AENC-NG-CNS-REP-0328

Norwich to Tilbury

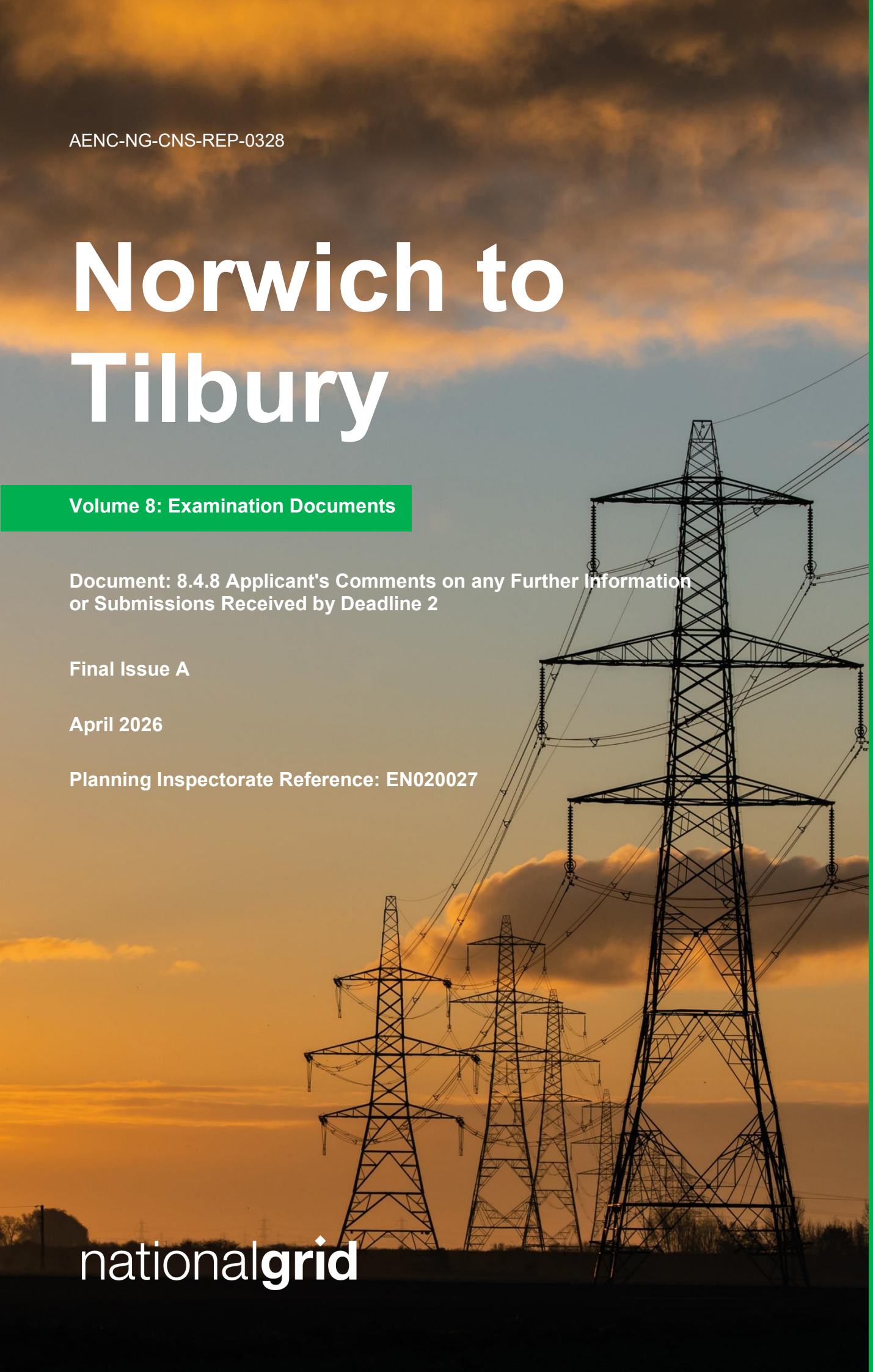
Volume 8: Examination Documents

Document: 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2

Final Issue A

April 2026

Planning Inspectorate Reference: EN020027



nationalgrid

Contents

1. Introduction 1

1.1 Purpose of the Document 1

2. Comments on any Further Information or Submissions Received by Deadline 2 2

Table 2.1 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 2

1. Introduction

1.1 Purpose of the Document

1.1.1 A number of additional submissions were accepted into the examination at or in advance of Deadline 2. The Applicant has reviewed these documents and provided a response where content is directed to the Applicant and the Applicant considers it would be useful for the purposes of the examination to address a new point, provide a correction, or signpost to information provided elsewhere in the Applicant's documents that provides a response. In some cases, this is a cross reference to a response previously provided by the Applicant where this addresses the point made. For example, signposting to the Applicant's response at Deadline 1, **8.4.4 Applicant's Comments on any Further Information/Additional Submissions Accepted by the ExA [REP1-135],** and Deadline 2, **8.4.7 Applicant's Comments on any Further Information or Submissions Received by Deadline 1 [REP2-027]**.

1.1.2 We note that on 26 March 2026 the Examining Authority accepted a late Deadline 2 submission from Babergh District Council and Mid Suffolk District Council containing comments on any further information or submissions received by Deadline 1 **[REP2-113]**. We understand from the local authorities that there were issues with the upload of this document. The Applicant is not responding to that document here as it was received after Deadline 2 and will respond at Deadline 4.

1.1.3 The responses are generally presented in numerical order based on the Examination Library reference number. However, where the same point has been made by multiple parties, this is only listed and responded to once, so may appear out of order for some representations. In such cases, the response is listed under the first representation that makes the point.

2. Comments on any Further Information or Submissions Received by Deadline 2

2.1.1 Table 2.1 summarises the Applicant's responses to Additional Submissions **[REP2-032]** to **[REP2-113]**.

Table 2.1 Applicant's Comments on any Further Information or Submissions Received by Deadline 2

Ref	Name	Matter Raised	Applicant's Response
REP2-032	Ardleigh Parish Council and Little Bromley Parish Council	The Applicant does not engage with the Parish Councils' specific concern about local emergency-response capacity and resilience in this clustered infrastructure setting.	All potential effects, including emergency response capacity and resilience have been scoped out from further assessment as per **6.19 Scoping Report [APP-288]** and **6.20 Scoping Opinion [APP-297]**. This was because there are no likely significant effects following the implementation of embedded mitigation measures that the Applicant adopts on all its projects and the established suite of National Grid policies and processes which contains details on design standards required to be met when designing, constructing, and operating its projects. The Applicant also refers Ardleigh Parish Council to its responses to the following questions in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**: • SS 1.2 (Security risks) • SS 1.3 (Emergency services – access and community safety).
REP2-032	Ardleigh Parish Council and	There is no agreed Fire and Rescue Service SoCG position confirming that the Parish Council's fears are	Question GEN 1.19 of **Examining Authority's Written Questions 1 [PD-014]** asks each of the

Ref	Name	Matter Raised	Applicant's Response
	Little Bromley Parish Council	unfounded or can be mitigated, see Table 1.3 of **5.9 Draft Statement of Common Ground – Overview**.	County Councils to clarify whether they have any comments on the proposed development in respect of their Fire and Rescue Service. The Applicant will include any matters relating to Fire and Rescue Services in the next versions of respective County SoCGs, should matters arise.
REP2-032	Ardleigh Parish Council and Little Bromley Parish Council	Interrelationship with Other Infrastructure Projects: Whilst the report identifies a number of relevant projects and describes engagement with their promoters, it appears primarily descriptive in nature and does not set out any clear strategy for addressing the combined local effects of those projects in the ALBA.	The detailed assessment of the Project with other developments can be found in **6.17.A1 Appendix 17.1 – Inter-Project Cumulative Effects [APP-282]**. The Applicant deals with the consideration of Inter-Project Cumulative Effects, including requirement for mitigation, in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** and does not agree that this content requires duplication in the Interrelationship Report.
REP2-032	Ardleigh Parish Council and Little Bromley Parish Council	Tree Preservation Orders (TPO): The Parish Councils note that TDC has recently made a number of TPOs affecting trees within the ALBA: a. Tree Preservation Order No. 26/00001/TPO – Dead Lane, Ardleigh, Protecting T1–T9 Oak and Group G1–G4 Oak. b. Tree Preservation Order No. 26/00002/TPO – Land East of Causeway, Wick Lane, Ardleigh, Protecting T1 Holly and T2–T3 Oak. c. Tree Preservation Order No. 26/00003/TPO – Land adjacent Fairhaven and Holly Trees, Wick Lane, Ardleigh, Protecting T1–T12 Oak. d. Order served 9 February 2026. The Parish Councils invite the ExA to request that the Applicant to confirm whether these recently designated Tree Preservation Orders (26/00001/TPO,	A number of TPOs and provisional TPOs have been made since 24 June 2025 and would not prevent works being undertaken to trees as per Article 51 (Trees subject to Tree Preservation Orders) within **3.1 Draft Development Consent Order (Revision C).** The TPOs identified have only very recently been designated and were designated after the submission of the Development Consent Order (DCO) application. It is not possible to accurately align the impacts to the trees referenced as the appended plans are for different TPOs (26/00004/TPO, 26/00005/TPO and 26/00006/TPO). The Applicant has sought to minimise impacts on trees through careful routeing, siting and detailed design. **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment**

Ref	Name	Matter Raised	Applicant's Response
		26/00002/TPO and 26/00003/TPO). The Parish Councils invite the ExA to request that the Applicant to confirm whether these recently designated Tree Preservation Orders have now been taken into account and how they are to be addressed through the proposed development.	**AIA [APP-236]** sets out the assessment of arboricultural features supported by extensive surveys undertaken between 2023 and 2025. Mitigation and good practice measures are secured through **7.4 Outline Landscape and Ecological Management Plan (Revision D)** and **7.2 Outline Code of Construction Practice (Revision C)**. During detailed design (post-consent) the Contractor will further develop the design, and it is anticipated that the amount of vegetation loss would be reduced and impacts to trees will be minimised as far as practicable. **7.4 Outline Landscape and Ecological Management Plan (Revision D)** and **7.2 Outline Code of Construction Practice (Revision C)** both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees, where practicable. Whilst therefore the recent designation of these trees has not been considered within the submission, the impact on the trees has been. Article 51 (Trees subject to Tree Preservation Orders) within **3.1 Draft Development Consent Order (Revision C)**, together with **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]**, set out controls on the Applicant's powers to fell and lop trees protected by TPOs, both within and outside the Order Limits. These controls are consistent with controls used in several precedent DCOs, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Enablement Project) Development Consent Order 2024. Article

Ref	Name	Matter Raised	Applicant's Response
			51(2) includes a clause which addresses the situation where a TPO is made after 24 June 2025.
REP2-032	Ardleigh Parish Council and Little Bromley Parish Council	The Parish Councils further note that a number of TPO trees were not identified in the Applicant's arboricultural and landscape assessments.	Information on TPOs is included in **2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]** which has been developed using information provided by relevant Local Planning Authorities. Where no information was provided by a Local Planning Authority, the Project digitised TPO records based on the readily available information on the Council's public mapping systems. The Applicant is in the process of requesting TPO information from LPAs for any TPOs served after the date of the assessment. This information will be used to update Schedule 14 at a future deadline.
REP2-033	Braintree District Council	Project List Coverage in the Interrelationship with Other Projects Report [**REP1-134]** Many of the projects listed within the Council's LIR appear in Table 2.1. However, the Council has identified the following omissions and clarifications: Application 17/01979/OUT is pending decision but is unlikely to be issued. However, application 23/00816/OUT, on the same site, was allowed on appeal. It is understood that the site is currently being marketed, although the Council is not aware of any recent updates. In any case, owing to the above, it is requested that application 17/01979/OUT be changed to 23/00816/OUT and updated accordingly.	As confirmed in paragraph 2.1.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]**, Table 2.1 of that report provides a summary of the other projects as identified in the Examining Authority's Rule 6 Letter, i.e. the ten Nationally Significant Infrastructure Projects (NSIPs) listed there, the Tarchon Interconnector Project and the other non-NSIP projects that are shortlisted in **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]**. Table 2.1 also provides information about EcoPower Suffolk Solar, as requested by the ExA subsequently. Planning application 17/01979/OUT (ID B12) and Application 23/00816/OUT (ID B39) are included in **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]**. As of the cut-off date for the assessment

Ref	Name	Matter Raised	Applicant's Response
			in this document (1 April 2025), the appeal for Application 23/00816/OUT had not been validated (3 April 2025); therefore, the development did not qualify for the short list and so was not included in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]**. The Applicant thanks the council for this update and will reflect this in the next version of the Interrelationship Report due to be submitted at Deadline 4.
REP2-033	Braintree District Council	Kings Dene (Proposed Local Plan Allocation for circa 5000 homes). The Council is currently updating its Local Plan, which has now entered the Regulation 18 stage, with Kings Dene included as a proposed allocation. While Regulation 18 carries limited weight in decision-making, the Council notes that by the time a decision is made on this DCO (late January 2027), the Local Plan will be further advanced and, assuming it is advanced, the proposed allocation will carry more weight. Owing to the above, the Council request that the interrelationship document is updated to include this allocation and for it to be considered accordingly.	As confirmed above, **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]** covers projects that were shortlisted in **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]**. Further updates of the Interrelationship Report will reflect any updates to the Environmental Statement Chapter 17 shortlist, to reflect the approach requested by the Examining Authority.
REP2-033	Braintree District Council	Feering Strategic Allocation. Table 2.1 of REP1-134 identifies the Feering Strategic Allocation. The table however is incorrect as an application was submitted in January 2026 for the site, under planning application reference: 26/00119/OUT. Moreover, the description of development mirrors the strategic allocation in the current Adopted Local Plan, which is for a higher number of dwellings than reported in Table 2.1. The Council request that the Applicants table be updated accordingly to reflect the above.	Planning application 26/00119/OUT was submitted in January 2026. **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** considered developments up to a cut-off date of 1 April 2025. Planning applications submitted since this date are currently being reviewed, and an updated assessment of inter-project cumulative effects is being undertaken on shortlisted developments. Further updates of the Interrelationship Report will reflect any updates to the

Ref	Name	Matter Raised	Applicant's Response
			Environmental Statement Chapter 17 shortlist, to reflect the approach requested by the Examining Authority.
REP2-033	Braintree District Council	Application 21/03579/OUT. This application is correctly identified in Table 2.1 of REP1- 134. It is anticipated that revised plans will be submitted shortly and the planning application is provisionally scheduled to be reported to the Council's Planning Committee for consideration in June 2026. Owing to the above, if the application is approved, the construction phase will likely overlap with the construction of Norwich to Tilbury. As such, this should be better reflected within Table 2.1 of REP1-134.	Planning application 21/03579/OUT is included within **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]** and **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** as ID B13. At this stage the planning application is pending determination and the Applicant, having searched for information online about construction dates in the development of Table 2.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]**, does not have any known construction start dates.
REP2-033	Braintree District Council	The Council notes that although the Interrelationship with Other Projects Report supplements the projects included in Chapter 17 (cumulative effects), several inconsistencies remain. For example, ES Chapter 17 [**APP-281**] broadly identifies significant cumulative effects in Braintree District relating to BMV land and multiple Landscape Character Areas and Visual Receptor Areas. However, the Interrelationship Report tends to characterise interfaces as "manageable." To aid the Examination, the Council requests that the Applicant provide a short bridging note, reconciling the environmental significance with the delivery/interface narrative (Interrelationship Report), project by project. This way impacts can be better understood related to each project.	**6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]** provides a detailed cumulative effects assessment splitting down effects into separate topics as covered by the Environmental Assessment. The Applicant does not consider that a short bridging note would add anything to summarise the effects assessed in this document. The Project used a cut-off date of 1 April 2025 to confirm the long list of developments considered within the cumulative assessment. However, since the 1 April the Applicant has been undertaking a monthly review of planning registers to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the ES then these would be published

Ref	Name	Matter Raised	Applicant's Response
			into the Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate).
REP2-033 REP2-035 REP2-041	Braintree District Council Chelmsford City Council Tendring District Council	Needs Case: The Council notes that no further evidence is to be submitted by National Grid to support the need for the project. While the Council has regard to the Applicant's position, it remains extremely dissatisfied that no additional evidence will be provided. As a result, the Council is unable to fully support the need case put forward by the Applicant, and this matter will remain not agreed.	The Applicant sets out its position on Needs Case in Section 3.2 of **8.8.2 Applicant's Comments on Local Impact Reports REP2-030]**. This set out the Applicant's arguments that: • The need case is robust, quantified, independently validated and the licence obligation to deliver by 2030 is statutory, not merely contractual; and • The Project is needed by 2030 — the Hiorns Report's 2035 conclusion is expressly rejected and including addressing why delay does not provide a deliverable High Voltage Direct Current (HVDC) alternative. The Applicant provides further information in Chapter 2 (Overarching Policy Context) of the same document, specifically Section 2.3.
REP2-033 REP2-035 REP2-041	Braintree District Council Chelmsford City Council Tendring District Council	Alternatives: The Council notes that the Applicant does not intend to provide any further evidence in relation to alternatives. The Council remains dissatisfied with this position. In addition, the Council remains concerned that the substantial landscape and visual impacts of the proposed overhead line have not been weighed against credible alternative approaches that could materially reduce such harm. In the absence of this further evidence, the Council is unable to agree that the Applicant has demonstrated that credible alternatives have been robustly assessed in accordance with National Policy Statement (NPS)	The Applicant sets out its position on Alternatives in Section 3.3 (Offshore) and 3.4 (Technology choice) of **8.8.2 Applicant's Comments on Local Impact Reports REP2-030]**. The Applicant explored a number of Onshore and Offshore alternatives, considering technologies including HVDC solutions. Documents **7.19 2023 - Strategic Options Backcheck and Review [APP-357] and 7.17 Strategic Options Backcheck and Review [APP-355]** have set out these alternatives and how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the

Ref	Name	Matter Raised	Applicant's Response
		EN-1 and EN-5. The matter of alternatives therefore remains not agreed.	capital lifetime costs. The cost element of the evaluation is supported by a transparent cost model in Appendix D: Economic Appraisal, pages D1-D14, of **7.19 2023 - Strategic Options Backcheck and Review** [**APP-357]**. This concluded that the need case was met by the onshore AC solution, in line with NPS EN-1 and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury Project, in line with the transmission and licence obligations. The conclusion remains that the nearest proxy for the Project at £1,630.3m remains best way to deliver the Project, with the urgent requirements set out in NPS EN-1 and EN-5, alongside the Electricity Act 1989 and Transmission Owner Licence requirements recognised within the NPSs and Applicant's obligations.
REP2-033	Braintree District Council	Landscape and Visual: Council's concerns around Residential Visual Amenity Assessments (RVAA), particularly at properties E7 and E8 where visual effects could be "unpleasantly encroaching" or "inescapably dominant" under realistic Limits of Deviation (LoD)scenarios, the Applicant's responses again rely heavily on reiterating its original assessment and methodology. The Applicant provides generalised statements defending the RVAA findings but does not meaningfully engage with the Council's specific concerns, including the potential for LoD-enabled movement of pylons to result in materially greater impacts than assessed.	Specific consideration of the worst-case scenarios for these properties (and what the Applicant considers these worst-case scenarios to be for each property, in terms of pylon location within the lateral and longitudinal LoD) has previously been explained in **8.4.1 Applicant's Comments on Relevant Representations**, pages E3 and E4 (comment 4.9). It should be noted, however, that it would be the outer limits of the conductors' swing that may possibly be re-located to the edge of the LoD, and subsequently, not the pylons themselves. Given the scale of the structures which would be introduced under the proposals, the vertical LoD of 6 m is not expected to make any material difference to the outcome of the RVAA, although it is noted within the assessment that the shorter pylons which are proposed along the

Ref	Name	Matter Raised	Applicant's Response
			route, at changes of direction, would be more visually prominent than the taller structures. Consideration of the angle of the view towards the Project, proportion of the views which are affected by the proposed pylons and overhead lines, how much of the existing view will still be visible, whether the elements within the view would be static or mobile, effects on light and shadow, etc. are all elements which affect the outcome of the assessment, and are taken into account when making a judgement as to the level of impact and whether the RVAT is likely to be breached or not. In all cases the impacts on views are considered in the round. For property E7 (West Ford Farm Cottage), a two-storey detached property, the Project would be clearly visible from the north-east and north-west elevations, and it is recognised that the Project would form a key defining element in views from the garden and rear/primary façade, resulting in a high magnitude of effect. However, views from both southern facing elevations would be unaffected by the Project, and it would therefore not be 'inescapable' in views from this property, when considered in the round. In addition, the visually permeable nature of the pylons proposed would also lightly filter, rather than screen, existing views of the surrounding farmland, treed hilltops, and open skies, which would still occupy the backdrop of the views. For property E8 (Whitehead's Farm), whilst the Project would be visible from the north-west and north-east facing elevations of this detached property, the remaining two elevations face away from the Project completely and would be unaffected by it.

Ref	Name	Matter Raised	Applicant's Response
			Baseline views from the property are medium-long distance across surrounding farmland in all directions, and whilst the pylons and overhead lines would form a new prominent feature in views to the north-west and north-east, views of the farmland will still be visible through the proposed structures, and occupy the majority of the views. Therefore, the Project is not considered to be 'unpleasantly encroaching' or 'inescapably dominant', overall, in views from this residence. In both cases, the Project is not deemed to be 'unpleasantly encroaching' due to the availability and openness of unaffected views from these properties, which are not 'encroached' upon at all.
REP2-033	Braintree District Council	Arboriculture: Of particular concern is the Applicant's reliance on statements that the exclusion of Category C trees from assessment is consistent with the scoping opinion, or that high and moderate-value surveyed trees have been adequately illustrated within Annex D of APP-236. The Council notes, for example, that reference is made to the treatment of T102, yet this does not resolve wider issues regarding the absence of clear, accessible information across the full arboricultural baseline.	The methodology of the assessment was agreed at the scoping stage in **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**. The Council's comments are noted. Figure A13.6.1: Arboricultural Impacts Plan (Revision B) - Annex D of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** was updated to include clear labelling of arboricultural features and submitted in **8.1 Errata List [REP1-071 / REP1-065]** which can be used to cross reference with the tree schedule. The Applicant hopes this addresses the concerns of Braintree District Council. It should be noted that Revision C of Figure A13.6.1: Arboricultural Impacts Plan - Annex D of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** has been submitted at Deadline 3 as part of **8.10.1 Technical Note – Ancient Woodlands and Veteran**

Ref	Name	Matter Raised	Applicant's Response
			Trees. The only difference between Revision B and Revision C of the plan is the addition / changes to ancient woodland boundaries.
REP2-033	Braintree District Council	Arboriculture: The Council notes that the Applicant does not consider that Requirement 8 requires amendment, stating that the requested measures are included within the Outline Landscape and Ecological Management Plan (OLEMP). However, the Council contends that the Applicant will not be building out the scheme; this will instead be undertaken by a separate contractor. The Council therefore remains strongly of the view that Requirement 8 must be updated to ensure consistency with the OLEMP, so as to avoid any inconsistency or confusion in the contractor's approach. As currently drafted, Requirement 8 does not mandate the necessary information in relation to Arboricultural Method Statements or Tree Protection Plans (including root protection areas).	Requirement 4 of **3.1 Draft DCO (Revision C)** states that Construction Management Plans including a Landscape and Ecological Management Plan (LEMP) shall be submitted prior to commencement of the authorised development. The LEMP should be in accordance with the outline landscape and ecological management plan, which states that an Arboricultural Method Statement and Tree Protection Plans will be produced following detailed design and agreed with the relevant LPAs.
REP2-033	Braintree District Council	Arboriculture: The repeated assertion that further detail "will be provided during detailed design" is not considered acceptable for a project of this magnitude, where the scale of tree and hedgerow loss, should be more clearly evidenced at the outset. The Council therefore maintains its position that arboricultural matters remain a significant area of dispute, and that further clarification, detail and secured commitments will be required during the Examination if these issues are to be satisfactorily resolved.	**7.4 Outline Landscape and Ecological Management Plan (Revision D)** and **7.2 Outline Code of Construction Practice (Revision C)** both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable.
REP2-033	Braintree District Council	Ecology and biodiversity: In relation to 6.2, the Council agrees that the 'Pathway to Effect and Significance of Effect' column in Table 8.23 of 6.8	The impact assessment, which includes short, medium and long-term impacts, is detailed within in the 'Pathway to Effect and Significance of Effect'

Ref	Name	Matter Raised	Applicant's Response
		Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026] does refer to short and medium-term impact magnitude predictions in the absence of mitigation. However, the Residual Effect column of Table 8.23 does not clarify how long it is predicted to take for the magnitude of impact to reduce to a negligible level for the affected receptors. This information would provide useful transparency, as without it one may incorrectly infer that the application of mitigation alone results in a neutral outcome, without recognising that a period of recovery, potentially measurable in years, may still be required.	column of Table 8.23 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The residual effects column identifies how the receptor is affected in the long term with mitigation in place, in line with the assessment methodology agreed at the scoping stage.
REP2-033	Braintree District Council	Ecology and biodiversity: In relation to 6.4, it is Braintree District Council's position that the bat roost impacts arising from tree clearance along the development route cannot be predicted with sufficient reliability prior to a DCO decision. Limiting mitigation to circumstances "where the presence of a roost is confirmed…" will underrepresent the true scale of impact on bat populations. Given that the Applicant proposes a preconstruction survey approach—which deviates from standard survey requirements—a correspondingly more robust and extensive mitigation commitment is necessary to compensate for that uncertainty.	The bat survey scope was agreed with Natural England in advance of surveys being undertaken, as included within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034].** Due to the transient nature of bat tree roosts, all impacted trees will be subject to pre-construction surveys in line with **7.4 Outline Landscape and Ecological Management Plan (Revision D).** Where the presence of a bat roost is confirmed during surveys/inspections, every effort will be made through micro-siting to retain the tree and associated bat roost, where practicable. Where unavoidable, any direct loss of a bat tree roost will be carried out under a Natural England licence. The Applicant is working with Natural England through the production of a draft licence to agree the mitigation approach. It is expected that this agreement will be received during the examination.

Ref	Name	Matter Raised	Applicant's Response
REP2-033	Braintree District Council	Ecology and biodiversity: The Council also considers that the current approach does not meet the tests of Natural England's Policy 4. Only PRF-M trees, identified through ground-level inspection alone, are proposed for aerial inspection or emergence surveys prior to works. Of those PRF-M trees, only those in which roosts are confirmed through these limited surveys would be subject to compensation under the mitigation licence. The Council believes that this approach will significantly underestimate and under-mitigate the overall impact on bat-roost resources along the route.	The Applicant disagrees with Braintree District Council that the approach to bat surveys/mitigation will underestimate and under-mitigate the overall impact on bat roost resources for the Project. The bat survey scope was agreed with Natural England in advance of surveys being undertaken, as included within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**. Due to the transient nature of bat tree roosts, all impacted trees will be subject to pre-construction surveys in line with **7.4 Outline Landscape and Ecological Management Plan (Revision D)**, not just PRF-M features as suggested by the Council. The requirement for and scope of pre-construction bat surveys is included within **7.4 Outline Landscape and Ecological Management Plan (Revision D).** All impacted trees will be subject to an updated ground-based bat tree assessments pre-construction. Any trees assessed as Preliminary Roost Features – Maternity (PRF-M) will be subject to 3 x aerial inspections/emergence surveys in line with the Bat Conservation Trust guidelines (Collins, 2023). If no bat roost is identified the tree can be felled, or the PRF-M destructively searched and blocked up immediately following the survey. Any trees assessed as a Preliminary Roost Feature - Individual (PRF-I) or PRF-M (where the PRF hasn't been immediately blocked or blocking is dislodged following pre-construction surveys) will require a single inspection under the supervision of a bat licensed ecologist immediately prior to being impacted to determine the presence / absence of a bat roost.

Ref	Name	Matter Raised	Applicant's Response
			Where the presence of a bat roost is confirmed during surveys/inspections, every effort will be made through micro-siting to retain the tree and associated bat roost, where practicable. Where loss of a roost is unavoidable in any tree/feature (whether PRF-M or PRF-I), appropriate compensation measures under a Natural England mitigation licence will be implemented.
REP2-033	Braintree District Council	Ecology and biodiversity: The Council also maintains that it is a flawed and inadequately supported assumption that Natural England derogation licensing can always be relied upon to maintain the favourable conservation status of affected species. Furthermore, the Council considers that the potential impacts on the conservation status of "the local population of any EPS" (i.e. bat species other than barbastelle) have not been satisfactorily assessed. A more generous and precautionary roost-tree compensation strategy is therefore required to address this limitation.	The Applicant disagrees with Braintree District Council's comment. The species protection provisions of the Habitats Directive, as implemented by The Conservation (Natural Habitats &c.) Regulations 1994, contain three 'derogation tests' which must be applied by Natural England when deciding whether to grant a licence to a person carrying out an activity which would harm a European Protected Species such as bats. The third derogation test is that the favourable conservation status of the species must be maintained. A draft licence application for bats has been submitted to Natural England for review which includes consideration of the third derogation test. The Applicant is working with Natural England towards agreeing the bat mitigation/compensation approach and are expecting receipt during the examination phase.
REP2-033	Braintree District Council	Ecology and biodiversity: The Council requests clarification on the basis for the stated "good practice": namely, what recognised guidance underpins this assertion and which specific industry standards for Ecological Clerk of Works (ECoW) practice will be applied. The Council further seeks clarity on the level	What classifies as a suitably qualified ECoW will depend on the specific task to be undertaken and the protected species or habitat in question. Therefore, a specific set of criteria that make an ECoW suitably qualified cannot be set out at this stage. This role will not be undertaken by one individual, but by multiple

Ref	Name	Matter Raised	Applicant's Response
		of conformity that will be required, as the term "based on" does not provide sufficient assurance regarding the degree of adherence to those established standards.	ecologists with a range of relevant experience and any protected species licences necessary for the specific task to be undertaken.
REP2-033	Braintree District Council	Historic Environment: The Council still considers that measure HO6 in the CoCP could be expanded, at least to signpost where further information is available to explain and support this commitment.	As presented in **7.2 Outline Code of Construction Practice (Revision C)** commitment H06 comprises: Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of works/impact to each Protected Lane (Essex) and Historic Land (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected/Historic Lane, including associated banks and ditches. During construction, the Main Works Contractor(s) will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, replacement (compensatory design elements) will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks). As stated in **7.2 Outline Code of Construction Practice (Revision C)**, further details will be confirmed by the Main Works Contractor(s) if the Project is consented.

Ref	Name	Matter Raised	Applicant's Response
			6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] at paragraph 11.6.8 sets out where further information is available, in **7.4 Outline Landscape and Ecological Management Plan (Revision D)**, which includes measures to protect and reinstate historic landscape features including protected lanes, in addition to the commitment set out in H06 of **7.2 Outline Code of Construction Practice (Revision C)**.
REP2-033	Braintree District Council	Historic Environment: The Council maintains its view that opportunities for further embedded mitigation should be explored, particularly at those assets where potential harm has been identified.	The Applicant has responded to this in its response to question HE 1.36 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.
REP2-033	Braintree District Council	Historic Environment: Regarding 7.14 and Paragraph 11.6.10…the Council remains concerned that the current drafting of 11.6.10 is ambiguous in a statutory context. To avoid misinterpretation, the Council proposes that 11.6.10 is revised to state explicitly that additional, asset specific mitigation is required, and to identify the mechanism by which such measures will be secured and approved.	The Project does not propose additional mitigation measures for historic buildings or historic landscapes, mitigation for these heritage assets is secured through the embedded and standard measures described in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**, **7.2 Outline Code of Construction Practice (Revision C)** and **7.4 Outline Landscape and Ecological Management Plan (Revision D)** and secured through Requirement 4 of **3.1 Draft Development Consent Order (Revision C)**. As set out in paragraph 11.6.10 and 11.6.1,1 additional mitigation is proposed for archaeology. Therefore, the Applicant does not consider that a change to this text is necessary.
REP2-033	Braintree District Council	Noise and Vibration:The Council will defer a substantive response pending the Applicant's further comments on the Local Impact Report.	Noted.

Ref	Name	Matter Raised	Applicant's Response
REP2-033	Braintree District Council	Air Quality: The Council have no further comments at this stage and will defer any comments to deadline 3 once the Applicant has had an opportunity to review the Councils Local Impact Report.	Noted.
REP2-033	Braintree District Council	Contaminated Land, Geology and Hydrogeology: The Council are content that the Applicant's responses address the questions raised and have no further comments at this stage.	Noted.
REP2-033	Braintree District Council	Agriculture and Soils: The Council remains concerned that the predictive model has been applied across a significantly wider area than the 866 predictive assessment points referenced. The Council therefore maintains that the ALC mapping should more accurately reflect the detailed survey results to ensure a robust assessment of impacts on BMV land. The updated ALC drawing [**REP1-062**] continues to show large areas where the mapped ALC grade differs from the grades recorded during the detailed survey, including instances where extensive surveyed areas have been overridden by predicted classifications. While the ALC guidance allows for interpolation of mapped areas using surrounding point data, the Council considers that the current mapping relies too heavily on the predictive model and not sufficiently on the more reliable surveyed data. The Council therefore maintains that the ALC mapping should more accurately reflect the detailed survey results to ensure a robust assessment of impacts on BMV land.	These points are addressed in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.

Ref	Name	Matter Raised	Applicant's Response
REP2-033	Braintree District Council	Agriculture and Soils: Regarding 12.4, the Council notes that a high-level assessment using provisional ALC data, together with any available post-1988 ALC survey information, could have been utilised at the optioneering stage. The Council considers that incorporating such data early in the route-selection process would have enabled clearer identification and avoidance of areas of provisional Grade 1 and Grade 2 agricultural land, which could reasonably have formed part of the route-selection criteria.	The Applicant has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routing and siting process confirms that no reasonable alternatives are available. Policy recognises that opportunities to fully mitigate impacts on existing land uses may be limited. Even so, impacts on land use and farming operations have been carefully considered and reduced as far as practicable.
REP2-033	Braintree District Council	Agriculture and Soils: Regarding 12.5, in relation to the updated corrections set out in **8.1 Errata List [REP1-072**], the Council notes that only 12 soil pits were ultimately assessed. Given the scale of the Order Limits (3,755 ha), the presence of 35 soil associations, and the extensive variation in mapped ALC grades ranging from Grade 2 to Grade 4 along the route, the Council does not consider this number of pits sufficient to underpin a robust land-grade assessment. As this limited dataset is being used to	These points are addressed in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**.

Ref	Name	Matter Raised	Applicant's Response
		inform a predictive model that is classifying the majority of the Order Limits, it is essential that the "ground-truthing" data is representative and reliable. While the Council acknowledges that the predictive ALC modelling approach is generally robust and provides greater accuracy than reliance on provisional ALC data alone, it remains critical that the underpinning survey data is sufficiently comprehensive to ensure confidence in the resulting classification.	
REP2-033	Braintree District Council	Draft DCO: Regarding 14.3 (pre-commencement operations definition), the Council notes that this definition was the subject of considerable debate prior to the confirmation of the Bramford to Twinstead (B2T) DCO, and that no substantive justification has been provided as to why it is appropriate, in the specific circumstances of the Norwich to Tilbury Project, to broaden the scope of "precommencement" beyond what was agreed for B2T. The Council is concerned that an unduly expansive definition would enable a wide range of impactful activities to proceed ahead of the Requirements being triggered, thereby reducing the effectiveness of the control framework intended to safeguard residents and the environment. In the absence of a third-party control mechanism, of the kind proposed by the Council, there is limited assurance that the promoter will acknowledge, or seek approval for, pre-commencement activities that could give rise to materially new or different environmental effects and potentially unacceptable impacts.	The Applicant has responded to this in its response to question DCO 1.A8 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.

Ref	Name	Matter Raised	Applicant's Response
REP2-033	Braintree District Council	Draft DCO: Regarding 14.6 (Article 2 "Maintain), the Council remains concerned that, without the incorporation of an appropriate thirdparty control mechanism of the kind previously suggested by the Council, the proposed definition would allow maintenance activities associated with the development to proceed without adequate scrutiny. In such circumstances, there is little incentive for the promoter to recognise or disclose where these works may give rise to materially new or different environmental effects, including the potential for unacceptable landuse impacts for residents. The Council therefore does not consider the Applicant's response to be acceptable.	The Applicant notes the Council's concern, however, it would reiterate that as a transmission licence holder, the Applicant has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system. Furthermore, the power for the Applicant to maintain the authorised development is, as the Council recognises, tied to those maintenance activities not giving rise to any materially new or materially different environmental effects to those identified in the environmental statement. The onus is on the Applicant to ensure that these maintenance activities do not give rise to any materially new or materially different environmental effects. A failure to comply with a term of the DCO would be an offence. This approach to maintenance has precedent in a number of made DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.
REP2-033	Braintree District Council	Draft DCO: Regarding 14.7 (Article 4 – maintenance), the Council notes the Applicant's response but remains concerned that the retention of obsolete equipment, even where it remains safe or technically functional, may nonetheless be visually intrusive for local residents and give rise to other adverse impacts, including increased vulnerability to trespass or unlawful interference. The Council therefore considers that such equipment should not remain in situ indefinitely and that appropriate provisions should be included to secure its timely removal.	The Applicant has responded to this in its response to question DCO 1.A14 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.

Ref	Name	Matter Raised	Applicant's Response
REP2-033	Braintree District Council	Draft DCO: Regarding 14.8 (Article 5 – vertical LoD), the Council notes that the Applicant has not provided a clear explanation as to why a 6m vertical limit of deviation is required in this instance, particularly when a 4m limit was considered acceptable and approved in the more recent Bramford to Twinstead DCO, which is located within the same broad landscape and terrain as the Norwich to Tilbury proposals. Given the importance of visual impacts to local residents, the Council considers that any increase in vertical deviation must be robustly justified and treated with appropriate sensitivity.	The Applicant has responded to this in its response to question DCO 1.A15 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.
REP2-033	Braintree District Council	Draft DCO: Regarding 14.13 and 14.14 (Article 50 – tree and hedge works), the Council remain concerned that the use of the term "near" introduces unnecessary vagueness and uncertainty, particularly in circumstances where works may take place outside the Order Limits and beyond the areas assessed within the Environmental Statement. The Council considers it essential that some form of third-party control mechanism is incorporated to ensure that tree and hedge works undertaken outside the authorised development boundaries are demonstrably limited to what is reasonably required. Once vegetation has been cut or removed, the resulting harm cannot be reversed, and appropriate safeguards are therefore necessary to prevent avoidable or disproportionate impacts.	The Applicant's justification for the approach taken in respect of Article 50 is set out in part 4 of **3.2 Explanatory Memorandum (Revision C**). Whilst there is no definition of 'near' in **3.1 Draft Development Consent Order (Revision C)** (which is consistent with the model provisions on which this article is based) the power in Article 50 (1) is limited and the given circumstances will help to define its meaning. More specifically, the Applicant notes that the power at Article 50 (1) may only be exercised for the specific statutory purpose(s) set out, namely to prevent an obstruction or interference with the construction, maintenance or operation of the 'authorised development' (as defined) or any apparatus used in connection with it, or to remove or prevent a danger to persons constructing, operating or maintaining the same. Therefore, as the distance from the Order limits increases, the more unlikely it will be for these statutory tests to be met.

Ref	Name	Matter Raised	Applicant's Response
			Other recent DCOs have made similar provision. See, for example, Article 48 (1) of the National Grid (Bramford to Twinstead Reinforcement) Order 2024, Article 81 (1) of the Sizewell C (Nuclear Generating Station) Order 2022, Article 32 (1) of the Cleve Hill Solar Park Order 2022 and Article 35 (1) of the Norfolk Boreas Offshore Wind Farm Order 2021. None of the Orders referred to include a definition of 'near'.
REP2-033	Braintree District Council	Draft DCO: Regarding 14.16 (Schedule 1 – authorised development), the Council is concerned that, without the incorporation of an appropriate third-party control mechanism, there is limited assurance that the scheme promoter will identify or acknowledge where associated, but currently unspecified, works may give rise to materially new or different environmental effects. Such effects could, in turn, result in unacceptable land-use impacts for residents. Given the breadth of activities that may fall under the umbrella of "associated development", the Council considers it necessary that it be notified of any such works in order to maintain a comprehensive understanding of the project as constructed.	The Applicant does not agree that the Associated Development should be subject to a further local-level approvals process. Notwithstanding the absence of obvious precedent for such an approach, the Applicant would point to Section 115(1) of the Planning Act 2008 which provides that, in addition to the development for which development consent is required under Part 3 of the Act, consent may also be granted for associated development. Approval or authorisation for the Associated Development sought in respect of the project is therefore a matter within the jurisdiction of the SoS as the determining authority pursuant to Section 103 of the Planning Act 2008. Within this context, the Applicant notes that the Associated Development included in Schedule 1 to **3.1 Draft Development Consent Order (Revision C)** is open to detailed scrutiny (including by the relevant local authorities) as part of the Examination of the Project. Should the Secretary of State be minded to grant development consent pursuant to Section 115(1), it will be on the basis that the detailed content of the Associated Development included in Schedule 1 is deemed necessary and expedient in relation to the construction or maintenance of the Project.

Ref	Name	Matter Raised	Applicant's Response
			Therefore, it is the Applicant's view that there is no need for an additional level of regional or local scrutiny to be applied at a later date. Indeed, the Applicant considers that such further scrutiny would be counterintuitive to the fundamental aims of the DCO process and particularly so given the need to ensure the timely delivery of this CNP Project. Furthermore, the Applicant's does not consider notification of all associated development on a project of this nature and scale to be appropriate or proportionate. Such an obligation would be an extraordinary administrative burden and the Applicant does not consider it to be a reasonable or practical request.
REP2-033	Braintree District Council	Draft DCO: Regarding 14.18 (Schedule 3, Paragraph 6), the Council acknowledges that the phrase "in substantial accordance with" represents a recognised drafting standard within Development Consent Orders. However, in the absence of an appropriate third-party control mechanism—as previously proposed by the Council—there remains limited assurance that the scheme promoter will identify or disclose where works may give rise to materially new or different environmental effects that fall outside the scope of the Environmental Statement. Such unacknowledged variations have the potential to lead to unacceptable land-use impacts for residents, and the Council therefore considers that additional safeguards are necessary to ensure appropriate oversight.	The Applicant has set out its position on assurances surrounding works that may give risk to materially new or materially different environmental effects to those identified in the Environmental Statement in a number of responses. The Applicant's position remains that it is not necessary for these third-party controls to be included in Paragraph 6 of Schedule 3 to **3.1 Draft Development Consent Order (Revision C**). The onus is on the Applicant to comply with the terms of the DCO and a failure to do so would be an offence.

