating to that pylon have been submitted and approved by the relevant planning authority for that phase. 2) The details submitted must accord with the outline design principles

ExQ1	Question to:	Question:	Colchester City Council Response
			<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>
AQ Air quality and emissions			
AQ 1.4	All local authorities	<p>Air Quality - Development Plan documents and adopted standards/ expectations related to air quality that exceed Government targets?</p> <p>ES Chapter 7 at paragraph 7.2.19 lists the names of the key regional and local plan documents relevant to each individual county and local authority area. Each local authority is asked whether their development plan documents contain any standards or expectations related to air quality that exceed government targets? If so the ExA would ask for the relevant authority to confirm what those standards are and what formal consultation/ adoption processes those air quality standards/ expectations have been subject to.</p>	CCC has no comment to make
DCO Draft Development Consent Order			
Articles			
DCO 1.A2	The applicant Local Authorities Relevant statutory undertaker Other relevant determining body	<p>Articles (general) - 2</p> <p>Throughout the articles contained in the draft DCO [APP-056] the applicant has specified time periods within which a response is required from a determining body. That time period tends to be 28 days. A number of the local authorities have raised concerns in regard to the time period specified, but there does not appear to be a consensus as to an appropriate alternative time period. The ExA is also concerned as to such a short period being imposed, especially where a deemed consent is triggered where a determining body has failed to respond in the period specified.</p> <p>Applicant: Explain how you have reached the time period chosen (generally 28 days), including an explanation of your understanding of any processes the relevant determining bodies have to/ or are required go through. For example, your understanding of: any application validation period; any minimum consultation periods required with statutory or other bodies; any report writing periods; any committee or delegated cycles; and any decision issuing periods that may apply.</p> <p>All local authorities, relevant statutory undertaker and or other relevant determining body: provide a summary of any processes you are required to go through, including any time period in the number of days required to undertake that process. For example, any application validation process; any 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 require 56 days.</p> <p>This is because it can take 2-3 days to upload the documents and put them on to the in-house system at validation stage. It is reasonable to take two working weeks (so ten days working days or 14 calendar days) to fully assess the scheme BUT if other consultees are needed to be consulted then they would need a standard 21 days in which to assess and comment. This is critical as the consultees may require changes. Less than 56 days will result in refusals of the requirements and this has happened on other DCOs. 56 days allows the applicant time to make changes and then allows the LPA the time to reconsult. It then takes a week to write any report needed for senior officer checking. It is then reasonable to give a senior planner time to read that report. It then takes a day or two to issue the decision to the applicant.</p>
DCO 1.A7	The applicant All local authorities APs and IPs	<p>Article 2 (Interpretation) (order land)</p> <p>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.</p>	<p>CCC acknowledges the need for clarity around ‘order land’ and would suggest that that the definition of Order Land is amended 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). It is suggested the definition could be Order Land means with the exception of uncoloured land (Class 8 - Land not subject to powers of</p>

ExQ1	Question to:	Question:	Colchester City Council Response
		<p>Should 'Class 8' (Uncoloured (White) Land), as set out in the SoR [APP-059] at Table 5.1 (Powers related to land acquisition and use being sought by the Project) be specifically defined and excluded in these articles or through the definition of 'Order land'?</p>	<p>acquisition nor temporary use) the land shown on the land plans and described in the book of reference".</p>
DCO 1.A10	<p>The applicant All local authorities</p>	<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 these adequately cover the definition of a 'stage'? 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? 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>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>	<p>The definition of "stage" in Schedule 3, para 1 is circular in that it is referable to a scheme of works submitted by the Applicant to a relevant planning authority. Thus, the stages are set by details submitted by the Applicant. It is unclear how "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.</p> <p>The answer to this is predicated on what a "stage" is – see above. 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>
DCO 1.A16	<p>The applicant Relevant local authorities</p>	<p>Article 5 (Limits of deviation) - 2 Provide an update with regards to the potential for pylons TB140 to TB142 (inclusive) and TB238 to TB243 (inclusive) and whether an 18 metre vertical limit of deviation will be required, should a change from low height pylons to standard height pylons be required. The explanatory memorandum (EM) [APP-057] suggests the change will be known following consultation feedback and engagement with statutory stakeholders. Please provide an indication of when that consultation and engagement concludes and when a decision on these pylons being low height or standard height pylons will be finalised.</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</p>	<p>Not relevant to CCC</p>