Ref	Name	Matter Raised	Applicant's Response
REP2-033	Braintree District Council	Draft DCO: Regarding 14.21 (Schedule 4 – Discharge of Requirements – Paragraph 1), the Council maintain that 28 days is wholly insufficient for discharge of requirements. The Council defer to comments in its **Local Impact Report [REP1-148]** Paragraph 16.2.68 which draws on its practical experience of 35 days in relation to Norwich to Tilbury.	The Applicant has responded to this in its response to question DCO 1.A2 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.
REP2-033	Braintree District Council	Draft DCO: Regarding 14.22 (Schedule 4 Discharge of Requirements – Paragraph 2), the Council maintain that five days is wholly insufficient for discharge of requirements. Based on recent experience of Bramford to Twinstead (which is seven days), this unrealistic timescale has caused issues and conflicts with the delivery team and the stretched Host Authority consultees.	The Applicant has responded to this in its response to question DCO 1.A3 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**. The Applicant has adjusted this time period to five business days provides an equivalent period to that contained in the National Grid (Bramford to Twinstead Reinforcement) Order 2024, and which also ensures that the relevant planning authorities are not disadvantaged when decision periods coincide with weekends or public holidays.
REP2-034	Burstall Parish Council	The Council provides a table which summarises the policy failures that it has identified. For items written in normal text, the supporting information can be found in our Written Representation at Deadline 1. For items written in italics the supporting information can be found in this document submitted at Deadline 2. As the Examination proceeds, we will update the table as and when the Applicant provides sufficient information to satisfy the conflict we identified.	The Applicant's position is that decision making is balanced to meet the varied requirements set by planning policy (NPS EN-1 and EN-5) and duties arising under various legislation including the Electricity Act 1989 (including Schedule 9 duties), Countryside and Rights of Way Act and Levelling up and Regeneration Act. The balanced decision making encompassing technical, environmental (includes landscape and views, heritage, ecology, water environment etc), socio-economics and cost aspects. The decision making process sits within the context of the Project's status as a critical national priority project, which does not require all impacts to be addressed and recognises that some residual effects

Ref	Name	Matter Raised	Applicant's Response
			will remain. The routeing and siting has inherently sought to avoid effects or, where not possible to avoid, to reduce them, and then considered the mitigation hierarchy where unacceptable effects are identified. The Applicant's more detailed assessment of the NPS policy framework and the mitigation hierarchy is set out in Section 8 of **5.6 Planning Statement [APP-085]**. The Applicant's position is that the decision is correctly based in policy with Schedule 9 duties correctly considered and balanced with other factors.
REP2-034	Burstall Parish Council	NPS EN-1 & EN-5 Mitigation Hierarchy: Chooses to compensate – lower down the hierarchy - for visual impact instead of avoiding.	The mitigation hierarchy has been systematically applied throughout the design of the Project. This is set out in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**, **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, **6.5 Environmental Statement Chapter 5 - Environmental Impact Assessment Approach and Method [APP-135]** and **5.6 Planning Statement [APP-085]**.
REP2-034	Burstall Parish Council	Electricity Act 1989 Section 9: Fails to develop and maintain an efficient and economical network.	The Applicant has addressed how it complies with the Electricity Act 1989 in **5.6 Planning Statement [APP-085]** (see Section 6.1).
REP2-034	Burstall Parish Council	Horlock Rules p10 and Rule 5 & 11: Fails to keep visual impacts to a minimum by proposing an increase in visual clutter around Bramford substation.	Throughout the development of the Project the Holford and Horlock Rules have been considered in conjunction with information on the presence of constraints, homes and environmental features and the finding of the Environmental Impact Assessment (EIA) process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. Further details on compliance

Ref	Name	Matter Raised	Applicant's Response
			with the Horlock Rules during optioneering can be found in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**.
REP2-034	Burstall Parish Council	NPS EN-1 3.3.66: Duplication of works required increases cost to consumers, delivery timescales, and community and environmental impacts.	The Applicant has addressed in detail how it complies with EN-1, including paragraph 3.3.66 in **5.7 Policy Compliance Document [APP-085]**.
REP2-034	Burstall Parish Council	NPS EN-1 4.1.7: Disengages the presumption in favour of consent.	The Applicant has addressed in detail how it complies with EN-1, including paragraph 4.17 in **5.7 Policy Compliance Document [APP-085].**
REP2-034	Burstall Parish Council	NPS EN-1 4.4.4: Proposed diversion route goes from one closed road to another closed road, with no impact assessment of the diverted traffic – ES is incomplete.	As noted in **Document: 8.4.1 Applicant's Comments on Relevant Representations**, it is anticipated that the coordination/planning of road closures will be secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently. The Applicant does not envisage simultaneous road closures along proposed diversion routes. When considered in the context of other major infrastructure projects, this has been considered to have residual effects for driver delay (journey times) and are considered not significant as detailed within Section 16.7 of **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271].**
REP2-034	Burstall Parish Council	NPS EN-1 4.4.5: Fails to assess cumulative construction impact in conjunction with Bramford to Tilbury NSIP - ES is incomplete.	The Applicant has addressed this point in the Burstall's Written Representation in **8.8.1 Applicant's Comments on Written Representations [REP1-151].**
REP2-034	Burstall Parish Council	NPS EN-5 2.9.14-15: Fails to assess a reasonable alternative proposed in Section 1.4.	The Applicant has responded to points on alternatives in **8.5.3 Applicant's Written Summary of Oral**

Ref	Name	Matter Raised	Applicant's Response
			Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139].
REP2-034	Burstall Parish Council	NPS EN-1 and EN-5: Fails to assess security and resilience risks.	See response to Burstall Parish Council below regarding security.
REP2-034	Burstall Parish Council	The Infrastructure Planning (EIA) Regulations 2017 Regulation 4 and 5: • Fails to provide a complete ES – consent prohibited. Fails to provide an ES in respect of the application – consent prohibited. Fails to assess impacts in an appropriate manner – consent prohibited.	The application for development consent has been produced in accordance with the requirements of: • Section 37(3) of the Planning Act 2008 • The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations) • The Infrastructure Planning (EIA) Regulations 2017. The Applicant has additionally had regard to relevant guidance including the Planning Inspectorate's Advice on the preparation and submission of application documents8 (August 2024). In accepting the development consent application for Examination, the Planning Inspectorate (on behalf of the Secretary of State) has found it to be of a satisfactory standard.
REP2-034	Burstall Parish Council	The Infrastructure Planning (EIA) Regulations 2017 Regulation 5 and Schedule 4 paragraphs 5 and 8: Fails to assess cumulative impacts of a reasonably foreseeable project – Brunfort BESS – ES is incomplete.	**6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** by competent and professional experts. **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** provides a list of all other development that met the criteria for inclusion within the inter project cumulative effects assessment as of the 1 April 2025. Since the 1 April the Applicant has been undertaking

Ref	Name	Matter Raised	Applicant's Response
			monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in Environmental Statement then these would be published into Examination as updates to the relevant inter-project cumulative effects documents (as appropriate). The Brunfort BESS project has not been considered within **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** as no details associated with this development were available prior to the cut-off date for the cumulative effects assessment (1 April 2025). There is still limited information available online for this development, however this development will be reviewed as part of the post 1 April 2025 review.
REP2-034	Burstall Parish Council	The Infrastructure Planning (EIA) Regulations 2017 Regulation 5 and Schedule 4 paragraphs 5 and 8: Fails to assess risks from major accidents or disasters – ES is incomplete	The Infrastructure Planning (EIA) Regulations 2017 require the environmental assessment to identify, describe and assess, where relevant, the expected significant effects arising from the vulnerability of the proposed development to 'major accidents and disasters'. All potential effects were scoped out from further assessment as there are no likely significant effects, as described in **6.19 Scoping Report [APP-296]**. A standalone major accidents and disasters chapter is therefore not included within Volume 6 Environmental Statement **[APP-123 to APP-298]**. In addition, existing National Grid processes are designed to identify potential security and safety risks

Ref	Name	Matter Raised	Applicant's Response
			during construction and operation (and maintenance) (including risks from major accidents and disasters) and to design these out at each stage of project development. This informs a suite of National Grid policies and processes, which contain details on design standards required to be met when designing, constructing, and operating assets such as proposed on the Project.
REP2-034	Burstall Parish Council	National Risk Register 2025, National Protective Security Authority, and The Electricity System Restoration Standard (ESRS): • Fails to assess reasonable worst-case scenarios on the regional and national electricity network. Fails to conduct a Site-Specific Risk Assessment for major CNI projects.	The Applicant refers Burstall Parish Council its response to the following questions in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**. • SS 1.1 (Bramford substation) • SS 1.2 (Security risks). In summary, the Applicant notes reference to national risk framework and guidance relating to reasonable worse case scenarios. Security and resilience planning for critical national infrastructure is undertaken in line with established government frameworks and involves engagement with relevant authorities. These processes consider a range of threats and scenarios, including those that are severe but plausible. For reasons of national security, it is not appropriate to set out detailed assessment of those scenarios in the public domain. However, appropriate site-specific security processes for the proposed development at Bramford substation is incorporated into the design and will continue to be reviewed during the lifecycle of the Project. The Applicant notes similar points were raised by Burstall Parish Council in their **Written Representation [REP1-151]** where the Applicant

Ref	Name	Matter Raised	Applicant's Response
			previously responded in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** to confirm CNI assessments and requirements are undertaken on an ongoing basis across our network and as can be appreciated are of the upmost sensitivity and disclosure requirements, for reasons of security.
REP2-034	Burstall Parish Council	Rochdale Envelope: Fails to assess the worst-case scenario.	The Applicant sets out how it has assessed the Project using the Rochdale Envelope in line with Advice Note Nine: Rochdale Envelope (Planning Inspectorate, 2025) in Section 4.6 of **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**. Section 9 of each ES chapter presents an assessment of the flexibility described in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]** which ensures a worst-case scenario is assessed as part of the ES.
REP2-034	Burstall Parish Council	NPS EN-1 5.4.44 Fails to maintain planting for the lifetime of the project. NPS EN-5 2.10.8 Fails to maintain mitigation planting for the lifetime of the project.	See response to Burstall Parish Council below regarding planting as mitigation and the response to the lifetime LEMP.
REP2-034	Burstall Parish Council	A Strategic Approach to Undergrounding We wish to clarify that our concern of strategic undergrounding is not asking for existing 400kV lines to be put underground. We are asking for the cost comparison of undergrounding a short section of the proposed new 400kV lines and retaining all existing overhead lines in the area versus undergrounding three separate 132kV lines and building 400kV pylons.	The Applicant's position is that it interprets the application of the mitigation hierarchy in a manner that takes into account the policy position established within NPS EN-5 and the Applicant's duties under the Electricity Act 1989 and all other related legislation, policy and guidance. This establishes a position that overhead lines are the strong starting presumption, that some level of effects is acceptable and that cost is a consideration. Application still seeks to emphasise avoidance by routeing and progresses to

Ref	Name	Matter Raised	Applicant's Response
		We continue to assert the Applicant has failed to demonstrate that they have followed the Mitigation Hierarchy correctly – Avoid > Reduce > Mitigate > Compensate. They appear to have jumped to the sole conclusion that undergrounding the existing 132kV lines is the only way to deal with the unacceptable impacts. Undergrounding the proposed 400kV line in this area to avoid the impact is also an option, which continues to go unassessed.	different technology solutions when effects are above acceptable levels and/or otherwise warrants it. In contrast, BPC's position appears to be to apply the hierarchy in reverse with an emphasis on only considering dropping down if, by whatever means, the effects have not been avoided. That is not how the various policies (especially NPS EN-5) operate. Applying its approach to develop the Project, a range of alternatives have been considered by the Applicant at a strategic level, including underground options, having regard to technical feasibility, deliverability, system performance, cost, environmental effects and programme risk. The Applicant remains satisfied that the chosen design represents a balanced and proportionate solution, while managing environmental effects through mitigation secured by the DCO. The Applicant has been proportionate and benefits from the application of professional judgement (informed by assessments, surveys and ongoing consultation and feedback) through the development of the Project design. The Applicant notes the IP's view but consider the suggestion to be based on an incorrect interpretation of policy and in any event disproportionate relative to other alternatives and the approach to the mitigation hierarchy. For instance, the location is outside a nationally designated landscape and effects arising from lattice pylons (which NPS EN-5 identifies as the strong starting presumption) are also not at a level that engages the tests in NPS EN-5 paragraph 2.9.23. The IP's suggestion would bring the potential requirement for additional equipment and further challenges the justification. The additional equipment

Ref	Name	Matter Raised	Applicant's Response
			has the potential to require further extension at Bramford substation, will require an additional cable sealing end compound and cable connection to wherever the CSE is located, all increasing effects on land use. Taken together the Applicant concluded that the effects did not meet the thresholds for change in NPS EN-5. Additionally, some undergrounding of the 132 kV connections is necessary to achieve safety clearances and extending these lines reduces the potential effects cost effectively. Overall, the difference in scale of the works is such that in combination with the policy position guiding to overhead line for 400 kV pylons, professional judgement can be applied to draw the conclusion. In conclusion the effects do not show that an overhead pylon line solution engages the relevant tests in EN-5 and it would not be appropriate or necessary to develop a design and costs for an alternative that does not come into consideration. The routeing and siting has inherently sought to avoid effects or, where not possible to avoid, to reduce them, and then considered the mitigation hierarchy where unacceptable effects are identified. The Applicant's more detailed assessment of the NPS policy framework and the mitigation hierarchy is set out in various submission documents including Section 8 of **5.6 Planning Statement [APP-085]** and Section 2.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
REP2-034	Burstall Parish Council	Further, we note that the Applicant regularly refers to their 'robust' Strategic Options Backcheck and Review document regarding alternatives such as	The Applicant's position is that it interprets the application of the mitigation hierarchy in a manner that takes into account the policy position established

Ref	Name	Matter Raised	Applicant's Response
		undergrounding. The Applicant's approach to alternatives appears to focus on an all underground or all-offshore alternative, which presents a false choice of options to the ExA. We are asking for an analysis of a hybrid alternative that considers the costs of mitigation (undergrounding existing functional 132kV overhead lines) versus a short section of new 400kV undergrounding. While NGET appear to show breakdowns of costs for overhead lines versus underground cable, we could find no breakdown of the cost to underground the three 132kV lines south of Bramford substation. The analysis provided by the Applicant in their Strategic Options Backcheck and Review cannot be robust - and has a methodological gap - if it only considers all or nothing scenarios and excludes hybrid options that could solve the local issue south of Bramford substation, as well as in other locations. Without this cost-benefit analysis the ExA cannot determine if the proposal truly is 'economic and efficient'.	within NPS EN-5 and the Applicant's duties under the Electricity Act 1989. As we set out in the answer on the row above, we do not consider there to be a justified case to retain the 132 kV pylons and underground the 400 kV infrastructure. More broadly, our approach is to develop a Project that is consistent with policy. The Applicant notes the comments made on undergrounding and has considered alternatives in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as an AC line. In keeping with our approach, it is the policy text and compliance with the tests that develops the nature of the Project. It follows that we consider hybrids but in this case do not agree with the basis for identifying the hybrid.
REP2-034	Burstall Parish Council	Relevant Representation Response: We note that the Applicant attempts to address the issue of unsuitable country roads, construction traffic routes, and diversion routes in their response. And they direct interested parties to various documents in the application. We have rechecked the documentation and those documents do not address our concerns.	The Applicant has responded to Burstall's Written Representation in **8.8.1 Applicant's Comments on Written Representations [REP2-029]**.

Ref	Name	Matter Raised	Applicant's Response
REP2-034	Burstall Parish Council	T-Pylons: Burstall Parish Council agree with the Applicant that the use of T-pylons south of Bramford substation are inappropriate.	Noted.
REP2-034	Burstall Parish Council	Lower-Height Lattice Style Pylons: After more consideration of this, Burstall Parish Council do not wish to pursue the topic of lower-height pylons in the currently proposed route further.	Noted.
REP2-034	Burstall Parish Council	We ask that the Applicant and the ExA consider the hybrid proposal of a gas-insulated line (GIL) to lower-height pylons by Councillor William Petersen – to be submitted separately at Deadline 2.	**7.19 2023 - Strategic Options Backcheck and Review [APP-357]** sets out all the alternatives considered by the Applicant including GIL. Table 15.4 on page 122 in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** provided a summary of the alternatives. Showing the technical option selected for each alternative. GIL is also not an appropriate basis for design given the implications of the 132 kV infrastructure
REP2-034	Burstall Parish Council	Planting as Mitigation: Both NPS EN-1 and EN-5 make it clear that any mitigation must be maintained for the long-term, including the projects lifetime. Whilst NGET assert that five years has been the industry standard for previous projects, that is not aligned with current policy. Failure 1: A five-year monitoring plan is therefore insufficient to ensure planting reaches maturity. Most planting requires a 10-15 year timespan to reach full maturity – tall trees even longer. EN-1 makes it clear that planting should be maintained for the lifetime of the project, and EN-5 states long-term management is essential for mitigation. If monitoring stops at year 5, then it is impossible to ensure the necessary planting is maintained for the lifetime of the project.	The five-year monitoring period for replacement planting (outside the Environmental Areas) is considered sufficient to ensure successful plant establishment. **7.4 Outline Landscape and Ecological Management Plan (Revision D)** states the planting will be undertaken by suitably experienced contactors in line with British Standards and follow general best practice principles outlined in Section 9.2 of **7.4 Outline Landscape and Ecological and Management Plan (Revision D)**. For example, Section 11.2 of BS 8545:2014+A1:2026 states '*Post-planting management and maintenance is important if longevity in the landscape is to be achieved. A full young tree management programme with budgetary provision should be in place for all*

Ref	Name	Matter Raised	Applicant's Response
		Failure 2: The residual impacts of the ES are concluded based on the presumption planting reaches full maturity and is maintained for the duration of the project. However, as the oLEMP fails to secure delivery of that premise, then the conclusions of the ES are flawed and inaccurate. The Infrastructure Planning (EIA) Regulations 2017 Regulation 5 (2), "The EIA must identify, describe and assess in an appropriate manner…" A flawed and inaccurate ES is not appropriate. This then engages Regulation 4 (2) which prohibits the Secretary of State from granting permission, because the ES has not considered the proposed five-year monitoring plan submitted as part of the application within its conclusions.	*planting schemes. This management programme should be in place for at least 5 years*.' The Applicant's commitment to a five-year aftercare period adheres to the recommendation set out in the British Standard. After this five--year aftercare period, the planting would be managed by the relevant landowner, as currently takes place in respect of the existing planting on private land. The Environmental Areas are located on land to be acquired by National Grid and any habitats included within the Biodiversity Net Gain (BNG) on-site mitigation will be monitored and managed by National Grid for 30 years. This commitment is aligned with paragraph 5.4.44 of NPS EN-1 (2024). Details of the management of the Environmental Areas will be provided within the final Landscape and Ecological Management Plan, which will build on the outline management plan in accordance with paragraph 2.10.8 of NPS EN-5 (2024). The Landscape and Visual Impact Assessment (LVIA) in **6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]** and supporting appendices has considered effects during construction, at year 1 of operation (in winter, when deciduous vegetation is not in leaf) and at year 15 of operation (in summer, when deciduous vegetation is in leaf). The assessment at year 15 assumes that reinstated planting and new planting within Environmental Areas will be semi-mature (not at full maturity). This is recorded under the year 15 assessment where applicable in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**

Ref	Name	Matter Raised	Applicant's Response
			and **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]**.
REP2-034	Burstall Parish Council	In October 2025 the Environment and Climate Change Committee launched a new inquiry called Drought Preparedness, which sought to understand the impacts of drought on rural and urban areas in England. Written Evidence from Forest Research submits that: *Drought is a growing threat to conifer and broadleaf tree species. Drought both reduces mature forest functioning and has severely reduced the success of new planting.* *Newly established trees, both conifer and broadleaf, are particularly vulnerable to episodic extreme drought events as access to water resources are limited by shallow rooting.* *An analysis of the impacts on tree planting from the 2022 drought and heatwave suggest over 60% of newly planted trees were severely impacted on the most affected sites. The combination of drought and prolonged summer temperatures are increasing the challenge to successful establishment for both new planting and seed production dynamics.*	As noted in paragraph 9.2.2 of **7.4 Outline Landscape and Ecological Management Plan (Revision D)** reinstatement planting shall be caried out in winter (November to March) and timed to avoid periods of drought, as far as practicable. The Applicant has committed to a five-year adaptive aftercare period for reinstated woodland, trees and hedgerows as outlined in paragraphs 10.1.1 to 10.2.2 of **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. As noted in paragraph 10.2.1, new woodland, tree and hedgerow planting will be watered as required to minimise failures in periods of drought, during the five-year aftercare. The five-year aftercare includes like-for-like replacement or consideration of alternative species based on site conditions and the reasons for failure. Requirement 9 (reinstatement planting plan) of **3.1 Draft Development Consent Order (Revision C)** secures the replacement of any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting, are removed, die or become seriously damaged or diseased. An extended 30-year aftercare period would apply to new areas of habitat creation within Environmental Areas in line with commitments made within **7.1 Biodiversity Net Gain Report [APP-299]**.

Ref	Name	Matter Raised	Applicant's Response
REP2-034	Burstall Parish Council	Lifetime Landscape and Ecological Management Plan: We request the ExA imposes a requirement on the Applicant to amend the LEMP to secure: • Annual monitoring for the lifetime of the project. • Where planting is identified as failed, replacements in the next available planting season, for the lifetime of the project. We also ask the ExA to secure this Lifetime LEMP as a Requirement of the DCO. Rationale 1: If the impacts are for the lifetime of the project, the mitigation must be too. Otherwise, any residual impacts are understated. Rationale 2: If the Applicant monitors for 5 years, but trees or hedges die in subsequent years then any visual and ecological effects return to 'Significant', and the conclusions of the ES become invalid.	Requirement 9(7) provides an appropriate monitoring and replacement planting procedure. A lifetime commitment to monitor and replace any failed plant would be disproportionate and not achievable given that the majority of the land is temporarily impacted by the Project and will be returned to landowners. The wording of Requirement 9 is considered appropriate and reasonable and reflects the standard approach across a number of NSIPs. An element of planting failure is part of natural plant variability even where good practice has been followed; the aim is to achieve healthy, high quality established planting. The Environmental Areas are located on land to be acquired by National Grid and any habitats included within the BNG on-site mitigation will be monitored and managed by National Grid for 30 years.
REP2-034	Burstall Parish Council	Security: Burstall Parish Council's concerns on this topic have always been, and remain, focused on: • The unacceptable risks of concentrating energy infrastructure at and through a single-point of failure at Bramford substation. • The unassessed risk to the wider UK economy, public safety, and defence in the event of a major failure at Bramford substation. • The unassessed risk to the local communities and environment in the event of a major failure at Bramford substation. In the Applicant's response to Open Floor Hearing 1, it correctly identifies Burstall Parish Council's presentation under the theme of Security and	The Applicant has reviewed the Deadline 2 response from Burstall Parish Council **[REP2-034]** with regard to the concerns raised on security and resilience risks of concentrated, cumulative, and critical infrastructure at Bramford substation. The Applicant has responded to the more detailed points on this topic raised in the Burstall PC Written Representation **[REP1-151]** at Deadline 2 (see **8.8.1 Applicant's Comments on Written Representations [REP2-029]**). A short summary of the Applicant's response to the main area of focus on the topic of security and resilience risks at Bramford substation is provided below. The network has been designed so that Bramford does not represent a single point of failure. As a key

Ref	Name	Matter Raised	Applicant's Response
		resilience of electrical infrastructure. However, this where the accuracy and correlation ends. Reading the response to the security theme it falls in line with that of the Relevant Representation response. It discusses weather related issues, maintenance for general wear and tear, anti-climbing deterrents, and surveillance for maintenance purposes. And the focus is entirely on the pylons. None of these are issues that we raised in the Open Floor Hearing.	node within the transmission network, its role and configuration are designed to ensure that the wider system remains operable and resilient including under fault conditions. The design process ensures no single asset or location gives rise to unacceptable levels of system risk. With regard to major accidents and disaster scenarios, including security threats to Bramford substation these are already considered within the established regulatory and policy frameworks applicable to critical national infrastructure. The proposed development at Bramford substation will also be designed to comply with design safety standards including the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) and the suite of National Grid policies and processes which contains details on design standards required to be met when designing, constructing, and operating its projects. The suggestion that the SQSS represents only a minimum baseline for system design is inaccurate. The SQSS forms part of a wider framework to ensure system resilience. The Project is compliant with the SQSS. All potential effects, including security threats to Bramford substation have been scoped out from further assessment as per **6.19 Scoping Report [APP-288]** and **6.20 Scoping Opinion [APP-297]**. This was because there are no likely significant effects following the implementation of embedded mitigation measures that the Applicant adopts on all its projects and the established suite of National Grid policies and processes which contains details on

Ref	Name	Matter Raised	Applicant's Response
			design standards required to be met when designing, constructing, and operating its projects. All potential effects have been scoped out from further environmental assessment, as there are no likely significant effects to Bramford substation caused by security and resilience risks due to the embedded design including risk management. The Applicant also refers Burstall Parish Council to its response to the following questions in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**: SS 1.1 (Bramford substation) SS 1.2 (Security risks) SS 1.3 (Emergency services – access and community safety).
REP2-035	Chelmsford City Council	Planning Policy: Chelmsford City Council (CCC) notes NGET's disagreement and appliance of Green Belt policy. CCC considers that the very special circumstances put forward by NGET do not justify the harm caused by the development on the openness of the Green Belt.	**5.6 Planning Statement [APP-085]** details the very special circumstances applicable should it be concluded that the Project is inappropriate development in the context of Green Belt policy. The very special circumstances for the Project are: • The UK government policy requires significant reinforcement of the transmission system to facilitate the connection of renewable energy sources to transport electricity to where it is used. • The British Energy Security Strategy sets targets for the connection of up to 50 GW of offshore wind by 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term • New connections for offshore wind and nuclear power generation projects, and for

Ref	Name	Matter Raised	Applicant's Response
			interconnectors, are expected into East Anglia by 2030. These connections are being constructed or expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell • Without reinforcement, the capacity of the East Anglia existing network is insufficient to accommodate the connection of the proposed new power sources. Therefore, reinforcement of the network is required • The requirement to meet net zero by 2050, to replace the fossil fuels that once powered the economy with low-carbon electricity • By reinforcing the capacity of East Anglia, the Project will address the need to be able to accommodate the connection of the proposed new power sources, namely offshore wind and nuclear power generation projects, as required by 2030. In addition, as stated within **5.6 Planning Statement [APP-085]** the Project is CNP. Paragraph 4.2.17 of EN-1 confirms that '…*the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests: Where development within a Green Belt requires very special circumstances to justify development*'.
REP2-035	Chelmsford City Council	Landscape and Visual (Great Waltham and Little Waltham): CCC notes NGET's disagreement regarding the assessment of effects and the nature of the impacts. CCC disagrees and remains concerned that the substantial landscape and visual impacts, heritage impacts and amenity impacts have not been appropriately weighted nor appropriate mitigation	The Applicant sets out its position on Great Waltham and Little Waltham further in Section 3.7 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. This sets out the Applicant's arguments that:

Ref	Name	Matter Raised	Applicant's Response
		measures provided that could materially reduce such harm.	• The Project is consistent with policy and is not required to have least overall or least residual effects • Route and pylon selection is based on balanced decision making and accords with policy Other new matters relating to specific environmental effects on landscape and visual (including visual amenity) and heritage in Great and Little Waltham are covered in Chapter 4 of the same document, specifically Section 4.9 - Historic Environment -Table 4.16 and Section 4.11 - Landscape and Visual - Table 4.20.
REP2-035	Chelmsford City Council	Design Change (Great Waltham and Little Waltham): To provide certainty and enable finalisation of the overall approach within the Statement of Common Ground. CCC requests that NGET confirms the proposed design change / use of the alternative approach no later than Deadline 4.	The Applicant has submitted **8.11 Approach to Scenarios** at Deadline 3. This confirms the Applicant's decision to proceed with Scenario B, with standard height pylons to the south of the River Chelmer, as opposed to the low height pylons originally proposed.
REP2-035	Chelmsford City Council	Alternatives (Great Waltham and Little Waltham): CCC reiterates its preference for an alternative proposal / routing to be used, due to the level of harm that the pylons would have on the gap between Great Waltham and Little Waltham. The impact upon Great Waltham and Little Waltham remains a key area of dispute, particularly with regard to the level of harm, proposed route and siting, and lack of mitigation / compensation.	The Applicant sets out its position on Great Waltham and Little Waltham further in Section 3.7 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. This sets out the Applicant's arguments that: • The Project is consistent with policy and is not required to have least overall or least residual effects • Route and pylon selection is based on balanced decision making and accords with policy
REP2-035	Chelmsford City Council	Historic Environment (Great Waltham and Little Waltham): The Applicant suggests that there is no	The Applicant disagrees that there has been insufficient assessment of the impacts to the historic

Ref	Name	Matter Raised	Applicant's Response
		requirement to provide additional mitigation or compensation yet recognise that compensation can be provided as part of the overall mitigation strategy, which is extensively referenced in the NPS. CCC considers that there has been insufficient assessment of the impacts to the historic environment. This means that the potential for effects is greater and therefore further mitigation /compensation needs to be considered further.	environment and is confident that assessment of the impacts to the historic environment detailed in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report (Final Issue A) [APP-209]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**, and **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** is proportionate and appropriate. The Applicant respectfully reiterates that given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, EN-1 (2024) does not require the Applicant to take any further measures.
REP2-035	Chelmsford City Council	Ecology and Biodiversity: CCC remains concerned regarding the lack of appropriate detailed assessment at outline stage. The repeated assertion that further detail "will be provided during detailed design" is not considered acceptable for a project of this magnitude, where the scale of tree and hedgerow loss, should be more clearly evidenced at the outset. CCC considers that detailed information should be provided prior to determination to enable the full effects upon these features to be considered / appropriately mitigated.	The Applicant has undertaken a detailed assessment of tree and hedgerow loss of the Project, as presented on the works plans, within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]**. These assessments are based on a reasonable worst-case scenario of vegetation loss, based on a standard overhead line and underground cable design. Following detailed design (post-consent) it is anticipated that the amount of vegetation loss would be reduced and impacts to trees and hedgerows will be minimised as far as practicable. **7.4 Outline Landscape and Ecological Management Plan (Revision D)** and **7.2 Outline Code of Construction Practice (Revision C)** both include commitments to ensure the mitigation hierarchy is

Ref	Name	Matter Raised	Applicant's Response
			applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable. The design information to which assessments have been made can be found in Figure 4.1 **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]** and Figure 4.2 **6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]**
REP2-035	Chelmsford City Council	Community Impact: The Applicant suggests that a "small minority of the population" are likely to be affected and change in quality of life may be moderate. This is considered to result in a minor adverse (not significant) health effect for both the general population and vulnerable groups. CCC consider that the Applicant has not addressed the impact sufficiently. Mitigation, compensation or resiting, should be introduced to reduce the effect of the Project upon these properties, such that their level of harm is consistent with that experienced by the wider population.	The Applicant provided a response based on the statement provided by CCC and in light of the assessment given within **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]**. The response accords with the methodology / approach used to undertake the Health and Wellbeing assessment (see section 10.4). The Applicant considers no additional mitigation is required.
REP2-035	Chelmsford City Council	Noise and Vibration - Table H1.1, CCC paragraphs 5.80, 5.133, 5.132 pages H17 and H28 CCC consider that it is reasonable and practicable to exclude Sunday and Bank Holiday working, particularly at directed affected receptors. CCC has provided details of those within its Local Impact Report and will await the Applicant's comments.	These points are addressed in Table A.9 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
REP2-035	Chelmsford City Council	Historic Environment (Landscape Screening) - H1.1, CCC paragraph 5.92, page H20	The Applicant's position on landscape screening for the historic environment in response to paragraph

Ref	Name	Matter Raised	Applicant's Response
		CCC consider that consultation on the provision of landscape screening should include a mandatory requirement to consult with Local Planning Authorities / Heritage specialists.	5.92 in **CCC's Relevant Representation [RR-0545]** has not changed. Where the Applicant has referred to reinstatement of landscape features by referring to the re-instatement plans in Section 9 of **7.4 Outline Landscape and Ecological Management Plan (Revision D)** Requirement 4 of **3.1 Draft Development Consent Order (Revision C)** would make it mandatory for the final version of the Landscape and Ecological Management Plan to be submitted and approved by the Local Planning Authority prior to commencement of development.
REP2-035	Chelmsford City Council	Landscape and Visual - Table H1.1, CCC paragraphs 5.116 and 5.125, pages H25 and H27. The Applicant refers to NPS-EN1 and NPS - EN5 and suggest that there is no requirement to provide additional mitigation or compensation, yet they recognise that compensation can be provided as part of the overall mitigation strategy, which is extensively referenced in the NPSs. CCC considers that there has been insufficient assessment and granularity of the impacts to the landscape. This means that the potential for effects is greater and therefore further mitigation /compensation needs to be considered further.	The Applicant disagrees that there has been insufficient assessment of the impacts to the landscape and remains comfortable that the assessment is proportionate and robust, and that the assessment is fair. The approach to the Landscape and Visual Impact Assessment (LVIA) follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** and was shared and discussed with stakeholders. The Applicant's position on landscape compensation is set out at Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
REP2-035	Chelmsford City Council	Socio Economics: The Applicant does not consider that the establishment of a DCO secured Employment and Skills Fund is appropriate, necessary or proportionate in the context of the Project. CCC disagrees and has provided appropriate justification for the Employment and Skills Fund within	In response, and to elaborate on what the Applicant set out in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, National Grid now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and

Ref	Name	Matter Raised	Applicant's Response
		its Local Impact Report [**REP1-153**] and will provide further comments once it has considered The Applicant's response. CCC notes that the provision of a DCO Employment and Skills Fund has been secured within other NSIP's including the Longfield Solar Farm NSIP (EN010118).	clarity regarding the approach that National Grid and its delivery partner, the Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.
REP2-035	Chelmsford City Council	Draft DCO: The Applicant maintains that 28-day decision making timescales with provision for "such other period" to be agreed are appropriate, and potential to agree extension of period for discharge of requirements. This fails to avoid the very issue CCC are concerned with: repeated requests for time extensions and insufficient certainty that requests for extensions of time will be granted. The nature of the 28-day decision making deadline is that it contains insufficient time to: • Register the application • Consult, receive and consider consultation responses • Request additional information as appropriate • Give sufficient time for the applicant to respond to information requests • Receive, process and reconsult amended information as necessary • Consider consultation responses, • Prepare report • Issue decision notice From CCC's experience as a Discharging Authority on the Longfield Solar Farm NSIP (EN010118), the current NSIP Requirement discharging process, is	The Applicant has responded to this in the response to DCO 1.A2 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.

Ref	Name	Matter Raised	Applicant's Response
		weak in addressing the complexities of discharging complex, high-level, technical requirements.	
REP2-035	Chelmsford City Council	**Inter Relationships with other Projects** [**REP-134**]. In relation to Longfield Solar Farm (EN010118), paragraph 3.2.21 notes the proposed creation of a new access from Terling Hall Road to access a UKPN overhead line. Whilst this matter is deferred to Braintree District Council, CCC consider that the Applicant should liaise directly with Longfield Solar Farm Ltd regarding access arrangements to ensure the DCO is not compromised.	The Applicant has contacted Longfield Solar Farm to arrange a meeting to discuss this.
REP2-035	Chelmsford City Council	**Response to Errata List [REP-071**] CCC has reviewed the updated materials and has no substantive comments to make. CCC reserves the right to comment should any further changes arise.	The Applicant has no comment on this matter.
REP2-036	Essex County Council	Statement of Common Ground [**REP1-014**]: Essex County Council (ECC) was disappointed to discover that despite its efforts to proactively work with the Applicant, the comments provided on 24 February were not included in the Deadline 1 submission of the SoCG. The Applicant has confirmed an error was made during the formatting process which resulted in ECC's comments being removed from the SoCG. The Applicant has confirmed these are being inserted back into the SoCG and that the Applicant will be submitting a revised SoCG for Essex at Deadline 2 with a covering letter to explain the circumstances.	The Applicant confirms that a revised draft SoCG for ECC was submitted at Deadline 2 [**REP2-012]**.
REP2-036	Essex County Council	ECC make the following observations on the Drainage Strategy:	The Applicant is engaging with the LLFAs to inform updates to 8.2 Drainage Strategy which will be submitted at a future deadline.

Ref	Name	Matter Raised	Applicant's Response
		Para 2.3.1 Drainage Stakeholders Consultation: There is an addition required to confirm the Lead Local Flood Authorities (LLFA) is the statutory consultee on all major planning application in relation to surface water drainage.	In this update, the text in paragraph 2.3.1 will be updated to reflect the request. For clarity the text will be updated to state: '*Lead Local Flood Authorities (LLFAs) investigate flood incidents and have powers to undertake works to manage flood risk from surface runoff and groundwater. They are the statutory consultee on all major planning applications in relation to surface water drainage. They also administer consents for applications to culvert or install structures in Ordinary Watercourses, except in Internal Drainage Board (IDB) areas*'.
REP2-036	Essex County Council	Developments within Essex should adhere to The Sustainable Drainage Systems Design Guide for Essex (Calculating Runoff Rates | Essex Design Guide). The surface water drainage design should ensure that surface water is discharged at the 1in1 greenfield rate for all events up to and including a 1in100 event plus the appropriate allowance for climate change and the appropriate attenuation to support this will be required	The Applicant confirms compliance with this request, with details provided in **8.2 Drainage Strategy DCO [REP1-072],** Table 5.2.
REP2-036	Essex County Council	Para 2.5.3 Defra Non-Statutory Technical Standards: Exceedance routes should not exceed the red line planning boundary and should not flow on the highway as well as minimising risk to people and property.	To provide further clarity on this matter, the Applicant will produce a series of drainage layout figures for the Project to be appended to **8.2 Drainage Strategy** which will be updated and submitted at a subsequent Deadline. These figures will demonstrate the overland flow routes for the Project, noting the criteria to minimise risks to people and property.
REP2-036	Essex County Council	Table 5.1 Environment Agency Peak rainfall allowances (for permanent infrastructure): The incorrect climate change allowance has been stated for Great Horkesley, this should read 45%. It is	**8.2 Drainage Strategy [REP1-072]**, paragraph 5.2.9 states 45% climate change allowance will be applied in all areas. The Applicant will correct the errata in

Ref	Name	Matter Raised	Applicant's Response
		acknowledged that para 5.2.9 states 45% will be used in all areas.	Table 5.1 and will submit the updated document at a subsequent Deadline.
REP2-036	Essex County Council	Para 5.3.2 Run off destinations: Where this section discusses source control measures, conveyance and attenuation measures, much more detail will be required as to the use of these features and where they will be used and engineering drawing and drainage plans giving a clear picture of the strategy.	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of DCO Requirement 4. This would include significant additional detail on the source control, conveyance and attenuation measures proposed. The Applicant will produce a series of drainage layout figures for the Project to be appended to **8.2 Drainage Strategy** which will be updated and submitted at a subsequent Deadline. These figures will provide further clarity on the current strategy.
REP2-036	Essex County Council	Para 5.3.2: Treatment must be added to this point i.e.) satisfactory collection, control, treatment and discharge of surface water.	**8.2 Drainage Strategy DCO [REP1-072]** will be updated at a subsequent Deadline. The text in paragraph 5.3.2 will be updated to reflect this request.
REP2-036	Essex County Council	Para 5.4.1 Management of Extreme Rainfall and Flooding: It is agreed that the drainage strategy should replicate as closely as possible the natural run-off and mimic the natural flows. The strategy should evidence how this will be done and how existing natural surface water flows will be managed where they flow across the development area.	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of Requirement 4 of the DCO. This will describe how existing natural surface water flows will be managed where they flow across the development area. The Applicant will produce a series of drainage layout figures for the Project to be appended to **8.2 Drainage Strategy** which will be updated and submitted at a subsequent Deadline. These figures will provide further clarity on this matter.

Ref	Name	Matter Raised	Applicant's Response
REP2-036	Essex County Council	Para 5.4.13 Estimated Storage volumes: It is stated that no freeboard has been used for 0.5m ponds and clarification is sought for this decision. The LLFA seeks 300mm freeboard for all ponds to protect against overtopping.	The Applicant will provide further clarity on this matter in the update to **8.2 Drainage Strategy [REP1-072],** which will be submitted at a subsequent Deadline.
REP2-036	Essex County Council	Para 5.4.4 Discharge to a watercourse: Discharge of surface water should be at the greenfield 1in1 rate for all events up to the 1in100 event.	**8.2 Drainage Strategy DCO [REP1-072]**, Appendix A (Preliminary Drainage Design Summary) provides calculated indicative discharge rates for each of the drainage catchments. **8.2 Drainage Strategy DCO [REP1-072]**, paragraph 5.4.4 will be updated to correct the errata, and the Applicant will submit the updated document at a subsequent Deadline. The following update is proposed: '*Discharging to the nearest watercourse at a restricted discharge rate is proposed in most cases. The sites are currently undeveloped, therefore, in line with guidance from the LLFAs, the flow restriction shall be based on either the estimated 'greenfield' runoff rate for Norfolk and Suffolk or the estimated 1in1 year 'greenfield' runoff rate for Essex and Thurrock, both limited to a maximum rate of 2 l/s/ha. In locations along the overhead line alignment running through an IDB catchment, the discharge rate is 1.4 l/s/ha in accordance with the WMA's requirement.*'
REP2-036	Essex County Council	Para 5.4.55 Access Roads and Bellmouths: The LLFA's preference would be for these areas to be permeable where possible.	The Applicant notes this request and draws attention to **8.2 Drainage Strategy [REP1-072]**, Section 10.3, where the use of permeable construction materials for the access road and bellmouths is considered as an opportunity for the Project. Where practicable, the Main Works Contractor(s) may seek to use these materials.

Ref	Name	Matter Raised	Applicant's Response
REP2-036	Essex County Council	Para 5.4.57: Run off from access roads and bellmouths should receive the appropriate level of treatment prior to discharge into a watercourse. Pollution and treatment indices tables should be presented to give a clear representation that the appropriate amount of treatment is being applied as per the Ciria SuDS Manual chapter C753.	Commitment W13 in **7.2 Outline Code of Construction Practice (Revision C)** secures that runoff from access roads, haul roads and bellmouths, will have suitable drainage provisions via appropriate SuDS that will provide attenuation and treatment of runoff. The Surface Water Management Plan prepared by the main works contractor to inform discharge of Requirement 4 of the DCO will provide the evidence to demonstrate the adequacy of the treatment that will be applied.
REP2-036	Essex County Council	Para 5.4.29 Haul Roads: Further detail is required regarding the construction of the haul road and how surface water run-off will be managed, treated and discharged. In addition, detail for the length of time they will be in place and how they ground will be re-instated, is required.	The Projects high level programme is presented in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, Section 4.7. Haul roads are expected to be in place for the total, of the programme. As stated in **8.2 Drainage Strategy DCO [REP1-072],** at paragraph 5.4.22, runoff from temporary features during the construction stage is considered 'dirty water' due to the possibility of contamination with oils and silts. The design shall include pollution controls and treatment, and the contractor shall implement suitable mitigation measures to manage this risk during construction.
REP2-036	Essex County Council	Para 5.4.42: Substations and CSE Compounds: Further detail is required regarding how surface water will be managed in these areas.	Commitment W08 in **7.2 Outline Code of Construction Practice (Revision C)** secures that measures to manage surface water runoff from operational above ground infrastructure (including substations and CSECs) and to maintain existing overland flow routes will be developed liaising with the LLFAs. Such measures will be managed in accordance with the requirements and standards of the relevant LLFA and maintained for the Project's

Ref	Name	Matter Raised	Applicant's Response
			lifetime. Surface water runoff will be captured using sustainable drainage techniques that will be designed to allow for climate change resilience and with consideration of exceedance flow routes.
REP2-036	Essex County Council	Essex and the wider East Anglian region have a number of significant NSIP projects, and major growth proposals, which will all impact the availability of a suitably qualified workforce from within the local area leading, as it is anticipated, to workforce shortages going forward. Skills as needed here will be transferable between a variety of projects, and the impacts cumulatively of multiple projects will be significant. The opportunity presented by the potential impacts are embedded into EN-1 and ECC consider the Applicant must explore this impact and propose methods to negate the potential harm this could have on local jobs and skills, local suppliers and the supply chain. Enabling the local workforce to be trained in such would lead to a significant legacy as many of the skills needed would be transferable between projects and significantly upskill economically active local people.	The majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines from approved contractors. Therefore, the Project will require specialist workers in contrast to general construction workers. These specialist workers are typically sourced from the Applicant's existing pool of approved contractors. The number of jobs supported by the Project is relatively low, with approximately 4,800 construction jobs FTE across the 180 km route over the four-year construction period. Hence, a not significant effect is anticipated.
REP2-036	Essex County Council	The Applicant makes no commitment as to where the workforce will come from, other than the assumption that they will be UK based at this time, or that it will be contractor dependant, which is not the appropriate test. It is recognised that on site employment would fluctuate during the build programme of this development, but without commitment to use local workforce it is considered to be a missed opportunity. Whilst some of the construction skills needed would be specialist in nature, some of it would not.	The majority of construction activities would require trained specialists who are qualified to work on high voltage electricity lines from approved contractors. This information is not available at the time of writing this response. Previous National Grid project experience indicates that these workers would be split between around 10% from the local area and 90% who would travel into the area from elsewhere. From experience with other National Grid projects, it is likely that a minimum of 10% of the workforce would be

Ref	Name	Matter Raised	Applicant's Response
			sourced from the local labour market. These could, for example, have less specialist roles such as security workers and delivery drivers. This information is set out in paragraphs 157.13 and 15.7.14 of **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**.
REP2-036	Essex County Council	ECC maintains that the establishment of a DCO secured Employment and Skills Fund or a DCO requirement for a Skills and Employment Strategy is justified by the scale and nature of the Project and to maximise the opportunities for local workforce. ECC would also advocate for the formation of a local stakeholder working group to co-design and inform the strategy and associated programmes. ECC is committed to collaborating with the Applicant to establish a skills initiative tailored to Essex, drawing on successful models implemented elsewhere. ECC asks that this matter continues to be given appropriate consideration through the Examination as a principal issue given the potential for a positive legacy to be offered through this project.	Assessment on local economy, local employment, tourism economy and businesses has been undertaken in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]**. The assessment concluded that no significant adverse effects have been identified on the local economy, local employment, tourism economy and the majority of business premises. The Applicant recognises the importance that host communities and host authorities place on social value including employment opportunities, skills development and local supply chain participation associated with a project of this scale and duration. In response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, the Applicant is proposing to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document will provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.