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		on this matter and request they submit alternative wording for consideration, should they wish.	
DCO 1.A19	All local authorities statutory undertakers	Article 11 (Street Works); Article 12 (Application of the Permit Schemes); Article 13 (Application of the 1991 Act) 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.	CCC have no comment to make
DCO 1.A35	The applicant All local authorities	Article 48 (Defence to proceedings in respect of statutory nuisance) 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.	CCC have no comment to make
DCO 1.A42	All local authorities, highway authorities and statutory undertakers	Article 58 (Application, disapplication and modification of legislative provisions) The ExA would ask for comments in regard to the disapplication and modification of certain public general legislation (See provisions set out in article 58(1) and the public general legislation listed at schedule 17 of the draft DCO), especially in regard to the Highways Act 1980 and the Land Drainage Act 1991.	CCC have no comment to make
Schedules			
DCO 1.S5	The applicant All local authorities	Schedule 3 – Requirement 1 (Interpretation) – Terms “discharging authority” and “start-up and close down activities” a) “discharging authority”: There are multiple examples throughout the draft DCO where terms such as ‘discharging authority’; ‘relevant planning authority’ and ‘relevant highways authority’ appear to be used interchangeably. This could lead to confusion and would ask the applicant and relevant local authorities for their views on this matter, including any suggestions, alternative wording or definitions within the interpretations section, that would prevent any such confusion. 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.	In response to part a, CCC agree that this should be clearer. CCC request that where relevant planning authority is used it the DCO sets out if that is the upper or lower tier authority (or both pursuant) to the relevant work area/section applied for at the time.
DCO 1.S7	The applicant All local authorities	Schedule 3 – Requirement 3 (stages of the authorised development) 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	Seven days is not sufficient. 21 days would be acceptable, but 14 days would be a reasonable compromise.

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		adequate period for such written notice and whether such written notice should be approved in writing by the relevant planning authority/ discharging authority? In addition to the above, should requirement 3(5) refer to sub-paragraph (2) and/ or (3)?	
DCO 1.S8	The applicant All local authorities	<p>Schedule 3 – Requirement 5 (archaeology)</p> <p>Braintree DC in its LIR [REP1-148] (section 10.9) has recommended changes to requirement 5, whilst Chelmsford City Council, Colchester City Council, and Essex CC in their LIR (LIRs [REP1-153]; LIR [REP1-156] and [REP1-161] respectively) all recommended amendments to the wording of requirement 5 and the inclusion of a new sub-paragraph.</p> <p>Additionally, Norfolk CC in its LIR [REP1-173] recommends amending the wording of requirement 5(1) and (4) and article 23 (Removal of human remains) so notification is required to be made to the relevant County/ Local Authority. In their joint LIR [REP1-178] Suffolk CC, Mid Suffolk DC and Babergh DC have recommended amendments to article 23 and to requirement 5 of the draft DCO.</p> <p>Historic England in its WR [REP1-191] has proposed an amendment to requirement 5 of the draft DCO and H04 of the outline CoCP to refer to consultation with Historic England.</p> <p>All local authorities, as well as the applicant, are invited to comment on all of these proposed changes (amendment to article 23 and schedule 3, requirement 5 of the draft DCO and to H04 of the outline CoCP).</p> <p>In addition, the applicant is requested to provide, for discussion purposes, a new draft of requirement 5 that, as far as possible, takes into account all of these requested changes and also is requested to provide a commentary on whether any of these proposed amendments sought by the various organisations would be incompatible with each other.</p>	<p>CCC continues to request the change to requirement 5 as set out above.</p> <p>ECC Place Services provides a response on behalf of Essex County Council, Chelmsford and Colchester City Councils 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).</p> <p>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</p>