Ref	Name	Matter Raised	Applicant's Response
REP2-036	Essex County Council	Highways and Transportation: ECC remains concerned about not including restrictions on HGVs during school pick up/drop up hours for following schools: Quilters Infant & Junior School in Billericay, Billericay Secondary School, Cressing Primary School, Maltings Academy and Powers Hall Academy in Wickham. In discussions with the Applicant, ECC has suggested that observations are undertaken during school drop off/pick up to more fully understand the movement of students and parents on the construction route in the vicinity of the schools. It is the level of activity and how people move within the location of the school that needs to be considered.	The expected daily Project construction traffic movements during the predicted peak weeks of the construction programme are detailed within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**, which are considered low past the schools identified by Essex County Council. A summary of the hourly anticipated construction vehicle movements during the peak construction period is provided below: • Quilters Infant and Junior school and Billericay Secondary School (PAR 58 - A176 Laindon Road): During the period of highest activity, there would be seven HGV movements an hour during the worst case peak construction period over a duration of seven weeks. This is an average of one HGV approximately every eight minutes and a net increase of 1% of total traffic • Cressing Primary School (PAR 41 - B1018 Braintree Road): During the period of highest activity there would be 16 HGV movements an hour over a duration of four weeks, which is an average of one HGV approximately every four minutes and a net increase of 1% of total traffic • Maltings Academy/Power Hall Academy (PAR 43 - Spinks Lane): During the period of highest activity, there would be 18 HGV movements an hour over a duration of two weeks, which is an average of one HGV every three and a half minutes and a net increase of 2% of total traffic The Applicant has considered the surrounding existing local infrastructure (e.g. controlled crossing, wide or separated footways, kerb side parking and

Ref	Name	Matter Raised	Applicant's Response
			loading restrictions, and available drop-off areas within school grounds) within the assessment of effects detailed in **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271].** The Applicant considers these adequate and appropriate for safe school access. Given the low frequency of construction vehicle movements along the PARs it is considered there would be limited interaction anticipated between construction vehicles and pupils during the school pick-up and drop off periods. The assessment has also taken account of mitigation measures detailed within **7.3 Outline Construction Traffic Management Plan (Revision B)**, such as the driver information pack which will identify sensitive receptors where there may be a higher number of pedestrian and cyclists along or crossing the PARs e.g. near to schools.
REP2-036	Essex County Council	ECC notes that no monitoring and review against assumed traffic generation is included in the Transport Assessment/ Environmental Statement. Although the Applicant has explained that there will be monitoring and there is a non compliance procedure, ECC is concerned that monitoring and non-compliance procedure has not been confirmed, and that the monitoring of construction traffic will compare the number of vehicles to those assumed in the assessments. In addition, there are a number of vehicles that are not included in the non-compliance list. Therefore, it is not clear to ECC how the non-compliance is to be measured.	As noted in **8.4.1 Applicant's Comments on Relevant Representations [REP1-231]**, the Applicant is actively engaging with the Main Works Contractor(s) regarding the construction programme and the associated trip generation. The trip generation and distribution used within the draft DCO assessments is considered to be comprehensive and has been shared with the appointed Main Works Contractor(s). Discussions and assessments undertaken with the Main Works Contractor do not currently indicate any increases in trip generation. Through ongoing discussions, the Applicant anticipates that the trip generation figures will form the basis of the monitoring and management mechanisms set out in **7.3 Outline Construction Traffic**

Ref	Name	Matter Raised	Applicant's Response
			Management Plan [APP-309]. The Main Works Contractor is expected to monitor the number of HGVs arriving to and departing from site from / to Primary Access Routes with the proposed implementation of a delivery management / scheduling system. The Main Works Contractor will develop the Final CTMP(s) and confirm with the Local Highway Authorities. Non-conformance with the Final CTMP will be reported by the Environmental Clerk of Work(s) (EnvCoWs) and Transport Coordinators. Where a breach or complaint is reported, the Main Works Contractor(s) and/or National Grid will carry out an investigation in order to identify appropriate corrective actions. Where needed, corrective actions will be agreed with the relevant LHA and/or community members prior to implementation. **7.3 Outline Construction Traffic Management Plan (Revision B)** is secured through Requirement 4 of **3.1 Draft Development Consent Order (Revision C)**. Through the monitoring and management mechanisms proposed, the junction monitoring programme and potential delivery management/scheduling system will capture any increase in proposed construction traffic volumes. In the instance where vehicle volumes are higher than the assessed peak week for a consistent and prolonged period of time, the Applicant and the appointed Main Works Contractor(s) will assess the trip generation for each specific location if required. In the instance where the reassessment highlights additional trips, the proposed mitigation measures could include signal timing adjustments, additional

Ref	Name	Matter Raised	Applicant's Response
			signage, and potential restrictions in peak hours (where required and agreed with the Local Highway Authority). **7.3 Outline Construction Traffic Management Plan (Revision B)** is secured through Requirement 3 of Article 4 of **3.1 Draft Development Consent Order (Revision C)**. The Applicant and the appointed Main Works Contractor(s) as a result will be compliant with each element listed within **7.3 Outline Construction Traffic Management Plan (Revision B)**.
REP2-036	Essex County Council	Regarding the Applicant's response to Paragraph 6.5.9 of ECC's relevant representation, ECC has requested through the LIR that there is a robust commitment in the Outline Construction Traffic Management Plan (CTMP) for mini-buses to be implemented as one of the measures to reduce the number of vehicles associated with workers and ensure the most sustainable methods of transport are used by workers.	The Applicant has responded to this within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** '*The location of construction staff is currently unknown. Once this information becomes available, it is expected that the Main Work(s) Contractor and Travel Plan Coordinator will identify clusters to inform the proposed staff mitigation measures, where required. This could include the provision of a minibus and other measures*.'
REP2-036	Essex County Council	The Applicant has explained in discussions regarding trip generation and assessment, that there will be monitoring and a non-compliance procedure but there is no confirmation that the monitoring will compare the number of vehicles to those assumed in the assessments. Therefore, it is not clear to ECC how the non compliance is measured.	The Applicant has shared the trip generation submitted within the draft development consent order with the appointed Main Works Contractor(s). Through ongoing discussions with the appointed Main Works Contractor(s), the Applicant expects these numbers to be the basis of the monitoring and management of **7.3 Outline Construction Traffic Management Plan (Revision B)**.
REP2-036	Essex County Council	Regarding the Applicant's response to Paragraph 6.5.14 & 6.5.15 of ECC's relevant representation regarding the Abnormal Indivisible Loads (AIL)	The concerns raised are acknowledged. The Applicant has no objections regarding joint discussions with ECC, National Highways and the

Ref	Name	Matter Raised	Applicant's Response
		Access Strategy in the outline CTMP [**APP-310**], ECC's concern remains that should the A12 not be suitable for AIL access, the Applicant may put forward a route through Colchester Town Centre which for the reasons set out in the Local Impact Report, is unacceptable. ECC therefore, needs to be part of the discussions between the Applicant, the Police and National Highways to ensure there are suitable AIL routes from port to site.	Police, and these can be arranged as appropriate as part of the Main Works Contractor(s)' confirmation of the AIL delivery routes.
REP2-036	Essex County Council	ECC notes that the Local Nature Recovery Strategy (LNRS) should also inform the whole project, not solely off site BNG. The LNRS provides clear spatial priorities for habitat creation, enhancement, and connectivity across Essex, and should therefore guide on site mitigation and enhancement opportunities wherever feasible, not just measures located at substation or cable sealing end compound sites	Given the temporary nature of impacts for the majority of the Project, mitigation primarily involves in-situ replacement planting. Therefore, the spatial priority of ecological mitigation for replacement planting has been based on the location of the temporary impact. Where there is opportunity for additional habitat creation and enhancement opportunities, such as through offsite BNG, the Local Nature Recovery Strategy(s) has been considered.
REP2-036	Essex County Council	ECC welcomes the Applicant's confirmation that the BNG principle of additionality has been applied to ensure no double counting of mitigation. However, the response does not address the original concern regarding the apparent shift in terminology within the Landscape and Ecological Management Plan (LEMP) from "enhanced mitigation" to "landscape compensation." It remains unclear whether this represents a substantive change in approach or simply a re-labelling of measures previously described as mitigation	The Applicant's position on landscape compensation is set out at Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. There has been no change in approach or shift in terminology from essential mitigation (necessary to further reduce significant environmental effects) to compensation (does not reduce or overcome an adverse effect) in **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. The Applicant has also responded to this in the response to LV 1.18 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**, which relates to local authorities raising concerns over mitigation measures, both in terms of language and

Ref	Name	Matter Raised	Applicant's Response
			terminology used. In particular, mitigative planting should not fall into the category of 'additional mitigation' or compensation and is instead required and necessary mitigation.
REP2-036	Essex County Council	In addition, while the commitment to apply additionality is noted, the Applicant has not explained how additionality will be applied in practice to distinguish: measures required to mitigate project impacts; enhancements linked to the landscape design strategy; and genuinely additional BNG interventions. ECC therefore seeks further clarity on how, in practice, BNG measures will be categorised separately from standard mitigation and enhancement to ensure transparency and compliance with best practice	All habitat creation measures proposed within the defined Environmental Areas provide landscape and visual mitigation for the associated permanent asset (substation or cable sealing end compound). In addition, these habitat creation proposals also provide ecological mitigation, for the permanent loss of habitat associated with the permanent asset. Habitat creation proposals within the Environmental Areas have been included within the BNG metric and will be managed for 30 years by the Applicant. The Environmental Areas are not being used specifically for any other ecological mitigation and therefore can be counted towards BNG in line with the additionality principle. There is no requirement to separate out landscape mitigation measures from BNG, and habitats within these areas can be counted for both purposes. The BNG 10% 'gain' will fully be delivered through offsite measures as set out within **7.1 Biodiversity Net Gain Report [APP-299]**.
REP2-036	Essex County Council	ECC supports the development of an indicative landscape design for the EACN Environmental Area. Continued coordination on landscape design and BNG is required with other projects in the area, as it will help ensure a cohesive and ecologically robust approach across the wider EACN landscape.	The Applicant has confirmed a shared landscape and visual mitigation approach is being taken for the EACN with the North Falls and Five Estuaries Onshore co-located onshore substations as reported in Section 7.2 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]**. The Applicant has continued to take a co-ordinated approach submitting comments on the most recent iteration of the North Falls and Five Estuaries

Ref	Name	Matter Raised	Applicant's Response
			Offshore Wind Farms Joint Substations Design Guide on 17 March 2026, which will be appended to the next version of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]** at Deadline 4.
REP2-036	Essex County Council	ECC understands that a 10 year aftercare period may not be practical if it delays handover to landowners. However, successful long term establishment still relies on early landowner engagement, clear communication, and a structured handover plan outlining responsibilities, timelines and any required legal arrangements. Close coordination with the relevant Local Planning Authority will also help ensure compliance and reduce the risk of planted features failing post handover. ECC 8 draws on commentary relating to longer term maintenance of 30 years as set out in its LIR [**REP1-163**] part 4.11.	The Applicant welcomes the comments made by ECC that a ten-year aftercare period may not be practical if it delays handover to landowners. We also welcome the advice provided by ECC. The Applicant provided a further detailed response to the aftercare period for planting and planting failure rate at Section 3.12 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant has also responded to this in its response to question LV 1.4 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]** providing further justification towards a five-year monitoring period for replacement planting.
REP2-036	Essex County Council	Development Consent Order: Regarding the Applicant's response to Paragraph 6.1.3 of ECC's Relevant Representation (Page 284/06) [**REP1-132**], it is noted that it is often good practice to follow precedent in the structure and content of DCO's, particularly in respect of Requirements. ECC however maintains that it's experience in discharging requirements and the implementation of the consents should be given weight by the Examining Authority. In this regard, ECC believes having realistic timeframes within the DCO can only benefit the overall efficiency of discharging requirements and avoid the need to secure numerous extensions of time which has been	The Applicant has responded to this in its response to question DCO 1.A2 and DCO 1.A3 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.

Ref	Name	Matter Raised	Applicant's Response
		the experience of this and other Authorities when dealing with other DCO projects.	
REP2-036	Essex County Council	Development Consent Order: The presence of a Planning Performance Agreement (PPA) while important in covering a Council's costs in engaging with the process, does not guarantee the availability of officers especially when there are multiple projects on going at any one time.	The discharge of DCO Requirements will build directly on the extensive pre-application engagement and the Examination process, through which the principle, scope and controls for the Project will have been thoroughly considered. By the point of consent, the intention is that the Requirements, the parameters of the authorised development, and the mitigation framework secured through the DCO and Environmental Statement will be well understood and familiar to the relevant authorities. Post consent submissions will therefore focus on the detailed implementation of agreed measures, rather than introducing new concepts or untested mitigation. The Applicant is progressing proposals for a post-consent delivery phase PPA to support host local authorities. As part of ongoing discussions, National Grid is engaging with host authorities to understand how it may support any increase in workload arising from the authorised development where this cannot be accommodated within existing resource capacity. The emerging proposals include the potential provision of funding to support temporary local authority resource, together with the offer of a dedicated coordination resource to assist with post-consent coordination, reflecting an approach previously taken on the Hinkley Connection Project. Discussions with host authorities are ongoing and no arrangements have been finalised at this stage. The Applicant will continue to engage with authorities to agree DCO Requirement pre-application ways of

Ref	Name	Matter Raised	Applicant's Response
			working, with an emphasis on draft document review to clarify expectations and reduce the likelihood of iterative amendments.
REP2-036	Essex County Council	Landscape: While the Applicant has set out how the mitigation hierarchy has been applied to the Project in **6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-145]** and other Application documents including the **Planning Statement [APP-085]**, in Paragraph 6.9.3 of ECC's Relevant Representation [**RR-1083**], it was made clear that the Council considers that the proposed development as it stands, does not meet (EN-1) Para 4.3.4 of which states *"… the applicant must … show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy*…". ECC's view is that this policy has not been followed as there is no compensation offered for the significant adverse landscape and visual effects of the overhead line and pylons. It is accepted that whilst compensation is part of the mitigation hierarchy, EN-1 or EN-5 (2024) do not state that all residual effects must be compensated for or that any compensation measures proposed must be accepted if there are residual effects. However, ECC contends that inherent in the mitigation hierarchy is that all reasonable steps should be taken to address the significant harm arising as a result of the Project to minimise those effects not capable of being addressed, before the impacts of any residual harm are weighed in the overall planning balance and the CNP weighting applied. ECC would also point out as	The Applicant disagrees with ECC's position that the Project has not followed paragraph 4.3.4 of NPS EN-1 (2024) in respect of compensation for the significant adverse landscape and visual effects. Paragraph 4.3.4 should be considered in the context of EN-1 and EN-5 as a whole. In particular, the proposition from the Local Authorities that residual impacts of a proposal must always be offset by compensation in full (including by off-site landscape works) for such impacts is simply not part of current NPS policy. The Applicant's case on this matter has already been set out in the application documents and restated in Sections 2.5 to 2.7 and 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, the following principles apply: 1. The provision and securing of full compensation or offset for any harmful impact of the proposal by binding masterplans would have to be necessary to make the development acceptable and secured by a requirement (which would itself have to pass the tests of necessity). The spending of customer's money on such works would not be authorised as appropriate expenditure by Ofgem unless on a proper reading of the policy it was required in order that consent should be granted. 2. The relevant guidance in NPS EN-1 indicates that residual impacts for critical national priority (CNP) infrastructure (even significant residual impacts

Ref	Name	Matter Raised	Applicant's Response
		per its LIR, that there has been insufficient assessment of the granularity of valued landscapes as a result of which the potential for impact is greater and which, therefore, supports the need for compensation. ECC's position is that the project should not go ahead without a substantial funded landscape and visual compensation scheme, alongside but distinct from any proposed community benefits and mitigation. This is in recognition of the long-term significant residual negative and un-mitigatable operational effects on both landscape and visual receptors that this project will generate.	following the operation of the mitigation hierarchy) are in fact inevitable and should not generally be a reason for refusing a DCO application (see EN-1 including paragraphs 3.1.2 and 4.2.17). 3. In the Bramford to Twinstead ExA Report[1] (paragraphs 3.9.196 and 3.9.197) it was specifically accepted by the ExA that compensation is in this regard to be treated differently to the other elements of the mitigation hierarchy The ExA, addressing Suffolk CC's submissions on this very issue, concluded that (our emphasis added): '*The EXA understands the local authorities' concerns that some of the impacts of the Proposed Development on landscape and views cannot be fully mitigated* ***but does not concur that this should automatically mean that some form of compensation must be provided***.' This rejection of the same essential case made now again in relation to masterplanning for compensation of all harms remains appropriate and proportionate. If all harmful impacts have to be addressed and compensated as argued, then NPS EN-1 and NPS EN-5 would say so in terms. 4. NPS EN-1 paragraph 4.1.7 provides that for CNP infrastructure 'it is likely that the need case will outweigh the residual effects not capable of being addressed by the application of the mitigation hierarchy'.

[1] Planning Inspectorate (2024) *Bramford to Twinstead Reinforcement, Recommendation Report*. https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020002-001913-BTTR%20-%20ExA%20Recommendation%20Report.pdf

Ref	Name	Matter Raised	Applicant's Response
			5. So, residual effects are likely an inevitable consequence and expectation of a CNP proposal. The existence of such inevitable harm does not give rise by itself to a requirement for a widespread scheme of automatic 'compensation' or offsetting of that inevitable impact (see Bramford to Twinstead ExA Report paragraph 3.9.196) but does require such harm to be outweighed by the need case for the proposal. 6. This is reflected in the fact that the only meaningful references in NPS EN-5 to compensation occur only in Section 2.14 in the context of a government-led and different commitment for what is properly called wider strategic compensation for landscape and other impact of multiple offshore/onshore transmission infrastructure in an area (see NPS EN-3 (December 2025) paragraph 2.8.234). This provision is still 'under development'. Its application to proposals such as the Project will depend on that development. But this is separate to the provision argued for by the Local Authorities and indeed would not be necessary if all residual impacts were required to be compensated in any event as argued by the authorities. 7. Compensation is required for DCO schemes where it is explicitly stated in policy to be required or needed (in terms of the mitigation hierarchy), e.g. woodland loss or compensation for loss or deterioration of ancient and veteran trees (NPS EN-1 Section 5) or biodiversity or specific habitat compensation (see The Conservation of Habitats and Species Regulations 2017 and the

Ref	Name	Matter Raised	Applicant's Response
			requirement for compensatory provision). The nature and extent of the compensation is provided for by policy and statute. The Project complies with all of these provisions of policy and statute. 8. There is no such requirement or need (as part of the mitigation hierarchy or in the NPSs, National Planning Policy Framework or at all) for all landscape or heritage impacts or other impacts to be automatically compensated for or offset as suggested by the Local Authorities. Neither is there any method of calculating or calibrating how such compensation is derivable or whether it is even appropriate. The operation of the mitigation hierarchy must be seen in the light of the inevitability and acceptability of some significant residual impact which falls to be balanced against the benefits of the proposal. Given the above, it is not surprising that there has been no DCO we are aware of where such 'compensation for all residual harm' masterplans have been imposed by way of DCO requirement or where landscape or heritage harms have been required to be the subject of full compensation (as opposed to mitigation) requirements. 9. So, overall, there is no specific requirement for all residual harms to be automatically compensated as argued for by the Local Authorities. The fundamental underlying premise of the Local Authorities' case is thus incorrect. Such an approach would be inconsistent with the NPS EN-1, EN-3 and EN-5 provisions when read as a whole, would be disproportionate and not necessary to the grant of permission. Neither

Ref	Name	Matter Raised	Applicant's Response
			would it be consistent with the requirement and duties of the Applicant to provide an efficient and economical supply of electricity. It would also be inconsistent with the careful and unchallenged decision of the ExA and the Secretary of State for the Bramford to Twinstead Reinforcement (BTNO). The Applicant has also responded to this in its response to question LV 1.18 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.
REP2-036	Essex County Council	Ecology / Biodiversity: It remains ECC's opinion that the bat roost impacts of tree clearance for the development route cannot be predicted with a reliable level of certainty prior to any decision on the DCO. Focusing on mitigation only "Where the presence of a roost is confirmed…" will under-provide for what should be anticipated as the true degree of impact on bat populations. The pre-construction approach to further roost surveys (which is a deviation from standard survey requirements) obliges a more extensive mitigation commitment than what is currently proposed, to compensate for the impact assessment uncertainty. ECC is therefore concerned that there should be recognition of the constraint that incomplete surveys put on the bat roost impact assessment, and that limitation should be compensated by an expanded mitigation scheme.	The Applicant disagrees with ECC that our approach to bat surveys/mitigation will under-provide for the impact on bat populations. The bat survey scope was agreed with Natural England in advance of surveys being undertaken, as included within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**. Due to the transient nature of bat tree roosts, all impacted trees will be subject to pre-construction surveys in line with **7.4 Outline Landscape and Ecological Management Plan (Revision D)** and therefore all bat roosts will be identified. Where the presence of a bat roost is confirmed during surveys/inspections, every effort will be made through micro-siting to retain the tree and associated bat roost, where practicable. Where loss of a roost is unavoidable in any tree/feature (whether PRF-M or PRF-I), appropriate compensation measures under a Natural England mitigation licence will be implemented. The Applicant is working with Natural England through the production of a draft licence to agree the bat mitigation approach. It is expected that

Ref	Name	Matter Raised	Applicant's Response
			this agreement will be received during the examination.
REP2-036	Essex County Council	Design: ECC considers that achieving good design is a fundamental requirement requiring a holistic approach to the design of structures and landscape which responds to its surroundings and often complex environments in order to deliver high quality, sustainable infrastructure. The Applicant has referred to Appendix B of the **7.15 Design and Access Statement [APP-353**] wherein, an internal design review note prepared in support of the application, explains the design review process which has had regard to the regulatory obligations, process and outcomes and design principles, most relevant being the Holford and Horlock Rules. The Applicant therefore is of the opinion a full design review panel is not considered necessary for the Project. While the commitment by the Applicant to continued dialogue with the promoters of North Falls and Five Estuaries is welcome, the current design review process arose out of the examination process for these windfarms, and together, North Falls and Five Estuaries have been working to establish design principles in a Joint Design Guide that is independently reviewed by the Essex Quality Review Panel.	The comments made by ECC on the importance of achieving good design for co-located infrastructure at Ardleigh is noted. The Applicant has responded to this in its response to questions DES 1.3 (Independent design review) and DES 1.8 (EACN) in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.
REP2-036	Essex County Council	It is important the Norwich to Tilbury project especially in the vicinity of Ardleigh, is not considered in isolation and it should be clear from the submitted material how the respective developments will interact with one another. ECC is therefore of the opinion that the	The North Falls and Five Estuaries are the two Wind Farms connecting at the EACN. The Applicant is collaborating over environmental topics such as landscape, ecology mitigation and noise monitoring. The Wind Farms agreed to a design review by the

Ref	Name	Matter Raised	Applicant's Response
		Applicant should sign up to the Substations Design Guide and the design principles therein, in the interests of securing consistent high quality design.	Essex Quality Review Panel. The Applicant is attending as a collaborating stakeholder. While the Wind Farms connect at the EACN, they do not form part of the Project. The Joint Substations Design Guide provides guidance on the layout, design and materials for the two co-located onshore substations for the North Falls and Five Estuaries Offshore Wind Farm projects. The full implementation of the measures set out in the Joint Substations Design Guide would be delivered separately. The Applicant has been engaging with North Falls and Five Estuaries throughout the examination of those separate applications for development consent to ensure that wherever there is design overlap this does not contravene what has been submitted for the Project. **7.16 Design Approach for Site Specific Infrastructure (DASSI) [APP-354]** sets out the Applicant's approach to the design of site-specific infrastructure of non-linear works. The DASSI outlines the regulatory and technical constraints that limit flexibility for the design of some permanent infrastructure, including the EACN Substation. Therefore, due to safety and technical requirements, we are unable to adopt the same measures outlined in the Joint Substations Design Guide regarding design variations (such as colour and materials used).
REP2-036	Essex County Council	A copy of the current draft of the Joint Substations Design Guide is attached as Appendix A which includes visualisation of the proposed substations in Section 7. ECC consider that the visualisations as provided within the Design Guide is effective in	The Applicant notes Section 7 within the Joint Substations Design Guide. The Applicant provides further examples and visualisations within **7.16 Design Approach for Site Specific Infrastructure**

Ref	Name	Matter Raised	Applicant's Response
		showing the true impact of the substation on the local area, and on local communities. Being minded of the visualisations currently provide by NGET at **Design and Layout Plans - Subs and Cables [APP-041**], ECC are of the view that this should be augmented by similar visualisations of the East Anglian Connection Network as is proposed in Ardleigh, and adjacent to the Five Estuaries and North Falls sub stations, both on its own and cumulatively.	**(DASSI) [APP-354]** including illustrative design and colour palette of the EACN.
REP2-036	Essex County Council	The **Design and Access Statement [APP-353**] places emphasis on the design of the route. ECC acknowledge the technical limitations required to meet safety, costs effectiveness and operational requirements. ECC also request greater commitment to the design of the EACN both in terms of the parameters where there is flexibility on building design and the landscaping.	The Applicant has now fulfilled the requirement to appoint a Design Champion role. Given the current stage of the Project, this will consist of two complementary roles: • Development Design Champion (DDC), formally appointed from the existing Project Design Team. • Delivery and Detail Design Champion (DDDC) from the Great Grid Partnership, who will be responsible for detailed design during the delivery phase. Together, the DDC and DDDC will ensure design leadership and continuity across the full Project lifecycle. The appointment of a Design Champion is supported by NPS EN-1, National Infrastructure Commission Design Principles and the Planning Inspectorate Advice on Good Design. The Design Champion function will oversee the areas where there is scope for variation at the EACN Substation: • Location based on the LoD; and • The landscape mitigation proposals.

Ref	Name	Matter Raised	Applicant's Response
			The core responsibilities and governance arrangements will be formalised within a dedicated Design Champion Brief. This brief, covering both the DDC and DDDC roles, will be included within the DASSI to be updated and submitted into the examination at Deadline 5. The DASSI serves as the Applicant's design guide and is a certified document under Schedule 19 of **3.1 Draft Development Consent Order [Revision C]**. Its inclusion in the DASSI ensures that the influence of the Design Champion is certified and will be further secured through a DCO requirement – exact details to be confirmed in an updated Draft DCO at Deadline 5. This approach will ensure the role of the Design Champion in the implementation of the design principles during final design and construction of the Project is enforceable.
REP2-036	Essex County Council	Given the cladding options in the Joint Design Guide, ECC seeks that the Applicant engages with the North Falls and Five Estuaries applicants to ensure the same approach and colour palette. A relevant design requirement should be included within the DCO. Given the number of projects in the Ardleigh area, the overall appearance must be considered to avoid inconsistency between the co-located substations which will have a severely negative impact on the local environment.	The Applicant notes Section 7 within the Joint Substations Design Guide. The Applicant provides further examples and visualisations within **7.16 Design Approach for Site Specific Infrastructure (DASSI) [APP-354]** including illustrative design and colour palette of the EACN. The design of permanent buildings set out in the **DASSI [APP-354]** are secured through Requirement 12 of **3.1 Draft Development Consent Order (Revision C)**. This requirement ensures that the final appearance of permanent buildings is consistent with the approved design principles in the **DASSI [APP-354]** as certified under Schedule 19 (Certified Documents) of **3.1 Draft Development Consent**

Ref	Name	Matter Raised	Applicant's Response
			Order (Revision C). It provides a mechanism for enforceable design-led detailing post-consent.
REP2-036	Essex County Council	The Design and Access Statement also references delivering to Building with Nature standards for substations, early plans for this should be made available and could positively impact the overall design.	An indicative landscape design has been created as detailed within **7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]**. The **DASSI [APP-354]** describes substantial Environmental Areas around the substation, including woodland belts, strengthened hedgerows, native planting and landform mounding. The DASSI also ensures the design incorporates nature-inclusive principles, with the Environmental Areas forming part of the Project's BNG commitments and long-term ecological management.
REP2-036	Essex County Council	ECC considers that within the **Design and Access Statement [APP-353]**, the quality of the visualisations submitted is not consistent. ECC would expect additional viewpoints near to the EACN substation, clearly indicating the EACN, and both windfarm compounds, as well as the landscaping proposal to be shown as 5/10/15 years in the photomontage.	The visualisations included within the **Design and Access Statement [APP-353]** were also produced for the **DASSI [APP-354]** for illustration purposes only. The DASSI at paragraph 5.3.9 states that '*the reader should defer to the detail shown in the Environmental Areas provided in the Outline LEMP'* (**Outline LEMP (Revision D)**.
REP2-036	Essex County Council	All the documentation on design is technical and largely overhead drawings. Without visualisations it is not possible to ascertain what the EACN will look like from local receptors in the public realm. For example, views looking towards the EACN from Grange Road, Ardleigh Road and Little Bromley Road - including the windfarm substations for cumulative impact, as well as from PROW Lawford 24, 25, 57 Little Bromley 12, 15 and Ardleigh 26, 28. This is crucial especially as the project is also proposing Ardleigh Road widening,	An illustration of the proposed EACN Substation with planting at year 15 can be found at Image 5.8 on page 69 of the **DASSI [APP-354]**. National Grid has engaged with other developers who are proposing developments in proximity of the Project, to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both of these wind farms are proposed to connect into the proposed EACN Substation. Both projects involve the

Ref	Name	Matter Raised	Applicant's Response
		scaled drawings showing cross-sections are also important to understand the visual impacts in the wider context.	construction of new substations, which are proposed to be located adjacent to the EACN Substation. Consideration has been given to these projects when preparing the Environmental Area around the EACN Substation. The latest version of the North Falls and Five Estuaries Joint Substations Design Guide illustrates the landscape and ecology masterplan for NF/FE alongside the Environmental Area proposals for the EACN in both **8.17 Landscape and Ecology Masterplan - Integration with Future Projects** and **8.19 Landscape and Ecology Masterplan - Illustrative Integration with Future Projects**. The Applicant has provided visualisations in proximity to the EACN as set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**, which are representative of the suggested locations, including north of Ardleigh, Ardleigh Road, Grange Road and Little Bromley Road. Relevant viewpoints include: • Viewpoint 3.11: PRoW north of Ardleigh (view direction 103 looking east towards the Project including the overhead line and the EACN, in the direction of the North Falls and Five Estuaries projects) • Viewpoint 3.12: Waterhouse Lane, Burnt Heath (looking north towards the Project including the overhead line and the EACN) • Viewpoint 3.13: PRoW, Little Bromley (Little Bromley 16) (looking north-west towards the Project including the overhead line and the EACN, in the direction of the North Falls and Five Estuaries projects)

Ref	Name	Matter Raised	Applicant's Response
			• Viewpoint 3.21: Barn Lane, Little Bromley (looking west/ north-west in the direction of overhead line approaching the EACN) The approach to selecting viewpoints is set out in paragraphs 13.2.39 to 13.2.41 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. The viewpoints were discussed and agreed with relevant Local Planning Authorities (LPAs), as set out in the **Statements of Common Ground** (5.9.1 - 5.9.12 **[APP-089 to APP-100]**). A number of viewpoints suggested by LPAs were not used. This was due to either a lack of potential visibility of the Project (due to screening or filtering of views by landform, buildings or vegetation), or the area in question being represented by an alternative viewpoint/s. The Landscape and Visual Impact Assessment viewpoints are a representative selection of publicly accessible locations along the Project, capturing a range of receptors and a variety of distances and viewing directions. Document 10.34.3 of the Five Estuaries Offshore Wind Farm Environmental Statement submission (Application Reference ENO10115) provides a visualisation of proposed substation proposals from Barn Lane PRoW, with the EACN included for context. This view lies approximately 40 m to the south-east of the aforementioned Viewpoint 3.21 at Barn Lane, and looks more to the west/south-west rather than the west/north-west. Existing (baseline) landscape and visual baseline information at the Barn Lane PRoW location is provided in Five Estuaries Offshore Wind Farm Volume 6, Part 7, Annex 2. 2. 3

Ref	Name	Matter Raised	Applicant's Response
			Figure 2.17A-C VP2 Barn Lane PRoW (document 6.7.2.2.3). The Applicant considers that the viewpoints provided in proximity to the EACN are sufficient, and representative of the surrounding visual receptors.
REP2-036	Essex County Council	Health and Wellbeing, Historic Environment and Historic Buildings: These matters will be addressed within ECC's response to the Applicant' comments on the Local Impact Reports to be submitted at Deadline 2.	Noted.
REP2-036	Essex County Council	Report on the **Interrelationship with other Infrastructure Projects [REP1-134]**: ECC notes that Table 2.1 has omitted the following proposals / developments within the Tending area which need to be taken into account. There may also be further projects which relevant district councils may raise: • Hempstalls Solar Farm and Battery Energy Storage System (BESS) with associated substation, access tracks and equipment (Application submitted to Tendring District Council, Ref Number: 25/01056/FUL). ECC is aware that a decision is pending on this application. • Proposed Housing Allocations of Tendring District Council Preferred Option Local Plan (Reg. 18 Consultation) which is currently under consultation until 23 March 2026, which will have direct construction impacts: • Proposed Garden Villages at Horsley Cross (SAMU9) for 6,000 dwellings, together with schools, higher education, community facilities and neighbourhood centre	The scope of the developments included within **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]** was instructed by the Examining Authority within the **Rule 6 letter – Notification of the Preliminary Meeting and matters to be discussed [PD-009]**. The Rule 6 letter requests that the NSIPs identified in the Rule 6 letter and the projects that are shortlisted in **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** are to be summarised in the Report on Interrelationship with Other Infrastructure Projects. The cut-off date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The application for the Hempstalls Solar Farm and BESS project was submitted in July 2025. **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** considered developments up to a cut-off date of 1 April 2025. Planning applications submitted since this date are currently being reviewed, and an

Ref	Name	Matter Raised	Applicant's Response
		Proposed Garden Villages at Hare Green (SAMU8) for 4,500 dwellings with community facilities and neighbourhood centre	updated assessment of inter-project cumulative effects is being undertaken on shortlisted developments.
REP2-036	Essex County Council	A number of the planning applications listed in this table were granted over 3 years ago. The Applicant does not provide any useful insight as to the status of these applications and whether these are still valid and relevant for the consideration of cumulative impacts.	Table 2.1 of **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]** responds to the ExA's requirements for this report, namely the second bullet in the list towards the bottom of Page F2 in Annex F to **Rule 6 letter - Notification of the Preliminary Meeting and matters to be discussed [PD-009]**. This requires the Applicant to provide '*updates to expected timings for their submission/ decision, construction phasing and expected start of operation*'. In providing information on construction and operation, the Applicant has relied on information in the public domain to ascertain whether development has commenced and / or concluded, for example news articles and reviews of Google Earth.
REP2-036	Essex County Council	ECC question the status assumed of the A12 Chelmsford to A120 Widening Scheme by the Applicant. It is understood that this consent may be revoked, however, at the moment, the DCO remains in force and is capable of implementation.	National Highways was the promoter for this project; their website confirms that the project has been cancelled in an update dated 1 August 2025. This decision was taken by the Government following the Spending Review. Therefore, even if the DCO remains in force, there is no realistic chance of the project progressing if its funding has been withdrawn.
REP2-036	Essex County Council	ECC is concerned regarding the coordination between the Applicant for the Norwich to Tilbury project, and those of the North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm projects. For example, there is potential for proposed Ardleigh Road widening works to interfere with the proposed joint structural visual and landscaping planting for these	The North Falls and Five Estuaries are the two Wind Farms connecting at the EACN. The Applicant is collaborating over environmental topics such as landscape, ecology mitigation and noise monitoring. The Wind Farms have agreed to a design review by the Essex Quality Review Panel. National Grid is attending as a collaborating stakeholder. More

Ref	Name	Matter Raised	Applicant's Response
		wind farms, as well as the proposed landscape and ecological enhancement areas. Further engagement between these projects is encouraged to ensure alignment. ECC remains strongly of the view that there must be a coordinated approach on landscape and visual mitigation, BNG as well as the wider design matters amongst these three projects.	information about the coordination and agreements between the projects can be found in **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]**.
REP2-036	Essex County Council	ECC would wish to raise the continuing importance of the mitigation hierarchy to reduce residual effects, considering the importance of good quality mitigation:	The mitigation hierarchy has been systematically applied throughout the design of the Project. This is set out in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**, **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, **6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135]** and **5.6 Planning Statement [APP-085]**.
REP2-036	Essex County Council	**8.4.2 Policy Compliance Tracker [REP1-133]**: The Applicant seeks to set out how the project is in accordance with the updated NPS' which came into effect in January 2026. The document also covers the draft NPPF and emerging local plans and new neighbourhood plans. ECC would wish to raise the continuing importance of the mitigation hierarchy to reduce residual effects, considering the importance of good quality mitigation and would draw attention to the following document references in EN-1 and EN-5 (2025): EN1 3.3.63 – likely that need case will outweigh any other residual impacts not capable of being addressed by application of mitigation hierarchy, in all but the most exceptional circumstances (see also 4.1.7).	In April 2025, the government launched a consultation on proposed changes to EN-1, EN-3 and EN-5 that ended on 29 May 2025. The updated NPSs were subsequently published in November 2025 and came into force on 6 January 2026. Paragraphs 1.6.2 and 1.6.3 of NPS EN-1 (2026) describe the transitional arrangements '*The 2024 NPSs included transitional provisions between the 2011 and 2024 NPS which remain in place. The Secretary of State has decided that similar transition provisions should apply for the 2025 NPSs, so that for any application accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect in accordance with the terms of those NPSs*.' At the point of submission of the Project in August 2025, the NPSs designated in January 2024 were

Ref	Name	Matter Raised	Applicant's Response
			government policy. In accordance with paragraph 1.6.3 of NPS EN-1 (2026) '*The 2025 amendments will therefore have effect only in relation to those applications for development consent accepted for examination after the final publication of those amendments*'. The updated NPSs are however important and carry weight in the decision-making process. The Project has therefore been assessed against the updated NPS EN-1, EN-3, and EN-5 (2026), and this was reported in **8.4.2 Policy Compliance Tracker [REP1-133]** which was submitted at Deadline 1. ECC has highlighted the importance of the Mitigation Hierarchy and identified extracts from relevant policies in EN-1 and EN-5 (2026). As stated previously the mitigation hierarchy has been systematically applied throughout the design of the Project. This is set out in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127], 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135]** and **5.6 Planning Statement [APP-085]**. It is considered that summary of paragraph 3.3.63 (NPS EN-1 (2026)) provided by ECC, omits key points of relevance. The full paragraph has been provided below (emphasis added). *'Subject to any legal requirements, the urgent need for CNP infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, means that it is likely the need case will outweigh any other*

Ref	Name	Matter Raised	Applicant's Response
			residual impacts not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional circumstances. ***Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible'.*** The 2026 revision of this policy is important in that it removes a presumption that the need case '*in general'* outweighs other residual impacts, to stating that the urgent need for CNP infrastructure '*means that it is likely that the need case will outweigh residual impacts….in all but the most exceptional circumstances'*. The Project notes the insertion of the additional reference to '*in all but the most exceptional circumstances'* and considers this adds additional clarity to the meaning and effect of CNP status in the NPS framework.
REP2-036	Essex County Council	EN1 3.3.80 – need demonstrated if it is an efficient and economical means of achieving the stated objectives – but recognising need to follow good design, avoidance and mitigation principles.	The Applicant notes that this policy relates to projects which are not brought forward through the Centralised Strategic Network Plan (CSNP). The CSNP is a new long-term planning framework being developed by the National Energy System Operator (NESO) to map demand and optimal transmission infrastructure needs to support net-zero goals. The CSNP when published will take a broad, whole energy system view to transform the delivery of affordable, clean and secure power. Whilst the Project pre-empts the delivery of the CSNP, the increased capacity being provided by the Project is critical to delivering a network which supports the clean power pathways as set out in the Clean Power Action Plan 2030.

Ref	Name	Matter Raised	Applicant's Response
			The Project responds to previously established policies and by coming forward as it is, also addresses the urgency and pace required to move towards delivering the necessary improvements to power infrastructure to respond to the challenges of meeting the obligations of the Clean Power Action Plan, and thereafter, net zero, making a significant contribution to both regional and national requirements.
REP2-036	Essex County Council	EN1 4.2.24 - Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.	**5.6 Planning Statement [APP-085]** sets out how the Application meets the requirements of the 2024 National Policy Statements (NPSs) (EN-1, EN-3 and EN-5), whilst the Environmental Statement **[APP-123 to APP-298]** assesses the potential environmental impacts of the Project. The latter demonstrates that the mitigation hierarchy has been applied throughout the design and development of the Project. Each topic chapter of the ES has identified proposed mitigation measures (which could fall under 'Avoid', 'Prevent' or 'Reduce') that are required to address potential significant adverse effects of the Project, following the mitigation hierarchy. Mitigation is categorised as follows: • Embedded Mitigation Measures: are those that are intrinsic to and built into the design of the Project. • Standard Mitigation Measures: comprising management activities and techniques that would be implemented throughout construction of the Project to limit effects through adherence to good site practices. These are included in **7.2 Outline Code of Construction Practice (Revision C).**

Ref	Name	Matter Raised	Applicant's Response
			• Additional Mitigation Measures: mitigation measures over and above embedded and standard mitigation measures to reduce environmental effects. This includes, but is not limited to, mitigation required for protected species. The **Design Development Report [APP-122], ES Chapter 3: Alternatives [APP-127], Design and Access Statement [APP-353] and Design Approach for Site Specific Infrastructure [APP-354]** provide an overview of the design rationale for the Project. It outlines how the design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated mitigation measures in order to avoid or reduce significant environmental effects wherever practicable.
REP2-036	Essex County Council	EN1 4.2.25 - Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success, and that action is taken.	**6.18 Environmental Statement Chapter 18 - Summary [APP-287]** identifies which environmental topics would have significant residual effects following the application of mitigation measures. Significant residual effects would be limited to five topic areas: Landscape and Visual, Historic Environment, Agriculture and Soils, Socioeconomics (specific sites), and Traffic and Transport (construction phase only). Six topics would have no significant residual effects. The residual effects that remain following the application of the mitigation hierarchy and any compensation provided then fall to the planning balance in accordance with the NPS policies. Policies relating to CNP infrastructure projects specifically address residual effects in the planning balance. For

Ref	Name	Matter Raised	Applicant's Response
			CNP infrastructure, EN-1 (2024) paragraph 4.2.15 provides that these **residual impacts are unlikely to outweigh the urgent need for this type of infrastructure.** Revised EN-1 (2026) paragraph 4.2.25 confirms that compensation, by definition, does not reduce an adverse effect resulting from a development. Whilst compensation is part of the mitigation hierarchy, NPS EN-1 or EN-5 (2024) do not state that all residual effects must be compensated for or that any compensation measure proposed must be accepted if there are residual effects. It is particularly noteworthy that none of the policies on landscape and visual effects in EN-1 or EN-5 expressly mention compensation. This is in contrast to the other NPS policy sections e.g. on biodiversity, where the provision of compensation is expressly referred to. The NPS position in relation to compensation is also consistent with the EIA Regulations. There is no requirement under the regulations for all residual effects to be compensated. The Applicant has provided an appropriate package of compensation and enhancement/furtherance measures to be delivered by the Project which include BNG, 3:1 replacement planting ratio for individual trees and the measures proposed in relation to the s85 duty of the Countryside and Rights of Way Act 2000. As stated above, the residual effects that remain following the application of the mitigation hierarchy therefore fall to the planning balance in accordance

Ref	Name	Matter Raised	Applicant's Response
			with the EN-1 and EN-5 policy framework, including the further CNP presumption in section 4.2 of EN-1.
REP2-036	Essex County Council	EN5 2.1.6 - Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy.	The mitigation hierarchy has been systematically applied throughout the design of the Project. This is set out in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**, **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, **6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135]** and **5.6 Planning Statement [APP-085]**.
REP2-036 REP2-037 REP2-040 REP2-042	Essex County Council Norfolk County Council Suffolk County Council Thurrock Borough Council	The Councils have met as lead local flood authorities (LLFA) affected by this project and have agreed to take the same position with regard to the response to the Drainage Strategy. The LLFAs are Norfolk County Council, Suffolk County Council, Essex County Council and Thurrock Council.	Noted.
REP2-036 REP2-037 REP2-040 REP2-042	Essex County Council Norfolk County Council Suffolk County Council Thurrock Borough Council	Normally, the LLFAs would expect a drainage strategy to have been included as part of the application materials. If this document had been published with the rest of the documentation on the acceptance date, our engineers would have had 11 weeks to review the drainage strategy before the relevant representations were due and nearly 22 weeks before the LIRs were due. Because the drainage strategy was only submitted at Deadline 1 the LLFAs have only had it for two weeks.	A summary of the surface water management proposals was provided as part of the DCO application submission in Appendix C, **7.9 Flood Risk Assessment [APP-331]**. In response to the feedback provided by the LLFA on this summary, the Applicant produced and submitted **8.2 Drainage Strategy DCO [REP1-072]** at Deadline 1.
REP2-036 REP2-037	Essex County Council	This is insufficient time to provide a comprehensive technical review of the drainage strategy. The ExA	The Applicant notes the respondent's comment and would like to draw attention to the updated

Ref	Name	Matter Raised	Applicant's Response
REP2-040 REP2-042	Norfolk County Council Suffolk County Council Thurrock Borough Council	may wish to ask the LLFAs how the drainage strategy should be secured in the draft development consent order, and what changes to the drainage strategy would be necessary to make it suitable for use as an outline drainage strategy.	commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**. This provides clarity that the Surface Water Management Plan produced by the Main Works Contractor(s) to discharge Requirement 4 of the DCO, will be substantially in accordance with **8.2 Drainage Strategy DCO [REP1-072]** and that this Plan will be developed liaising with the LLFAs and statutory undertakers, with ongoing dialogue during implementation of the measures.
REP2-036 REP2-037 REP2-042	Essex County Council Norfolk County Council Thurrock Borough Council	What the LLFAs can say at this point is that the drainage strategy will require further work before it can be used as a basis for detailed design at a later stage. NCC's LIR contained a proposal for a new requirement for a construction surface water drainage strategy ([**REP1-173**], Table 4-A, pp. 43-44). NCC stands by this approach, subject to a suitable outline strategy being developed.	This point is addressed in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, paragraph 3.18.60 in response to Norfolk County Council's Local Impact Report. The Applicant notes the respondents comment and will await the final comments from Norfolk County Council and the other LLFAs before resubmitting the Drainage Strategy at a subsequent deadline.
REP2-038	North-West and South-West Chelmsford Parishes Group	Alternatives that follow the A12 corridor: The Group welcomes the Applicant's acceptance that 'there could be potential benefits from infrastructure being concentrated geographically' and that close paralleling of transport infrastructure would appear 'beneficial in some short sections'. However, most of paragraph then appears to argue against close paralleling the A12 completely, as that would clearly affect a succession of towns villages and hamlets. But that is a different argument - it does not touch upon the Group's point that close paralleling the A12 WHERE THIS IS POSSIBLE is a positive factor to consider in route selection.	The general routeing points are addressed in **8.8.1 Applicant's Comments on Written Representations** [**REP2-029]** in the response to North-West and South-West of Chelmsford Parishes Group. We would not dispute that there are individual sections where close parallel alignment with particular features may be possible. This is the case whether that is the A12, existing overhead lines, railways etc. The broader position remains that these short sections have to be connected to make a complete route. The Applicant's position is that is not achievable.

Ref	Name	Matter Raised	Applicant's Response
		The Group's case, set out in its Written Representations at Deadline 1, is that there are a variety of advantages in N2T following the A12 in the 'short section' between Boreham and the Galleywood/Stock A12/B1007 junction.	
REP2-038	North-West and South-West Chelmsford Parishes Group	Alternatives at Great and Little Waltham: In its Written Representations at Deadline 1, the Parishes Group presented a detailed examination of alternative routes to the east and south of Chelmsford. The Applicant's summary comments in this Response shed no real light on its reasons for rejecting this option, without consultation. The Applicant's Response provides no explanation of the failure to properly consider rationalisation with the existing 440 and 132kv lines to the east of Chelmsford (particularly through undergrounding the 132kv line) either at the outset or subsequently. We believe it would be helpful for the Examining Authority, as well as other stakeholders, to be able to understand what concrete steps were taken to assess the potential for rationalisation as a way of overcoming these 'technical complexities' in the east and south of Chelmsford option.	The general routeing points are addressed in **8.4.1.2 Addendum to Applicant's Comments on Relevant Representations [REP2-025]** in the response to North-West and South-West of Chelmsford Parishes Group. In terms of the potential for rationalisation the first part of any such review is to establish whether the removal of the line (however achieved) provides sufficient space for the successful routeing of the larger 400 kV infrastructure. In this case existing constraints (other infrastructure, homes, buildings etc) do not support an overhead line or underground cable route. In the Applicant's view, mitigation such as the use of a Tunnel is not justifiable.
REP2-039	Offton and Willisham Parish Council	This response on behalf of Offton and Willisham PC to the National Grid (NG) Funding Statement covers: • Timeline and Energy Security • Underground • Swimming Pools • Property • Economy	The Applicant acknowledges the points raised by Offton and Willisham Parish Council on the Funding Statement submitted at Deadline 1 - **4.2 Funding Statement [REP1-004]**. The purpose of the Funding Statement is to contain sufficient information to enable the Secretary of State to be satisfied that, if such powers are granted, the proposed development is likely to be undertaken and

Ref	Name	Matter Raised	Applicant's Response
		• Summary	not prevented due to difficulties in obtaining the requisite funding. The Applicant considers the Funding Statement fulfils this requirement by detailing the Proposed Project's components at the detail required and need for the project due to the existing network's insufficient capacity to handle future energy demands. It also highlights National Grid's regulatory framework, business model, and the financial mechanisms in place to ensure the project's successful implementation.
REP2-039	Offton and Willisham Parish Council	"The government is pursuing a goal to achieve clean power by 2030 for Great Britain, including developing a range of pathways that reflect the possible routes to a decarbonised power system" (source: Funding Statement). There are two existing High Voltage AC (HVAC) overhead existing lines built in the 1950s from Norwich to Tilbury. These are old height 15m pylons, compared to the proposed double height and four times the size pylons proposed by the Applicant. No analysis has been provided on usage, capacity, or forecast for the current network. No offshore wind actually connects at Norwich. N2T is one of several projects presented in a piecemeal way too hide the purpose of reinforcing an old network based now in the wrong location using the wrong technology. Experience in Ukraine shows the danger of exposed power networks. Yet the Applicant proposes to have the N2T route use Bramford, along with a number of other NG projects, all converging on a single point of weakness. The proposed route by the	The first quote was a statement made to explain the role of the National Energy System Operator (NESO) and in particular Clean Power 2030 that provides important context for the Project purpose. It is not intended that the Funding Statement provides technical analysis on usage, capacity or forecast for the current network. However, the need case set out in **4.2 Funding Statement (Revision C)** is underpinned by quantified analysis on technical system deficits and the regulatory requirement to facilitate generation. Such technical details behind the need case for the reinforcement of the East Anglia and South East Transmission System is fully set out in **7.17 Strategic Options Backcheck Review [APP-355]**. The need case is robust, quantified, independently validated and the licence obligation to deliver by 2030 is statutory, not merely contractual. The Planned Generation for East Anglia includes offshore wind connections at Norwich as shown in

Ref	Name	Matter Raised	Applicant's Response
		Applicant reduces our energy security, it does not increase it.	Table 3.2 of **7.17 Strategic Options Backcheck Review [APP-355]**.
		NG has suggested that without the project it would add significant costs to the consumer (Funding statement page 6 section 1.1.4, and page 10 section 3.1.5). No evidence or numbers are provided to substantiate this assertion. NG has utilised the marker of 2030 to justify reinforcing N2T, citing NESO. These muddled facts have been used to incorrectly suggest that the Applicant has a Licence Obligation, when the obligation is to meet government goals on Net Zero, including reducing costs for consumers and increasing energy security.	The need case is much more than meeting capacity requirements and our regulatory duties to customers. Hence reference was made to meeting the requirements of Clean Power 2030. NESO is the owner of the Least Worst Regrets Analysis and the owner of the model and data that produces the output balancing project costs against constraint costs. The NESO evaluations are reflected in **7.17 Strategic Options Backcheck and Review [APP-355]** Annex 2 of the NESO Clean Power 2030 Report, which represents the latest impact upon constraints.
		The Applicant has chosen a process of two non-statutory consultations and one statutory consultation to progress the N2T plan, but there have been no alternatives examined, no costings, no definition of scope. This has delayed planning and "kicked the can down the road" in order to create a false and narrative that N2T is required in its current form.	The NESO Clean Power 2030 report identifies the Project as critical to delivering a network which supports the clean power pathways. Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional recognition of the need for the Project to what is stated on the need for new electricity networks.
			The Applicant notes the comments made by Offton and Willisham Parish Council on the consultation process but does not consider this needs to be reported in the Funding Statement.
REP2-039	Offton and Willisham Parish Council	The Applicant state undergrounding is unaffordable as it is 10x cost of overhead. But this is for HVAC, which is the old technology. ESO identifies undergrounding High Voltage DC (HVDC) will be at a comparable cost	The Applicant notes the comments made on undergrounding and has considered alternatives in **7.19 2023 - Strategic Options Backcheck and Review** [**APP-357**], with all onshore alternatives of

Ref	Name	Matter Raised	Applicant's Response
		in the early 2030s (Source: ESO East Anglia Network Study, dated March 2024). So a reasonable assumption is, it is currently 1.5 times the cost to underground HVAC than the proposed overhead lines. Which implies difference in undergrounding HVDC compared to HVAC is 10/1.5 = 6.7 times cheaper. Or 6.7 x 21km is 140km underground HVDC for same cost as NG proposed underground of 21km HVAC. The total length is 180 km. It is suggested a cheaper alternative would be to underground the remaining 40km rather than spend the money on 159km of overhead HVAC lines. As The Applicant has produced no financial breakdown it is impossible to unpick its figures, and its numbers make a mockery of any oversight in the planning process.	alternating current (AC) overhead Line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. The Funding Statement has been prepared: • To meet the requirement of Regulation 5(2)(h) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) • In accordance with Paragraphs 25 and 26 of DCLG guidance 'Planning Act 2008: Application Form Guidance' (DCLG, 2013b) • In accordance with Paragraphs 9, 17 and 18 of DCLG guidance 'Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land', published September 2013 (DCLG, 2013a). The Applicant considers the Funding Statement meets these requirements.
REP2-039	Offton and Willisham Parish Council	The Applicant states that it is regulated by Ofgem (source: Funding statement page 8 section 2.1.3 and page 11 section 3.2.1). This is not true. See Ofgem freedom of information request FOI2025/01671 which states that Ofgem does NOT regulate the consultation practices of the Transmission Owners. No oversight has happened on NG's consultations, where no	National Grid is regulated by Ofgem. The Applicant has developed its proposals and carried out consultation in accordance with relevant legislation and statutory guidance. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation.

Ref	Name	Matter Raised	Applicant's Response
		alternatives, transparency, scope, or costs were provided.	
REP2-039	Offton and Willisham Parish Council	Swimming Pools With 509 Pylons (source: Funding Statement), and assuming 1 pad foundation size 2.6m x 2.6m x 3m deep results in 20m3 capacity of concrete. And for 4 pads per pylon 80 m3. For the 509 Pylons mentioned requires 40720 m3 of concrete. An Olympic swimming pool has a capacity of 2500 m3, meaning National Grid plans to pour 16.3 Olympic pools of concrete just for the foundations. With concrete CO2 per m3 of 410 kg, this means NG plans to emit 16,695,200 kg of CO2, or 16,695 tons. Figures are missing all transport costs, costs of excavation, and congestion. This is not environmentally sensible when there are better, cheaper and more practical alternatives.	The Applicant would firstly note that its position is that the Project as submitted represents the preferred solution. Various responses included in the WQs demonstrates that assertions about other solutions being better or cheaper are unfounded. The Applicant is committed to embedding a sustainable approach in the design of the Project. The Project design team and the Great Grid Partnership will adopt the National Grid framework for sustainability at the detail design stage. The sustainability vision set out in **7.15 Design and Access Statement [REP2-020]** ensures that sustainability is embedded through the full life cycle of the Project from design – procurement – construction – operation. Therefore, the Project design team including the Great Grid Partnership will continue to embed National Grid's design principles through to delivery of the Project. This includes delivering world class carbon efficient infrastructure. Whilst the comments are noted, the Applicant does not consider this level of detail is necessary in a Funding Statement.
REP2-039	Offton and Willisham Parish Council	There are 154 postcodes directly affected on the N2T route. Using historical house prices in Rightmove.co.uk, a total of 595 properties sold in the 154 postcodes. Analysis done in 2024 identifies value of sold properties as £346m, for properties between 1990 to 2024. Therefore, average property was sold in 2007. Assuming a 40% uplift to 2024 prices identifies £484m. But the database only covers sold	It is understandable for residents of the Parish to have concerns about property values regarding new infrastructure proposals near homes, however there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, national factors affecting the housing market at any time. These are

Ref	Name	Matter Raised	Applicant's Response
		property, so assuming it is one in two, an uplift of 2 identifies a more realistic £968m value of property directly underneath the N2T route. With an impairment average of 20% * equates to £194m. However compulsory purchase, as mentioned by NG, will be required. It is safe to assume this will cover 20% of properties, giving 80% remaining impairment of £155m, and the cost of the compulsory purchase at £194m, total £348m. NG states it has made an allowance of £184.9m. This does not appear to match real data. No narrative has been provided to clarify the NG numbers, or the scope of what they cover. Further, the LSE report into pylons show an average £12.5k per property (Source: LSE and Telegraph 22/08/2024). Findings suggest that the construction of new overhead pylons reduces prices by 3.9pc for properties up to 1500 metres away, suggesting the impacts extend further than previously estimated. This catches a significantly greater number of houses than the above. There is no clarity as to what is included/what mechanisms, and scale for compensation in the funding report. * 20% As identified by a panel of estate agents and property consultants.	constantly changing. Some factors that impact house prices can be temporary or over a term. The Beauly-Denny 2024 report was commissioned by Scottish Renewables and conducted by BiGGAR Economics. The report focused on house prices along the 137 km (615 x 53 m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers; and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that: • House prices in affected areas (Highland, Perth & Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beauly-Denny power line. • Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different buyers and opinions on certain properties are entirely subjective. Some potential buyers could be deterred while others are entirely unbothered.

Ref	Name	Matter Raised	Applicant's Response
REP2-039	Offton and Willisham Parish Council	In the funding statement page 6 there is a line: "*Ancillary and/or temporary works associated with the construction of the Project*". The Applicant plans to build a new road across East Anglia - this detail is hidden (source: NG documents). There is no clarity of how long this road will be in place, or if, more likely, it becomes a permanent feature. For Offton, the Applicant plans to split the village into 3 as it also plans undergrounding existing services. No where does NG recognise economic damage. This should include business impairment, such as farms cut in two, hospitality businesses damaged by interruption and permanent damage to the locale. Anecdotal evidence in Offton identifies farms that will be no longer viable.	The Applicant has previously responded in detail to concerns raised by the Parish Council over temporary works associated with the construction of the Project around Offton see **8.8.1 Applicant's Comments on Written Representations [REP2-029]** page 15. The Applicant considers the Project description used with regards to '*Ancillary and/or temporary works associated with the construction of the Project*' is appropriate for the Funding Statement. Matters relating to loss of business income are compensation matters. Such matters would be assessed separately, on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code, and are not matters to be determined through the Examination of the DCO. Under the Compulsory Purchase Code, businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
REP2-039	Offton and Willisham Parish Council	From the above it is safe to conclude that there has been: • No clarity on numbers • No definition as to why the Applicant has chosen 1950's HVAC pylon technology • Factually incorrect statements made such as regulation by Ofgem • Illogical assertions to suggest the Applicant has a Licence Obligation	The Applicant has addressed these points most fully in the responses to the parish council above.

Ref	Name	Matter Raised	Applicant's Response
		• No validation on compensation other than an assertion that property consultants have been consulted • No analysis of the property along the route, the scale of compensation, and level of blight expected • No assessment of the economic damage to businesses and the community • Key details have been hidden under the terms "Ancillary and/or temporary works" • No clarity on the scope, plan, cost, or timeline.	
REP2-040	Suffolk County Council	1.1. Aims, Methodology & Presentation (Geophysics Report) 3.1. Aims and Objectives …this paragraph needs to clearly state that the results of the geophysical survey will be used in conjunction with the trial trenching results of the priority areas to inform a programme of archaeological mitigation for the priority areas.	The purpose of the geophysical survey results report is to provide results and interpretation of the survey. The strategy for trial trenching and mitigation is outlined in the Written Schemes of Investigation (WSI) for the priority trial trenching areas and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which will be submitted into Examination. The Applicant has actively engaged with Local Planning Authorities and Historic England regarding **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** since submission of the DCO application. The Applicant has discussed progress on the ongoing geophysical survey and trial trenching, the approach to Phase 2 trial trenching and the programme for updates to **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** at meetings with Essex and Suffolk County Councils on 26 March 2026, with

Ref	Name	Matter Raised	Applicant's Response
			Norfolk County Council on 27 March 2026, and with representatives from Historic England, Thurrock Council and Essex, Suffolk and Norfolk County Councils, at the Archaeological Working Group Meeting on 1 April 2026. The Applicant is currently preparing an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** taking into account feedback received from stakeholders noted above as well as others. The updated document is scheduled for submission at Deadline 5. Prior to this, the updated document will be shared with the relevant stakeholders for their review.
REP2-040	Suffolk County Council	1.2. Aims and Objectives (Geophysics Report) Geophysics does not, on its own, establish the presence or absence of archaeological feature or reveal the archaeological significance, function, date, depth, or state of preservation of those anomalies it does identify. But provides useful information for sites where early trial trench evaluation should be undertaken to inform development. Therefore, geophysical survey on its own cannot be used to establish the presence/absence of archaeology within any given area.	The Applicant acknowledges this and notes that the strategy for trial trenching is outlined in the WSIs for the priority trial trenching areas and **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328**], which is being updated and will be submitted into Examination and updated for the Phase 2 trial trenching.
REP2-040	Suffolk County Council	1.3. Conclusion (Geophysics Report) *"…The magnitude and resolution of the anomalies identified throughout the project indicates that there was likely sufficient magnetic contrast for the detection of sub-surface archaeological features, if present, notwithstanding the limitations of*	The Applicant has responded to this in its response to question HE 1.47 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.

Ref	Name	Matter Raised	Applicant's Response
		magnetometer survey to identify certain types, sizes and periods of archaeological features." This risks over stating the capabilities of magnetometer survey unless the report also explains what is not detectable. A better, balanced statement should acknowledge that apparent good resolution does not guarantee detection of all feature types, and depth, deposits and local environment (alluvium and peat) can severely reduce detection of anomalies that could be detected elsewhere on different geologies. Within the report there are three occasions where it mentions there are limitations to magnetometer survey, but it does not detail what these limitations are. This is particularly important to understand the limitations of the survey technique within the river valleys of the Waveney, Gipping and Stour as detection in deep colluvium, alluvial and peat deposits is often reduced.	
REP2-040	Suffolk County Council	**1.4 5549, 5496, 603883, 234690, 21.35ha** *"No anomalies of clear archaeological potential have been identified in PA 5496, immediately north and east of the River Stour (Illus 398). These Priority Areas lay within the floodplain of the river which is reflected in the survey data recording former channels and amorphous spreads of discrete anomalies likely resulting from alluvial deposition."* It needs to be made clear throughout the report what the limitations of magnetometry are, particularly within the river valleys. Broad statements "No anomalies of clear archaeological potential have been identified" need to be caveated with the limitations of the survey technique within the environmental context and that	The Applicant will update the interpretation section of **6.11.A4 Environmental Statement Appendix 11.4 – Geophysical Survey (Priority Areas) Results Report [AS-072 - AS-077]** to take account SCC's comments. The updated document is scheduled for submission at Deadline 4.

Ref	Name	Matter Raised	Applicant's Response
		deep deposits within the river valleys can mask the magnetic signals of archaeological features. Additionally, magnetometer survey cannot reliably determine the presence of archaeologically sensitive deposits (for example undisturbed peat, waterlogged organics, or buried soils); it only detects contrasts in magnetic properties, so depth, thick alluvium/colluvium, waterlogging and local geology can mask or eliminate detectable anomalies. For river valleys such as the Waveney, Gipping and Stour this limitation should be stated clearly in the report. Therefore, SCCAS recommend the interpretation section of the report is reassessed to incorporate the limitations of the survey technique in areas, particularly the river valleys.	
REP2-040	Suffolk County Council	2.1 to 2,10: **11.A5 (B) Environmental Statement Appendix 11.5 – Trial Trenching Results Report [AS-078]** This is an interim report, SCCAS will comment on full report when that is submitted. SCCAS will discuss mitigation with the Applicant.	Noted. The Applicant will respond further when it receives SCCAS comments.
REP2-040	Suffolk County Council	3.1 Errata Table 1.1 **6.3.A6 Environmental Statement Appendix 13.6: Arboricultural Impact Assessment [APP-236]**: SCC considers that the Applicant should clearly list what the changes between the versions are and on which sheets of the figure they can be found. It is further not helpful, that while the figure has been re-issued the text of the AIA is only provided within [**APP-236**]. The Applicant needs to further clarify whether **7.4 Outline Landscape and Ecological Management**	The only change between Revision A and Revision B of Figure A13.6.1: Arboricultural Impact Plan within **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236**] is all labelling of arboricultural features is included on Revision B to aid cross referencing with the tree schedule. Although there is no difference between the arboricultural data presented on Revision A and B of Figure A13.6.1, labelling will also be updated on **7.4**

Ref	Name	Matter Raised	Applicant's Response
		Plan Appendix A - Arboricultural Impacts Plan [APP-322] is in accordance with Revision A [**APP-236**] or Revision B [**REP1-065**].	**Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan [APP-322]**. The plan will be submitted as part of the next iteration of the Errata List for consistency at Deadline 4. It should also be noted that Revision C of Figure A13.6.1: Arboricultural Impacts Plan - Annex D of **6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]** has been submitted at Deadline 3 as part of **8.10.1 Technical Note – Ancient Woodlands and Veteran Trees.** The only difference between Revision B and Revision C of the plan is the addition / changes to ancient woodland boundaries. This change will also be reflected in the updated **7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan [APP-322]**.submitted at Deadline 4.
REP2-040	Suffolk County Council	3.2 Errata Table 1.1 **6.13.F7 Environmental Statement Figure 13.7: Visual Receptors and Viewpoints**: SCC would welcome, if the Applicant was to confirm that this was the only change between the two versions. Alternatively, if other additional changes have been made, SCC considers that the Applicant should clearly list what they are and on which sheets of the figure they can be found. No explanation is given as to the changes that have been made in Revision B versus Revision A [**APP-243**]. A page at the beginning of the document, that identifies the changes made, would have been helpful for any reviewer of the documents.	The Applicant can confirm that the only change made between the two versions was the addition of long distance footpaths this is explained in **8.1 Errata List** Since the submission of the Errata List, we have identified that further additional long distance paths were not included in the original **Environmental Statement Figure 13.7: Visual Receptors and Viewpoints (Revision B**) [**REP1-066**]. This will be updated in the next iteration of **8.1 Errata List.**

Ref	Name	Matter Raised	Applicant's Response
REP2-040	Suffolk County Council	5.1 **8.4.1 (A) Applicant's Comments on Relevant Representations [REP1-132]**. Table 2.1 (Comments about cumulative impacts with developments that connect to the Project (e.g Tarchon Interconnector, North Falls Wind Farm)). SCC (Highways) would be interested is seeing what modelling has been undertaken to assess the cumulative impacts and what the measures are to reduce this combined impact.	All relevant and known developments, including NSIPs, that might impact the junctions connecting the Primary Access Routes (PARs) to the Strategic Road Network/Major Road Network were identified and considered in **7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]**. Modelling has been undertaken at sensitive junctions to understand the impact of the Project against future baseline with committed developments, as set out in Section 7 of **7.11 Transport Assessment [APP-333]**. Where required mitigation measures have been proposed as detailed within Section 5.9 of **7.3 Outline Construction Traffic Management Plan (Revision B)**. The Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments / NSIPs. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in Environmental Statement and **7.11 Transport Assessment [APP-333]** then these would be published into Examination. The Applicant is aware of the Tarchon Project, however, there is limited information available given its development status for it to be included within the traffic cumulative assessment. As such The Applicant considers it more appropriate for the Tarchon Project to consider the cumulative impact with the Norwich to Tilbury Project and other committed developments.

Ref	Name	Matter Raised	Applicant's Response
REP2-040	Suffolk County Council	5.2 Table 2.1 (Comments about the construction traffic and activities of the Project causing vibrations to nearby buildings) SCC (Highways) asserts that consideration should also be given to sensitive structures such as listed buildings close to the major access routes, for example A140 Brockford Street.	Construction traffic vibration is scoped out of the DCO, as agreed in 3.12.3 of **6.20 Scoping Opinion [APP-297]** on the basis that vibration is only generated when there are irregularities in the road surface and it is reasonable to assume that public highways road surface would be well maintained by the relevant Highways Authority and therefore significant effects are unlikely to occur.
REP2-040	Suffolk County Council	5.3 Table 2.1 (Comments about road closures resulting from the construction of the Project) SCC (Highways) comments also relate to the disruptive nature of traffic using diversion routes for local communities and the delays, safety issues for road users.	Detailed within **7.3 Outline Construction Traffic Management Plan (Revision B)**, where diversions are necessary (due to temporary closure of roads), these will adopt the principle that they will use the same standard of road, or higher, where practicable and available. A full point-to-point diversion on public roads will be provided so that all vehicles that will usually and legitimately use a road can continue to use it to complete their journey. The Applicant will provide temporary diversion signage in accordance with relevant signage design guidance. The proposed temporary closures are for short term durations within Suffolk, an indicative maximum of four weeks for cabling closures. The Applicant is proposing to use the Permit Scheme in place and operated by the Local Highway Authorities in order to best coordinate the street works required for the Project. When considered in the context of other major infrastructure projects, the residual effects in terms of driver delay (journey times) are considered not significant as detailed within Section 16.7 of **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271**].

Ref	Name	Matter Raised	Applicant's Response
REP2-040	Suffolk County Council	5.4 Table T (Article 14: Power to alter layout, etc. of streets) *'The street authority to permanently or temporarily alter the layout and carry out works to the streets specified in column (1) of Part 1 (streets subject to permanent alteration of layout) or 2 (streets subject to temporary alteration of layout) of Schedule 6. This also includes streets whether or not within the Order limits. This power to far too wide and vague to be acceptable to NH."* SCC (Highways) concurs with view that the powers are in excess of what is needed as a statutory undertaker and may result in LHA having to rectify the highway if it is changed to an unsafe layout or additional maintenance is required following changes.	Article 14(1) of the draft DCO needs to be read alongside the whole of Article 14. Article 14(1) is limited to the works set out in Part 1 or 2 of Schedule 6 – for these limited works, consent is sought from the Secretary of State via the DCO application process. Article 14(2) states that further powers (beyond the limitations in Article 14(1)) are only exercisable with relevant street authority consent (which would include SCC for streets falling within SCC's authority). Ultimately, and in all cases, the conduct of these street works will be regulated in accordance with the standard protective provisions set out in Schedule 16, part 4. The wording proposed in Article 14 is an adoption of the wording used in the Bramford to Twinstead DCO order granted by the Secretary of State – from the Applicant's recollection of that application, SCC did not object to either approach or the wording used.
REP2-040	Suffolk County Council	5.5, 5.6, 5.9, 5.10, 5.15 and 5.16 SCCAS reiterates that the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** remains unapproved, and until an approved version is secured the post-consent framework for evaluation and mitigation is not in place. SCCAS have provided detailed comments on the submitted document in Annex A of the **Joint Local Impact Report [REP1-178]**. Accordingly, SCCAS requires the Applicant to submit an amended version in reasonable time during the examination, incorporating LPA archaeological advisor comments. The document must be approved by the Local	The Applicant has responded to this in its response to question HE 1.46 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**. This confirms that the Applicant is preparing an updated **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which is planned for submission at Deadline 5.

Ref	Name	Matter Raised	Applicant's Response
		Authority Archaeological Advisors (Norfolk, Essex and Suffolk) and Historic England. If approval of the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** cannot be achieved by the time of determination, the DCO must include provision for post-consent approval of the document. SCCAS request that the Applicant provide a timetable for when the amended **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** will be submitted for review.	
REP2-040	Suffolk County Council	5.5 and 5.8 The Applicant refers to **6.11.A6 Environmental Statement Appendix 11.6 – Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**, which identified deposits with potential archaeological and palaeoenvironmental value, notably peats and organic silts (which may preserve significant archaeological and palaeoenvironmental evidence). However, the scope of the monitoring did not include palaeoenvironmental assessment or scientific dating, and consequently, the chronology, preservation conditions, and significance of these deposits remain undetermined. Accordingly, this document constitutes a preliminary assessment only and should not be considered as a substitute for the full geoarchaeological and palaeoenvironmental assessment that will be required to inform project design decisions and mitigation. SCCAS therefore recommends a programme of post consent geoarchaeological assessment including transects of boreholes, within the river valleys to	The Applicant acknowledges the potential for sections of the Project to contain peat and alluvial deposits with the potential to mask deeply buried archaeological material. However, where such deposits are oversailed by the overhead line or are located outside areas of impact, no further evaluation work will be undertaken as there is no potential for physical impact. The results of **6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]** and included in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]** will be used to inform proposals for further geoarchaeological and palaeoenvironmental works, where such areas correspond with areas of known impact to deeply buried deposits. Provision for further geoarchaeological and palaeoenvironmental work in areas of impact is included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**, which

Ref	Name	Matter Raised	Applicant's Response
		refine the deposit models produced in 6.11.A6 Environmental Statement Appendix 11.6 – Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214], and to inform a programme of coring, to retrieve sleeved collum samples, for palaeoenvironmental sampling and scientific dating (e.g. radiocarbon, OSL where appropriate). The results should be used to assess the survival and significance of deposits, to inform an appropriate mitigation strategies and to feed directly into project design. This programme must be secured by enforceable Requirement wording and scheduled early in the project timetable so that results can inform design decisions and mitigation.	is currently being updated following comments received in Local Impact Reports and Written Representations. It is anticipated to be submitted at Deadline 5.
REP2-040	Suffolk County Council	5.7 Archaeological mitigation must, however, be secured irrespective of the assessed significance of individual heritage assets. The results of the evaluation to date are indicative rather than definitive. The results to date cannot fully determine significance until full excavation and recording have been undertaken. SCCAS therefore maintains that post-consent archaeological evaluation for all remaining areas of project impact must be secured through approval of the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and by enforceable requirement wording in the DCO.	The Applicant has already committed to undertaking evaluation of the areas of impact from the Project, and progress on this is well advanced, as set out in the Applicant's response to question HE 1.43 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**. Part (1) of Requirement 5 of **3.1 Draft Development Consent Order (Revision C)** already ensures that pre-commencement and construction activities cannot commence until evaluation (if not already completed) and mitigation have been agreed through Detailed WSIs.
REP2-040	Suffolk County Council	5.10 The Applicant argues that the level of fieldwork undertaken exceeds that of many other NSIPs at DCO submission stage. While SCCAS recognises the volume of evaluation undertaken, the Norwich to Tilbury National Infrastructure Project is a c.180km	The Applicant maintains the position that the level of fieldwork undertaken on this Project exceeds that of many other NSIPs and DCO submission stage and positively accepts SCCAS's recognition of that. The Applicant also draws attention to the response to

Ref	Name	Matter Raised	Applicant's Response
		linear scheme which crosses Norfolk, Suffolk and Essex, which will require evaluation of the development impacts to inform a programme of archaeological mitigation and to allow development to commence in evaluated areas with no archaeology. Recent NSIP projects in Suffolk demonstrate the scale of trial trenching undertaken prior to determination: Sizewell C completed trial trenching across approximately 80 – 90% (2204 no. trenches) with all remaining or additional areas secured post-DCO. Other NSIPs currently pre-DCO such as SeaLink and Lion Link are each trail trenching around 90% of their impact areas prior to determination.	question HE 1.43 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]** where it is detailed that the Priority trial trenching areas are due to be completed by the end of April 2026 and the Phase 2 trial trenching is programmed to commence in summer 2026 and is expected to be mostly complete by the end of 2026. The Priority trenching area comprises a total of 3,350 trenches. The exact number of trenches within the Phase 2 area is still subject to agreement with the Archaeological Advisors to the Local Planning Authorities but for the purpose of illustration a 2.5% sample of the Phase 2 area would represent 3,000 trenches. Together the Priority and Phase 2 trenching represent the same or greater level of coverage as achieved by the DCO's quoted by SCCAS. As with the approach taken by Sizewell and quoted by SCCAS any outstanding trial trenching post-DCO for this Project will be secured through commitments made in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]**.
REP2-040	Suffolk County Council	5.11 SCCAS acknowledges that Requirement 5 and the revised **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) [APP-328**] include methodologies for further assessment and mitigation. However, while the submitted AMS-OWSI now sets out a range of techniques, the proposed approaches remain inadequate to ensure that the full archaeological implications of the Project are	The Applicant has actively engaged with Local Planning Authorities and Historic England regarding **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** since submission of the DCO application. The Applicant has discussed progress on the ongoing geophysical survey and trial trenching, the approach to Phase 2 trial trenching and the programme for updates to **7.5 Outline Archaeological Mitigation**

Ref	Name	Matter Raised	Applicant's Response
		identified and appropriately mitigated before development works commence.	**Strategy and Outline Written Scheme of Investigation [APP-328]** at meetings with Essex and Suffolk County Councils on 26 March 2026, with Norfolk County Council on 27 March 2026, and with representatives from Historic England, Thurrock Council and Essex, Suffolk and Norfolk County Councils, at the Archaeological Working Group Meeting on 1 April 2026. The Applicant is currently preparing an updated version of **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** taking into account feedback received from stakeholders noted above as well as others. The updated document is scheduled for submission at Deadline 5. Prior to this, the updated document will be shared with the relevant stakeholders for their review.
REP2-040	Suffolk County Council	5.12 Where archaeological remains are to be preserved in situ that are outside the Applicant's ownership, the Applicant shall record and map their locations, notify the landowner and prepare and implement a written management plan that includes consultation triggers for any project related future intrusive works with in these areas (such as maintenance, enhancement), the management plans must defined roles and responsibilities, monitoring and reporting, and any necessary protective measures. These provisions shall be included in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328**] and secured through Requirement 5 of the Draft Development Consent Order.	**7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** is currently being updated and will be submitted into Examination, anticipated for Deadline 5.

Ref	Name	Matter Raised	Applicant's Response
REP2-040	Suffolk County Council	5.13 SCCAS strongly disagrees that the **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328**] alone can secure post-excavation analysis, reporting and archiving. The OAMS-OWSI can set out the requirement for post-excavation assessment work, but it cannot detail the delivery for full analysis of the archaeological resource because the precise scope of post-excavation requirements can only be determined after fieldwork and post-excavation assessment has been completed. SCCAS has advised that there must be additional DCO requirements to secure an Updated Project Design (UPD) informed by Post-Excavation Analysis Reports. The UPD should set out detailed analyses, a timetable for completion and publication, repository acceptance for physical and digital archives, and confirmed funding to deliver all stages. This position aligns with Historic England's MoRPHE (2015). Requirement 5 as currently drafted does not ensure these outcomes and must be strengthened. SCCAS seeks clear triggers and timescales for submission of Post-Excavation Analysis Reports and the UPD, proof of secured funding and repository deposition agreements following completion of the post-excavation assessment stage, and to ensure timely publication and long-term preservation of the archaeological record generated by this project. The additional requirement as suggested is not onerous and will enable the discharging authority to track and ensure compliance. Similar DCO requirements have been accepted by examiners and	The Applicant has responded to this in its response to question DCO 1.S8 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.

Ref	Name	Matter Raised	Applicant's Response
		attached to consent for other large infrastructure projects in Suffolk, please see detailed comments on DCO requirement wording in Chapter 14 of the **Joint Local Impact Report [REP1-178]**.	
REP2-040	Suffolk County Council	5.17 Please see SCCAS comments In Annex A of the **Joint Local Impact Report [REP1-178]** on document **7.2 Outline Code of Construction Practice and 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303]**	An updated version of **7.2 Outline Code of Construction Practice (Rev B) (Revision C)** has been submitted at Deadline 3. **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** is currently being updated and will be submitted into the examination.
REP2-040	Suffolk County Council	5.18 SCC (Ecology) welcomes the updated survey information presented in November 2025 and are content with the conclusions that the assessments do not require changing from those presented in the ES. It is noted that 3% of the route (3miles+) remains unsurveyed and subject to assessments via indirect data sources and scientific assumption. Whilst this approach to the assessment of these areas is broadly acceptable, it is essential that any works undertaken that could have potential impacts upon ecological receptors, within the unsurveyed sections, be first visited and assessed by the ECoW: including within the pre-commencement works. The results of any such surveys and assessments would need to be suitably mitigated in accordance with the CoCP and LEMP.	Pre-commencement surveys will be undertaken as set out within **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. This will include all land where access was previously not possible. Results of these pre-commencement surveys, and any associated mitigation requirements, will form part of the Final Landscape and Ecological Plan (LEMP) and Final Code of Construction Practice (CoCP). The Final LEMP and CoCP will be submitted to the Local Planning Authority to discharge.
REP2-040	Suffolk County Council	5.19 SCC (Ecology) would expect to see all versions of both the LEMP and CoCP when completed, upto and including the final versions, in order to provide	The Applicant can confirm that SCC will have sight of the Final LEMPs and Final CoCP. The Final LEMP and CoCP will be submitted to the Local Planning Authority to discharge.

Ref	Name	Matter Raised	Applicant's Response
		comment and monitor reactions and adaptations to the comments of consultees.	
REP2-040	Suffolk County Council	5.20 SCC (Ecology) welcomes the commitment to the 3:1 replacement of trees alongside the BNG calculations.	The Applicant appreciates SCC acknowledgement and agreement to the proposed 3:1 replacement tree strategy.
REP2-040	Suffolk County Council	5.21 SCC (Ecology) notes the extent and location commitments provided by the Applicant. The reinstatement of hedgerows facing "temporary impacts" will need to be monitored closely and thoroughly to ensure the reinstatement is entirely successful to at least as high a value as prior to the impacts. It is considered that a 10-year monitoring period would provide a greater insurance of success rather than a 5-year monitoring period. In fact, for species-rich hedgerows in good condition (an achievable and ambitious target for hedgerow creation within Suffolk), the BNG stated time to achieve final condition is 12 years and therefore a 10 year monitoring programme (which may only require two additional monitoring visits in e.g. year 7 and year 10) seems a more considered and valuable approach, likely to increase the chances of successful reinstatement in the long term.	The Applicant provided a further detailed response to the aftercare period for planting and planting failure rate at Section 3.12 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** see Section 3 (Overarching Topics): • 3.12 Biodiversity, Ecology and Nature Conservation – Replacement Tree Planting (paragraphs 3.12.21 - 3.12.26); and • 3.13 Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain (paragraphs 3.13.11 - 3.13.16). The Applicant has responded to this in its response to question LV 1.4 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]** that asks the Applicant to provide further justification for a five-year period of monitoring/management of habitats to ensure successful establishment and regrowth. In the response to the question, the Applicant provides further justification towards a five-year monitoring period for replacement planting.
REP2-040	Suffolk County Council	5.22 SCC (Ecology) would like the language regarding retention of veteran trees be significantly more direct and ambitious (i.e. rather than "with effort made to retain the trees" it would be preferred that the language was more akin to; the tree will be retained	Paragraph 8.2.3 of **7.4 Outline Landscape and Ecological Management Plan (Revision D)** confirms that, following detailed design and prior to construction, relevant surveys will be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment

Ref	Name	Matter Raised	Applicant's Response
		unless every reasonable alternative to removal has been fully explored and completely exhausted).	GG14 within **7.2 Outline Code of Construction Practice (Revision C)**. Notwithstanding this post-consent commitment, the Applicant is also reviewing whether there is the potential to commit to retaining any of the veteran trees identified to be removed ahead of the close of the examination. This work is ongoing.
REP2-040	Suffolk County Council	5.23 SCC (Ecology) asserts that the previous comment in the Relevant Representation was a request for ecological enhancement through eradication of INNS if found within the Order Limits. This is not considered in the Applicant's response. In addition, details of how the unsurveyed 3% of the Order Limits will be subject to mitigation, if works are required within these areas which may result in an offence, for INNS requires clarification.	Invasive plant species in England are primarily managed under the Wildlife and Countryside Act 1981, which makes it illegal to plant or cause certain species to grow in the wild. It is important to emphasise that the legislation does not require the Applicant to remove all invasive species present within the Order Limits. Instead, the obligation is to ensure that construction and operation activities are managed in a way that avoids the spread of invasive plants and complies with relevant biosecurity standards as set out within **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. It would not be viable to consider eradication of invasive species across the Project Order Limits as an enhancement opportunity due to the timeframe and sheer scale of the Project.
REP2-040	Suffolk County Council	5.24 Table 8.23 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** "Mitigation for the permanent loss of habitat would be delivered through the creation/enhancement of habitat associated with achieving BNG for the Project." The above text appears contradictory to the last sentence of the Applicant's response. Please could the distinction be clarified.	The Applicant acknowledges the wording within Table 8.23 of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** could be clearer. The landscape proposals within the Environmental Areas will provide additional benefit to other ecology receptors such as breeding birds, but habitat creation/enhancement is not a required mitigation measure for breeding birds.

Ref	Name	Matter Raised	Applicant's Response
REP2-040	Suffolk County Council	5.25 SCC (Ecology) queries that given the complexity, extent, cross authority nature and potential impacts on significant habitats, sites, species and projects e.g. WaLOR, could the applicant please clarify their rationale, if they have one, for not raising and engaging with an Ecology Working Group? It is our experience, in previous and current NSIPs, that an Ecology Working Group is a highly useful and productive way for key parties, including: local authorities, the Applicant and NGO's to identify and resolve issues as they rise through the lifetime of the project. The resources, extent, locations, manpower etc. of the ECoW will be crucial. It is expected that rather than a bare minimum, one size fits all, industry standard approach the role of ECoW is designed and implemented in a bespoke way, that is suitable for the specific requirements of this project.	The Applicant acknowledges the large scale and complexity of the Project and sees the value in setting up an Ecology Working Group for the construction phase. This Ecology Working Group would be formed post-consent to provide progress updates on ecological mitigation, as set out within **7.4 Outline Landscape and Ecological Management Plan (Revision D)** and **7.2 Outline Code of Construction Practice (Revision C)** during the construction period. The Ecology Working Group would include the Ecological Clerk of Works and suitably qualified and experienced members from the Local Planning Authorities, Wildlife Trust/s and Natural England on their request and agreement with the Applicant. The next iteration of the Outline Landscape and Ecological Management Plan (Revision C) has been submitted at Deadline 3 to include the commitment for a post-consent Ecology Working Group.
REP2-040	Suffolk County Council	5.26 SCC (Ecology) states that given the proposal to incorporate BNG management and monitoring information within the LEMP, SCC would like confirmation that the final version of the LEMP will be constructed in such a way as to include all detail, sections and information expected to be included within the most recent version of the Natural England/DEFRA HMMP template.	The Applicant can confirm that full details of the habitat management and monitoring of the Environmental Areas will be included within the Final Landscape and Ecological Management Plan(s). This will broadly follow the Defra Habitat Management and Monitoring Plan (HMMP) template for Town and Country Planning Applications, although this will be adapted as required for a NSIP, in the absence of any formal NSIP BNG guidelines.
REP2-040	Suffolk County Council	5.27 SCC (Ecology) seek assurance that the toolbox talks are delivered by a suitably qualified and experienced ecological professional rather than non-specialist works contractor.	The Applicant can confirm that toolbox talks will be delivered by suitably qualified and experienced ecological professionals as set out within **7.4 Outline Landscape and Ecological Management Plan (Revision D)**.

Ref	Name	Matter Raised	Applicant's Response
REP2-040	Suffolk County Council	5.28 As mentioned previously and echoing the comments from numerous other consultees on this project, an extended period of monitoring would be preferable for this project. Being in line with other recent NSIPs does not necessarily make it adequate for this particular case. As mentioned earlier (in response to table item 37), for BNG hedgerows in good condition, a 12-year period is expected for them to reach good condition. For hedgerow plants and trees to have survived for 5 years, does not guarantee high quality establishment and failure may still occur, particularly given the increased variation and frequency of extreme weather events (flooding, drought, high temperatures etc.). A 10-year monitoring period, even with only 2 further monitoring visits than proposed, would enable greater potential to identify and remedy failure within the establishment phase and also modify management, to ensure the best possible condition for the habitat can be achieved, rather than the bare minimum.	The Applicant provided a further detailed response to the aftercare period for planting and planting failure rate at Section 3.12 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** see Section 3 (Overarching Topics): • 3.12 Biodiversity, Ecology and Nature Conservation – Replacement Tree Planting (paragraphs 3.12.21 - 3.12.26); and • 3.13 Biodiversity, Ecology and Nature Conservation – Biodiversity Net Gain (paragraphs 3.13.11 - 3.13.16). The Applicant has responded to this in its response to question LV 1.4 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]** that asks the Applicant to provide further justification for a five-year period of monitoring/management of habitats to ensure successful establishment and regrowth. In the response to the question, the Applicant provides further justification towards a five-year monitoring period for replacement planting.
REP2-040	Suffolk County Council	5.29 SCC (Skills) does not agree that the ES meets the requirements of EN-1 or SCC's adopted Supplementary Guidance. It does not include the granular, phase-by-phase workforce modelling required to understand labour demand across civils, mechanical and electrical works, commissioning and other sequential construction stages, nor does it identify workforce numbers, skills profiles, or home- vs non-home-based labour as required by the Guidance. The Applicant instead applies generic assumptions which prevents a reliable assessment of socio-economic effects, including impacts on	At this stage, the competence profile of the construction workforce is not available. However, it is anticipated that this information would become accessible following the appointment of the construction contractor. The assessment approach set out in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** is in line with other grid connection projects, including Yorkshire Green and Bramford to Twinstead Reinforcement. To provide an initial insight at the current design stage, the anticipated peak daily construction workers

Ref	Name	Matter Raised	Applicant's Response
		accommodation, transport and public services, which must be based on a credible and evidenced labour model. This is a fundamental flaw affecting the adequacy of the ES. EN-1 requires applicants to assess workforce influx across different construction phases, but in the absence of phase-specific modelling, the ES cannot demonstrate how labour demand will vary over time, how it interacts with other NSIPs in the region or how any cumulative labour market pressures will be managed. The Applicant's commitment to share data "once available" is insufficient: the ES must be complete at submission and cannot defer core information on which impact assessments depend.	distribution throughout the construction phase in Suffolk is presented in Figure 2.2 of **7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311]**. The cumulative effects on local employment and visitor accommodation bedspace are set out in **6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]**.
REP2-040	Suffolk County Council	5.29 The Examining Authority for the Sea Link Examination (EN020026) has already recognised the importance of robust, evidence-based workforce assessment and a secured Skills and Employment Strategy in the recent Sea Link Issue Specific Hearing; where the ExA required the Applicant to submit a detailed Skills and Employment Strategy to demonstrate how construction workforce demand would be managed and how local labour and skills opportunities would be maximised. Sea Link is a significantly smaller project in terms of workforce numbers and construction intensity than Norwich to Tilbury, which highlights the imperative importance of securing complete phase-specific labour assessments and enforceable skills commitments for a scheme of this scale, duration and regional impact.	The Applicant recognises the importance that host communities and host authorities place on social value including employment opportunities, skills development and local supply chain participation associated with a project of this scale and duration. The Applicant also acknowledges that a number of Local Impact Reports express concern about the absence, at application stage, of a single consolidated document setting out how these matters would be approached in practice. In response, and to elaborate on what the Applicant set in response to Relevant Representations and without prejudice to the Applicant's position that such matters do not constitute mitigation, National Grid now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery

Ref	Name	Matter Raised	Applicant's Response
			partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.
REP2-040	Suffolk County Council	5.29 The importance of detailed, evidence-based initial labour modelling has been highlighted by the reported experiences at Hinkley Point C where there has been major underestimation of the size of the construction workforce, with original peak workforce assessed at 5,600 but now estimated to be 12,000 (more than double the original expectation). This has resulted in substantially greater pressure on local accommodation, intensified transport impacts, greater pressure on public services and community infrastructure, as well as increased strain on the supply chain, labour availability and wage inflation. For these reasons, SCC considers the ES not adequate in respect of skills, education and employment and continues to require the Applicant to provide full, phase-specific labour modelling in line with SCC's adopted methodology. SCC also expects this modelling to form the basis of a DCO-secured Skills and Employment Plan, without which the socio-economic effects of the scheme cannot be properly assessed, monitored or mitigated. A secured plan is essential for both the direct socio-economic effects and because the workforce profile influences multiple other topic areas, including transport, where the Applicant's conclusions are dependent on the accuracy of the underlying labour demand modelling.	The current workforce data reported in the ES has been generated from the traffic model produced for the Project with a worst-case scenario applied. As stated in the response above, the Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5 which will be secured by way of a DCO Requirement to be added into an updated version of the Draft DCO alongside the submission of the Employment and Skills Plan. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.
REP2-040	Suffolk County Council	5.30 SCC (Skills) does not accept the use of a fixed 10% local labour assumption, as it is not supported by transparent or project-specific evidence. ES Chapter	At this stage, the competence profile of the construction workforce is not available. However, it is anticipated that this information would become

Ref	Name	Matter Raised	Applicant's Response
		15 confirms that the 10% figure is based solely on National Grid's experience on other projects and not on any assessment of local labour capacity, skills profiles, or economic activity within the Wider Study Area. This approach conflicts with SCC's adopted Supplementary Guidance, which requires structured scenario modelling (low/medium/high), phase-specific labour demand analysis and the definition of workforce geographies co-produced with the Regional Skills Coordination Function. A blanket 10% assumption masks the differing labour requirements across civils, mechanical and electrical phases, prevents meaningful assessment of displacement, wage pressure and competition between simultaneous NSIPs, and undermines linked assessments, for example accommodation, transport and cumulative socio-economic effects, all of which rely on accurate labour modelling. EN-1 requires applicants to assess workforce influx across different construction phases; this cannot be achieved without phase-based labour modelling. SCC therefore rejects the 10% assumption as neither robust nor policy-compliant and continues to require scenario-based, phase-specific workforce modelling, to be undertaken with the Regional Skills Coordination Function and used to inform a DCO-secured Skills and Employment Plan.	accessible following the appointment of the construction contractor. The assessment approach set out in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** is in line with other grid connection projects, including Yorkshire Green and Bramford to Twinstead Reinforcement. As stated in the response above, the Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.
REP2-040	Suffolk County Council	5.31 SCC (Skills) does not agree that cumulative labour impacts can be considered "non-significant." Although the ES identifies a peak workforce of 1,720 workers per day and 4,800 workers over four years, ES Chapter 15 provides no quantitative cumulative	Cumulative effects from the Project are reported in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**, including local employment.