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			<p>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> <p>CCC has no objection to the changes requested by Norfolk CC, The Suffolk LPAs or Historic England.</p>
DCO 1.S19	<p>The applicant All local authorities All discharging authorities</p>	<p>Schedule 4 – (Discharge of requirements) - 1</p> <p>The government published its response to the Nuclear Regulatory Review 2025 on 13 March 2025, in its document 'Building our nuclear nation: government response to the Nuclear Regulatory Review 2025'. The ExA draws attention to: i) it is seeking to accelerate "...efforts to ensure the planning system more effectively enables both low-carbon energy projects and infrastructure as a whole..."; and ii) its response to Recommendation 30, where it indicates this includes "...establishing a new unit within DESNZ to coordinate post-consent discharge functions for nuclear power and electricity network projects."</p> <p>In the light of the above document and a clear statements from the government regarding its intention in related to post-consent discharge, the applicant and discharging authorities are asked to:</p> <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-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>CCC have no comment to make.</p>
HE Historic environment			
HE 1.9	All local authorities	<p>Applicant's assessments:</p> <p>Unless you have provided agreement or otherwise in your LIR, for your area of jurisdiction please state whether you are in agreement with the applicant's assessment of:</p> <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]. c) The levels of harm assessed in relation to Non-Designated Heritage Assets (NDHA), as described in ES Chapter 11 [AS-068]. 	<p>This was dealt with in the CCC LIR [REP1-156].</p> <p>We are in agreement with the scoping of heritage assets based on the methodology provided.</p> <p>We are in agreement with the level of harm, on the assumption that this is based upon the route line given. The applicant appears to be saying that rather than using the proposed pylon locations and overhead line alignment shown in document APP-133 (Proposed Project Design) and APP-134 (Proposed Project Design – Permanent Features) as the basis of their assessment of the impact on the setting and significance of heritage assets, they have made an assessment that takes into account the worst case pylon and overhead line positions based on the LoD parameters. We would request a more detailed explanation of the applicant's assessment methodology.</p> <p>Historic England are the statutory consultees for scheduled monuments (SMs) so they will comment on SMs.</p>

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			<p>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> <p>It is our understanding that non-designated buildings were scoped out of full assessment as they are classified as low value as part of the methodology.</p>
HE 1.12	All local authorities Historic England	<p>Heritage visualisations - 1</p> <p>A range of heritage visualisations are provided [APP-350] and [APP-351].</p> <p>All local authorities and Historic England are asked to confirm:</p> <ol style="list-style-type: none"> Agreement with the viewpoints chosen to reflect any potential impacts on heritage assets. In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from? 	<p>The viewpoints were agreed as part of the pre-planning process.</p> <p>CCC have not requested any additional visualisations at this stage. On the same basis as our response to Question HE1.9, we would request further clarification about the Heritage Viewpoint visualisations and the LVIA visualisations (some of which have been used to inform heritage impact assessments). Are the visualisations based on the pylon locations and overhead line alignment shown in the relevant figures in documents APP-342 to APP-351 or worst-case pylon locations and overhead line alignments based on the LoD parameters? It is important to CCC that it is the latter.</p>
HE 1.39	All Essex local authorities	<p>Protected Lanes</p> <p>Please provide further evidence relating to the protected lanes in your respective administrative areas which would in your opinion be negatively impacted by the proposed development, including evidence over why they should be considered as NDHA.</p>	<p>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>There is one lane in Colchester District where this could occur within an undergrounding section: Crabtree Lane, Little Horkesley (COLLANE24).</p> <p>Further lanes may be impacted to a lesser degree in the area of overhead lines due to groundworks associated with infrastructure</p>