Ref	Name	Matter Raised	Applicant's Response
		assessment of how these labour demands overlap with other NSIPs in the region, despite acknowledging their presence. SCC's adopted Supplementary Guidance requires developers to assess labour needs alone and in combination with other projects, including modelling a worst-case home-based labour scenario and undertaking phase-based cumulative analysis in partnership with the Regional Skills Coordination Function. EN-1 further recognises that concurrent NSIPs may create short-term labour shortages. The Applicant has not provided the evidence needed to discount these risks.	The projected construction employment is to be employed across the approximately 180 km route. The projected peak construction workforce for the project is 1,720 employees, representing less than 3% of the total construction workforce in the Wider Study Area. Alternatively, the cumulative construction employment over a four-year period is estimated at 4,800 workers, equating to less than 10% of the total construction workforce in the area. Given these proportions, the overall contribution of the project to construction sector employment within the Wider Study Area is considered minimal and is considered not significant.
REP2-040	Suffolk County Council	5.32 SCC (Skills) considers the Applicant's position to be inadequate and inconsistent with both SCC's adopted Supplementary Guidance and EN-1. The Guidance requires NSIP promoters to work through the Regional Skills Coordination Function (RSCF) to coordinate labour demand, develop skills pipelines, and manage cumulative impacts arising from multiple simultaneous NSIPs. ES Chapter 15 confirms that, instead of participating in these established governance structures, National Grid proposes to address skills matters through its Community Grant Scheme, which sits outside the DCO and is explicitly not part of EIA mitigation processes. Community benefit schemes are voluntary, unenforceable and not aligned to construction phasing; they therefore cannot be relied upon as socio-economic mitigation. SCC further emphasises that the Applicant's refusal to participate in the RSCF fundamentally undermines the	As stated in the response above, the Applicant now proposes to prepare and submit an Employment and Skills Plan into the Examination at Deadline 5. This document is intended to provide transparency and clarity regarding the approach that National Grid and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project.

Ref	Name	Matter Raised	Applicant's Response
		purpose for which the RSCF was established and directly weakens the regional capacity to anticipate, mitigate and jointly manage cumulative labour impacts.	
REP2-040	Suffolk County Council	5.33 SCC (Highways) The Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on road users and local communities and propose typical working hours of Monday-Friday 0700-1900 and Saturday 0800-1300. SCC continues to oppose to 7 day a week working.	The Applicant has responded to this in Section 3.18 (Requirement 7 Construction Hours) of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030**].
REP2-040	Suffolk County Council	5.34 Whilst SCC (Highways) accepts that most transport impacts for the operational phase are scoped out it considers that the AIL operational movements should be included with assessment. This is due to concerns about the resilience of the routes, for example being compromised by weight or other limits being placed on the network, together with the impacts of any temporary measures to overcome these. SCC accepts that inclusion of improvements to the Lorraine Way / Bullen Lane junction is a move towards this. For clarity SCC's concern is that a resilient route is available for AILs, particularly special order movements during the operational phase of this project. SCC is seeking a commitment that the Applicant continues to engage with the authority to achieve this.	The methodology for assessing Traffic and Transport was outlined through **6.19 Scoping Report [APP-288] to [APP-296]** and **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate. SCC raised in their statutory consultation response that they accept scoping out of transport issues from the operational phase except for AIL movements. AIL movements during operation would be ad hoc and not result in likely significant effects therefore as per **6.20 Scoping Opinion [APP-297]** received from the Planning Inspectorate, they have not been assessed in the ES.
REP2-040	Suffolk County Council	5.35 SCC (Highways) understands that the DCO includes construction of the temporary accesses within the definition of pre-commencement whilst the OCTMP states it will be inclusive of these works. This places a tension between the OCTMP commitment to	The Applicant anticipates that a number of site access points and crossover bellmouths will be completed as part of the pre-commencement operations. **7.3 Outline Construction Traffic Management Plan (Revision B)** details that '*All site access points*

Ref	Name	Matter Raised	Applicant's Response
		use of agreed site access and haul roads and that construction of the haul road will be post commencement. For complete clarity can the Applicant confirm that temporary access to provide access to haul roads and works for haul roads crossing the public highway are not included in the pre-commencement works.	*(inclusive of crossover points) can be constructed from the highway with temporary traffic management, including temporary road closures where necessary. When forming site access points, the internal haul road does not need to be constructed before works commence*.'
REP2-040	Suffolk County Council	5.36 SCC (Highways) states that disapplication of parts of the New Roads & Street Works Act 1991 (the 1991 act) should not fetter LHA in managing highway network (co-ordination), recovering reasonable costs and avoidance of long-term maintenance costs. The comments refer to article 13 (3) (e) to (h) and (4) specifically (3) (g) which removes the undertaker from duties under NRSWA.	The Applicant refers to the detailed justification already provided in Paragraphs 3.17.4 to 3.17.6 of **3.2 Explanatory Memorandum (Revision C)** and notes, in particular, that comparable provisions have been included by the Secretary of State in a wide range of other made orders. More specifically, the Applicant anticipates that the matters which appear to be of particular concern to SCC will be addressed through the protective provisions/ framework highways agreement currently being negotiated with each of the affected local highways authorities.
REP2-040	Suffolk County Council	5.37 The Applicant will need to retain overall control of the CTMP particularly if multiple contractors are responsible for the roles as occurs in other similar projects. SCC (Highways) comments reflect experience delivering NSIPs where difficulties have been experienced when roles have been delegated to contractors, such as the contractor being unaware of agreed AIL routes, and failing to deliver approved highway works.	The Applicant will retain overall control of the Final CTMP(s) and is responsible for any breach of compliance with the CTMP. Detailed in paragraph 3.1.2 of **7.3 Outline Construction Traffic Management Plan (Revision B)** *'The Appointed Main Works Contractor(s) are responsible for developing and adopting the CTMP, National Grid is held responsible for any breach of compliance with the CTMP.'*
REP2-040	Suffolk County Council	5.38 The estimate numbers of HGVs are similar to other energy projects (EA1(N), Bramford to Twinstead). This volume of movements will have	The Applicant has undertaken a realistic worst case transport assessment detailed in **7.11 Transport Assessment [APP-333]**. Within **6.16 Environmental**

Ref	Name	Matter Raised	Applicant's Response
		negative impact for the highway network in the construction period, most noticeable, but not exclusively, on minor roads where existing HGV use is low. With the number of NSIPs and other large infrastructure projects in East Anglia significant pressure is being put on the available facilities for HGV drivers and this matter should be considered by the Applicant. The authority recognises there is balance between a haul road dominated access plan as in this application and the alternative of many local accesses. The former requires significant volumes of material for haul roads but avoids use of unsuitable local roads and in the case of Norwich to Tilbury the impacts in highway terms are lessened by the projects approach. Note that this may not be the best solution for other disciplines. SCC (Highways) notes the comments regarding facilities in Essex and hope that the same measures are provided in Suffolk. The concern about driver welfare reflects experience in East Suffolk where a lack of facilities led to an increase in HGVs using highway laybys. While not unlawful this has had negative impacts on residents who live on or adjacent to these laybys including antisocial behaviour such as littering or fouling verges.	**Statement Chapter 16 - Traffic and Transport [APP-271]** an assessment has been undertaken on all roads that form Primary Access Routes (PARs) for construction traffic to access the proposed alignment. Where required, mitigation has been proposed along minor roads to minimise significant effects as detailed within **7.3 Outline Construction Traffic Management Plan (Revision B)**. This is in addition to embedded mitigation e.g. carriageway widening and passing places to allow the safe movement of HGVs along minor roads. This was identified through the assessment of suitability of the PARs to cater for the expected Project vehicles as part of the overall Project routeing strategy outlined in **7.3 Outline Construction Traffic Management Plan (Revision B)** and **7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]** As detailed in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**, the Applicant is proposing a number of types of temporary construction compounds for the Project. These include Main Works compounds, satellite compounds and primary compounds which would allow for deliveries, material storage and welfare facilities. Highway mitigation compounds (where material laydown areas are proposed) would also include welfare facilities and vehicle parking. Construction laydown areas are proposed to store stone and other materials to facilitate the construction of the Project. The Main Works Contractor(s) will provide welfare vans and vehicle parking on these sites, where alternative provisions are not available.

Ref	Name	Matter Raised	Applicant's Response
			A detailed Construction Traffic Management Plan (CTMP) will be developed post consent under Requirement 4 of Schedule 3 to **3.1 Draft Development Consent Order (Revision C).** This will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will be encouraged to use welfare facilities on-site. Hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more likely to utilise welfare/rest facilities a few hours away from site, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access to welfare facilities. Again, the detailed CTMP will include measures to encourage HGV drivers to use welfare facilities on-site. As noted in paragraph 2.3.6 of **7.3 Outline Construction Traffic Management Plan (Revision B),** unless otherwise agreed with the Local Highway Authority (LHA), any HGVs which are projected to arrive on site prior to 07:00 would be required to park at an appropriate lorry park, services or other designated overnight parking locations until they can complete their journey within the appropriate restrictions. These locations would be agreed with the relevant LHAs prior to the commencement of construction and would be communicated to drivers within their delivery instructions. The Main Works Contractor(s) is expected to monitor the number and timing of HGVs arriving to and departing from site from/to Primary Access

Ref	Name	Matter Raised	Applicant's Response
			Routes with the proposed implementation of a delivery management/scheduling system. As noted in paragraph 2.14.3 of **7.11 Transport Assessment [APP-333]**, site access point layouts are designed to allow for two-way HGV movements to occur, i.e. an HGV can enter the site access point while a second HGV is waiting to exit. A number of matters have been defined as non-compliance to ensure that the CTMP is effectively enforced within Section 6.4 of **7.3 Outline Construction Traffic Management Plan (Revision B).** HGV drivers parking or waiting on the highway in inappropriate locations which could result in highway safety issues is defined as a matter of non-compliance. All incidents associated with the construction of the Project, including non-conformance with the CTMP, will be reported by the Environmental Clerk of Works and Transport Coordinators. Where a breach or complaint is reported, the Main Works Contractor(s) and/or National Grid will carry out an investigation in order to identify appropriate corrective actions. Where needed, corrective actions will be agreed with the relevant LHA and/or community members prior to implementation. Where a corrective action is identified, the LHA will be informed. Data recorded from the non-compliance procedure will be collated on a quarterly basis and will be issued out to the relevant parties, including LHAs.
REP2-040	Suffolk County Council	5.39. SCC (Highways) have yet to review the details of the assessment. However, based on the information available SCCs specific concerns are:	The Applicant has responded to these points on pages 499/450 of Appendix AB in **8.8.1 Applicant's Comments on Relevant Representations [REP2-023]**.

Ref	Name	Matter Raised	Applicant's Response
		a. safety, particularly at evolved junctions where delays joining the main carriageway may result in driver frustration. b. that the impacts on the Major Road Network ("MRN") are not considered, in the case of Suffolk specifically the road safety at the A140/A143, Stoke Ash junctions. c. there is a reliance on others providing mitigation at the A1071/B1113 e. g. Beagle Roundabout For clarity the junction referred to by SCC is the crossroads on the A140 at Stoke Ash (Norwich Road IP23 7ET) not the A140/A143 junction at Stuston. While the peak may only be one week it is the duration of the use of the A140 for construction vehicles for the duration of the project.	The Applicant notes SCC's clarification on the junction referred to in their original relevant representation as being the A140 at Stoke Ash (Norwich Road IP23 7ET). The Applicant confirms that this junction was incorrectly referenced as A140/A143 in the third paragraph on page 499 in Appendix AB in **8.8.1 Applicant's Comments on Relevant Representations [REP2-023]**. The Applicant should have referenced this junction as being Site 35 – A140 Stoke Ash i.e. A140 at Stoke Ash (Norwich Road IP23 7ET).
REP2-040	Suffolk County Council	5.40 Potential improvements for passage of AILs has not been considered such as the A1120 Cedars Link and A140 Brockford Street Bridge which have restrictions on AIL use. **7.3 Outline Construction Traffic Management Plan Appendix A - Abnormal Indivisible Load (AIL) Access Strategy [APP-310]** outlines the process for checking the structural capacity of structures along the proposed AIL routes, stating that a case-by-case approach is necessary. The document further states that, in the case of Local Highway Authority structures, structural assessments will be undertaken as necessary to confirm suitability and to investigate potential mitigation measures. Should this process conclude that no mitigation measures are suitable, the Applicant would seek alternative access for the AIL. Taking Stowmarket as an example AIL restrictions on	SCC's comment is acknowledged. The Main Works Contractor is working to confirm the routes for AIL deliveries. Further discussions on this matter can be arranged when the timing is appropriate.

Ref	Name	Matter Raised	Applicant's Response
		the A14 Hillhouse Viaduct and the A1120 Cedars Link Viaduct mean there is no special order route along the A14 corridor at this point. However, SCC welcomes commitments made by the Applicant to continue discussion on this matter.	
REP2-040	Suffolk County Council	5.41 SCC (Landscape) disagrees with several aspects of the Applicant's position. SCC's views are detailed in the **Joint Local Impact Report**, its Annexes [**REP1-178**] and its Appendices [**REP1-179**]. SCC does not expect the Applicant to compensate for every residual effect, irrespective of the degree of impact, and considers that a proportionate approach is appropriate. However, SCC does not consider that effects which are assessed to be non-significant should automatically be discounted or disregarded simply for that reason when applying the mitigation hierarchy. SCC considers that the collective impact of several 'minor' effects on the same receptor or receptors may justify mitigation and/or offsetting. Moreover, SCC does not consider that the Applicant has adequately mitigated or compensated as far as possible for the identified significant adverse effects on the landscape resource and on visual receptors. While accepting that not all residual adverse effect can be mitigated, SCC considers that the Applicant needs to deliver further improvements to its scheme in terms of landscape and visual mitigation and landscape scale appropriate compensation, in the following key areas: • Waveney Valley • Mellis Common/Gislingham	The Applicant's position on landscape and visual compensation is made clear in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** and **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The Applicant directs SCC and the Examining Authority to the responses to ExQ1 LV1.18 and LV1.28 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]** which further address the matters raised in this comment.

Ref	Name	Matter Raised	Applicant's Response
		• Gipping Valley • Bramford/Burstall • Dedham Vale National Landscape • CSE compounds SCC is particularly disappointed with the Applicant's position reading the Waveney Valley. From considering undergrounding, the Applicant is now pointing out that there is no Special Landscape Plans, so therefore cannot cover any areas. Prior to this, the parts of the Waveney Valley were designated as Special Landscape Areas (as in the Mid Suffolk Local Plan 1998 (superseded)). SCC is asking for a specific approach for a specific area for specific and identified harm. SCC has provided evidence that the Waveney is a highly valued and highly sensitive landscape (Annex B [**REP1-178**] and Appendix 22 [**REP1-179**]). With regards to the wider Bramford substation area, SCC's ask for strategic placemaking is less based on EIA requirements and instead grounded in National Grid's own business plan to deliver environmental goals as part of its business plan. Here is an opportunity for National Grid to fulfil the aspirations of its business plan in relation to its environmental obligations by delivering a co-ordinated approach of its own infrastructure and with that of its connection customers.	
REP2-040	Suffolk County Council	5.42 Notwithstanding the Applicant's assertions that Raydon Wings is not adversely impacted, SCC (Planning) maintains that it will and would like to reiterate this by reference to the concerns expressed by itself [**REP1-178**] and [**REP1-179**], the airfield	The Applicant has previously responded to the concerns expressed by Suffolk County Council and the CAA AAT (see 3.17.1 to 3.17.9 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030])**, the airfield operator (see page 637 of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**) and the

Ref	Name	Matter Raised	Applicant's Response
		operator [**RR-0915**], the GAAC [**RR-1224**] and the CAA AAT (Appendix 25 and 26 of the Joint LIR) [**REP1-179**].	GAAC (see page 655 of **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**). The Applicant acknowledges that, in terms of permanent impacts, there will be a theoretical inner horizontal surface infringement by the Project overhead line alignment, which it assesses to be minor at 2 to 3 metres (see footnote to Table A15.2.9 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**). Our assessment considers that a 2 to 3 metre infringement would not be material for an aircraft in flight as the pilot would be expected to avoid obstacles by at least an order of magnitude more. Furthermore, we have assessed that existing circuits can continue to be used safely, including to the north, overflying the overhead line at a safe height from which there would be a range of alternative landing sites in the event of an emergency. As per Matter 6.7 of **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]** the Applicant has suggested the Operator might consider measures to enhance pilot situational awareness of the Project as an obstacle within the inner horizontal surface, or operational changes in relation to aerobatic display aircraft practicing at low level. In terms of temporary construction impacts, the Applicant is pursuing further engagement with the operator to explore potential mitigations to minimise temporary disruption associated with construction works to install the proposed underground cables.
REP2-040	Suffolk County Council	5.43 Draft DCO: For the reasons stated in SCC's RR [**RR-3520**], the Council considers that the 28-day decision-making period to be insufficient. The equivalent period in the Bramford to Twinstead Reinforcement Order is 35 days. SCC's experience of determining applications for the discharge of requirements for that Order have shown that 35 days	The Applicant has responded to this in Table 3.25 Suffolk County Council, Babergh District Council and Mid Suffolk District Council – Applicant's Response to Local Authority comments on the draft DCO of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030**].

Ref	Name	Matter Raised	Applicant's Response
		is insufficient. Therefore, SCC considers that a decision period of 56 days to be more conducive than 28 or 35 days to the delivery of critical energy infrastructure.	
REP2-040	Suffolk County Council	5.44 Schedule 4 (discharge of requirements) (paragraph 3, fees): SCC has submitted additional clarification on this matter in the **Joint LIR [REP1-178]**, namely in paragraphs 14.74 – 14.80.	The Applicant has responded to this in Table 3.25 Suffolk County Council, Babergh District Council and Mid Suffolk District Council – Applicant's Response to Local Authority comments on the draft DCO of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
REP2-040	Suffolk County Council	5.45 SCC (Public Health) considers that the conclusion that "no significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures" is inconsistent with a precautionary approach. The absence of a significant effect does not negate the value of proportionate monitoring. Monitoring in this context is not solely a mitigation measure triggered by significance thresholds, but a mechanism to validate the assumptions made within the assessment and to enable adaptive management where real-world impacts differ from those predicted. Structured monitoring arrangements are necessary to identify trends, assess whether mitigation measures remain effective, and provide transparency and reassurance to communities and partner organisations. SCC (Public Health) therefore reiterate that a proportionate Mental Health and Wellbeing Monitoring Plan should be implemented for the duration of the Project, covering the construction phase and early	The approach taken by the Applicant with regard to monitoring measures for health and wellbeing is consistent with that set out in the EIA Regulations in relation to significant adverse effects. No significant adverse effects have been identified in the assessment undertaken in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. There is typically no clear, direct causal pathway linking large infrastructure construction to diagnosable mental health conditions in the general population. Distinguishing project-related impacts from those caused by unrelated social, economic, or personal factors is methodologically very difficult. For example in relation to mental wellbeing, any monitoring is likely to capture background mental health trends rather than, or in addition to, project-specific effects, making attribution and actionable conclusions unreliable. A formal, standalone health and wellbeing monitoring plan or framework which includes thresholds for potential mitigation carries notable methodological, ethical and practical limitations, and risks being

Ref	Name	Matter Raised	Applicant's Response
		years of operation, with clear reporting routes and defined review points. Learning from monitoring arrangements associated with other NSIPs, including Sizewell C, suggests that a multi-layered approach is more robust. This may include: • Population Health Management data and trends in Primary Care activity • Monitoring of referrals to social prescribing and community mental health services • Engagement with Primary Care leads within the project catchment to identify emerging trends • Regular liaison with Community Mental Health Teams • Clear community routes for raising concerns (with mechanisms to ensure issues are captured, categorised and escalated appropriately) • Periodic reporting to relevant local authority and health partnership forums to enable two-way dialogue • Consideration of independent or academic evaluation to provide objective assessment of early and cumulative impacts including work undertaken by Suffolk MIND and University of Suffolk. In addition to the monitoring mechanisms described above, SCC (Public Health) recommend that the Applicant clarifies the escalation process should monitoring or stakeholder feedback indicate emerging health or wellbeing concerns. This should include defined reporting routes to relevant local authorities	disproportionate to likely impacts anticipated for the Project. The Applicant does, however, consider that it may be appropriate to identify specific actions that could help with understanding community mental health over the pre-construction, construction and operation periods. This could include: • Effective and timely communication about construction activities and timescales. The need for this is highlighted in **7.2 Outline Code of Construction Practice Appendix E: Community Engagement and Public Information [APP-305]**, which confirms that an appropriate approach to community relations and communication with local residents will be required during the construction period. Further wording has been proposed for inclusion in **7.2 Outline Code of Construction Practice Appendix E: Community Engagement and Public Information [APP-305]** to secure a commitment to preparation of a detailed Communications Strategy, which will include the approach to community liaison. This demonstrates the Applicant's commitment to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. • Proactive community engagement through the construction period will encourage open communication, build trust, and address concerns; establishing dedicated support channels, such as helplines or liaison officers, will enable residents to voice concerns and access guidance promptly. Information relating to communication and

Ref	Name	Matter Raised	Applicant's Response
		and health partners, together with a commitment to review and, where necessary, adapt mitigation measures in response to emerging evidence.	complaint resolution, reviewing the number and type of complaints or concerns raised during construction, will form part of the complaints process set out in **7.2 Outline Code of Construction Practice Appendix E: Community Engagement and Public Information [APP-305]**. • In line with government guidance, the Applicant expects to invest more than £30 million to support communities near our Norwich to Tilbury proposals. We are currently developing our approach to community benefits, and in spring 2026, we plan to begin consulting on how the community benefit funds should be used. Throughout that consultation, we will engage with local communities and elected representatives to find out more about local priorities (for example mental health resilience has been highlighted by a number of stakeholders) and where community benefits could deliver long-lasting benefits. The feedback we receive will help shape and inform our approach to community benefits. Following the consultation, we will develop a community benefit programme to address key themes and priorities.
REP2-040	Suffolk County Council	5.46 SCC (Public Health) acknowledges the programme pressures described, however, SCC (Public Health) maintains that predictable respite periods are essential to protect mental wellbeing, sleep, and quality of life. The Applicant's assertion that start-up and close-down activities may occur outside core hours further increases concern. SCC (Public Health) therefore reasserts its position that core hours should be restricted. SCC (Public Health)	The Applicant has responded to this in Section 3.18 (Requirement 7 Construction Hours) of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.

Ref	Name	Matter Raised	Applicant's Response
		emphasises that flexibility for the Applicant cannot outweigh the predictable and sustained amenity needs of local residents over a multi-year construction programme.	
REP2-040	Suffolk County Council	5.47 SCC detailed in its Relevant Representation [**RR-3520**] the schedules that SCC considers necessary to include in a Section 106 Agreement. Further, SCC understands from Essex Police and Suffolk Constabulary (as heard in Open Floor Hearing 1 [**REP1-232**]), that a further schedule related to AIL movements should be included. The purpose of this schedule would be to ensure sufficient resource is available to the relevant authorities to escort and facilitate AIL movement across the Scheme.	The Applicant is working closely with Essex Police and Suffolk Constabulary to confirm the number of AILs on the public highway that may require escort during the Project's construction, as well as any associated additional policing needs and lead-in times. To date the Applicant has shared with the Police forces proposed AIL routes, indicative volumes of AIL movements and indicative programme dates. The Applicant has held regular meetings with the Police forces and will continue to engage to agree on the most appropriate and effective way to address the anticipated demand for AIL escorts, see **8.3.3. Statement of Common Ground Essex Police (Revision B)** for further details. The Applicant considers that no case has been made that a material residual safety or health impact is likely or justifies any request for a Section 106 agreement that meets the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010.
REP2-040	Suffolk County Council	6.1 In its **Joint LIR [REP1-178**], SCC raised in paragraphs 10.3 and 10.5 concerns regarding the Applicant's decision to scope out other projects from the considerations of cumulative effects in regard to workforce pressures and employment. Upon reviewing the **Report on Interrelationship with Other Infrastructure Projects [REP1-134**], SCC considers that the Applicant has opted to limit the	The scope of the developments included within **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]** was instructed by the Examining Authority within the **Rule 6 letter – Notification of the Preliminary Meeting and matters to be discussed [PD-009]**. The Rule 6 letter requests that the NSIPs identified in the Rule 6 letter and the projects that are shortlisted in **6.17.A2**

Ref	Name	Matter Raised	Applicant's Response
		scope to discussing only those other infrastructure projects which have a physical interface with the Project. Namely, in addition to those included, SCC would have expected that the report would mention and address: Sizewell C, Sea Link, LionLink, Sunnica Energy Farm, and Kingsway Solar Farm. Each of these projects will have a temporal overlap with the construction of the Proposed Development and therefore result in competition of labour amongst skilled professions.	**Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** are to be summarised in the Report on Interrelationship with Other Infrastructure Projects. Therefore, the projects identified by SCC have not been included within the **Report on Interrelationship with Other Infrastructure Projects [REP1-134]** as this is outside of the scope the Examining Authority has identified.
REP2-040	Suffolk County Council	6.2 SCC (Landscape) welcomes that an area has been designated (immediately west of Bramford Substation) within Bramford to Twinstead's Order Limits to provide an environmental area to deliver mitigation planting. However, SCC considers that this falls short of a strategic and co-ordinated landscape masterplan approach that the Councils considers to be required for the wider Bramford and Burstall area.	The Applicant has responded to this in its response to question LV1.28 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.
REP2-040	Suffolk County Council	6.3 Table 6: **8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134**]. Table item 6.3 Landscape and Visual Referenced Paragraph or Item: Table 6.1 Interaction with other projects' mitigation and enhancement proposals: EN0110019 EcoPower Suffolk Limited SCC (Landscape) would welcome further information regarding how the oversailing between RG11 and RG12 affects the mitigation proposals for EcoPower Suffolk Limited.	**6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]** by competent experts. **6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]** provides a list of all other development that met the criteria for inclusion within the inter-project cumulative effects assessment as of the 1 April 2025. Since the 1 April 2025 the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant

Ref	Name	Matter Raised	Applicant's Response
			developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement then these would be published into Examination as updates to the relevant inter-project cumulative effects documents (as appropriate). The Applicant can confirm that EcoPower Suffolk Solar is being considered as part of the post 1 April 2025 cumulative assessment – as part of this work if additional significant effects are concluded details would be published into the Examination.
REP2-040	Suffolk County Council	6.4 SCC (Public Health) notes that [**REP1-132**] does not reference health or wellbeing considerations, nor does it identify any potential for cumulative or inter-project interactions affecting community health outcomes. It is recognised that detailed assessment of health pathways sits primarily within [**APP-192**] and the cumulative assessment in [**APP-281**], however, the absence of any discussion of health- related interrelationships in the report limits completeness given the scale and geographic overlap of multiple NSIPs across Suffolk and the wider region. Public Health considers that cumulative amenity effects, prolonged construction programmes, uncertainty about phasing, overlapping workforce demands and repeated disruption to Public Rights of Way can contribute to wider impacts on community health and wellbeing. These pathways are inherently influenced by inter-project interactions, even where individual schemes apply best practicable mitigation.	The inclusion of health and wellbeing considerations within the **Report on Interrelationship with Other Infrastructure Projects [REP1-134]** is outside of the scope the Examining Authority identified within the **Rule 6 letter [PD-009]**. Inter-project effects on community health and wellbeing are described in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**. Measures to help manage potential disruption described in this chapter in relation to relevant environmental topics (for example air quality, noise and traffic and transport) are considered sufficient. Other developments in the vicinity of the Project would also implement their own standard mitigation measures (in accordance with guidance) which would ensure that cumulative effects would be negligible and not significant. Mitigation is secured within **7.2 Outline Code of Construction Practice (Revision C)** and **7.3 Outline Construction Traffic Management Plan (Revision B).**

Ref	Name	Matter Raised	Applicant's Response
		In this context, Public Health considers that there is potential for inter-project effects on community health and wellbeing. Proportionate measures to help manage potential disruption and provide reassurance to local communities include the incorporation of predictable respite periods through restricting core working hours in line with comments detailed in Table Item 5.46 (above), together with the implementation of a proportionate health and wellbeing monitoring framework as outlined in Table Item 5.45 (above).	As set out in **8.4.1 Applicant's Comments on Relevant Representations [REP2-023]**, no significant health and wellbeing impacts have been identified in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** and as such there is no requirement for monitoring measures. There is typically no clear, direct causal pathway linking large infrastructure construction to diagnosable mental health conditions in the general population. Distinguishing project-related impacts from those caused by unrelated social, economic, or personal factors is methodologically very difficult. For example, in relation to mental wellbeing, any monitoring is likely to capture background mental health trends rather than / or in addition to, project-specific effects, making attribution and actionable conclusions unreliable. A formal, standalone health and wellbeing monitoring plan or framework which includes thresholds for potential mitigation carries notable methodological, ethical and practical limitations, and risks being disproportionate to likely impacts anticipated for the Project. The Applicant has also responded to this further in its response to question HW 1.13 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.
REP2-040	Suffolk County Council	6.5 SCC queries when/at what stage the Design Champion will be appointed and whether the Design Champion should not be appointed early in the project's development to inform and shape the design, including embedded mitigation. SCC addressed in its **Relevant Representation [RR 3520**], within	The Applicant has now fulfilled the requirement to appoint a Design Champion role. Given the current stage of the Project, this will consist of two complementary roles: • Development Design Champion (DDC), formally appointed from the existing Project Design Team.

Ref	Name	Matter Raised	Applicant's Response
		paragraph 145 and 146, that the Design Champion should be engaged sufficiently early in the development of the project. SCC considers that the Applicant's response [**REP1-132**] to this matter did not directly address this matter, and therefore SCC requests clarity on the timeline for the appointment.	• Delivery and Detail Design Champion (DDDC) from the Great Grid Partnership, who will be responsible for detailed design during the delivery phase. Together, the DDC and DDDC will ensure design leadership and continuity across the full Project lifecycle. The appointment of a Design Champion is supported by EN-1, National Infrastructure Commission Design Principles and the Planning Inspectorate Advice on Good Design. The core responsibilities and governance arrangements will be formalised within a dedicated Design Champion Brief. This brief, covering both the DDC and DDDC roles, will be included within the DASSI to be updated and submitted into the examination at Deadline 5. The DASSI serves as the Applicant's design guide and is a certified document under Schedule 19 of **3.1 Draft Development Consent Order [Revision C]**. Its inclusion in the DASSI ensures that the influence of the Design Champion is certified and will be further secured through a DCO requirement – exact details to be confirmed in an updated Draft DCO at Deadline 5. This approach will ensure the role of the Design Champion in the implementation of the design principles during final design and construction of the Project is enforceable.
REP2-040	Suffolk County Council	6.6 The Council notes that, in February 2026, the Five Estuaries and North Falls Offshore Wind Farms published a Joint Design Guide for their co-located substations near the EACN.	Noted.

Ref	Name	Matter Raised	Applicant's Response
		SCC welcomes the facilitator role that National Grid undertook to enable this development, resulting in this example of good design	
REP2-041	Tendring District Council	EACN Site Selection, Corridor Choice and the Holford/Horlock Rules National Grid largely reiterates its original positions and, in many areas, simply states that it disagrees with Tendring District Council (TDC) and that they are unwilling, or they feel that it is disproportionate, to provide the additional evidence and information that TDC are asking for. The Applicant has not provided the further evidence that TDC requested during pre-application discussions, nor the clear justification we had repeatedly sought for the selection of Ardleigh/Little Bromley over more suitable locations, including brownfield sites west of the A12. In TDC's view: • Key site selection questions remain unanswered, particularly regarding timing, flexibility assumptions, comparative impacts, and the weighting of customer convenience relative to community harm. • The claimed constraints on western options have not been fully substantiated with the technical drawings, schematics, or evidence TDC repeatedly asked for. On a matter as consequential as National Grid's chosen EACN location, it simply is not sufficient to say that requests for such critical information is not proportionate as part of a development consent application, and once such alternative routes have been discounted, especially if they have been discounted on grounds that rely on 'professional	The Applicant appreciates and understands TDC's perspective but remains confident that it has developed the Project and undertaken decision making with the appropriate details for the comparisons being made. In respect of key site selection questions, there is no weighting of, as TDC refer, 'customer convenience relative to community Harm'. Flexibility in this context was judged to be present for the EACN but very substantially constrained for the western site and aligns with the Applicant's view that the latter has reduced flexibility. All sites have to achieve the same project timing. For the western options, the Applicant reiterates its position that there is no requirement to develop a design for another location to the level of detail needed to inform decision making, nor is there a requirement to select an option with the lowest level of effects. The effects need to be in line with policy, which the Applicant asserts they are. The Applicant also disagrees on the suitability of the alternative site. In regard to the Holford and Horlock Rules, the Applicant is clear that the Rules are guidance and point to a preferred outcome but recognise and allow for taking into account local circumstances and context. In regard to future flexibility, as noted, the Applicant judges the western site to be heavily constrained and

Ref	Name	Matter Raised	Applicant's Response
		judgements' that are not backed up by clear and transparent, qualifiable evidence that is capable of public scrutiny – as we have repeatedly set out. • The degree of deviation of the pylon route around Ardleigh—and the significant visual, agricultural and residential harm this creates—we maintain our position that this is inconsistent with the stated reliance on the Holford and Horlock Rules. • National Grid's characterisation of "flexibility" for future unspecified customers continues to place disproportionate emphasis on customer convenience over landscape, food security and community wellbeing. TDC considers the ExA must now judge whether the Applicant has supplied sufficient evidence to justify its conclusions.	considers it appropriate and reasonable that this factor should carry some decision-making weight.
REP2-041	Tendring District Council	Visual, Landscape, and Residential Amenity Impacts: While National Grid acknowledges significant adverse effects, the Applicant has not responded to the core concern: that the selection of the Ardleigh/Little Bromley location has intensified and concentrated impacts unnecessarily, and that other locations perform materially better—an assertion that National Grid has itself partially conceded (e.g., stronger performance of western sites on screening and visual containment). TDC has addressed this in full within the LIR and maintains that the Applicant has not demonstrated a transparent or balanced assessment of alternatives that would reduce impacts in this highly sensitive landscape.	The Applicant has carefully considered other alternatives to a level of detail that is appropriate to inform its decision making. This decision making was set out in **5.15 Design Development Report [APP-122]** and is based on factors over and above the environmental references made. Given the nature of those include physical constraints due to limited space these become more important in the decision making on the basis that if connections cannot be made then the comparisons of effects becomes a moot point.

Ref	Name	Matter Raised	Applicant's Response
REP2-041	Tendring District Council	Agriculture, BMV Land and Food Security: National Grid's position does not address the central concern that the proposed siting places nationally significant infrastructure at the very heart of the district's most productive Grade 1 agricultural land, despite alternatives existing. The Applicant's responses continue to treat BMV loss as unavoidable without demonstrating that the harm has been genuinely minimised. TDC has presented extensive further evidence on this in the LIR.	The Applicant has responded to this point within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** in Table 4.6.
REP2-041	Tendring District Council	Traffic and Transport: The Applicant's response does not resolve TDC's concerns regarding: • Unsuitability of rural lanes for HGV volumes, • Long-term consequences of widening or constructing haul routes, and • Compounded impacts arising from simultaneous NSIP construction. Without quantified assessment of Tendring-specific harm, the Council maintains that significant residual impacts remain, and this is further evidenced in the LIR.	The Applicant has responded to this point within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].** The Applicant's construction routing strategy is detailed within **7.3 Outline Construction Traffic Management Plan (Revision B)**. The strategy routes construction traffic from the Strategic and Major Road Network to the site access points along Primary Access Routes. The suitability of the routes has been assessed, and any mitigation that may be required is detailed in **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 to 320]**. **7.11 Transport Assessment [APP-333]** details the construction assessment undertaken on the cumulative impacts of the simultaneous NSIPs which are expected to use the same Primary Access Routes.
REP2-041	Tendring District Council	Ecology and Biodiversity (including TPOs and arboriculture) National Grid states that TDC did not respond to an email from them on the 4 April 2025	The email response is noted. The applicant requested TPO data in the form of a transferable file on the 11 June 2025, in line with similar requests to other Local

Ref	Name	Matter Raised	Applicant's Response
		seeking TPO information. This is factually incorrect. TDC responded on the same day (4 April), confirming that our TPO dataset was current. A screenshot of these emails have been supplied.	Planning Authorities. No files containing the dataset were received from Tendring District Council. This data is routinely supplied by councils under the under the Open Government Licence (OGL v3). The project digitised TPO records based on the readily available Tendring Map Access Portal having accepted the response that the TPO data available on the mapping service was up to date.
REP2-041	Tendring District Council	The Applicant has not addressed the omission of many TPOs, many of which have been made several years ago, and whilst confirmation has been offered in April 2025 that our TPO database is up to date. This include TPOs along Wick Lane where removal or conflict is proposed. TDC gets routine feedback from members of the public, agents, architects etc confirming the helpful nature of ability to view TPOs on a publicly accessible platform, and we routinely consider arboricultural reports with accurate TPO information obtained from this very mapping portal. TDC remains concerned that National Grid continues to rely on reports that contain errors and omissions, which materially affect routeing decisions and impact assessments. These deficiencies undermine confidence in the arboricultural baseline and has been examined in further detail within the LIR.	The Applicant requested TPO data in the form of a transferable file on the 11 June 2025. No files have been received. The Applicant is concerned that the online mapping service does not show all current TPOs within the district council's boundaries, and is therefore not a reliable single source of information. The following Tree Preservation Orders were supplied in REP2-032 Ardleigh Parish Council and Bromley Parish Council: 26/00004/TPO, 26/00005/TPO and 26/00006/TPO. These TPOs do not appear on the Tendring Map Access Portal, so clarity and certainty is requested.
REP2-041	Tendring District Council	Heritage, Archaeology and the Setting of Rural Settlements: National Grid's response does not resolve the concern that the pylon alignment and EACN siting have created avoidable harm to heritage settings, particularly around Ardleigh and Little	The Applicant has responded to Tendring District Council within Table A.6 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.

Ref	Name	Matter Raised	Applicant's Response
		Bromley. TDC notes that the Applicant simply asserts compliance rather than addressing the specific deficiencies raised in the RR.	
REP2-041	Tendring District Council	8. Cumulative Impacts and Coordination with Other NSIPs National Grid's responses do not demonstrate the degree of cross-project coordination that TDC has consistently called for. Key risks remain, including overlapping construction periods, excessive construction hours that will result in significant residential amenity harm, traffic peaks, land take, and cumulative landscape effects. TDC has fully evidenced these concerns in the LIR, and reserves the right to respond further to National Grid's future submissions.	National Grid has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. Meetings have been held with the North Falls and Five Estuaries Offshore Wind Farm project teams. Both of these wind farms are proposed to connect into the proposed East Anglia Connection Node (EACN) Substation. Both projects involve the construction of new substations, which are proposed to be located adjacent to the EACN Substation. The Applicant worked with North Falls and Five Estuaries project teams up to the submission of the development consent application and assessments are considered to be accurate and reflective of the current numbers included within each of the wind farm projects application/DCO (North Falls and Five Estuaries). It is noted and accepted that the Norwich to Tilbury numbers included within the wind farms assessments are reflective of an earlier stage of assessment for the Project. The Applicant is continuing to work with the wind farms to establish if any programme adjustments can be made: • To reduce the likelihood of both projects' peak construction activities coinciding • To ensure the proposed connection to the East Anglia Connection Node (EACN) Substation for

Ref	Name	Matter Raised	Applicant's Response
			the wind farm takes place at the correct stage of the Project. **7.3 Outline Construction Traffic Management Plan (Revision B)** provides details on how the Project aims to deliver collaboration across a number of projects within the locality of the Norwich to Tilbury construction programme. Traffic numbers from the North Falls and Five Estuaries Projects are also built into the construction traffic numbers used in the assessments in the Environmental Statement. The Tarchon Interconnector project was not included within the cumulative assessment for the Project as a cutoff date of 1 April 2025 was used to confirm the long list of cumulative developments to be assessed. The s35 Direction was not issued for the Tarchon project until 7 April 2025, however, since 1 April the Applicant has been undertaking monthly reviews of planning registers and will continue to do so during the Examination period, to check whether there are any new relevant developments. Where this review identifies the potential for new or different significant effects or changes to the conclusions presented in the Environmental Statement, these would be published during Examination as updates to the relevant inter-project Cumulative Effects documents (as appropriate). Cumulative Effects documents would not be updated just because there is new information available about a development, where this information has been assessed as having no change to the assessment or conclusions presented in **6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]**. In addition, the Tarchon Interconnector project will be required to undertake its

Ref	Name	Matter Raised	Applicant's Response
			own the cumulative assessment with other developments as part of their respective development consent application.
REP2-041	Tendring District Council	Community Impacts, Health, Skills, Employment, Wellbeing and Socio-economics The Applicant largely reiterates general statements about engagement and community benefit packages (including skills and employment), but does not address TDC's core issue: that the concentration of multiple NSIPs on north-west Tendring imposes exceptional cumulative harm without proportionate mitigation or compensation. TDC maintains that the Applicant has not adequately assessed or mitigated these impacts.	A cumulative assessment has been prepared and is provided in **6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]**. Paragraphs 17.5.46 to 17.5.48 include the findings in relation to health and wellbeing of inter-project cumulative effects. For example, it is identified that, in a number of instances, adverse effects on mental health and wellbeing may be particularly relevant as a result of the scale of other development (for example significant residential or infrastructure development) and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases. The cumulative assessment was undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]**.
REP2-041	Tendring District Council	Draft DCO and Governance National Grid's responses do not address several detailed concerns raised jointly by ECC and TDC. These remain open and will be further examined through the SoCG process and the LIR. TDC emphasises that key issues within the DCO—particularly relating to construction controls, governance, monitoring, and flexibility parameters—are still unresolved.	The Applicant has responded to these points within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** in Table 3.27.
REP2-042	Thurrock Borough Council	Comments on the Applicant's update to Scenario B and LTC The Applicant notified the Examining Authority of its intention to proceed with Scenario B of the Project	The Applicant's decision to proceed with Scenario B requires the Applicant's update of a number of application documents, which has involved considerable design work and engagement with

Ref	Name	Matter Raised	Applicant's Response
		due to overlap with LTC on 9 February 2026. In the Applicant's Deadline 1 Cover Letter they confirmed they intend to submit the updated documents for this change at Deadline 5 (10 June 2026). However, this deadline poses a significant issue for the Council, as the examination is scheduled to close in August 2026, leaving insufficient time to properly review the revised material. Therefore, the Council requests the ExA to ask the Applicant to provide the updated documents at an earlier date to ensure sufficient time for thorough review. To ensure that the Council has sufficient time to undertake a thorough review of the revised material, the Council requests that the ExA ask the Applicant to provide the updated documents at an earlier stage in the examination. The Council considers that provision of the updated documents by Deadline 3 (10 April 2026) or at least by Deadline 4 (12 May 2026), would allow a more reasonable period for review and engagement.	stakeholders to collaborate on matters include mitigation areas. In moving to Scenario B, the Applicant also has taken the opportunity to reduce the area of land where compulsory powers are required (Class 1 land). The Applicant considers there is sufficient time in the examination for stakeholders to provide comments on updated documents relating to Scenario B. Comments on documents submitted at Deadline 5 (10 June 2026) are due to be provided at Deadline 6 (7 July 2026), nearly four weeks later. The Applicant regards this as sufficient time for stakeholders to review and provide comments on information that relates to a single area of the Project. Moreover, the Applicant is able to share submitted documents with key stakeholders including Thurrock Borough Council, Lower Thames Crossing and Bloor Homes at the same time as they submit them to the examination. The Applicant notes that, the Environmental Statement submitted with the application did assess the impacts relating to this scenario and the others covered in **6.4 Environmental Statement Chapter 4 - Project Description [APP-130]**.
REP2-040 REP2-042	Suffolk County Council Thurrock Borough Council	1. Drainage Layout Drawings Separate drainage layout drawings should be provided for both temporary works areas and permanent development sites. These should clearly identify the location, type and function of all proposed Sustainable Drainage Systems (SuDS) features and demonstrate the overall surface water management strategy.	Indicative drainage features are depicted in **6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133],** including the temporary and permanent developments. To provide further clarity on this matter, the Applicant will produce a series of drainage layout figures for the Project to be appended to **8.2 Drainage Strategy** which will be updated and submitted at a subsequent deadline.

Ref	Name	Matter Raised	Applicant's Response
REP2-040 REP2-042	Suffolk County Council Thurrock Borough Council	2. Hydraulic Calculations Detailed hydraulic calculations should be provided to demonstrate that adequate attenuation capacity is available within the site to manage runoff for a range of rainfall events, including the 1 in 100-year storm event with a 40% climate change allowance.	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of Requirement 4 of the DCO. This would include hydraulic calculations to demonstrate how runoff across the site will be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes.
REP2-040 REP2-042	Suffolk County Council Thurrock Borough Council	3. Overland Flow Modelling Surface water modelling should be undertaken to demonstrate how existing and proposed overland flow paths will be managed. The modelling should confirm that flows can be safely intercepted and conveyed without increasing flood risk within the site, the surrounding area, or the upstream catchment.	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. This would include proportionate overland flow modelling.
REP2-040 REP2-042	Suffolk County Council Thurrock Borough Council	4. Interaction with the Lower Thames Crossing Scheme The drainage strategy should consider and demonstrate any potential interactions or cross-implications between the proposed drainage arrangements and the infrastructure associated with the Lower Thames Crossing across the relevant catchments.	Engagement with the Lower Thames Crossing (LTC) scheme is ongoing. The current position is captured in **8.3.4 Draft Statement of Common Ground - Lower Thames Crossing [REP1-075]**. The Applicant will continue to engage with LTC to develop proposals that ensure both projects are deliverable.
REP2-040 REP2-042	Suffolk County Council Thurrock Borough Council	5. Surface Water Flood Risk Mapping Plans should be provided showing an overlay of the Environment Agency's Risk of Flooding from Surface Water mapping across all temporary and permanent works areas, demonstrating how the proposed layout	The Environment Agency Risk of flooding from surface water mapping is depicted in **6.12.F2 Environmental Statement Figure 12.2 - Flood Risk Areas** [**APP-224**]. This illustrates where the Project interfaces with areas of high (3.3%) and medium (1%) surface water flooding risk.

Ref	Name	Matter Raised	Applicant's Response
		has taken account of areas potentially susceptible to surface water flooding.	The mapping is appraised in **7.9 Flood Risk Assessment [APP-331]**, Section 4.10 and in **6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]**, paragraphs 12.5.51 to 12.5.97 provide a summary of the baseline information for flood risk and land drainage. The Project has sought to avoid placing temporary works and permanent development in areas at high and medium risk of surface water flooding. Where this is not practicable, a range of commitments to control and manage such interactions are secured through inclusion within **7.2 Outline Code of Construction Practice (Revision C)**.
REP2-040 REP2-042	Suffolk County Council Thurrock Borough Council	6. Water Quality – High Pollutant Risk Sites For sites identified as having high pollutant loading, a Water Quality Risk Assessment should be submitted in accordance with Environment Agency requirements to demonstrate that surface water discharges to a watercourse or river will not adversely affect the receiving environment. 7. Water Quality – Medium to Low Pollutant Risk Sites For sites with medium to low pollutant risk, a Simple Index Approach (SIA) assessment should be undertaken in accordance with the CIRIA SuDS Manual C753 to demonstrate that appropriate levels of treatment are provided.	The potential for the Project to impact on surface water quality is assessed in **6.12 Environmental Statement Chapter 12 – Hydrology Land Drainage and Flood Risk [APP-221**which also described a range of measures and controls that would be implemented to avoid and reduce pollution risks. These controls are secured via commitments within **7.2 Outline Code of Construction Practice (Revision C)** and include the provision of sustainable drainage measures to provide runoff capture and treatment. The Surface Water Management Plan prepared by the main works contractor to inform discharge of Requirement 4 of the DCO will provide the evidence to demonstrate the adequacy of the treatment that will be applied.

Ref	Name	Matter Raised	Applicant's Response
REP2-040 REP2-042	Suffolk County Council Thurrock Borough Council	8. Water Quality Monitoring Details of water quality monitoring arrangements should be provided for both the construction and operational phases, setting out how potential pollution risks will be managed and monitored throughout the lifecycle of the development.	The Applicant has engaged extensively with the Environment Agency during preparation of its assessments of the Project's impacts on water quality which are presented in **6.12 Environmental Statement Chapter 12 – Hydrology Land Drainage and Flood Risk [APP-221]**. The assessments conclude that there would be no likely significant residual effects on water quality during construction, operation and maintenance of the Project, accounting for the suite of embedded, standard and additional mitigation measures proposed. As detailed in **5.9.15 Draft Statement of Common Ground - Environment Agency [REP1-038]** items 3.2.8, 3.2.9 and 3.2.10 confirm that the Environment Agency is in agreement that the embedded, standard and additional mitigation measures proposed are appropriate and adequate. Given this position, water quality monitoring is not proposed by the Applicant; however, as detailed in **7.2 Outline Code of Construction Practice (Revision C)** (Outline CoCP) regular site checks will be carried out across the Project to monitor compliance with the CoCP and other associated plans. The programme of site inspections will be managed by the Environmental Manager who will draw on appropriate suitably experienced specialists for specific tasks. Further details and an indicative programme of inspections will be incorporated within the CoCP. Site checks and inspections will include checks against compliance with standard mitigation measures and other commitments made by the Project.

Ref	Name	Matter Raised	Applicant's Response
REP2-040 REP2-042	Suffolk County Council Thurrock Borough Council	9. Groundwater Monitoring In areas identified as susceptible to groundwater flooding, groundwater monitoring data and supporting assessment should be provided to demonstrate that groundwater conditions have been appropriately considered in the drainage design.	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. This would be informed by proportionate groundwater monitoring to inform the detailed drainage designs, as necessary.
REP2-043	National Highways	3.1 NH has provided further comments to the Applicant on the Statement of Common Ground to reflect the latest position. However, these were received after the Applicant's internal deadline for updating Deadline 1 documents and they are not therefore reflected in the submitted version. The Applicant has advised NH that an updated version of the Statement of Common Ground will be submitted at the next deadline.	The Applicant wishes to clarify that it was able to incorporate NH's further comments into **5.9.20 Draft Statement of Common Ground - National Highways [REP1-048]** at Deadline 1. The draft Statement of Common Ground will be further updated and resubmitted at Deadline 4.
REP2-043	National Highways	2.5 (e) Deemed Consent (across multiple articles): NH object to deemed consent. There are safety implications of works being carried out to or under the strategic road network that may have bypassed NH's approval processes. This is a fundamental issue of public safety that should not be comprised to enable a private developer to achieve a quicker build programme. NH has statutory obligations to behave reasonably and support sustainable development and so it should not be forced to work under the pressure of deemed consent. The potential implications from a safety perspective of something going wrong far outweigh the Applicant's case for such a provision.	The Applicant wishes to clarify that it was able to incorporate NH's further comments into the Deadline 1 draft Statement of Common Ground. The draft Statement of Common Ground will be further updated and resubmitted at Deadline 4.
REP2-043	National Highways	Appendix 1 Table T1.2 Deemed Consent Note – There are a number of articles which contain deemed	The Applicant notes National Highways' position in relation to deemed consent. The Applicant's position

Ref	Name	Matter Raised	Applicant's Response
		consent provisions which would apply where NH does not provide its consent or approval to any provisions under the order within 28 days of it being requested where no response is received. 28 days is not considered a reasonable period of time to consider every application that may come through under this DCO, some may be more involved than others. 8 weeks would be considered reasonable.	is that deemed consent is appropriate and proportionate for a Project of critical national priority. The inclusion of deemed consent is well precedented by other DCOs including the recent National Grid (Bramford to Twinstead Reinforcement) Order 2024.
REP2-043	National Highways	The Applicant's position is largely that it is liaising with National Highways (NH) to resolve the concerns raised. Whilst NH acknowledges that matters remain outstanding and that negotiations are ongoing or due to commence, there are a number of instances in which NH wishes to respond directly to the Applicant's comments on National Highways' relevant representations. In relation to technical matters, NH's advisors are currently reviewing the traffic and transport responses received from the Applicant on NH's Relevant Representations. A response will follow from NH at the next deadline.	Noted.
REP2-043	National Highways	*DCO a) and b) Compulsory acquisition* NH fundamentally disagree with the Applicant's comment in T1 on page 345 that, "*In relation to concerns regarding National Highways' ability to discharge its statutory duties, it is the Applicant's position that, the acquisition of land or rights should not cause a material detriment to National Highways' ongoing land management and ability to ensure safe and efficient operations*".	Noted. The Applicant is continuing to engage with National Highways on the draft Protective Provisions, which includes the acceptability of deemed consent provisions.

Ref	Name	Matter Raised	Applicant's Response
		Compulsory Acquisition: in relation to Articles 24, 25 and 26, NH's object to the compulsory acquisition of its land and interests without its consent. NH's consent needs to be secured through the Protective Provisions.	
REP2-043	National Highways	*DCO c) and d) Protective Provisions* Articles 11, 13, 14, 16, 17, 18, 20, 21, 22, 27, 28, 29, 30, 38, 39, 40, 41, 44, 45, 49, 50:- The Applicant's response notes that these articles can be dealt with in the Protective Provisions in favour of NH. If suitable Protective Provisions can be agreed which ensure that the rights within the article cannot be exercised without the consent of NH, then this approach is welcomed. A further update will follow as negotiations on the Protective Provisions continue. In relation to Article 12, 16, 47, whilst not referred to explicitly in the Applicant's response to NH's Relevant Representations, it is NH's position that these articles could be dealt with in the Protective Provisions in favour of NH if suitable Protective Provisions can be agreed which ensure that the rights within the article cannot be exercised without the consent of NH.	Noted. The Applicant is continuing to engage with National Highways on the draft Protective Provisions, which includes the acceptability of deemed consent provisions.
REP2-043	National Highways	*DCO e) Deemed Consent* NH object to deemed consent. There are safety implications of works being carried out to or under the strategic road network that may have bypassed NH's approval processes. This is a fundamental issue of public safety that should not be comprised to enable a private developer to achieve a quicker build programme. NH has statutory obligations to behave reasonably and support sustainable development and	The Applicant notes National Highways' position in relation to deemed consent. The Applicant's position is that deemed consent is appropriate and proportionate for a Project of critical national priority. The inclusion of deemed consent is well precedented by other DCOs including the recent National Grid (Bramford to Twinstead Reinforcement) Order 2024.

Ref	Name	Matter Raised	Applicant's Response
		so it should not be forced to work under the pressure of deemed consent. The potential implications from a safety perspective of something going wrong far outweigh the Applicant's case for such a provision.	
REP2-043	National Highways	*Draft Statement of Common Ground – National Highways* NH has provided further comments to the Applicant on the Statement of Common Ground to reflect the latest position. However, these were received after the Applicant's internal deadline for updating Deadline 1 documents and they are not therefore reflected in the submitted version. The Applicant has advised NH that an updated version of the Statement of Common Ground will be submitted at the next deadline.	The Applicant wishes to clarify that it was able to incorporate NH's further comments into the Deadline 1 draft Statement of Common Ground. The draft Statement of Common Ground will be further updated and resubmitted at Deadline 4.
REP2-043	National Highways	*Latest Statutory Undertaker Tracker* Line 15 of the Tracker relates to NH and notes, "*Parties have been in correspondence since July 2025. A meeting is being arranged to discuss National Highways' concerns over Class 1 land take week commencing 23 February 2026 and comments on the draft protective provisions for the week commencing 2 March 2026*". By way of an update, a meeting took place over Class 1 concerns on 26 February 2026. Further meetings are required. In relation to the protective provisions and as noted above, a meeting to discuss the latest draft is scheduled for 16 March 2026.	The Applicant can confirm that discussions are ongoing and progress will be reported in the draft Statement of Common Ground which will be further updated and resubmitted at Deadline 4.
REP2-043	National Highways	*Table T1.1 – Traffic and Transport* NH notes that the Applicant will continue to engage with National Highways throughout the DCO Examination to resolve the concerns raised. This will	Noted.

Ref	Name	Matter Raised	Applicant's Response
		be documented in 5.9.20 Draft Statement of Common Ground - National Highways.	
REP2-043	National Highways	*Table T1.1 – Cumulative effects* LTC will pick up any response.	Noted.
REP2-043	National Highways	*Table T1.1* – NH notes the Applicant's response on these items. Draft DCO, Cumulative effects, Key Legislation and Planning Policy Context, Draft DCO.	Noted.
REP2-043	National Highways	*Table T1.1 – Traffic and Transport* In relation to all of the traffic and transport responses that follow, these are being reviewed by NH's technical advisors. A response will follow at the next deadline.	The Applicant will respond to these comments at the following deadline.
REP2-043	National Highways	Table T1.1 – Compulsory Acquisition NH is reviewing the information supplied by the Applicant. From NH's review to date NH is struggling to understand the need for compulsory acquisition powers in relation to a number of the plots. For example, overhead lines are capable of being installed pursuant to NRSWA. A full plot-by-plot response will follow.	The Applicant will consider to the plot by plot response when received and respond at the following deadline if necessary.
REP2-043	National Highways	*Table 1.2 – Article 11, 13, 14, 16, 17, 18, 20, 27, 28, 29, 30, 38, 39, 40, 41, 44, 45, 47, 49, 50* NH welcomes this approach provided that suitable Protective Provisions can be agreed which ensures that the applicant is required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in. Deemed consent is not agreed by NH and the Protective	Noted. The Applicant is continuing to engage with National Highways on the draft protective provisions, which includes the acceptability of deemed consent provisions.

Ref	Name	Matter Raised	Applicant's Response
		Provisions will need to disapply all references to deemed consent.	
REP2-043	National Highways	*Table 1.2 – Article 12: Application of the Permit Schemes* NH welcomes confirmation that Permit Schemes do not apply to the Strategic Road Network and this should also be confirmed through the Protective Provisions.	Noted. The Applicant is continuing to engage with National Highways on the draft protective provisions.
REP2-043	National Highways	*Table 1.2 – Article 21 and 22* NH notes the Applicant's response.	Noted.
REP2-043	National Highways	Table 1.2 – Article 24: Compulsory acquisition of land, Article 25: Compulsory acquisition of rights, Article 26: Acquisition of subsoil or airspace only NH's object to the compulsory acquisition of its land and interests without its consent and this needs to be secured through the Protective Provisions.	Noted. The Applicant is continuing to engage with National Highways on the draft protective provisions.
REP2-043	National Highways	Table 1.2 – Article 55: Procedure requiring certain approvals etc. Paragraph 3(1) refers to a fee being paid to the "relevant authority" which is defined as "the body responsible for giving and consent, agreement or approval under this schedule " whereas 3(2)(b) requires the relevant planning authority who fails to determine the application within 28 days to refund the fee. Please confirm that this is a deliberate carve out so NH would not be obliged to refund fees.	**3.1 Draft Development Consent Order [Revision C]** has been submitted at Deadline 3 which includes a new sub-paragraph (4) of Article 55 that disapplies paragraphs 3, 4 and 5 of Schedule 4 in respect of any consent, agreement or approval required by Schedule 16 to which article 62 (Arbitration) instead applies.
REP2-043	National Highways	Table 1.2 – Article 58: Application, disapplication and modification of legislative provisions	These exclusions do not circumvent a requirement for the Applicant to seek National Highways' consent in relation to any of the activities that are governed by

Ref	Name	Matter Raised	Applicant's Response
		NH do not accept the exclusions sought. The exclusions comprise:- Highways Act 1980: 6. Sections 141 (restriction on planting of trees etc. in or near carriageway), 169 (control of scaffolding on highways) and 171 (control of deposit of building materials and making of excavations in streets) of the 1980 Act will not apply to the extent such operations or works are required for the purposes of, or in connection with, the construction and maintenance of the authorised development. Any exclusion does not allow NH to safely manage its asset and consent needs to be obtained from NH in undertaking any of the activities that are governed by the provisions which NG are seeking to exclude.	the legislative provisions. The activities will be governed by the protective provisions that are currently being negotiated with National Highways.
REP2-043	National Highways	*Table 1.2 – Deemed Consent Note* The ExA should note that NH's position is that deemed consent should not apply wherever works or activities are proposed on the SRN. NH do need to give actual consent. Were the ExA to disagree with NH's position, then a period of 28 days for providing consent is not sufficient.	Noted. The Applicant is continuing to engage with National Highways on the draft protective provisions, which includes the acceptability of deemed consent provisions.
REP2-043	National Highways	*Table 1.2 – 4. Construction Management Plans* NH notes that requirements do need to be sufficiently precise and clear and therefore NH do request these revisions to put matters beyond doubt.	The Applicant has amended this requirement to consult with the relevant highway authority in relation to the construction traffic management plan. This is reflected in the updated **3.1 Draft Development Consent Order [Revision C]** submitted at Deadline 3.
REP2-043	National Highways	*Table 1.2 – 8. Retention and removal of trees, woodland and hedgerows*	Noted. The Applicant is continuing to engage with National Highways on the draft protective provisions.

Ref	Name	Matter Raised	Applicant's Response
		The Applicant's response is agreed, subject to the Protective Provisions making it clear that site clearance includes reference to trees, woodland and hedgerows.	
REP2-043	National Highways	*Table 1.2 – 9. Reinstatement planting plan* The Applicant's response is agreed, subject to the Protective Provisions making it clear that site clearance includes reference restatement planting plan within the landscaping.	Noted. The Applicant is continuing to engage with National Highways on the draft protective provisions.
REP2-043	National Highways	*Table 1.2 – 10. Reinstatement schemes* A reduced period does need to be provided for in the case of the A120 to ensure a safe and efficient operation of the SRN. Moreover, we note that article 29 provides for an open ended temporary possession over a period of 5 years.	Reinstatement works of the A120 verge would fall within the definition of 'Highway Works' under National Highways' protective provisions. As such, the 12-month maintenance period under these provisions would apply. The 5-year maintenance period is a standard period and precedented in many made development consent orders, including The National Grid (Bramford to Twinstead Reinforcement) Order 2024, the A122 (Lower Thames Crossing) Development Consent Order 2025 and The Gatwick Airport (Northern Runway Project) Development Consent Order 2025.
REP2-043	National Highways	Table 1.2 – Discharge of Requirements Schedule 4 Paragraph 1 This provision will need to be kept under review as discussions on Protective Provisions are advanced. In the meantime, NH stands by its previous comments.	Noted. The Applicant is continuing to engage with National Highways on the draft protective provisions.
REP2-043	National Highways	Table 1.2 – Discharge of Requirements Schedule 4 Paragraph 2 The Applicant's response is noted. NH's position remains that 5 days is not acceptable.	National Grid has had regard to feedback received from host authorities and the Examining Authority both on the duration of the decision period and the consistency of the use of 'days' and 'business days'

Ref	Name	Matter Raised	Applicant's Response
			and has revised its proposed 5 day decision period to instead allow 5 business days. The Applicant considers that this revised decision period to be adequate, proportionate and appropriate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government's Net Zero Target of 2030, is not unnecessarily delayed by means outside the control of National Grid. National Grid's position remains that extending the decision-making period beyond what it proposes would not be proportionate or appropriate given the Project's programme constraints, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.
REP2-044	Durrants on behalf of various clients	Summary – Agents' Response to Revised Heads of Terms (10 March 2026) This email is a collective response from four land agents (Whirledge & Nott, Brooks Leney, Clarke & Simpson and Durrants), acting for over 250 affected parties, to the revised Heads of Terms (HoTs) issued by the Applicant on 27 February 2026 for the Norwich to Tilbury project. The agents consider that the revised HoTs remain inadequate and do not provide sufficient incentive for voluntary agreement when compared with acquisition	The Applicant has responded on the deemed approvals process and the proposed 28-day timeframe in its responses to relevant representations and does not repeat that response here. In practical terms, the Applicant would anticipate working closely with National Highways and other relevant authorities to provide advance notice, where practicable, of any requests for approval to which a deeming provision would apply under the draft DCO.

Ref	Name	Matter Raised	Applicant's Response
		under the DCO. They state that the HoTs should, as a minimum, leave landowners no worse off than under compulsory acquisition and ideally offer improved terms, which they say is not currently the case. The agents confirm that this correspondence will be provided to the Planning Inspectorate.	
REP2-045	Essex Scouts and Guides	I do not consider that the specific concerns raised regarding the Jamboree have been substantively addressed. The Jamboree is a major international youth event hosting around 5,000 young people and more than 2,500 volunteers. Significant charitable funds have been invested in infrastructure at the site and many thousands of volunteer hours are devoted to organising the event.	The Applicant acknowledges the representations made on behalf of Essex Scouts and Guides regarding the Essex International Scout and Guide Jamboree and recognises the scale, longevity and charitable significance of the event, together with the investment of volunteer time and resources associated with its delivery. The Applicant recognises that concerns raised extend beyond matters of technical safety and include practical operational considerations associated with hosting a large international youth event, including safeguarding, licensing and parental confidence. These matters are considered capable of being addressed through ongoing engagement, event management practices and, where appropriate, proportionate mitigation measures developed as the Examination progresses.
REP2-045	Essex Scouts and Guides	The Applicant has not addressed the operational implications of placing transmission infrastructure within the centre of the event site. In particular: It has not addressed the fact that the 2028 Jamboree cannot take place during the construction period; It has not considered the impact of pylons within the campsite on safeguarding, licensing and parental confidence; and	The Applicant has accepted that the event due to take place in 2028 is unlikely to be able to take place on the existing site due to the construction of the scheme taking place at the same time. The Applicant has also noted the affected party's view that future events once the overhead line is institute may be perceived to be less desirable to attend due to the overhead line crossing the main event area. The Applicant has confirmed its willingness to support the

Ref	Name	Matter Raised	Applicant's Response
		It has not assessed the effect on the long-term viability of the event. While the Applicant refers to the technical safety of overhead lines, the concern raised was not simply one of engineering safety but the practical ability to host a large international youth event beneath major transmission infrastructure. The potential mitigation options raised at the hearing, including undergrounding of this section of the route or identifying and funding a suitable alternative site, have also not been addressed. Given the scale and significance of the Jamboree and the charitable investment involved, I respectfully request that the Examining Authority seek further clarification from the Applicant on how the scheme would affect the future operation of this long-established international youth event and what mitigation measures have been considered	event organisers with obtaining a new permanent or temporary site for the 2028 event and future events. Funds have already been provided to the organisers to cover the initial costs of searching for suitable new sites that could hold the event and to carry out initial assessments of what would be required at the new site. The organisers are also looking at the layout of the existing site to see whether the event could be held at the site utilising alternative areas of land. The Applicant has also confirmed willingness to enter into a more legally binding agreement alongside the drafted Statement of Common Ground in order to provide the affected party with financial certainty. The Applicant notes the mitigation options raised, including routeing alternatives and the identification of alternative arrangements, but considers that the selected alignment represents a balanced solution when assessed against a range of technical, environmental and deliverability considerations. The Applicant does not consider that the absence of a detailed event-specific operational assessment indicates that the matters raised have not been considered but recognises that further clarification may be helpful. The Applicant has engaged constructively with representatives of the Essex International Scout and Guide Jamboree since the non-statutory consultation in spring 2022. This has included a site visit during the 2024 event, attended by the Project's Land Project Manager and members of the design engineering team. Numerous virtual meetings have taken place between representatives of the Jamboree and the Norwich to Tilbury Project team.

Ref	Name	Matter Raised	Applicant's Response
			At present, the Applicant is aware that the affected party has identified a potential alternative site. Initial discussions with the landowner of this site are currently underway and remain at an early stage. On 25 March, the Applicant's Land Rights Project Manager engaged in dialogue with a representative of the Essex International Scout and Guide Jamboree (EIJ) to obtain an update regarding the progress of negotiations with the landowner of the alternative site. The purpose of this conversation was also to agree the next steps in the process. Following the update, it was agreed that a further meeting would be arranged between the EIJ and the Applicant, including their respective legal representatives. The objective of this meeting will be to work towards heads of terms and a formal legal agreement. Given that discussions with the landowner at the alternative site are still at an early stage and may require additional time, the EIJ and the Applicant have decided to outline several options. These options will be addressed within the legal agreement in order to provide the EIJ with financial certainty and ensure that the 2028 event can proceed as planned.
REP2-046	Five Estuaries Offshore Wind Farm Ltd	2. **Tendring District Council Local Impact Report** (LIR) [**REP1-182**] Five Estuaries notes that there are several requests in the LIR which request that 'binding' restrictions or 'compulsory' obligations are placed on Five Estuaries within the Norwich to Tilbury DCO. These include: Five Estuaries objects to any such imposition of restrictions or obligations on its development as being	2. Matters relating to binding coordination mechanisms between the projects raised in **[REP1-182] Tendring District Council Local Impact Report.** The Applicant responded to these matters at Deadline 2 in **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. The below extract provides the position, found on page 804 of **REP2-030**:

Ref	Name	Matter Raised	Applicant's Response
		outside the scope of what the Norwich to Tilbury DCO can lawfully include. Five Estuaries submits that there is no legal basis for the imposition requested by TDC to be included in the order.	*'The Applicant does not consider it appropriate or necessary to have a legally binding commitment that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables and shared mitigation strategies. These are separate schemes at different stages. The Applicant will, through existing measures in its own DCO documentation, ensure there is no conflict during construction activities. This will be developed further through continued co-operation / engagement.'*
REP2-047	General Aviation Awareness Council	Comments on any further information or submissions received by deadline 1	Addressed by the Applicant in the response to **General Aviation Awareness Council Written Representation [REP2-050]** below as **[REP2-047]** summarises points made within General Aviation Awareness Council Written Representation **[REP2-050]**.
REP2-050	General Aviation Awareness Council	The Civil Aviation Authority Airfield Advisory Team (AAT) was involved with the Norwich to Tilbury National Grid project until March 2025. It provided advice to National Grid on the extent of impact that the proposed line routes could have on established aviation systems. The AAT was disbanded in April 2025. However, the CAA's General Aviation (GA) unit has made clear that it does not seek to retract or repudiate any of the work previously done by the AAT. The AAT's letter to National Grid, dated 20 March 2025 is at Appendix 1.	**8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** provides detail of the Applicant's position regarding the Civil Aviation Authority Airfields Advisory Team (CAA AAT) remit and its involvement in the Project prior to disbandment. More specifically, paragraphs 3.17.5 to 3.17.15 explain the Applicant's consideration of advice provided within the CAA AAT Position Statement of March 2025 during the development of the Project design.
REP2-050	General Aviation Awareness Council	This Representation relates to the principle that General Aviation airfields constitute a national asset and they should be taken into account at the start of the evaluation of new infrastructure projects. It also	**8.8.1 Applicant's Comments on Written Representations [REP2-029],** and specifically the Applicant's response to the **Raydon Wings Aerodrome Written Representation [REP1-268]**

Ref	Name	Matter Raised	Applicant's Response
		relates to aerodromes directly affected by this proposed scheme. No consideration was given to General Aviation when the proposed route for this scheme was first published. National Grid has lacked genuine engagement and given inadequate consideration to General Aviation infrastructure since then. The Civil Aviation Authority has enabled some minor measures to be put in place to reduce the impact on a number of aerodromes affected.	describes the Applicant's early recognition of potential aviation impacts within **6.19 Scoping Report [APP-296]** (see para. 5.7.3) and **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** (see Table 3.3). General Aviation was not considered differently to broader civil aviation impacts. Paras. 15.3.13 to 15.3.17 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** describe the Applicant's approach to engagement regarding civil aerodromes, including with General Aviation aerodrome operators and relevant aviation bodies namely the CAA, the CAA AAT, the British Gliding Association (BGA) and the General Aviation Awareness Council (GAAC). Feedback from General Aviation stakeholder engagement, as well as the Applicant's aviation impact assessments, directly informed development of the Project design. This is evidenced within the Design Development Report as detailed below. Significant design changes were implemented where determined to be justified by potential aviation impacts as per the examples of Brook Farm airfield (see paras. 5.4.43 to 5.4.44 of **7.21 2024 Design Development Report for the Project [APP-359]** and 5.1.1 to 5.1.3 of **5.1.5 Design Development Report [APP-122]**), Raydon Wings aerodrome (see paras. 5.4.104 to 5.4.110 of **7.21 2024 Design Development Report for the Project [APP-359]** and Thurrock aerodrome (see paras. 11.1.1 to 11.1.15 of **5.1.5 Design Development Report [APP-122]).** Para. 3.17.5 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030**] notes the CAA AAT's recognition of modifications to the proposed

Ref	Name	Matter Raised	Applicant's Response
			Project alignment implemented to minimise adverse aviation impacts.
REP2-050	General Aviation Awareness Council	**6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism** 1. As stated, the 'Review of Aviation Impact' is flawed, in respect of: its interpretation of, and failure properly to apply, national planning policy (set out in the EN documents and the National Planning Policy Framework), aviation regulation and related guidance and the provisions of CAP 738 and 793, as well as the scope of the assessment undertaken and the ALARP principle. ES Chapter 15 is therefore also flawed. 2. This Chapter only considers aerodromes where even the flawed assessment has identified what the promoter considers to be 'likely significant effects'. Therefore, this Chapter has only addressed Raydon Wings and Chase Farm Aerodromes. 3. It concludes that only Chase Farm Aerodrome would be subject significant adverse effects – 'as closure is anticipated'. The effects are described in paragraph 15.7.23 as 'permanent, long-term, moderate adverse and significant'. 4. There is a fundamental flaw in the approach that is being applied. The route alignment at Chase Farm could have been modified at an early stage of this project. This Document sets out post-hoc justification for the flawed route alignment process. The judgement of 'moderate adverse' is not explained but would appear to be post-hoc	1.The Respondent's comments regarding **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** are addressed separately in response to the Respondent's B Document: 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism Appendix 15.2 Review of Aviation Impact. 2.The Applicant notes that whilst **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]** addresses effects on Raydon Wings and Chase Farm aerodromes (see paras. 15.7.23, 15.7.37 and Table 15.15), this main chapter is supported by **6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266]** which evaluates the significance of impacts on further General Aviation aerodromes - Barnards Farm, Brook Farm, Chase Farm, Elmsett, Priory Farm, Tibenham, and Thurrock. 3.and 4. As described within **8.8.1 Applicant's Comments on Written Representations [REP2-029]**, and specifically the Applicant's response to the **Raydon Wings Aerodrome Written Representation [REP1-268]** the Applicant adopted a reasonable and responsible approach to the consideration of aviation impacts at the early stages of the route's development, recognising the need to consider variable and site-specific factors to determine aviation impacts of the Project, informed by operator

Ref	Name	Matter Raised	Applicant's Response
		subjective judgement about the size and importance of this aerodrome. 5. The assessment also concludes that the 'temporary' closure of Raydon Wings would take place but the duration of this is not identified. The document admits it has no detailed information about the nature of the operation nevertheless is able to conclude that impact is, 'temporary, short-term, minor adverse and not significant.' 6. As noted above, not all affected aerodromes have been addressed – where the flawed assessment concludes there will be no impacts on these aerodromes. Aside from our analysis which demonstrates that the overall impact assessment is very narrowly focussed, this assessment has not even considered the following points. 7. The nature of the proposed development introduces a major change to approaches very close to some of the airfields. Unfamiliarity may be a deterrent per se. Major structures in proximity of an airfield runway may also deter all users in some weather conditions. Certain types of flying activity – including aircraft types, training and competitions may be compromised. Any and all of these significant changes in the environs of an aerodrome can then have knock-on effects on visitor numbers and income. 8. As aerodromes play a very significant role in providing leisure and recreational experiences, the recreational value of existing, established, aerodromes may be compromised, affecting not just pilots but the communities within which the aerodromes sit. The broader socio-economic value	consultation, rather than applying a generic, potentially unsuitable and disproportionate separation distance to avoid aerodromes when developing the preferred corridor graduated swathe. **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** further describes the Applicant's assessment approach and specifically explains how consultation with the operator of Chase Farm informed impact assessments, design changes and consideration of alternative mitigations to identified adverse effects (see paras. 15.4.4 to 15.4.8). This is evidenced by the consideration of alternative route alignments in the vicinity of Chase Farm throughout the pre-application period (see paragraphs 5.5.142 to 5.5.145 of **7.20 2023 – Design Development Report for the Project [APP-358],** paragraphs 5.4.205 to 5.4.214 of **7.21 2024 – Design Development for the Project [APP-359]** and paragraphs 10.3.1 to 10.3.5 **of 5.15 Design Development Report [APP-122]**) involving the balancing of aviation impacts with other constraints. Judgements around aviation effects are further detailed within **8.3.33 Draft Statement of Common Ground – Chase Farm Airfield [REP1-101],** which demonstrates assessed impacts of the Project on the aerodrome have been agreed with the operator. 5. **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]** states that no detailed information about the nature of operations at Raydon Wings is available in the public domain. Given the current stage of the design process, details of the duration of potential impact on the receptor were not available at the time

Ref	Name	Matter Raised	Applicant's Response
		of the affected General Aviation aerodromes has not been taken into account. Page 3 of 18 The Environmental Statement has not properly addressed the socio-economic, recreation and tourism impacts of the proposed development.	of writing. The assessment was based on a worst-case scenario, assuming the potential construction impact will be throughout the duration of the construction period. Further details will become available when design progresses. **8.3.35 Draft Statement of Common Ground – Raydon Wings Aerodrome [REP1-103]** describes the Applicant's engagement with the aerodrome operator from May 2022, seeking information regarding operational activities to inform assessments. The Applicant's latest position in relation to SoCG matter 6.5 recognises information requested regarding the operator's proposed operational activities had not been received. 6. and 7. The Applicant's position is that collectively **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265],** supported by **6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266]** and **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** provide a comprehensive assessment of Project impacts on aviation and associated socio-economic, recreation and tourism impacts. Para. 15.3.3 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** recognises the proposed Project represents a new obstacle within the proximity of aerodromes, with the stated aim of the assessment being to evaluate safety, operational and capability impacts arising as a result of the Project's presence. Para. 15.3.51 recognises that, in addition to design-based mitigation

Ref	Name	Matter Raised	Applicant's Response
			to minimise adverse effects, where possible, the Applicant has considered operational mitigation measures, including to enhance pilot situational awareness of the Project as an obstacle. This is in accordance with EN-1 (2024) which states impact mitigation many include changes to aerodrome operational procedures, and/or notification in Aeronautical Information Service publications (see para. 5.5.44). EN-1 further states it is incumbent on operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures (see para. 5.5.50). 7. **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]** assessed the potential impacts on airfield operation. These include access and the safe operation of the business. No significant adverse effects have been identified for airfields within the 3 km Study Area, except for Chase Farm Airstrip. The Applicant is having ongoing discussions with the airfield operator and their appointed agent in respect of reorientation of the airstrip to minimise the potential effect on the business and recreational assets and the Applicant has reiterated its intention to provide firm commitment to reorientate the airstrip once the airfield operator confirms its preferred option. This matter falls outside the scope of the EIA. Perceived effect is not within the scope of the Socio-economics, Recreation and Tourism. In regard to competitions and training activities, given the aviation assessment concludes that clearance margins for take offs and landing are acceptable (recognising a minor Inner Horizontal Surface (IHS) infringement), and that the current

Ref	Name	Matter Raised	Applicant's Response
			circuits can continued to be used, the business is anticipated to be able to operate safely. 8. **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]** and **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** assessed the potential impact on airfield operation. These include access and the safe operation of aircraft movement for leisure and recreational purposes. No significant adverse effects have been identified for airfields for leisure and recreational purposes within the 3 km Study Area, except for Chase Farm Airstrip. The Applicant is having ongoing discussions with the landowner regarding potential compensation measures to minimise the potential effect on the business and recreational assets. This matter falls outside the scope of the EIA. Perceived effect is not within the scope of the Socio-economics, Recreation and Tourism. 9. The Socio-economics, Recreation and Tourism ES assessment has been guided by various EIA guidance documents and further developed following different thematic group engagement throughout the EIA stages. The assessment scope has been based on the agreed approach on **6.19 Scoping Report - including appendices B to K [APP-296]** and **6.20 Scoping Opinion [APP-297]**.
REP2-050	General Aviation Awareness Council	**6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism Appendix** 15.2 Review of Aviation Impact 15.1 Introduction	1. As previously stated, para. 15.3.3 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** recognises the proposed Project represents a new obstacle within the

Ref	Name	Matter Raised	Applicant's Response
		1. Paragraph 15.1.1 refers to a 'review' of aviation impacts. This implicitly accepts that the proposed development does have 'impacts' on aviation – which includes safety, the nature, range and scale of operations, together with planned development and future opportunities. However, as can be seen below and in representations by the aerodrome operators, the actual 'review' is much more narrowly focussed than that. 2. Paragraph 15.1.2 refers to drawing on 'the findings of Alan Stratford and Associates' (ASA). However, no comprehensive report setting out the scope of the work undertaken by ASA is provided. Their skills and understanding of the aviation activities affected are unknown. Their instructions have not been provided. As will be demonstrated below, the 'findings' are narrowly based and do not fully or adequately contribute to any proper evaluation of aviation impacts.	proximity of aerodromes, with the stated aim of the assessment being to evaluate safety, operational and capability impacts arising as a result of the Project's presence. 2. The scope of the Applicant's appointed aviation consultants, independent specialists with substantial experience in operational safeguarding evaluation for UK aerodrome (see paragraph 15.1.2 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267**]) , was to provide independent technical assessment of aviation safety, operational and capability impacts, in support of the Applicant's responsibilities, in accordance with of EN-1 and EN-5 (2024) As previously stated the Applicant's position is that collectively **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265]**, supported by **6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266]** and **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** provide a comprehensive assessment of Project impacts on aviation and associated socio-economic, recreation and tourism impacts.
REP2-050	General Aviation Awareness Council	National Planning Policy 1.1 In paragraph 15.2.6, the applicant's reference to the wording of EN-1 is factually correct but its requirements have not been adhered to. The level of consultation with Raydon Wings, Priory Farm, Tibenham and Chase Farm airfields has been superficial and comments made by the aerodromes	In addition to paragraphs 15.2.3 to 15.2.13 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**, **5.6 Planning Statement [APP-085]** and **5.7 Policy Compliance Document [APP-086]** summarise the Applicant's accordance with national planning policy, including

Ref	Name	Matter Raised	Applicant's Response
		have not been incorporated into the assessment of the proposal on aviation. Neither has there been consideration of operational or cumulative effects, for example the relationship between Priory Farm and Tibenham aerodrome operations.	EN-1 (2024), EN-5 (2024) and the National Planning Policy Framework, as relevant to aviation. **1.1 Draft Statement of Common Ground – Chase Farm Airfield [REP1-101], Draft Statement of Common Ground - Raydon Wings Aerodrome [REP1-103], Draft Statement of Common Ground – Priory Farm Airfield [REP1-104]** and **Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]** provide chronologies of the Applicant's engagement with the aerodrome operators in accordance with para. 5.5.39 of EN-1. The Applicant is confident that the consultation undertaken was fully compliant with **5.1 Consultation Report – Appendix E: Statement of Community Consultation (SoCC) and supporting evidence [APP-071]** and legislative requirements under the Planning Act 2008. As previously referenced, para. 15.3.3 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** recognises the proposed Project represents a new obstacle within the proximity of aerodromes, with the stated aim of the assessment being to evaluate safety, operational and capability impacts arising as a result of the Project's presence. The Applicant's consideration of cumulative impacts as culminating from existing and proposed electricity network infrastructure in the vicinity of aerodromes is evidenced in the impact assessment for Thurrock aerodrome, resulting in significant changes to the Project design to minimise adverse impacts (see paras. 15.4.19 to 15.4.21). As recognised within **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**, deconfliction

Ref	Name	Matter Raised	Applicant's Response
			of interactions in flight procedures between Priory Farm and Tibenham aerodrome was considered within the relevant impact assessment, but we suggest this is a moot point in view of the conclusion Priory Farm circuit patterns need not change.
REP2-050	General Aviation Awareness Council	1.2 EN-1 is also quoted at its paragraph 15.2.7 but the applicant has not included any mitigation measures as an integral part of the proposed development, contrary to the principles of this and subsequent paragraphs. 1.3 Paragraph 15.2.8 of the Applicant's document draws attention to paragraph 5.5.50 of EN-1 which states: '…the SoS should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes, and that realistically achievable mitigation is carried out ….' 1.4 The proposed route was identified before any attention was given to the existence or proximity of airfields. No change has been made to the route to take account of the existing airfields. It is clear, therefore, that the provisions of EN-1 have not been taken into account. 1.6 There is no evidence that the provisions of paragraph 5.5.50 of EN-1 have been followed. No information or evidence has been put forward by the promoter to demonstrate that the design of the scheme or the route of the proposed overhead pylon line has been to identified so as to 'minimise adverse impacts'.	1.2, 1.3, 1.4 and 1.6 In accordance with Applicant responsibilities defined within paras. 5.5.43 and 5.5.50 of EN-1 (2024) design-based mitigations, including realignment of the proposed overhead line, and reductions to pylon heights (as described within paras 15.3.49 to 15.3.50 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**) were implemented where determined to be justified by potential aviation impacts. This is evidenced as per the General Aviation examples previously given of Brook Farm airfield (see paras. 5.4.43 to 5.4.44 of **7.21 2024 Design Development Report for the Project [APP-359]** and 5.1.1 to 5.1.3 of **5.1.5 Design Development Report [APP-122]**), Raydon Wings aerodrome (see paras. 5.4.104 to 5.4.110 of **7.21 2024 Design Development Report for the Project [APP-359]** and Thurrock aerodrome (see paras. 11.1.1 to 11.1.15 of **5.1.5 Design Development Report [APP-122]**). Furthermore, a design change was implemented to realign the overhead line to increase separation distances from South Norfolk Model Aircraft Club (see paras. 4.3.3 to 4.3.4 of **5.1.5 Design Development Report [APP-122]**).

Ref	Name	Matter Raised	Applicant's Response
REP2-050	General Aviation Awareness Council	1.5 EN-1, quite correctly, notes that the CAA requires licensed civil aerodromes to comply with 'obstacle limitation surfaces' and have safeguarding arrangements in place. It also notes CAA guidance also recommends that all aerodrome operators should take steps to protect their aerodrome from the possible effects of development. However, ASA has not applied the appropriate parameters in its assessment, consistently arguing that CAA protection extends only to licenced aerodromes. Furthermore, ASA also rejects there being any case there for safeguarding principles, as set out by the CAA, to be varied in order to cater for the specific aerodrome operations or location. Therefore, the Applicant has not complied with the provisions of paragraph 5.5.50 (November 2023), (5.5.52 December 2025).	1.5 The Applicant does not recognise this account. As described within **8.8.1 Applicant's Comments on Written Representations [REP2-029],** and specifically the Applicant's response to the **Norfolk Gliding Club Written Representation [REP1-254]**, the Applicant does not dispute operator responsibilities for safeguarding nor aerodrome-specific considerations therein. The Applicant urges distinction between safeguarding and its own undertaking of aviation impact assessments (in accordance with EN-1 (2024) requirements, see paras. 5.5.37 to 5.5.42) focused on obstacle clearance and consideration of the significance of Obstacle Limitation Surface (OLS) infringement amongst other factors. The Applicant's approach is described within para 15.3.27 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267],** which recognises OLS consideration to be a best practice, standardised and objective measure for obstacle assessment, as defined under the CAA CAP 168 regulations for licensed aerodromes[2]. The Applicant has consistently applied these best practice parameters to all civil aerodromes within scope.
REP2-050	General Aviation Awareness Council	1.7 It is important to record that there was no mention of aviation in the first route selection report (East Anglia Green Energy Enablement (GREEN) Corridor and Preliminary Routeing and Siting Study Report, April 2022). Only one aerodrome is mentioned – Stow Maries - but this reference related solely to its historic	1.7 and 1.8 Refer to previous comments regarding the Applicant's early recognition of potential aviation impacts within **6.19 Scoping Report [APP-296]** (see para. 5.7.3) and **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** (see Table 3.3).

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

Ref	Name	Matter Raised	Applicant's Response
		value and listed status, not to the activities that currently takes place. 1.8 No other active general aviation aerodrome was mentioned and neither was the sport, recreation, training or connectivity value and importance of general aviation airfields addressed or considered to be a material consideration.	
REP2-050	General Aviation Awareness Council	1.8 Paragraph 15.2.9 of the Applicant's document notes that EN-1 places an obligation on aerodrome operators to agree reasonable changes to operating procedures. This is sound but the applicant is also required to demonstrate '… necessity, acceptability and reasonableness' which has not been done.	1.8 Para. 5.5.51 of EN-1 (2024) relates to the Secretary of State's assessment of necessity, acceptability, and reasonableness of operational changes to aerodromes. The Applicant's impact assessment has enabled demonstrable risks or evidence of harm to justify the integration of design-based mitigation, where necessary. The Applicant has suggested operational mitigation measures but recognises operator responsibilities to consider the acceptability of residual risks, or if operational changes are required. This is consistent with safety risk management principles as described within the CAA's CAP 1059[3] guidance.
REP2-050	General Aviation Awareness Council	1.9 If the initial route selection had been undertaken thoroughly it is highly likely that relatively small modifications could have been identified which would have avoided the adverse impacts on General Aviation aerodromes which are now evident. 1.10 The GAAC accepts the need for network enhancement. However, if National Grid had carried out proper evaluation in 2022, it would have avoided,	1.9 and 1.10 The Applicant has correctly interpreted EN-1 and the CAA guidance and adopted an approach that is responsive to the potential interaction between the network reinforcement project and airfields. This interpretation is that it is appropriate for both parties to engage in reasonable adjustments rather than only being the network reinforcement project that must adjust. The Applicant's view is also that the comments are speculative and fail to appreciate the entirety of the Applicant's

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

Ref	Name	Matter Raised	Applicant's Response
		or at least substantially reduced, the time and cost of now seeking to defend its route.	responsibilities in accordance with EN-1, including assessment of a range of competing environmental constraints. They also fail to appreciate the consequences of alternative routes or technology selection. And greater effects through longer routes and at increased cost to electricity consumers. It is also the case that where appropriate to do so, the Applicant has modified the Project either by changes to routeing, changes to pylon type and is actively working with one site to support the relocation of the airstrip.
REP2-050	General Aviation Awareness Council	1.11 Paragraph 15.2.10 of the Applicant's document refers to mitigation with the overarching purpose of avoiding economic loss, harm to training and safety risks. However, the applicant has not attempted to quantitatively or qualitatively assess economic loss, harm to training or recreational value. Its appraisal of safety risks is not comprehensive. Overall, the applicant's engagement with aviation operators, to date, has not been constructive.	1.11 The Applicant's assessment of socio-economic, recreational and tourism impacts associated with aviation sites is addressed within **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265],** supported by **6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266]**. **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** provides a comprehensive assessment of aviation safety impacts.
REP2-050	General Aviation Awareness Council	1.12 The position of National Grid in all early discussions was that its advisors stated there would be no adverse impact on general aviation activity and only a small risk to aviation safety. National Grid's advisors insisted that it would only consider route changes if the CAA Civil Aviation Publication (CAP) 168 safeguarding provisions were infringed. Generally, these provisions are not directly relevant to General Aviation aerodromes, however, as set out below, other safety requirements must be met.	1.12 and 1.14 The Applicant does not recognise this account, and in contrast, our consideration and mitigation of identified site-specific adverse impacts on general aviation aerodromes (including safety, operational and capability impacts as described within paragraph 15.3.3 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]**). is demonstrated by the implementation of the changes to the Project's design in the examples previously referenced. The

Ref	Name	Matter Raised	Applicant's Response
		National Grid's advisors have consistently set aside these safety requirements. 1.14 The Applicant's lack of consideration of the issues set out in paragraphs 15.2.6 – 15.2.10 may derive from its failure adequately to address relevant planning policy and its misinterpretation of the provisions of the Air Navigation Order. This is addressed below.	Respondent's comments regarding the Applicant's compliance with national policy and interpretation of relevant aerodrome-specific legislation and regulation are addressed in detail below.
REP2-050	General Aviation Awareness Council	National Planning Policy Framework 2.1 The Applicant's paragraph 15.2.12 refers to the National Planning Policy Framework (NPPF), however it only refers to some of its provisions and salient policy statements are omitted. In particular, It omits paragraph: 111 of the Framework which states: 'Planning policies should: f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the General Aviation Strategy,' 2.2 None of the relevant qualitative considerations in the NPPF have been considered. The affected aerodromes are businesses with rigorous operational and safety requirements to be operating. Their current and potential future value – not only in monetary terms but also in recreational, business, training and emergency activity terms has not been addressed at all by the Applicant. As stated in paragraph 111(f) airfields do need to adapt and change over time and the proposed pylon route creates both current and potential future restrictions on their operations. 2.3 In addition, the NPPF recognises the importance and value of general aviation aerodromes for sport.	2.1 Paragraph 15.2.12 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** specifically references paragraph 111 of the NPPF and details the policy considerations as described by the Respondent. 2.2 As previously stated, the Applicant's assessment of socio-economic, recreational and tourism impacts associated with aviation sites is addressed within **6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265],** supported by **6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266]**. 2.3 and 2.4 Para. 15.4.22 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** recognises Tibenham aerodrome's designation as a national Significant Area for Sport (SASP) by Sports England. This status is also recognised within **6.15.A1 Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266]**. 2.5. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** assessment has considered the NPPF and assessed the potential effects on community facilities

Ref	Name	Matter Raised	Applicant's Response
		Sport England recognises all flying activities as 'sports' in planning policy terms. This means that aerodromes are sports venues and therefore the relevant planning policies as set out in the NPPF to protect Sports Venues apply to general aviation aerodromes, as identified below. 2.4 Tibenham Aerodrome is identified by Sport England as a National Significant Area for Sport (SASP). It is also identified in the whole Strategic Aerodrome Network (SAN) as of Regional Significance. Tibenham Priory Farm is identified as of Local Significance in the SAN. 2.5 Paragraph 88 of the NPPF states: 'Planning policies and decisions should enable: d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.' 2.6 Paragraph 96 of the NPPF states ' Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:… c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green Page 8 of 18 infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.' 2.7 Paragraph 98 if the NPPF states: 'To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions	within the Local Study Area. No significance adverse effects have been identified following mitigation. 2.6. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** assessment has considered the NPPF and assessed the potential effects on community facilities, recreational land and recreational routes within the Local Study Area. No significant adverse effects have been identified following mitigation. **6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]** assessment has considered the NPPF and assessed the potential effects on health and wellbeing. 2.7, 2.8, 2.9, 2.10 and 2.11. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** assessment has considered the NPPF and assessed the potential effects on community facilities within the Local Study Area, and sports clubs, businesses, recreational land and recreational routes within the 3 km Study Area. Appropriate mitigation measures have been provided in **7.2 Outline Code of Construction Practice [REP2-014]** to mitigate potential impact on receptors. 2.12. The Socio-economics, Recreation and Tourism ES assessment has been guided by various EIA guidance documents and further developed following different thematic group engagement throughout the EIA stages.