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			<p>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 Protected Lanes in Colchester: Fossetts Lane, Church End (COLLANE 8) and Fossetts Lane, Church End (COLLANE 9)</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>
LUS Land use and soils, green infrastructure			
LUS 1.2	The applicant Natural England Pylons East Anglia Limited All local authorities	<p>Best and most versatile agricultural land (BMV) and soils - 1</p> <p>It would appear from Paragraph 6.4.7 of the ES that detailed Agricultural Land Classification (ALC) survey was undertaken on approximately 1,011 ha (representing 54% of the proposed survey areas within the Order Limits). Predictive ALC grading was then carried out where it was not possible to undertake a detailed ALC survey. Given the coverage of actual survey work how much confidence can be placed on the applicants response on acid soils in document 8.4.6 page 22 that 'the detailed surveys did not identify the presence of jarosite in the soil and in locations where desk-based information suggested a potential for acid sulphate soils some of the soils were found to be moderately calcareous. There is no evidence to indicate the presence of actual or potential sulphate soils within the surveyed areas'. As being a representative conclusion that can be applied across the whole Order Limits as they are not all 'surveyed areas'.</p>	<p>CCC understand that it is not a usual requirement of the ALC survey to look for jarosite within the soil, and therefore less experienced surveyors may not detect its presence. Without soil analysis of these soils where they were not identified as being calcareous, there is no other information obtained during the ALC survey that would conclusively determine whether the soils are not acid sulphate soils. A preliminary risk assessment should have picked up the likelihood of these soils being present, and where they have been identified further testing should be carried out.</p> <p>Additionally, given that only 54% of the survey area was subject to the ALC, it cannot be held to be conclusive.</p>
LUS 1.4	Natural England All local authorities Pylons East Anglia Limited	<p>BMV and soils - 3</p> <p>To what extent are the mitigation measures proposed by the applicant in the outline CoCP (measures GH02 and GH08) sufficiently robust to address issues should acid sulphate soils be encountered during construction.</p>	<p>The inclusion of GH01 more so than GH02 could ensure that further testing of identified soils that pose that risk as being acid sulphate soils is carried out, but only if the BRE SD1:2005 is followed as part of the ground investigations.</p>
LUS 1.14	All local authorities	<p>Green infrastructure and open space - 1</p> <p>Appendices B1, B2 and B3 to the applicant's Planning Statement [APP-085] contain tables and assessment of the projects impact on open spaces.</p> <ul style="list-style-type: none"> Do the host local authorities agree with the assessment and conclusions reached in table B.1, if not explain your reasoning and justification for your conclusions. 	<p>No comment regarding table B.1.</p> <p>Ardleigh and the Ardleigh Parish fall within Tendring District Council (TDC) LPA area so CCC will revert to TDC to comment on that section.</p>

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		<ul style="list-style-type: none"> Do Colchester City Council agree with the conclusions and assessment of fishing provision within Ardleigh and if not explain your reasoning and justification. Do Thurrock Council agree with the applicant's assessment of the impacts of pylons in Maple Park and if not explain your reasoning and justification. 	
LV Landscape and visual			
LV 1.14	All local authorities	<p>ES Appendix 13.5 National Landscape assessment study - 2</p> <p>The study [APP-235] concludes that: <i>"In conclusion, the Project would result in significant adverse effects on the special qualities of the Dedham Vale National Landscape during construction. However, during operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be minor and not significant (adverse)"</i> (paragraph 13.3.8)</p> <p>The local authorities are asked whether they agree with this conclusion and provide reasoning if you do not.</p>	<p>CCC disagree that the impact of the project in operation will not be adverse. To the contrary, with National Grids own submissions showing that the EACN will be visible over 25% of the Dedham Vale, between 11 and 23 pylons visible from individual viewpoints across 50% of the Vale, and up to 35 pylons visible at some locations within the Vale. This is manifestly a very material impact and cannot be dismissed as immaterial, cannot be described as 'not adverse'. To the contrary it amounts to a very significant industrialisation of the National Landscape which is entirely contrary to its purpose and directly harms its important qualities. CCC disagree that National Policies have been appropriately applied. Per NPS-EN5 the Dedham Vale should have been "avoided altogether" and that <i>'Even residual risk is unlikely to be acceptable in planning terms'</i>.</p>
LV1.22	All local authorities	<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 visualisations be taken from? 	<p>CCC disagree that sufficient or appropriate viewpoints have been demonstrated. Within our LIR (REP1-156) we note the need for several additional viewpoints which are listed in paragraph 12.109. None have been chosen which detail the degree of harm illustrated clearly on the reverse viewfall diagrams.</p>
LV 1.34	The applicant All local authorities	<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 secured? 	<p>CCC have several concerns regarding replacement planting such as:</p> <ul style="list-style-type: none"> A fixed ratio of 3:1 is not considered appropriate for all replacement planting and should respond to the specific details of planting lost. I.e a Veteran Oak would require far greater replacement than a smaller sapling. The replacement is also subject to stock availability in the UK. Consideration should also include Landscape Character and ecological habitat creation. With regards to Off-Site, 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 need to be carefully managed to ensure they are successful.</p>