Ref	Name	Matter Raised	Applicant's Response
		should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;…' 2.8 Paragraph 103 states: 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.' 2.9 Paragraph 104 underlines the need to retain sports facilities. It refers to their loss through development but such loss could also be caused by changes to the local flying environment. 2.10 A further, highly relevant element of the NPPF, paragraph 200, makes clear that the existence of a community facility and /or sports venue takes precedence over a new development. This provision has been specifically applied to airfields by Planning Practice Guidance Paragraph: 014 Reference ID: 30-014-20190722.	

Ref	Name	Matter Raised	Applicant's Response
		2.11 Paragraph 200 states: 'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.' 2.12 The sport and recreational value of general aviation aerodromes has not been accorded appropriate weight by the scheme promoter. The value and function of the established general aviation businesses and community facilities have not been adequately considered or taken into account in National Grid's scheme design, contrary to the provisions of the NPPF.	
REP2-050	General Aviation Awareness Council	Aviation Regulation and Related Guidance 3.1 Paragraph 15.2.14 of the Applicant's document is an incorrect description / interpretation of the Air Navigation Order. Paragraph 15.2.14 states: The Air Navigation Order (ANO) 2016 (as amended) (UK Government, 2016) is the statutory instrument that establishes UK regulations for civil aviation matters, including safety management. The ANO requires that, in the UK, flights for the public transport of passengers, and for certain types of flying	3.1 to 3.4 The Applicant does not dispute that Air Navigation Order (ANO) 2016 is applicable to all civil aviation matters. Paragraph 15.2.14 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** is correctly quoted by the Respondent, but misinterpreted. The Applicant's comments regarding relevance relate to Aerodromes UK Regulation (EU) 139/2014 and its applicability to certificated aerodromes.

Ref	Name	Matter Raised	Applicant's Response
		instruction, take place at a certified, licensed or government (military) aerodrome. The minimum standards for certified aerodromes are established in Aerodromes UK Regulation (EU) 139/2014 (UK Civil Aviation Authority, 2025) but are not directly relevant as no certified aerodromes have been identified within the scope for assessment (see Section 15.3). Regulatory Article (RA) 3512 (Ministry of Defence, 2023) is relevant to military aerodromes (such as Wattisham Flying Station, see Table A15.2.1) and addresses OLS definition requirements.' 3.2 The wording highlighted in red above is not correct. ANO 2016 Article 240 applies to any aerodrome. It states: Endangering safety of an aircraft Article 240 states 'A person must not recklessly or negligently act in a manner likely to endanger an aircraft, or any person in an aircraft.' [our emphasis] 3.3 ANO Article 265 defines offences and penalties for contravention of the provisions of the Order. 3.4 There is no basis to assert that the provision of the ANO applies only to 'certified' aerodromes. 3.5 There is little information in the documents about maintenance of the proposed overhead cables. National Grid's website refers drones revolutionising the maintenance of grid infrastructure. Drones would create an added threat to aviation safety in the vicinity of the aerodromes along this route.	3.5 Uncrewed Aircraft Systems (UAS) are deployed by National Grid for a range of use cases, primarily condition assessment of existing assets and in support of major construction developments. All internal UAS operations are managed under a single CAA authorisation, Accountable Manager, and Operations Manual, that are in full compliance with UK Regulation (EU) 2019/945 and 2019/947 and CAA guidance (CAP 722[4]). In National Grid's eight-year history of UAS deployment, there have been no recorded AIRPROX events as a result of robust pre-flight planning and operational procedures. Where the presence of aerodromes in proximity to planned flights is identified, they will be contacted to discuss the flight plan and ensure safe separation of crewed and uncrewed aircraft. Where the UAS operation lies within controlled or restricted airspace, the relevant contact will be made to gain permission for airspace access prior to any flight taking place. Section 4.10 of **6.4 Environmental Statement Chapter 4 – Project Description [APP-130]** describes the activities that are anticipated during the operational phase including site inspections and route maintenance. As an aviation operator including of helicopters and UAS, alongside holding membership with ARPAS UK (the non-profit trade association representing the commercial drone industry) National Grid takes the need to safely integrate crewed and uncrewed aerial operations seriously. Remote Pilots are trained in their response to the presence of crewed aviation in the vicinity of operation and

[4] Civil Aviation Authority (2024) CAP 722: Unmanned Aircraft System Operations in Uk Airspace - Guidance

Ref	Name	Matter Raised	Applicant's Response
			alongside this, overhead line surveys typically take place proximal to National Grid infrastructure, further reducing the likelihood of a mid-air collision.
REP2-050	General Aviation Awareness Council	4. CAP 738: Safeguarding of Aerodromes 4.1 The Applicant correctly states that CAP 738 (paragraph 1) provides advice and guidance to '…certified, licensed and non-licensed aerodromes…' Paragraph 7 of CAP 738 also states that whilst it considers the aerodrome operator of certificated and licensed sites to hold expert opinion on safeguarding their site, it does not '…hold a view on safeguarding at non licensed sites.' 4.2 However, other advice is relevant and should be taken into account. In particular, the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 Annex 1 – Circular 1/2003 states: 'Other civil aerodromes Operators of licensed aerodromes which are not officially safeguarded, and operators of unlicensed aerodromes and sites for other aviation activities (for example gliding or parachuting) should take steps to protect their locations from the effects of possible adverse development by establishing an agreed consultation procedure between themselves and the local planning authority or authorities. One method, recommended by the Civil Aviation Authority to aerodrome licensees, is to lodge a non-official safeguarding map with the local planning authority or authorities. Local planning authorities are asked to respond sympathetically to	4.1 to 4.3. The Applicant agrees with the position of the Respondent that aerodrome operators which are not officially safeguarded should take steps to protect their aerodrome from the possible effects of development by establishing an agreed consultation procedure between themselves and the LPAs, as stated within para. 5.5.14 of EN-1 (2024), which also references DfT/ODPM Circular 01/2003 and CAA guidance. The Applicant recognises, as per para. 5.5.16 of EN-1 (2024) that for General Aviation aerodromes this is the responsibility of the operator. 4.4 Para. 15.2.16 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** recalls the stated aim of all safeguarding, according to CAP 738[5] guidance (see para. 5), is to assess the implications of any development being proposed within the vicinity of an established aerodrome to ensure, *as far as practicable* [our emphasis], that the aerodrome and its surrounding airspace are not adversely impacted by the proposal, thus enabling the continued safety of aircraft operating at the location. The Applicant strongly agrees that consideration of best practice standards ensures the consistent and appropriate assessment of the aviation operational safety, hence its assessment of the Project's infringement of OLS, as defined under the CAA's CAP

[5] Civil Aviation Authority (2020) Safeguarding of Aerodromes CAP 738

Ref	Name	Matter Raised	Applicant's Response
		requests for non-official safeguarding. The general advice in this Annex is applicable to non-officially as well as to officially safeguarded aerodromes, but the requirements of the Direction at Annex 1 will not apply. The Civil Aviation Authority is prepared to offer advice on the preparation of a non-official safeguarding map at the request of any aerodrome operator or local planning authority.' [our emphasis] 4.3 In addition, the CAA Combined Aerodrome Safeguarding Team publication GA1: Safeguarding Guidance to General Aviation Aerodrome Managers & Operators states 'Whilst, therefore, it is not a requirement for an unlicensed aerodrome to have a safeguarding arrangement it is a very good idea to do so.' 4.4 Therefore, it is clearly best practice, recently reinforced, for all unlicensed aerodromes to ensure a safe operating environment is maintained and for this to be accorded weight when new development proposals are under consideration. To be sufficiently safe, an unlicensed aerodrome must meet most of the standards set by the UK CAA licensing regime.	168[6] regulations for licensed aerodromes, for all civil aerodromes in scope (see para. 15.3.27 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**).
REP2-050	General Aviation Awareness Council	5. CAP 793: Safe Operating Practices at Unlicensed Aerodromes 5.1 CAP 793 is referred to in paragraph 15.2.18. The Applicant has not articulated the relevance of CAP 793. Prior to 2010, all flying training was required to be undertaken at licenced aerodromes. This was changed in April 2010 by an amendment to the Air	5.1 The relevance of CAP793 to the Applicant's assessment methodology is explained at para. 15.3.23 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267].** 5.2 to 5.7 The Applicant does not recognise this description of its position regarding safeguarding, which is referenced in the previous response. Also as

[6] Civil Aviation Authority (2025) CAP 168: Licensing of Aerodromes

Ref	Name	Matter Raised	Applicant's Response
		Navigation Order (ANO) 2009 which allows some flying training to take place at unlicenced aerodromes. 5.2 The Applicant implies that unlicensed aerodromes are less important and less worthy of safeguarding protection than licenced sites. 5.3 The ANO change demonstrates that the protection of unlicensed aerodromes should be given comparable weight as that applied to licensed sites. The relaxation related to training, not to status or safeguarding. 5.4 This is reinforced by Chapter 1 paragraph 2 of CAP 793 which refers to the 'sound practice' of safeguarding. In particular, attention is drawn to paragraph 4 which states, '…where flying training is taking place additional safety margins should be considered.' Paragraph 9 also states, 'This publication is written primarily to cover unlicensed aerodromes used by aeroplanes. Less demanding criteria my apply to aerodromes solely uses by helicopters, gyroplanes or microlights.' 5.5 And, further, by paragraph 8 which states: 'The fact that an aerodrome is unlicensed does not preclude compliance with the ANO or the Rules of the Air Regulations.' 5.6 Chapter 2, paragraph 3.2 confirms HM Government advises that aerodrome owners should take steps to safeguard their operations. 5.7 Chapter 4, paragraph 2 states: 'The physical characteristics required of a licensed aerodrome are detailed in CAP 168 Licensing of Aerodromes,	previously stated, the Applicant's has applied the same CAP 168-derived parameters to its assessment of aviation impacts for licensed and unlicensed aerodromes (see para. 15.3.27 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**). 5.8 Consistent with Chapter 4, paras. 5.1 to 5.4 of CAP 793[7] the Applicant describes within paras. 15.3.49 to 15.3.51 of **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]** the range of mitigation measures that have been applied or considered to minimise adverse impacts and/or reduce residual effects. The Applicant position, aligned with CAP 793 guidance, is that the absence of obstacles in proximity to an aerodrome is not an absolute requirement. Risks associated with obstacles may be minimal or capable of being mitigated to acceptable levels. 5.9 The Applicant agrees with the position of Norfolk Gliding Club (operator of Tibenham aerodrome) as stated within its **Written Representation [REP1-254]** that the degree or significance of an increased risk to aviation associated with the proximity of the Project to the aerodrome requires consideration (see para. 7.3). We also note the operator's position that powered aircraft should be able to depart and overfly the proposed overhead line with a sufficient safety margin (see para. 8.4) which contrasts within the Respondent's statement. Our response within **8.8.1 Applicant's Comments on Written Representations [REP2-029]** refers to the

[7] Civil Aviation Authority (2010) CAP 793 Safe Operating Practices at Unlicensed Aerodromes

Ref	Name	Matter Raised	Applicant's Response
		available via www.caa.co.uk/cap168. While the licensing criteria may not be necessary for safe operation of every type of aircraft, they can be used as guidance on which the layout of an unlicensed aerodrome may be based.' 5.8 Paragraph 5.1 goes on to address obstacles, stating, 'Anything that, because of its height or position, could be a hazard to an aircraft landing or taking off should be conspicuously marked if it cannot be practicably removed or minimised.' However, this proposed obstacle is not capable of being removed or minimised. In addition, in an emergency, marking has no value as any form of mitigation. 5.9 The specific circumstances at Tibenham Aerodrome underline the failure adequately to take account of the provisions of CAP 793. Paragraph 15.2.18 acknowledges the CAP 793 requirement to have no obstacle of 150 ft within 2000 m of a runway mid-point (a climb gradient of 2.286%). The proposed pylons are 2300m from the centre of Tibenham's runway 26 but are a continuous obstacle of at least 180ft (a climb gradient of 2.385% which is 4% greater than that implied by CAP793)	aerodrome-specific impact assessments undertaken to detail and quantify the extent of impacts, as described within **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]**. Para 15.3.23 explains how the Applicant methodology enables more nuanced appraisal of multiple risk factors, in comparison to the 150 ft/2000 m measure recommended (not required) in relation to runway design within CAP 793 guidance. The latter approach does not distinguish where an obstacle is in relation to a runway, and does not consider runway length, aircraft performance, flight paths and existing operational procedures, or the surrounding context in terms of topography and existing obstacles (including other overhead lines).
REP2-050	General Aviation Awareness Council	15.3 Scope of the Assessment, Overview 1. EN-1 which is introduced in paragraph 15.3.1 of the Applicant's document, makes no distinction between different 'categories' of aerodrome in the protection it affords. 2. The provisions of EN-1 include the following: • Paragraph 5.5.1 states: 'All aerodromes, covering civil and military activities, as well as aviation technical sites, meteorological radars	1.Paras 5.5.8 to 5.5.20 of EN-1 (2024) recognise the various safeguarding systems applied to different categories of aerodrome. Notwithstanding this and as previously explained, the Applicant's applied assessment parameters do not distinguish between licensed and non-licensed civil aerodromes. 2. and 3. **5.7 Policy Compliance Document [APP-086]** describes how the Applicant has complied with the applicant requirements of EN-1 (2024) relevant to

Ref	Name	Matter Raised	Applicant's Response
		and other types of defence interests (both onshore and offshore) can be affected by new energy development.' • Paragraph 5.5.2 states: 'Collaboration and co-existence between aviation, defence and energy industry stakeholders should be strived for to ensure scenarios such that neither is unduly compromised.' • Paragraph 5.5.5 states: 'UK airspace is important for both civilian and military aviation interests. It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure. Likewise, it is essential that aerodromes, aircraft, air systems and airspace operators work collaboratively with energy infrastructure developers essential for net zero. Aerodromes can have important economic and social benefits, particularly at the regional and local level, but their needs must be balanced with the urgent need for new energy developments, which bring about a wide range of social, economic and environmental benefits.' • Paragraph 5.5.12 states: 'The CAA's CAP 738 sets out that all licensed aerodromes are required to ensure they have a system in place to safeguard their aerodrome against the	aviation. Paras. 15.3.1 to 15.3.48 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** provide an overview of the Applicant's assessment approach as well as a detailed description of the Applicant's assessment methods. 4. to 10. The Applicant is cognisant of aviation safety risk management principles including operator responsibilities to review risks and consider measures to mitigate risk to as low reasonably practicable (ALARP) levels as described within CAP1059[8], considered applicable to General Aviation aerodromes. As per the Respondent's descriptions of comparable guidance within CAP738 and CAP760, the Applicant does not dispute that these advised risk management principles are relevant to operators. Again, the Applicant wishes to distinguish between operator safeguarding responsibilities and its own applicant responsibilities as particularly defined within paras 5.5.37 to 5.5.43 and 5.5.49 to 5.5.50 of EN-1 (2024). With regard to mitigation, para 5.5.43 requires the applicant to include appropriate mitigation measures as an integral part of the proposed development. Furthermore, para. 5.5.50 states that the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes. The Applicant's position is that its undertakings are in compliance with EN-1 requirements and complementary, but separate, to operator risk management activities.

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

Ref	Name	Matter Raised	Applicant's Response
		growth of obstacles or activities that may present a hazard to aircraft operations.' • Paragraph 5.5.14 goes on to state: 'The DfT/ODPM Circular 01/2003196 and CAA guidance also recommends that the operators of aerodromes which are not officially safeguarded should take steps to protect their aerodrome from the possible effects of development by establishing an agreed consultation procedure between themselves and the LPAs.' • Paragraph 5.5.16 states: 'The CAA makes clear that the responsibility for the safeguarding of General Aviation aerodromes lies with the aerodrome operator.' • Paragraph 5.5.50 states: 'In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes….' 3. This first part of the Applicant's 'Scope of the Assessment' has not taken account of the salient issues set out in EN-1 and identified above. The method of assessment set out in Sections 5.3.4 – 5.3.35 of the Applicant's document similarly lack rigor or serious 'assessment'. The conclusions in Section 5.4 are not supported by any proper assessment, as we set out below. 4. In the 'Assessment Approach' there is no mention of the ALARP principles. Paragraph 5 of CAP 738 states: 'The common aim of all safeguarding is to assess the implications of any development being	11.The Applicant requests that the Respondent clarify its assessment that the 'cost of the potential risk generated by the proposed development is high'. It is important to understand if this risk has been determined from evaluation of both the severity of a potential incident arising as a result of the presence of the Project as an obstacle, which could be high, and the likelihood, which may be low, depending on site-specific considerations. Please can the Respondent clarify if this evaluation is its own, or from the aerodrome operator(s), and whether it is considered in relation to the entire Project, or specific to particular sites. Appendix 1 of CAP1059 provides a matrix defining thresholds to assist operators in the determination of risk tolerability. This matrix demonstrates that even in circumstances where the severity of a risk may be assessed to be catastrophic (defined as resulting in death or equipment destruction), risks are not assumed to be unacceptable as, for low likelihood risks, review may identify mitigation measures to reduce to ALARP, with the potential for residual risk to be deemed acceptable. The Applicant recognises that the proposed Project represents a new obstacle in the vicinity of aerodromes and is therefore a hazard that should be subject to evaluation via appropriate safety management systems. Whilst the severity of potential aircraft collision incidents resulting from the presence of the proposed overhead line may have severe consequences, risk likelihood may be low, and although difficult to determine statistically, has been considered within in-depth aerodrome-specific

Ref	Name	Matter Raised	Applicant's Response
		proposed within the vicinity of an established aerodrome to ensure, as far as practicable, that the aerodrome and its surrounding airspace is not adversely impacted by the proposal, thus ensuring the continued safety of aircraft operating at the location.' 5. CAP 738, paragraph 3.2 requires the aerodrome operator to assess the risks to safeguarding to include the following: 'as a minimum: a) any development or change in land use in the aerodrome area;' 6. The CAA's CAP 760 also provides '*Guidance on the Conduct of Hazard Identification, Risk Assessment and the Production of Safety Cases' which is sub-titled, 'For Aerodrome Operators and Air Traffic Service Providers*' – and which again confirms how and where the assessment and mitigation of risk is to be managed. 7. CAP 760 was prepared to '…enhance safety regulation and potentially enhances safety performance…' 8. 8. It defines 'ALARP', (As Low As Reasonably Practical) as: '*A risk is low enough that attempting to make it lower, or the cost of assessing the improvement gained in an attempted risk reduction, would actually be more costly than any cost likely to come from the risk itself.*' 9. The principle of ALARP was established in a 1949 court case in the UK, is internationally recognised and is applied throughout the nuclear industry and was codified in the 1974 Health and Safety at Work Act. The principle applied through industry is	assessments undertaken in accordance with the Applicant's responsibilities (defined within EN-1 (2024) 5.5.37 to 5.5.42). The Applicant has presented its assessment conclusions to aerodrome operators, several of whom have concurred with the conclusions and agreed that the Project is acceptable in terms of assessed aviation safety impacts (for example, as described within **5.9.22 Signed Statement of Common Ground – Barnards Farm Airfield [REP1-050]**). The examples of Brook Farm and Thurrock aerodromes, and South Norfolk Model Flying Club demonstrate where risk tolerability has been agreed following the Applicant's implementation of appropriate changes to the Project design to minimise adverse safety and operational impacts, in accordance with EN-1 requirements (see **5.9.32 Signed Statement of Common Ground – Brook Farm aerodrome [REP1-061**), **5.9.23 Draft Statement of Common Ground – Thurrock Airfield [REP1-052]** and **8.3.34 Draft Statement of Common Ground – South Norfolk Model Flying Club [REP1-102]**. In instances where operators are yet to agree with Applicant conclusions that risks are acceptable, we suggest there remains opportunity for further collaborative review involving the consideration of reasonable mitigation measures and the operator's acceptance of any residual risk. In only one instance (the case of Chase Farm) have the Applicant and the operator agreed that safety risk would be unacceptable unless major mitigation measures were implemented. The operator is considering whether the proposed mitigations (to re-align or re-locate the

Ref	Name	Matter Raised	Applicant's Response
		that the operator must analyse hazards, determine the risks and take appropriate actions to reduce the risks. 10. Whilst the main focus of CAP 760 is on internal systems it is equally applicable to external threats. 11. In this case, the cost of the potential risk generated by the proposed development is high and the Applicant has not demonstrated this risk is tolerable. The Applicant did not include the consideration of major disasters (including loss of life caused by aircraft accidents) in its Environmental Impact Assessment Scoping document. It did not, therefore, consider the potential effects of its proposals on general aviation or aviation safety. 12. In paragraph 15.3.5, no detail is provided of any of the data obtained – for example LiDAR. 13. The NPPF definition of general aviation airfields is 'Licenced or unlicenced aerodromes with hard or grass runways, often with extensive areas of open land related to aviation activity.' It makes no distinction between licensed or unlicensed which underlines the flaws of the 'Scope of the Assessment.' 14. Paragraph 15.3.6 notes that the consultant's 'professional judgement' originally applied a 2km radius for its assessment. As stated in paragraph 15.3.7, on the advice of the CAA, this was extended to a 5km radius. The CAA's Airfield Advisory Team (AAT) may now have been disbanded but the CAA has not indicated that its advice has been withdrawn. This underlines our	aerodrome runway) are practical or viable and if residual risk can be accepted (see **8.3.33 Draft Statement of Common Ground – Chase Farm Airfield [REP1-101]**. The Applicant's early recognition of potential aviation impacts within **6.19 Scoping Report [APP-296]** (see para. 5.7.3) has previously been addressed. 12. As stated within para. 15.3.5, LiDAR information has directly informed impact assessments. The data also informed technical drawings shared with aerodrome operators to illustrate and explain assessment calculations. 13. To repeat, aligned with the NPPF glossary definition of General Aviation airfields, the Applicant impact assessment parameters do not distinguish between licensed and unlicensed airfields. 14. As described within para. 15.3.6 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]**, the 2 km radius distance initially proposed for the Aviation Impact Study Area responded to the generic CAP793 recommendation for runway positioning to avoid obstacles greater than 150 ft within 2 km of the runway mid-point. The radius was extended and remains at 5 km following engagement with the CAA AAT. Para. 15.3.15 reflects that CAA AAT consultation resulted in development of Study Area parameters, mutual recognition of multiple site-specific risk factors, and independent peer review of impact assessments. The Applicant agrees the advice within the CAA AAT's Position Statement (March 2025) remains extant, albeit dated and limited in scope. Our consideration of the advice is further

Ref	Name	Matter Raised	Applicant's Response
		concerns about the 'professional judgement' applied in other parts of this report. 15. As is clear from paragraph 15.3.27, the CAA does not define an 'acceptable' obstacle clearance. The aerodrome operator is the expert responsible for ensuring ongoing safety of the airfield and its surroundings. 16. There is no foundation for the assertion in paragraph 15.3.28 and 15.3.36 that an obstacle clearance height of 100 ft is acceptable. The rules of the air state that a 500ft clearance is required (save for take-off and landing). 17. Paragraph 15.3.38 specifically acknowledges that and '…overhead line may not be fully visible over the nose of an aircraft on take-off and approach…' whilst not proposing any measures to change this. Paragraph 15.3.50 goes on to make reference to marker balls but without any proposal for their use. In any case, as noted above, marking is irrelevant in an emergency – such as engine failure on take-off.	described within **8.8.2 Applicant's Comment on Local Impact Reports [REP2-030]** (see paras. 3.17.5 to 3.17.15) 15. and 16. The Applicant methodology applies a range of assumptions to enable objective, quantified assessments to inform operator consideration of risk acceptability, including minimum obstacle clearances during take-off and approaches (see paras. 15.3.26 to 15.3.28 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267])**. These assumptions are conservative and allow for a range of flying conditions and differing levels of pilot experience. This includes the assumption that, where possible, aircraft turn as soon as practicable on climb-out to avoid the overhead line, to minimise the possibility of a forced landing into it. Should a departure over the overhead line be preferred, the aircraft should overfly the overhead line with a margin of at least 100 feet (30 metres). This vertical clearance should apply within a 5.5° horizontal splay on either side of the runway centreline, to allow for some drift away from the nominated take-off track and should allow for any difference in ground heights between the take-off point on the runway and at the overhead line. The Applicant recognises that the UK CAA publish no recommendation regarding aircraft obstacle clearance margins at unlicensed aerodromes. By means of comparison, the New Zealand CAA recommend a minimum of 50 feet margin over obstacles[9]. The US FAA stipulate a margin of at least 48 feet above

[9] Civil Aviation Authority of New Zealand (2020) Good Aviation Practice: Take-off and landing performance [page 13 refers]

Ref	Name	Matter Raised	Applicant's Response
			obstacles per nautical mile (1,850 m) from a runway end, where an instrument departure is not published[10]. In the UK, large regulated transport aircraft departing licensed aerodromes may clear obstacles by as little as 35 feet in some exceptional circumstances, by design[11]. Further to the above comparators, the Applicant assessment uses a minimum margin of 100 feet (30 metres) as it is a visually discernible difference in height and is clearly defined on most aircraft altimeters. It has also been demonstrated as a practicable margin at other airfields with similar nearby obstacles (for example Peterborough Sibson airfield in Cambridgeshire). The Applicant does not consider the Rules of the Air[12] in relation to low flying to be relevant to assessed overhead line clearances where these relate to aircraft take-off and landing, exempt from low flying prohibitions (see Schedule 1 Section 3 Article 6). This is notwithstanding that the Applicant's lateral minimum clearance assumption specified of 150 m (500 ft) is consistent with the Article 5 "500 feet rule". The Applicant has repeatedly requested clarity from aerodrome operators and aviation bodies with regard to their own perspectives on acceptable minimum clearances to enable objective, quantified risk assessment. We continue to seek constructive discussion on this matter to enable progression of risk

[10] Federal Aviation Administration (2024) United States Standard for Terminal Instrument Procedures (TERPS) [page 2-3 refers]

[11] Civil Aviation Authority (2026) Air Operations UK Regulation (EU) No. 965/2012 [page 1285 refers]

[12] Rules of the Air Regulations 2007

Ref	Name	Matter Raised	Applicant's Response
			acceptability discussions and the consideration of appropriate mitigation measures, where needed. 17. Para 15.3.50 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** makes reference to the Applicant's consideration of the potential integration of marker balls within the overhead line. Para. 15.4.11 specifies this matter relates to ongoing discussions with the operator of Priory Farm aerodrome, who has previously raised visibility concerns. This subject is also referenced within Matter 6.5 of **8.3.36 Draft Statement of Common Ground – Priory Farm Airfield [REP1-104]** which relates to mitigation measures. The Applicant notes extant CAA guidance[13] refers to '*use of marker buoys, such as those that may be fitted to overhead power cables*' recognising the measures may be requested by aviation stakeholders as an effective means of increasing visibility of a structure during daylight periods. This guidance also refers to a GAAC request for the matter of use of daytime markers to be relayed to operators and developers by the CAA on their behalf. With this in mind, the Applicant requests clarity on the GAAC position that marker balls/buoys are an ineffective mitigation measure.
REP2-051	Innova Renewables Limited	This representation is made in respect of IR's Parkgate and Hall Farm projects. In terms of the new material, neither the Interrelationship Report [**REP1-**	The Applicant is in ongoing engagement with Innova Renewables Limited to reach a mutually agreeable

[13] Civil Aviation Authority (2026) Lighting and marking of obstacles, www.caa.co.uk/commercial-industry/airspace/event-and-obstacle-notification/lighting-and-marking-of-obstacles

Ref	Name	Matter Raised	Applicant's Response
		134] nor the Applicant's comments on Innova's representations made at ISH1 [**REP1-132**] take matters further forward. More explicitly, the Applicant has not addressed IR's concerns at all. In respect of IR's Hall Farm BESS project, the Applicant once again notes that justification for inclusion of the Eastern swathe (as referred to by IR, see [**REP1-243**]) is based on the BESS project not coming forward. However, the **Design Development Report** [**APP-122**] notes that the scheme's alignment is subject to IR receiving consent for the BESS project. IR has that consent and expects the Applicant to remove the Eastern swathe from the Order Limits as there is now no justification for its inclusion; contrary to its own case and justification for seeking CA powers.	design having proposed design solutions to Innova Renewables Limited noting their feedback. Until that solution is agreed it is preferential to keep the Eastern swathe option open within the draft DCO for any potential design solutions which may arise from its inclusion. See also further responses below on itemised matters.
REP2-051	Innova Renewables Limited	Of significant concern to IR is the Applicant's current approach in negotiations of using the removal of the Eastern swathe from the Order Limits as leverage to incur more significant impacts on IR's consented infrastructure (near RG4). IR's position is that the Eastern swathe should be removed from the scheme and that interfaces with its site in and around RG4 should be avoided and resolved by the Applicant. In terms of REP1-134, clearly the Order Limits interact with IR's consented project (not the other way round as noted by the Applicant). In respect of Parkgate, IR remains concerned with the reference to panel removal from its site and IR is waiting for a proposal from the Applicant to settle this issue. IR has received the interface agreement letter from the Applicant and is considering this. In terms of the Applicant's	Regarding the Hall Farm Interface, the Applicant has been engaging with Innova Renewables Limited since late 2023 to understand both projects design intentions and accommodate Innova Renewables Limited proposal as best able hence the project adopting the less preferred Western corridor (note while less preferred for the overhead line in isolation this arrangement is preferred for the two project in combination) south of Norwich Main substation to allow room for the battery storage development to the east. As an outcome of that engagement the Applicant, as a stakeholder in the battery storage development, returned "no comment" to the Hall Farm consultations (planning application reference: 2024/3750) as per the design communicated to the Applicant. Innova

Ref	Name	Matter Raised	Applicant's Response
		comments on the RRs [**REP1-132**] this is wholly inadequate and the Applicant has not responded to any comments made by IR to date. Further, no comment has been made regarding IR's status as a statutory undertaker and this needs to be addressed and accounted for. As such, unfortunately, little progress has been made by the Applicant in respect of the concerns raised by IR in written submission and at hearings. Given we are now in March and the DCO application was submitted in August 2025, this is poor progress on the Applicant's part. IR's negotiations with the Applicant are ongoing. On Parkgate, design solutions are still being considered and, as noted, IR is considering the interface agreement letter referred to by the Applicant. On Hall Farm, there is still significant resistance from the Applicant to amend the interactions it has with IR's consented project. It is unfortunate to see this, as minor changes could resolve these interactions and the Applicant should seek changes to its proposal. It should not be for IR to amend its consented proposal, which is a suggestion that has been made by the Applicant. IR again reserves its position on the SoCG for its projects and notes the submission of a further SoCG in respect of Parkgate [**REP1-088**]. IR will keep the ExA updated but to date progress has been very limited and the Applicant has not addressed the comments raised by IR.	Renewables Limited later amended the design post submission of the planning application to situate a drainage pond over known Norwich to Tilbury proposed assets (pylon RG4, haul road and permanent access) locations, of which Innova Renewables Limited was in receipt of the proposed locations provided in December 2024 and as discussed by the Applicant in collaboration with the respondent. The delegated report for the Hall Farm Energy Storage Project shows evidence National Grid was not aware of (and re-consulted on) the amended plans; only the technical consultees were reconsulted. National Grid would have sought to have reached a resolution through the re-consultation. It was only after the decision notice was issued that Innova Renewables Limited notified National Grid of the amended change. Given the significant historic engagement by the Applicant in an attempt to reach what was understood to be a mutually agreed solution, which Innova Renewables then amended to the now conflicting design, Innova Renewables Limited cooperation in reseeking a mutually agreeable solution is requested. Until that solution is agreed it is preferential to keep the Eastern swathe option open within the draft DCO for any potential design solutions which may arise from its inclusion.
REP2-052	Lower Thames Crossing Project	Cover Letter **[REP1-141]**: NH LTC welcome confirmation that application documents will be updated but is concerned about the length of time it will take until these are introduced into	The Applicant notes NH LTC's comments on this matter. The updates to application documents are scheme-wide and require coordinated inputs to the full suite of land-related documents, including, but not

Ref	Name	Matter Raised	Applicant's Response
		the examination. NH LTC fails to understand why an update to documents necessitates such a long delivery time.	limited to **2.2 Land Plans [AS-005]** to **[AS-012]**, **4.3 Book of Reference [AS-018]** and **4.1 Statement of Reasons (Revision C)**. Given the scale of this task, and interdependencies, the current proposal is to submit updated documents at Deadline 5.
REP2-052	Lower Thames Crossing Project	Applicant's Comments on Relevant Representations **[REP1-132]**: The Applicant confirms that it is willing to explore the possibility of NH LTC undertaking Work No.23b as part of its own construction activities. Whilst NH LTC understands that discussions remain ongoing as to the feasibility of this (partly due to the exploration of construction programmes of both projects), NH LTC confirms that should this be agreed, it would wish to see an express transfer of the benefit of the order in relation to Work No.23b in Article 6 (Benefit of Order) of the draft DCO, rather than a transfer needing to be granted and consented to at a later date under Article 7 (Consent to transfer benefit of Order). Similarly, NH LTC advocates the benefit of works to provide the replacement compensatory woodland, being expressed granted in NH LTC's favour in the draft DCO.	The Applicant notes NH LTC's comments. Discussions between the parties are ongoing regarding the temporal and spatial interfaces between the projects, which would identify the most appropriate party to undertake the works referenced. To support these discussions, the Applicant shared a draft construction programme, alongside overlay plans with the NH LTC in January 2026. The Applicant is aware of NH LTC's emerging preferences as regard the inclusion of additional drafting within the draft DCO. In principle, the Applicant has no concerns with the suggestions made by NH LTC in that respect. The Applicant notes that matters of detailed drafting remain subject to further discussion between the parties, with the intention that a developed solution can be agreed upon and submitted into the Examination at or before Deadline 7.
REP2-052	Lower Thames Crossing Project	Applicant's Comments on Relevant Representations **[REP1-132]**: The Applicant sets out its position on the site selection process for the Tilbury North Substation. The Applicant states that the selection of the site has been, "appropriately evidenced and justified in Section 11.4 of the Design Development Report" [APP-122]. The NH LTC team disagrees with this statement, but	The Applicant notes the comments raised by the NH LTC team regarding the site selection process for the Tilbury North Substation. While the Applicant maintains that the site selection has been appropriately evidenced and justified in the **Design Development Report [APP-122]**, a meeting was held on 2 March 2026, to answer NH LTC's queries on this matter.

Ref	Name	Matter Raised	Applicant's Response
		note that recent interactions between the parties has elicited further information. In particular, the NH LTC team is considering a document setting out further detail on the site selection process for the replacement of NH LTC's compensatory habitat sites received from the Applicant on 3 March 2026 and expects to be able to provide a response on this issue to the Examining Authority at Deadline 3.	With respect to the site selection process for NH LTC's alternative ancient woodland and nitrogen deposition sites, the Applicant shared a Draft Environmental Interaction Report with NH LTC and Natural England on 3 March 2026, in advance of a joint meeting between the parties. This report sets out the Applicant's site selection methodology for the alternative nitrogen deposition compensation and Ancient Woodland compensation sites, and evidences how it aligns with NH LTC's own site selection methodology. The Applicant awaits NH LTC's comments on this report.
REP2-052	Lower Thames Crossing Project	Applicant's written summary of oral submission and response to action points for Issue Specific Hearing 1 **[REP1-139]**: The Applicant addresses the site selection process for the North Tilbury Substation. Reference is made to LTC's "locational flexibility". NH LTC would like to clarify that this flexibility relates to a required degree of flexibility at the LTC's detailed design stage. It is based on established principles, formed through interaction with key stakeholders and is measured and proportionate in the context of a DCO of LTC's scale. It was not intended as flexibility in the manner in which the Applicant refers to it in this document.	The Applicant notes NH LTC's clarification regarding LTC's 'locational flexibility'. In this instance, the Applicant was referring to the locational flexibility discussed with NH LTC in relation to the environmental mitigation. For example, in the case of the nitrogen deposition compensation, a degree of flexibility has been discussed regarding the location of grassland and woodland planting to accommodate the Applicant's design. This might include planting grassland rather than woodland over the alignment of underground cables.
REP2-052	Lower Thames Crossing Project	Report on Interrelationship with other infrastructure projects **[REP1-134]**: NH LTC considers that this document should contain information on: 1. Land interfaces between the Applicant's project and the LTC DCO	The Applicant notes NH LTC's comments regarding the Interrelationship document. A meeting to discuss NH LTC's comments was held on 30 March 2026, and both parties have agreed to work collaboratively to update the report at Deadline 4.

Ref	Name	Matter Raised	Applicant's Response
		2. Consideration of temporal impacts of the Applicant's project on the LTC DCO, i.e. construction effects 3. Inter-Project Cumulative Effects 4. Construction phase control documents - Code of Construction Practice - Outline Traffic Management Plan for Construction 5. Consultation and engagement with key stakeholders In particular, the interface between the Applicant's Project and the LTC is not solely spatial but also temporal and, as such, this document should include details of construction activities of both projects including details of site occupation and accesses. It should also cover the outages issue, referenced in 3.2.1 of the Statement of Common Ground between the parties [**REP1-075**], which is a main factor of concern for NH LTC. The Interrelationship document fails to address these issues, and those listed above, and does not contain any information about how the interrelationship between the projects is to be managed. As discussions between the parties progress, NH LTC would expect to see this document updated to reflect any discussions that take place.	
REP2-052	Lower Thames Crossing Project	Statement of Common Ground with Natural England **[REP1-034]**: Following a meeting held between the Applicant, Natural England and NH LTC on 6 March 2026, NH LTC awaits Natural England's confirmation that the alternative sites proposed for LTC in the NTT DCO for nitrogen deposition and environmental mitigation are appropriate, in comparison to those secured through	The Applicant shared a Draft Environmental Interaction Report with NH LTC and Natural England on 3 March 2026, in advance of a joint meeting between the parties. The report sets out the Applicant's site selection process for the alternative nitrogen deposition compensation and Ancient Woodland compensation sites. The Applicant awaits NH LTC's comments on this report.

Ref	Name	Matter Raised	Applicant's Response
		the LTC DCO. Confirmation is also awaited from Natural England that a circa 10 year delay of planting at these sites, as a result of the NTT DCO is acceptable.	LTC's proposed nitrogen deposition compensation planting, is primarily in response to potential future operational impacts on designated sites (long-term habitat degradation) in the wider area, following expected changes to air quality within the operational phase of LTC. It is the Applicant's position that the c.10-year delay, suggested by LTC, of approximately 3-4% of nitrogen deposition planting and c.4-year delay of approximately 3% of the planting, will not have a significant effect on the success of the overall LTC nitrogen deposition compensation strategy (which totals 245.7ha). However, the Applicant challenges LTC's suggestion that the planting delay will be up to 10 years, given that paragraph 2.1.4 of LTC's Project Description states that '*Construction may take up to six years*' (LTC's DCO Application Document **6.1 Environmental Statement- Chapter 2- Project Description [APP-140]**) and given the lack of specific timings for the nitrogen deposition planting to be undertaken within the submission documents. Rather than specific years, the LTC DCO instead uses the term "*where reasonably practicable"* and the Register of Environmental Actions and Commitments refers interchangeably to *"the earliest practicable opportunity/planting season",* making it unclear exactly how long the planting delay would actually be. The Applicant is in consultation with Natural England to agree this assessment.
REP2-053	Norfolk Gliding Club	Norfolk County Council LIR From the first consultation in 2023, Norfolk Gliding Club has identified the aviation safety concerns that the proposed route represents. Since the receipt of	Section 3.17 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]** addresses matters raised within **Norfolk County Council Local Impact Report [REP1-173]** in relation to airfields,

Ref	Name	Matter Raised	Applicant's Response
		the draft SoCG and Airfield Assessment Summary from National Grid in July 2025, Norfolk Gliding Club has endeavoured to resolve the aviation safety issues contained in both documents as identified in Norfolk County Council's Local Impact Report.	including for Tibenham aerodrome where the Respondent is the operator. To clarify, and as recognised within Section 4 of **8.3.37 Draft Statement of Common Ground – Tibenham Aerodrome [REP1-105]** the Applicant's first non-statutory consultation took place in 2022, during which the General Aviation Awareness Council (GAAC) raised concerns on behalf of the Respondent regarding the proximity of the Project to the aerodrome.
REP2-053	Norfolk Gliding Club	South Norfolk District Council LIR Norfolk Gliding Club has repeatedly advised National Grid since the first consultation of 2023 that the proximity of the proposed pylon route would have an adverse impact on both the safety and financial operations of the airfield as outlined in the South Norfolk Council's Local Impact Report Had the agreed documents been supplied by National Grid at the 7 August 2025 consultation then it is quite probable that some of these impacts might have been resolved but the decision to withhold them resulted in the meeting being adjourned and as yet they are still outstanding	The respondent's reference to pages within the **South Norfolk District Council Local Impact Report [REP1-176]** relate to its Appendix E and the Council's responses to the 2022 and 2023 non-statutory consultations, and the 2024 Statutory Consultation respectively. The Local Impact Report does not directly raise aviation impacts as a matter for the Examining Authority's consideration. The Applicant is therefore satisfied that its position on aviation safety and impact assessment is appropriate, as articulated within paragraphs 3.17.2 to 3.17.15 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
REP2-053	Norfolk Gliding Club	7 August Meeting and Draft SoCG Following the adjournment of this consultation to allow the Applicant time to provide the withheld documents, Norfolk Gliding Club has repeatedly offered to host a resumed meeting This meeting would then allow Norfolk Gliding Club, Priory Farm Airfield and National Grid to work together and produce agreed versions of	The Applicant's position is as described within pages 261 – 262 of **8.8.1 Applicant's Comments on Written Representation [REP2-029]** in response to **Norfolk Gliding Club Written Representation [REP1-256]** regarding the Statement of Common Ground.

Ref	Name	Matter Raised	Applicant's Response
		the SoCG and AAS for both airfields but those offers have been declined	
REP2-053	Norfolk Gliding Club	Environmental Statement Appendix 15.2 – Review of Aviation Impact Within the Written Representation submitted on behalf of Norfolk Gliding Club, Appendix O reviews the aviation impact assessment contained within appendix 15.2 The GAAC has now received a reply from the Applicant which recognises the abbreviations within Table A15.2.1 would benefit from definition, and propose to provide this, as well as to undertake the correction of the Table A15.2.4 references. The comment that 'the abbreviations within Table A15.2.1 would benefit from definition' demonstrates yet again the attitude of National Grid in terms of withholding information and addressing this significant issue.	As per the Applicant's email response to the GAAC, it is undertaking amendments to **6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267]**, which it intends to submit at Deadline 4. The Applicant does not agree this demonstrates an attitude of withholding information as suggested by the Respondent.
REP2-053	Norfolk Gliding Club	The Civil Aviation Authority's (CAA) guidelines with respect to Engine Failure After Take-Off (EFATO) state that in the event of an emergency, the pilot should land straight ahead within a splay of +/- 300 either side of the runway centreline and that area should extend 3km from the end of the runway. Table A15.2.1 shows that for Tibenham that distance is less than 2km. Further CAA guidelines widen that splay from +/- 300 for airfields such as Tibenham where training is taking place. Appendix D is reproduced from the Written Representation to show how the current pylon route proposal would impact a splay of +/- 500	Other matters raised by the Respondent are addressed within pages 257 to 259 of **8.8.1 Applicant's Comments on Written Representation [REP2-029]** in response to **Norfolk Gliding Club Written Representation [REP1-256]**.