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			<p>The provision of an offsite planting delivery scheme document, including a commitment to fund such a project is critical to mitigate the impact of the scheme in terms of tree loss. CCC supports the principle of an Offsite Planting Delivery Scheme (OPDS) to accompany the applicant's 3:1 replacement ratio for individual trees and small groups, as set out in ES Appendix 13.6 and the Outline LEMP. The OPDS is acceptable in principle, but ECC advises that its usefulness depends on early provision and strategic alignment with wider environmental priorities.</p> <p>The OPDS should be submitted prior to commencement of main works so that CCC can meaningfully influence site selection and ensure alignment with local and county-wide GI priorities.</p> <p>CCC expects the OPDS to include:</p> <ul style="list-style-type: none"> • A clear summary of onsite planting capacity and the resulting offsite requirement. • Site selection criteria aligned with the Essex Local Nature Recovery Strategy (LNRS) and the Essex Green Infrastructure Strategy, demonstrating contributions to ecological connectivity, canopy cover and climate resilience. • Mapping of proposed offsite locations and their relationship to priority habitats, GI networks and landscape character. • Species selection principles based on local provenance and resilience. • Aftercare, monitoring and reporting arrangements <p>The OPDS should be secured via Requirement 4 (LEMP) or a dedicated DCO Requirement, with offsite planting on third-party land supported by a legal agreement to ensure delivery and long-term management.</p>
NV Noise and vibration			
NV 1.5	The applicant Relevant local authorities	<p>Use of use of triple Araucaria conductors or alternative technology</p> <p>Throughout ES Chapter 14 [APP-256] reference is made to the use of triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons).</p> <p>In the event of alternative technology being used, as opposed to the use of the use of triple Araucaria conductors on part or all of the route, should a mechanism be included to ensure that alternative technology is of the same or better standard in relation to noise on standard lattice pylons. In the event a mechanism should be used, what form should the mechanism take (ie should it be a requirement within the DCO), should there be a need to agree to the alternative technology and should there be a discharging and appeal authority?</p> <p>In addition to the above, the ExA notes ES Chapter 7 paragraph 7.9.4 Refers to pylons TB140 to TB142 (inclusive) to the south of River Chelmer being low height pylons.</p>	<p>CCC considers that 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. It considers this could be secured through a requirement that could be discharged by the relevant discharging authority for the section of line affected.</p> <p>A Requirement could be worded as follows:</p> <p>1) No phase of the construction works to pylons TB140 – TB142 (inclusive) may commence until details of—</p>

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		<p>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>(a) the design, specific and acoustic attenuation of the conductor system relating to those pylons 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>Compaction activities and potential for damage due to construction vibration</p> <p>ES Chapter 14 [APP-256] paragraph 14.7.27 to 14.7.30 (inclusive) indicates there are five structures or buildings where there is potential for damage due to construction vibration from potential compaction activities. It also indicates: i) the identified locations will be reviewed by the main contractor in their specific detailed assessments, prior to the start of work with mitigation measures put in place, where required, to avoid potential significant effects; and ii) will review all works locations to determine whether any other buildings or structures may be affected by vibration from construction activities. However, no further details are provided.</p> <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>	The structures and buildings listed at 14.7.27 are not in the CCC area.
NV 1.13	The applicant All local authorities	<p>EACN and Tilbury North Substations operational noise assessment</p> <p>ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259] and ES Appendix 14.4 (Tilbury North Substation Operational Noise Assessment) [APP-260]. The ExA is concerned with the reference to 'reasonably practicable' (also referred to as Best Available Technique Not Entailing Excessive Cost (BATNEEC)) in both documents. This is due to 'reasonably practicable' and BATNEEC including an element of cost within the assessment. The ExA considers any mitigation used must achieve the outcome intended, as set out in tables 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>	Yes, BAT should be employed and it should be secured as a requirement in the DCO. The details should be submitted to both the upper and lower tier LPAs that have jurisdiction over that work area/section for discharge.

ExQ1	Question to:	Question:	Colchester City Council Response
SET 1.5	The applicant Relevant local authorities	<p>Mitigation measures - 2</p> <p>The ExA notes the use of the term 'where practicable' in relation to proposed mitigation and is concerned as to the vagueness of this term.</p> <p>Applicant - justify the use of this term in each instance or amend the proposed mitigations accordingly.</p> <p>Relevant County and Local Authorities – The ExA seeks your views in regard to the use of this term and your suggestions in regard to any alternative forms of wording.</p>	<p>The use of 'where practicable' is wholly unacceptable. It is vague, imprecise and most concerningly because of this it is completely unenforceable. Mitigation must be agreed and must be provided in complete accordance with the agreed details.</p>