Ref	Name	Matter Raised	Applicant's Response
		In addition, the CAA advise that only the airfield operator holds expert opinion as to the operational safety where new obstacles are being proposed. In terms of mitigation, Norfolk Gliding Club consider that the proximity of the proposed route would make operations from runways 26 and 33 unsafe and National Grid should either realign the proposed route to outside the Tibenham 5km safeguarding zone or underground the route within the zone.	
REP2-054	Pylons East Anglia Ltd	2.2.1 The Applicant has made no mention in its comments of the colony of endangered White Clawed Crayfish in the River Tas, downstream of the project and at risk from construction pollution. We repeat again that there IS a colony of White Clawed Crayfish in the River Tas which the Applicant was unaware of even though it is known of by Norfolk Rivers Trust, which specifically seeks care by developers (see Appendix A). White Clawed Crayfish are highly vulnerable to pollution and development. The Norwich to Tilbury project crosses several tributaries of the River Tas, such as the two shown below, and the risk of pollution downstream, from construction is severe. Appendix A Norfolk Rivers Trust, Crayfish, River Tas	Surveys for white-clawed crayfish at the River Tas were scoped out, as presented within the Scoping Report, following a review of the desk study data and an assessment of potential impacts. While white-clawed crayfish are known to be present within the River Tas catchment, no desk study records of the native crayfish have been obtained within 2 km of the Order Limits. However, desk study records of the invasive signal crayfish have been recorded throughout the Order Limits. This invasive species is a threat to native, white-clawed crayfish populations as they are in direct competition and carry the crayfish plague that is fatal to the native species. Direct impacts to the River Tas are limited to one crossing between RG49-RG50 for a temporary construction haul road. This crossing will be a clear span bridge, which will not directly impact the riverbanks, the riverbed, the natural water flow or substrate and will therefore have no impact on any white-clawed crayfish that may be present within the wider area. The River Tas and its tributaries would be protected from pollution during construction of the Project by the standard pollution control and management measures

Ref	Name	Matter Raised	Applicant's Response
			that are secured through inclusion of commitments within **7.2 Outline Code of Construction Practice (Revision C)**. Measures include those to control runoff from worksites that may contain elevated concentrations of silt, as well as controls on potentially polluting activities such as refuelling and working with concrete, including protocols for unplanned events/spillages. In addition, due to the known presence of white-clawed crayfish within the River Tas in the wider area, specific biosecurity measures have been included within **7.4 Outline Landscape and Ecological Management Plan (Revision D)** to ensure no spread of crayfish plague as agreed with the Environment Agency. There will be no significant residual effects to the white-clawed crayfish at the River Tas or any other river within/adjacent to the Order Limits.
REP2-054	Pylons East Anglia Ltd	2.2.2 Security at Bramford. Security & resilience of electricity infrastructure' is listed as a summary of issue raised, has been only partially summarised and should also say, 'specifically, the continuity of the Bramford Substation in the event of worst-case scenarios'. The response only mentions the resilience of overhead lines, which was not even raised.	The Applicant refers to its responses to the following questions in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**: • SS 1.1 (Bramford substation) • SS 1.2 (Security risks). In summary, the Applicant notes reference to national risk framework and guidance relating to reasonable worst-case scenarios. Security and resilience planning for critical national infrastructure is undertaken in line with established government frameworks and involves engagement with relevant authorities. These processes consider a range of threats and scenarios, including those that are severe but plausible. For reasons of national security, it is not appropriate to set out detailed assessment of those

Ref	Name	Matter Raised	Applicant's Response
			scenarios in the public domain. However, appropriate site-specific security processes for the proposed development at Bramford substation is incorporated into the design and will continue to be reviewed during the lifecycle of the Project.
REP2-054	Pylons East Anglia Ltd	2.2.3 Roydon Parish Council, South Norfolk, notes that based their open forum verbal submission around the ignoring of the Holford rules in relation to the pylon route around the village on three sides, the Applicant says on page 4 that they did consider the Holford rules when setting out the pylon route. However, the point was that they might have considered those rules but chose to ignore them in the case of Roydon. Consideration of rules is not the same as applying them.	The Applicant disagrees with the implication that the Holford Rules have been ignored. Throughout the development of the Project they have been considered and applied in conjunction with information on constraints, homes and environmental features and the finding of the EIA process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that consideration of the Holford Rules typically involves balancing alternative solutions with different combinations of effects which can present conflicting Holford Rule compliance. For example, routeing in a straight line is a primary focus of Holford Rule 3, which states "**Other things being equal**, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers" (emphasis added). A balanced decision is taken which is not the same as not considering or applying the Holford Rules. At Ardleigh the ability to route in a straight line is compromised by many factors such as the presence of individual residential properties and other buildings, areas of woodland etc. Decision making then has to establish the most appropriate arrangement, consider whether this is acceptable in policy terms, or if not the nature of the change required.

Ref	Name	Matter Raised	Applicant's Response
			Our decision making and how the Holford Rules informed decision making is set out in documents including **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** published in 2022, and the Design Development Reports (**7.20 2023 Design Development Report for the Project [APP-358]**, **7.21 2024 – Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]**).
REP2-054	Pylons East Anglia Ltd	2.2.5 BMV farmland. The point was raised that the Applicant should have considered the lower quality land when choosing the route, and that this was not done. This has not been addressed.	The Applicant has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land wherever practicable, in line with policy. However, due to the widespread presence of BMV land across East Anglia, some temporary and permanent effects are unavoidable. During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. As Critical National Priority Infrastructure, the limited permanent loss of BMV land is necessary and justified, and the routing and siting process confirms that no reasonable alternatives are available. Policy recognises that opportunities to fully mitigate impacts on existing land uses may be limited. Even so, impacts on land use and farming operations have been carefully considered and reduced as far as practicable.

Ref	Name	Matter Raised	Applicant's Response
REP2-054	Pylons East Anglia Ltd	2.2.6 Pacemakers. One resident informs us that her concerns about pacemakers remain unaddressed, as do her emails on the subject.	The Applicant has responded on electric and magnetic fields (EMF) and pacemakers in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to Maguire (pages 129 – 130).
REP2-054	Pylons East Anglia Ltd	2.2.8 Bat Activity We remain concerned that the Applicant has not heeded warnings about the risks of relying exclusively on a tool called Kaleidoscope. For the high-level steps agreed, the devil is in the detail, and the implementation could vary from good to execrable. For example, the selection of static detector locations appears to be at the discretion of the applicant's environmental consultants. One resident has told us that he has previously told the applicant that he has recorded bats within the proposed DCO boundary, that information could have augmented the survey but that he had no response. The biggest issue with the exercise is that all the results and analysis are predicated on species identification by a software tool called Kaleidoscope. This is a standard tool for use in initial species identification but the developers set out very clear warnings on exclusive reliance on its results and that it is not a substitute for fieldwork. In particular they caution that its results should not be relied upon for land management decisions, which is exactly what the Applicant is doing. On the limitations of Kaleidsoscope, the software works by pattern matching recordings to a pre-defined	The bat survey scope was agreed with Natural England in advance of surveys being undertaken, as included within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**. Bat activity has been assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and specifically **within 6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036]**. Bat Sound analysis was undertaken in line with the Bat Conservation Trust (BCT) Good Practice Guidelines (2023). BCT acknowledge that automated analysis is a more effective and efficient way to handle a large volume of data achieving consistency across the data set. These tools were not solely relied upon and all data analysed using Kaleidoscope Pro was subject to a comprehensive quality assurance process. The auto analysed files were manually identified by a competent ecologist experienced in the use of the Kaleidoscope Pro software. The calls were randomised and then the following percentage of calls were subject to further Quality Assurance review: • All unidentified (NOID) • 10% barbastelle • 5% all other calls (including Noise files) Where the Auto-ID label was incorrect, the correct species label was attributed to the call. Each file may

Ref	Name	Matter Raised	Applicant's Response
		library of calls for species. This library is by no means complete and consists solely of sample hunting calls. Several species of bat also make mating and social calls which can be at completely different frequency ranges and patterns from their hunting calls. Kaleidoscope will either ignore these calls completely or misidentify them as a wrong species. There is nothing in the environmental report that indicates any quantification of these potential errors in the dataset out. Natural England should be concerned about establishing a precedent for the misuse of software tools in support of planning applications. See comments about Bat Activity Surveys in Appendix I (separate attachment).	contain calls of multiple bat species; however, the Auto-ID function is only capable of labelling one species. This was corrected during manual checks by duplicating the file and labelling each species separately If 50% of the 5% Noise files were bats, then all Noise files were manually reviewed. BCT suggest a quality assurance approach that reflects the ease of identification of each sub-group and give more weight to species that are of particular interest or have a lower level of confidence. The quality assurance process adopted for the Project has followed such BCT guidance. Furthermore, given all NOID calls were manually checked, the correct classification rate (CCR) is considered to be high (>80% confidence) for the auto-ID of species recorded within the Survey Area. The only exception to this is Myotis species (<80% confidence) due to overlapping call characteristics and have been grouped together to overcome this constraint. The placement of the static detectors took into consideration the quality of habitats for commuting and foraging bats and adopted a RAG (Red, Amber, Green) rating system where red indicated high quality habitats, amber as moderate quality and green as low quality habitat for commuting and foraging bats. Further to this, potential impacts of the Project were considered, as such only locations rated Red or Amber that would be impacted by the Project were taken forward to survey. Any locations within the Order Limits that would not be impacted by the Project were scoped out of the survey effort. This

Ref	Name	Matter Raised	Applicant's Response
			approach was discussed and agreed with Natural England.
REP2-054	Pylons East Anglia Ltd	2.2.9 Treasury Green Book. We remain in disagreement with the Applicant and we also note that they have not challenged the analysis or the conclusions drawn in our report, "Norwich to Tilbury Project Green Book Analysis".	In the thematic response provided in **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]** the Applicant states clearly its confidence that the Treasury Green Book is not relevant to its projects. It therefore rejects the entirety of the analysis referred to.
REP2-054	Pylons East Anglia Ltd	3.1 For this project, the Applicant places overly heavy reliance on the presumption in favour of overhead lines. Yet when the Applicant chooses to, in the case of other projects (Sea Link and Eastern Green Link 3 and 4) they ignore this presumption and choose to prefer HVDC subsea/underground over the OHL options they also appraise.	The presumption in favour of overhead lines is a logical starting point for the NPSs given the significant difference in cost between the various technologies. In the case of Sea Link and Eastern Green Link 3 & 4 it is not that the presumption is ignored, it is that there is an economic and efficient offshore alternative to an onshore overhead line. In the case of Norwich to Tilbury, the offshore alternative does not offer a more economic or efficient alternative – we refer you to our various explanations on the approach provided throughout the pre-application rounds of consultation, in the DCO submission itself and more recently in responses to questions and submissions forming part of the examination stage.
REP2-054	Pylons East Anglia Ltd	3.2 Bradwell. As stated in our Deadline 1 submissions, the Applicant continues to misrepresent our position. We seek to see Bradwell as a landing point, and for the disused 132kv overhead lines to be removed and cable to continue underground (HVDC) along the 132kv. route. The pylons are due to be removed soon anyway.	The Applicant notes the comments made on the route to be taken by a HVDC connection and has considered alternatives in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives of alternating current (AC) overhead Line, AC cable, AC gas insulated line and HVDC Options, and offshore options of AC subsea cables and HVDC alternatives.

Ref	Name	Matter Raised	Applicant's Response
			In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. Regardless of whether the HVDC option from Norwich connects to Tilbury by a predominantly offshore connection or makes a landing on the Bradwell peninsula before routeing onshore to Tilbury, it makes no material difference to the cost differential between the onshore overhead line option and the HVDC option. The Applicant's position remains clear and consistent with relevant policy that the Project need case is best delivered by an onshore AC connection predominantly comprising steel lattice pylons.
REP2-054	Pylons East Anglia Ltd	3.3 We have never asked for HVDC undergrounding only in the Dedham Vale. That misrepresents our position. We are fully aware that HVDC for short distances is impractical and that HVDC is a long-distance solution well suited to the entire route from Norwich to Tilbury, ideally without a break.	The Applicant has considered alternatives in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, with all onshore alternatives including HVDC considered. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative.
REP2-054	Pylons East Anglia Ltd	3.4 Advanced, high-capacity conductors. We understand the current restrictions in substations, but the Applicant has never explained what upgrades would be required to substations should a technology such as TS Conductor be used and what the costs of those upgrades would be compared with building an entirely new 400kv AC line for 180km.	The Applicant has explained the phenomenon that is present in AC underground cables, that due to the voltage gain caused by capacitance with the cable, we must install reactive switching stations every 20-30 km along the circuit. This is because as the voltage rises the power transfer becomes unstable and we would get collapse along the circuit from the high voltage. The capacitance in the cable is driven by a

Ref	Name	Matter Raised	Applicant's Response
			square of the voltage relationship. In overhead lines there is a reverse situation that arises when the currents get so high that losses in the circuit start to make the voltage drop which causes power instability again. This is driven by a square of the current relationship, multiplied by line impedance/resistance effects. This applies to all conductor types including TS conductor which also drives the need for mid-point switching stations along the line. For currents above 5000 A, which are already the highest rated 400 kV lines in the world, over distances of circa 100 kms this loading is possible and stable, but going beyond that the exponential nature of the current square law give rise to effects. It is only really possible to run 5000 A circuits in small island nations like our own or Japan for example, as in countries like the US, Canda or long circuits in Europe, the effect discussed above become prevalent at even lower currents due to the distance of circuits being many 100s to 1000s of km and natural line loading causes instability. To cope with the current effects above 5000 A continuous on all substation equipment, would require a duplicate and separate substation at each existing substation location, such that the currents in a circuit could be divided into ones which equipment could deal with. The higher the current the hotter things become, not just conductors but fittings, joints and electrical/electronic equipment designed to keep the system safe. The duplication of every substation to maintain a safe system of operation, would have to happen over an entire area of the network not for just one circuit. This is because the National Electricity Transmission System Security and Quality of Supply

Ref	Name	Matter Raised	Applicant's Response
			Standards (NETS SQSS), requires us to consider the worst case "Secured Event" so it is not possible just to uprate one circuit, build split mid-point capacitance stations (they need to be split to keep to 5000 A equipment ratings same as substations), and duplicate substations at all points the line connects. Because, this circuit becomes the worst "secured event", therefore an entire region has to be uprated in such a manner, with every circuit requiring the above requirements. The NETS SQSS sets out the conditions which ought to be planned for, as they are highly likely events. Events beyond the NETS SQSS on the transmission system do occur, although they are rarer, and these issues have to be managed a different way. For events beyond the NETS SQSS, we rely on number of systems that are designed to prevent system failure. These include frequency response schemes on both the demand (to automatically remove demand) and generation (both to automatically decrease or increase generation output, depending on frequency direction). For as system with multiple substations, and in circuit capacitive switching, operating in excess of 5000A, under fault "secured event" losing one high capacity circuits, and increasing loads on the other high capacity circuits would incur more losses, voltage step changes, and power flow effects, leading to system brittleness. Under such events beyond NETS SQSS that have and do occur, the existing demand and generation frequency response is likely to be insufficient and have less tolerance. This will lead to the need to pay for more response from generators, costing

Ref	Name	Matter Raised	Applicant's Response
			consumers more for faster, higher levels of demand disconnection needed to ensure the system is safe and robust. In summary, • Loadings above 5000A increase the need for mid-point capacitive compensation • Loadings above IEC equipment ratings requires split, mid-point compensation, and duplicate split substations • One circuit is not sufficient; a whole area would require matching to meet NETS SQSS • Stability and safety of the system would be impaired for events which have and do occur beyond the NETS SQSS. No Transmission System in the world has been operated this way.
REP2-054	Pylons East Anglia Ltd	3.4.2. When it comes to TS Conductors, they are not simply deployed, as the Applicant states, "on pylon designs that are not capable of carrying the normal conductor bundles". They can be installed in their own right to upgrade a grid OR to provide new overhead lines on lower and fewer pylons at a much lower cost than the 50m lattice pylons proposed.	TS Conductor is designed to operate at high temperature for constrained applications where operational efficiency is compromised to achieve network capacity gains. That is not the issue here. This project is designed to resolve a different problem, where case the network needs a significant increase in capacity, rather than resolving relatively local constraints. The Applicant does not agree with the statement "*TS Conductors ... can be installed in their own right to upgrade a grid OR to provide new overhead lines on lower and fewer pylons at a much lower cost than the 50m lattice pylons proposed*" The design and application of pylons is dependent on many factors, not just conductors and tower height.

Ref	Name	Matter Raised	Applicant's Response
			The starting point is to design an efficient transmission line which operates at conventional temperatures, thereby optimising operational heating losses. Furthermore, pylons need to adhere to electrical design paraments set in legislation, they need to be maintainable, and they need to operate within their environment. Audible noise and EMF also need to be considered, which in turn influence pylon, conductor bundle, and line design, and ensure compliance with the requirements of NPS EN-5.
REP2-054	Pylons East Anglia Ltd	3.4.3. The Inspectorate does not allow web links but the panel should watch the excellent 11 minute TED talk called The High-Wire Act of Unlocking Clean Energy | Jason Huang | available on YouTube. Jason Huang is the founder of TS Conductor. We include the transcript in Appendix C.	The Ted Talk is a representation from a company seeking to sell its technology to the market and should be seen in that context of a 'sales pitch' representing only the seller's view. However, there are many points the Applicant agrees with and that reinforce rather than contradict the position taken by National Grid. '*The problem is hard aluminium cannot handle high temperature. This limits capacity*' - This is true. Aluminium has its limits and this is overcome by designing for a greater cross-section of aluminium (more subconductors in the bundle) on pylons that are designed for these bundle sizes. Larger bundles also bring some advantages including better audible performance and electrical effects of the line. '*By 2016, TS technology was developed and commercially deployed. We solved all the problems associated with the first-generation advanced conductors, at source*.' - TS Conductor acknowledged that there have been problems with similar conductor in the past but state they developed their technology in 2016. Therefore,

Ref	Name	Matter Raised	Applicant's Response
			they have not had any in service for longer than 10 years, so longevity in operation beyond 10 years is not established. '*Let me give you a real-world example. In March 2021, we reconductored an 11-mile, 230-kV transmission line in North Dakota. The utility needed to increase line capacity to accommodate wind farms in the area. Traditional conductors, ACSS, were initially used, which required an expensive and time-consuming structural retrofit to 90 percent of the structures because of excessive sagging. When they later switched to the TS solution, they were able to save 40 percent in total project CapEx, because we avoided all the structural retrofit. The project was completed 12 months ahead of schedule, with 1.8 million dollars' CapEx savings*.' - The exact example used in the Ted Talk, was the situation the Applicant set out for the use of a conductor (like TS conductor or other manufacturers). Where we have existing infrastructure not capable of carrying power up to the 5000 A IEC rating because of sag or our *pylons* not being strong enough to support larger conductors, in such cases we would have a choice: replace the *pylons* and conductors, or compromise on operational efficiency (high heating losses) and use a solution like TS conductor and achieve up to the IET 5000 A rating. We are in complete agreement with the TS Conductor Ted Talk point made above. "*No more bottlenecks holding back wind or solar projects*" - We agree that there is a bottleneck when our existing circuits can only provide 3000-4000 A

Ref	Name	Matter Raised	Applicant's Response
			capacity. Technologies like TS conductor and others are being deployed to ensure such systems can be upgraded quickly to achieve 5000 A where possible. We should also note TS conductor are a United States based organisation and the transmission system in the US is not as highly integrated, nor operating in the same way as the UK. Many of the arguments and data points are based upon US installations and do not align with UK transmission standards. Conclusion – The Ted Talk is a view from a commercial organisation seeking to sell a product. As discussed above, none of the talk contradicts the Applicant's position on use of conductors like this and we stress again to point out that the US market and transmission is very different to the UK and therefore some claims would be different when compared to UK assets. The existing system in East Anglia is already capable and considered to be achieving the 5000 A rating. The needs case in Section 3: Needs Case, Table 3.3, Page 31, of **7.17 Strategic Options Backcheck and Review** [**APP-355]** states the existing system capabilities, highlighted by the purple box, and the amount of energy that is expected to transfer across system boundaries replicated below.

Ref	Name	Matter Raised	Applicant's Response
			Table 3.3 Planned Transfer requirements | | Planned Transfer | Post Fault Capability by 2031 | Planned Transfer Boundary Deficit | | --- | --- | --- | --- | | EC5N (Maximum) | 15,774.0 MW | 6,652 MW | -9,122 MW | | EC5 (Maximum) | 24,834.7 MW | 13,552 MW | -11,531 MW | | EC5N (Minimum) | 14,171.7 MW | 6,652 MW | -7,520 MW | | EC5 (Minimum) | 23,232.4 MW | 13,552 MW | -9,928 MW | There are limitations as to what a circuit can carry, and these are defined by the International Electrotechnical Commission (IEC), who set ratings for 420 kV transmission, of 5,000 amperes being the highest available equipment. This equates to • a capacity on a single circuit of 3,465 MVA (megavolt-ampere), • a double circuit of 6,930 MVA, and; • where there are four circuits remaining crossing a boundary after a fault, 13,860 MVA. The current post-fault capacities of: • EC5N – 2031 post fault capability 6,652 MVA, leaves a deficit of -7,520 MW • EC5 – 2031 post fault capability 13,552 MVA, leaves a deficit of -9,928 MW.
REP2-054	Pylons East Anglia Ltd	3.4.4. Note that Bute Energy, in Wales, is choosing to deploy a technology not dissimilar to TS Conductors, not because there is a problem with pylon designs such that old school conductors are required but because they transmit more electricity: "The ACCC (aluminium conductor composition core) Cardiff is also crucially designed to provide higher capacity and	The respondent suggests that conductor choice has enabled Green GEN Cymru to choose smaller pylons. This is not accurate. The circuits referred to are 132 kV. The lower towers come from the lower voltage. There is no possibility that the increase in transmission capacity required of Norwich to Tilbury could be achieved in an economic and efficient

Ref	Name	Matter Raised	Applicant's Response
		reliable long-term performance. Green GEN Cymru will deploy the variant on L7c pylons. At a standard 27m tall and 5m wide, these pylons are half the size of typical 400 kV towers." Why has National Grid not considered solutions such as these that would significantly reduce the overall harm in East Anglia should overhead lines be built?	manner using 132 kV circuits. These examples do not show a viable alternative. The circuits referred to above are constructed at 132 kV not 400 kV and carry a lot less power than the 400 kV network. They are not comparative at all with the proposals set out, nor with the deficits the Applicant has set out. The needs case in Section 3: Needs Case, Table 3.3, Page 31, of **7.17 Strategic Options Backcheck and Review [APP-355]** states the existing system capabilities, highlighted by the purple box, and the amount of energy that is expected to transfer across system boundaries replicated below. Table 3.3 Planned Transfer requirements Planned Transfer / Post Fault Capability by 2031 / Planned Transfer Boundary Deficit EC5N (Maximum): 15,774.0 MW / 6,652 MW / -9,122 MW EC5 (Maximum): 24,834.7 MW / 13,552 MW / -11,531 MW EC5N (Minimum): 14,171.7 MW / 6,652 MW / -7,520 MW EC5 (Minimum): 23,232.4 MW / 13,552 MW / -9,928 MW The towers described above are 132 kV towers, which are smaller as they are a lower voltage and therefore have different clearance requirements. However, 132 kV circuits have an International Electrotechnical Commission substation rating of 2000 A and at 132 kV this relates to a circuit capacity of 460 MVA or 920 MVA for a double circuit. This is compared with the 3465 MVA circuit rating and 6930 MVA double circuit rating achieved with the 400 kV connection with its IEC 5000 A rating.

Ref	Name	Matter Raised	Applicant's Response
			Even if 5000 A were achievable at 132 kV, which it is not, this would only achieve a power rating of 1150 MVA single circuit and 2300 MVA for a double circuit. Therefore, comparing a 132 kV solution to the integrated 400 kV transmission solution is not comparable.
REP2-054	Pylons East Anglia Ltd	3.5. Supply issues. NG continues to maintain it cannot get hold of HVDC cables but (as stated in our Deadline 1 submission), the entire transmission market is constrained, not just HVDC, and NG has access to one third of the world's HVDC cables, with its suppliers ramping up output. NG makes the following, unsubstantiated, claim, "The Project will operate at three times the capacity of the best available technology and therefore would require three times the capacity in the market of a typical HVDC project."	The Applicant stated clearly that its existing projects EGL1,2,3,4,5 and Sealink all are installing a single 525 kV 2GW solution, each requiring two convertors, one at each end and 1 Bi-pole (2 sets of cables) each. These projects have already contracted or are seeking to contract into the Market, so already consume market capacity in their own right in near term time scales. To provide the capacity required by the Applicant's project, HVDC solutions of 6 GW capacity are required. 525 kV HVDC cable is the Highest voltage cable available in the world currently and a bi-pole pair highest capacity is 2 GW, along with the capacity limits for HVDC power electronics at 525 kV. Therefore, to deliver a HVDC alternative the Applicant has consistently stated, 3 x 2 GW HVDC link would be required. This requires six HVDC convertor stations, three at each end, and three bi-pole (6 cables) to connect to convertors, if the same flexibility is to be achieved in the network as the Applicant's proposals as **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** page 111 Paragraph 14.4.6 referenced in the table above, states: '*14.4.6 Should this circuit at full 6000 MW capacity made multiterminal to provide the same system flexibility as the AC circuit options. There would be a*

Ref	Name	Matter Raised	Applicant's Response
			need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £ 5361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).' This option would require an additional three converters and an additional 150 km of cable. Therefore, even the less optimal solution would three times the capacity of EGL1 or Sealink for example, therefore the cable and convertor requirements are significant in the world market where capacity is finite in nature and in high demand worldwide.
REP2-054	Pylons East Anglia Ltd	3.5.1. However, Eastern Green Link 3 is 2GW and is 580km long; Eastern Green Link 4 is 2GW and is 530km long; Sea Link is 2GW and 130k. (In all cases, overhead lines were REJECTED). So National Grid can find enough cable for a total of 1140km of HVDC cable for these projects but not 540km of HVDC cable for Norwich to Tilbury (if delivered at 6GW, not 4GW, which is understood to be the actual capacity requirement unless North Falls/Five Estuaries/North Falls are landed away from North Essex). We arrive at a figure of 540km because to achieve 6GW will require three circuits at 2GW each. This is not to do to with 'best available technology'. It simply needs more cables.	The Applicant has made the following comments about timing and need The timing and urgency for electricity infrastructure is referred to within EN-1 (2024). 3.3.68 The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; ... and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England). 3.3.83 Given the urgent need for new electricity infrastructure and the time it takes for electricity

Ref	Name	Matter Raised	Applicant's Response

NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.

The NESO has continued to emphasise the independent need for this Project in the NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery[1], which states:

'There are three key schemes originally signalled as being delivered in 2030 in the Pathway to 2030, but where delivery will now be in 2031. The impact of these schemes is shown below. The percentages shown represent the difference in modelled percentage clean power generation across a typical year across the pathways.

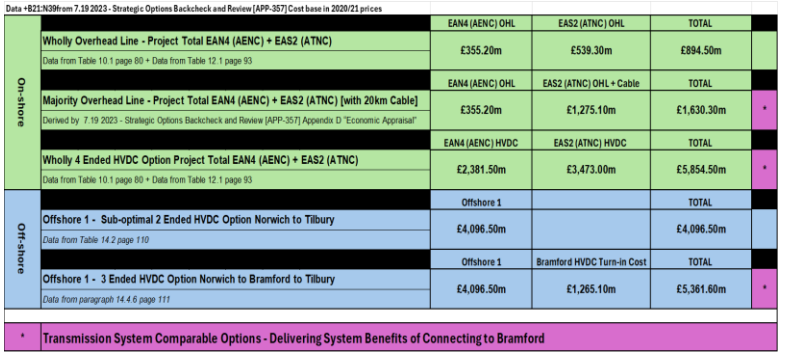
Table 1: **Impact of key projects for delivery in 2031 if not accelerated**

Project	Connections / Support	Impact on Clean Power / Constraint Impact		Latest Status from TOs
		Further Flex and Renewables	New Dispatch	
Norwich to Tilbury (AENC and ATNC)	Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia	-1.04% +£2.8 billion constraints in 2030	-1.0% clean power +£2.7 billion constraints in 2030	Planned for 2031
Sealink HVDC from Suffolk to Kent (SCDI)	Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension	-0.6% +£1.4 billion constraints in 2030	-0.25% +£1.1 billion constraints in 2030	Planned for 2031

There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the

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

Ref	Name	Matter Raised	Applicant's Response
			significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas.' The NESO Clean Power 2030 report identifies the Project as critical to delivering a network which supports the clean power pathways, Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional recognition of the need for the Project to what is stated on the need for new electricity networks Therefore, the project is needed by 2030 as cited by NESO, as pointed out even for the sub-optimal direct solution Norwich to Tilbury, amount of cable and need for six convertors is a sizeable requirement for to deliver within four years when capacity has already been utilised by the applicants and other worldwide projects. The sub-optimal and more optimal 9 Convertor Solution, as significantly more costly that the Applicant's proposal, do not connect customers as required by the Applicant's transmission licence requires, and have their own Environmental and Socio-Economic impacts. The costs were set out at the hearing with all data coming from **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, Sections 7 -14,

Ref	Name	Matter Raised	Applicant's Response
			tables of each section and all cost information defined by the fully transparent cost model for circuit alternatives in its Appendix D: Economic Appraisal. 
REP2-054	Pylons East Anglia Ltd	Impact on farmland The Applicant's claim that it has sought to minimise impacts on BMV agricultural land holds no water. Other options would reduce the impact on agricultural land significantly. We note that the Applicant acknowledges that the loss of best arable land is contrary to the NPPF. We do not agree that the significant benefits arising from this CNP Infrastructure justify the permanent loss of 172.7 hectares of BMV agricultural land and the temporary loss of many hundreds more.	The Applicant has outlined why these other options would not meet the Project objectives in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**.
REP2-054	Pylons East Anglia Ltd	3.6.2.1 Impact on farmland One farmer has pointed out that his land has been downgraded by the Applicant to Grade 3 land when it is Grade 2. See below for National Grid's map showing G3 and Natural England's map showing G2:	The two map images that are presented show two different data sets. The Provisional mapping is at a scale of 1:250 000 and should not be used to undertake site-specific assessments. It provides an indication of potential grade, but this needs to be confirmed through detailed surveys. The maps presented in **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification**

Ref	Name	Matter Raised	Applicant's Response
			Report Figure A6.1.1 - Detailed Agricultural Land Classification (ALC) [REP1-062] show a more detailed assessment of land grades, based on either detailed surveys or a predictive approach which was agreed with Natural England. Where the data is based on a prediction further surveys will be undertaken pre-construction to confirm the grades. As such, the data presented in the submission provides a definitive or more likely ALC grade and does not represent a downgrading of land.
REP2-054	Pylons East Anglia Ltd	3.9 Bird Strikes We remain extremely concerned about the methodology chosen and the conclusions drawn, namely that "*Outside of these key movement corridors the Order Limit is made up of predominantly farmland and would therefore support farmland passerines*." From the detailed evidence that we have submitted at all stages of consultation and again at Registration for the DCO and again at Deadline 1, it is clear that there is not only a risk to farmland passerines but that the farmland areas on the route contain very high numbers of non-passerines at risk. We refer below to submission document "6.6.A8 Environmental Statement Appendix 6.6 - Wintering and Passage Bird Report - Part 1, Final Issue A, August 2025. Planning Inspectorate Reference: EN020027" and we believe that Natural England has erred in its approach. Alternatives such as undergrounding or subsea cables would avoid the very high risk to birds of all	Response to concerns regarding bird collision risk methodology The Applicant notes the concerns raised regarding bird collision risk, including the assertion that the assessment methodology is flawed and that farmland areas along the route support high numbers of non-passerine species at risk of collision. The Applicant does not agree that the assessment is negligent, or that evidence has been disregarded, and clarifies the basis of the methodology and conclusions below. Interpretation of the statement regarding farmland and passerines The statement that "outside of key movement corridors the Order Limits are made up predominantly of farmland and would therefore support farmland passerines" has been interpreted by Pylons East Anglia Ltd as implying that farmland supports only passerine species, or that non-passerines were not considered. This interpretation is inaccurate. The assessment recognises that farmland can support a range of bird species, including

Ref	Name	Matter Raised	Applicant's Response
		types in farmland areas (as set out in our submissions) from collisions with power lines.	non-passerines. However, the methodology appropriately differentiates between habitat presence and collision susceptibility, which is driven by species behaviour, flight characteristics and movement patterns rather than species richness alone. Therefore, survey effort has been focused in areas where the presence of Target Species is most likely, which was supported by a desk study including a habitat review and mapping the distribution of Target Species records. Scoping of farmland passerines Farmland passerines were scoped out of detailed collision risk analysis because, in accordance with established guidance, they are generally small, highly manoeuvrable, and typically fly at low heights during the breeding season, and while foraging during the winter. During migration, they typically fly at high altitudes, above cable array height. This position is set out within **6.8.A8 Environmental Statement Appendix 8.8 – Wintering and Passage Bird Report [APP-167 to APP-170]** and is consistent with NatureScot (2017, updated 2025) guidance. This approach does not equate to an assumption that farmland supports only passerines, nor does it preclude the presence or consideration of non-passerine species. Consideration of non-passerine species Non-passerine species with recognised collision susceptibility, including wildfowl, waders, gulls, large waterbirds and raptors, were explicitly considered within **6.8.A8 Environmental Statement Appendix**

Ref	Name	Matter Raised	Applicant's Response
			8.8 – Wintering and Passage Bird Report [APP-167 to APP-170]. The assessment was informed by: • a comprehensive desk study incorporating over 26,000 bird records from the BTO, RSPB and local records centres; • targeted wintering and passage bird surveys, including vantage point surveys; • mapping of records to identify hotspots, corridors and areas of concentrated flight activity; and • selection of Target and Secondary Species using NatureScot (2017, updated 2025) guidance. <u>Survey focus on key movement corridors</u> Vantage point surveys and desk study analysis focused on locations where collision risk is most likely to arise, including watercourses, wetlands, reservoirs and estuarine–inland movement corridors. These landscape features provide the strongest predictors of collision risk for non-passerine species, where flight paths may be constrained and intersect overhead conductors. <u>Assessment of collision risk in open farmland</u> Outside key movement corridors, collision risk in open farmland areas was assessed in accordance with the Guidelines for Ecological Impact Assessment (CIEEM, 2018; updated 2023), using a proportionate methodology informed by desk-based evidence and professional judgement of species-specific flight behaviour. In line with established guidance, detailed survey effort was focused on species groups and locations where collision risk could reasonably arise,

Ref	Name	Matter Raised	Applicant's Response
			rather than undertaking targeted collision risk surveys along the full length of the proposed overhead line. Engagement with Natural England appropriately focused on collision risk assessment required to inform the Habitats Regulations Assessment and internationally designated sites. Assessment of collision risk in open farmland areas outside the HRA context was therefore undertaken by the Applicant in accordance with published guidance, standing advice and standard professional practice. For non-passerine species recorded within farmland, movements are typically characterised by occasional transit flights or low-level foraging activity, rather than concentrated or repeated commuting flights at conductor height. In the absence of identifiable landscape features or habitats that would channel flight activity at collision relevant heights, and consistent with the absence of defined flight corridors across open farmland, the likelihood of collision in these areas was therefore assessed as low. <u>Agreement with Natural England</u> The scope and methodology of bird surveys were developed through pre-application consultation and were informed by the EIA Scoping Report and Scoping Opinion issued by the Planning Inspectorate. Engagement with Natural England appropriately focused on matters within its statutory remit, namely wintering and passage bird surveys and assessment required to inform the Habitats Regulations Assessment (**5.3 Habitats Regulations Assessment Report [APP-082]**) and internationally designated sites.

Ref	Name	Matter Raised	Applicant's Response
			Natural England reviewed and agreed the scope of wintering and passage bird surveys for the Project in that context, including survey coverage of key movement corridors connecting designated sites. This agreement is documented within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]** and supports the conclusions of the HRA. Natural England has confirmed that it does not provide bespoke comment or agreement on ornithological survey methodology in relation to ecological impact assessment matters that do not affect ecological features outside of their remit. Assessment of collision risk to wider bird assemblages in farmland areas was therefore undertaken by the Applicant in line with published guidance, professional judgment, and a proportionate evidence led approach, as set out in the Environmental Statement (**6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**) and relevant appendices. <u>Mitigation measures</u> Although the assessment did not identify significant collision risk outside key movement corridors, precautionary mitigation in the form of bird diverters is proposed at two locations associated with larger waterbodies and future wetland features, where a wider range of species may occur. These measures further reduce an already low baseline risk. No additional mitigation is proposed in farmland areas because the assessment concludes that collision risk in these locations would be negligible and not significant.

Ref	Name	Matter Raised	Applicant's Response
			Consideration of alternatives The consideration of alternatives, including undergrounding and subsea cables, set out in **6.3 Environmental Statement Chapter 3 – Alternatives [APP-127]**, has been addressed elsewhere within the draft DCO application. The presence of a low or negligible collision risk in farmland areas does not provide an ecological imperative for undergrounding along the route, particularly where the assessment has demonstrated that potential effects on birds would not be significant.
REP2-054	Pylons East Anglia Ltd	Appendix F Bird Collision Matrix We attach a Bird Collision Matrix in Appendix F which gives a very clear picture of the bird species at risk along the route.	The Bird Collision Matrix attached to submission EN020027-000797 collates published data on bird species known to be involved in collisions with power lines in other geographic contexts. While this material demonstrates that collisions can occur, it does not provide site-specific evidence of regular flight activity, commuting routes or collision risk along the Project alignment. **6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026]** does not dispute that many bird species have been recorded colliding with power lines within the UK. Rather, it assesses whether the specific habitat context, species assemblage and flight behaviours present along the Project route give rise to a significant collision risk. Collision risk is not determined by species presence alone, but by the interaction of species behaviour with landscape features and infrastructure layout. The Applicant therefore does not consider that the Bird Collision Matrix demonstrates that the Project assessment is incorrect or negligent, nor that it

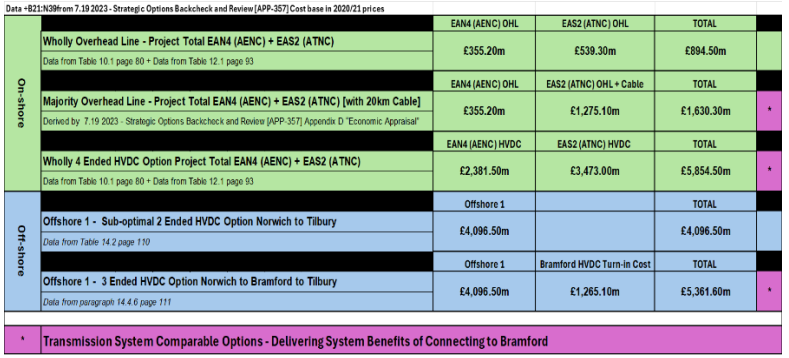
Ref	Name	Matter Raised	Applicant's Response
			overrides the need for a proportionate, site-specific assessment.
REP2-054, REP2-056	Pylons East Anglia Ltd	4 Funding Statement 4.1. Why is the overall cost base for 2025/26 but the compensation for 2024/25? 4.2. A 10% contingency remains woefully inadequate for a complex infrastructure project of this type and size. Previous TGB guidelines recommended c40% (as borne out in the Inspector's letter for the North Essex Authorities Local Plan Examination, 2020 – submitted as Appendix H). At a minimum we need to see reference class forecasting based on an analysis of high voltage transmission projects and compared with our preferred alternative of HVDC cables laid underground by cable plough. 4.3. The funding statement cannot be considered suitable evidence for examination of the project - it contains no breakdown of costs for appraisal.	Further details of the basis of the compensation calculations are given in the response to question CA 1.17 of **8.9.1 Applicant's Responses to First Written Questions [Revision A]**. The multi-factor evaluation of all alternative options confirms the same conclusion. **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** Section 5 Options assessment process, pages 47-49, sets out how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical benefits and the capital lifetime costs. This concluded that the need case was met by the onshore AC solution, in line with NPS EN-1 and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury Project, in line with the transmission and licence obligations. The Applicant has considered a whole range of different alternatives on the Project, some more theoretical and conceptual, as reported in **7.17 Strategic Options Backcheck and Review [APP-355]** Chapter 5 Strategic Option Overview pages 45-47 summarises the options, **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127],** entire chapter and **5.15 Design Development Report [APP-122]** Section 2 Project-Wide Consideration Relevant to Design Development pages17-33 and local issues addressed in section A-H sitting and routing alternatives. More localised design variants have also been considered.

Ref	Name	Matter Raised	Applicant's Response
			The Applicant considered the following options, as well as alternating current (AC) overhead lines: • An AC gas insulated line: this uses a tube with an insulator in it and gas surrounding it as the insulation material. No AC gas insulated line has been constructed anywhere in the world above 10 km in length. It is not a technology that has reached sufficient maturity at transmission level for this proposal. • AC underground cables: these require a Cable Sealing End (CSE) compound or substation every 20-30 km to have a set of reactors and switching stations to manage technical limitations in the way that cables work and to avoid a collapse of energy within the cable. Therefore, an AC underground cable has to come above the ground at intervals and reactors are needed. • High voltage direct current (HVDC) cable: this requires a converter station at each end of the cable. The largest converter stations with cables that are being used currently are 2 GW at 520 kV, so to achieve the 6 GW needed on Norwich to Tilbury, three sets of these HVDC systems would be required, with a minimum of three converters at each end of the connection. Appendix D: Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** pages D1-D14, presents the costs, based on a transparent economic appraisal. The costs were set out at the hearing with all data coming from **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**, Sections 7 -14,

Ref	Name	Matter Raised	Applicant's Response

tables of each section and all cost information defined by the fully transparent cost model for circuit alternatives in its Appendix D: Economic Appraisal.

Image 1.1 Alternative Methods of Electricity Transmission – Cost Overview



Data +B21:N39from 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Cost base in 2020/21 prices

On-shore	Wholly Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC) Data from Table 10.1 page 80 + Data from Table 12.1 page 93	EAN4 (AENC) OHL £355.20m	EAS2 (ATNC) OHL £539.30m	TOTAL £894.50m	
	Majority Overhead Line - Project Total EAN4 (AENC) + EAS2 (ATNC) [with 20km Cable] Derived by 7.19 2023 - Strategic Options Backcheck and Review [APP-357] Appendix D "Economic Appraisal"	EAN4 (AENC) OHL £355.20m	EAS2 (ATNC) OHL + Cable £1,275.10m	TOTAL £1,630.30m	*
	Wholly 4 Ended HVDC Option Project Total EAN4 (AENC) + EAS2 (ATNC) Data from Table 10.1 page 80 + Data from Table 12.1 page 93	EAN4 (AENC) HVDC £2,381.50m	EAS2 (ATNC) HVDC £3,473.00m	TOTAL £5,854.50m	*
Off-shore	Offshore 1 - Sub-optimal 2 Ended HVDC Option Norwich to Tilbury *Data from Table 14.2 page 110*	Offshore 1 £4,096.50m		TOTAL £4,096.50m	
	Offshore 1 - 3 Ended HVDC Option Norwich to Bramford to Tilbury *Data from paragraph 14.4.6 page 111*	Offshore 1 £4,096.50m	Bramford HVDC Turn-in Cost £1,265.10m	TOTAL £5,361.60m	*
*	Transmission System Comparable Options - Delivering System Benefits of Connecting to Bramford				

The table sets out all of the figures shown in the presentation slide and the location of the data from **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. All costs are in 2020/21 cost base. The Wholly Overhead Line cost £894.5m (the pre-consultation cost considering the whole option provided by overhead line). The Majority Overhead Line option included the consultation sections of underground cable which mitigate the impact on the Nationally Designated Landscape as required by NPS EN-5. These sections of cable, which form part of the EAS2 (ATNC) Bramford to Tilbury section, total circa 20 km and are the nearest proxy for the Project at £1,630.3m.

Paragraph 14.4.6 referenced in the table above, states:

'14.4.6 Should this circuit at full 6000 MW capacity made multiterminal to provide the same system

Ref	Name	Matter Raised	Applicant's Response
			flexibility as the AC circuit options. There would be a need for an additional three sets of HVDC convertor stations and three sets of 50 km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £ 5361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).' The cost of a wholly overhead line, without any regard to any landscapes or any other environment constraints is presented as part of the initial appraisal. There is also a second cost, which includes the post-consultation view of the requirements to mitigate the landscape impacts, i.e., the cost with the underground cable of £1.6 billion. In comparison, the cost of a wholly four-ended HVDC option is £5.8 billion. The Offshore 1 - suboptimal 2-ended HVDC option between Norwich and Tilbury would cost £4 billion. The reason it is suboptimal is because it does not have the connection with Bramford Substation and therefore would not facilitate the connection of generation customers or give the same transmission capabilities as are provided in the proposed connection. To achieve the proposed same electrical capabilities, there is an option to have a three-ended link in Bramford Substation, so there would be three converters at Norwich, three converters at Tilbury, and three converters at Bramford Substation on a three-ended HVDC Voltage Source Converter (VSC) link. This would bring it to a similar technical capability as the proposed connection but would raise the price

Ref	Name	Matter Raised	Applicant's Response
			to £5.3 billion. It would also have no ability to connect the generation customers. The Applicant also notes constraints in the HVDC market, which are likely to make a HVDC alternative a deliverability risk even if there was a delay of five years. Where the Applicant is currently delivering HVDC projects, it is delivering 2 GW solutions. Norwich to Tilbury would require a 6 GW solution. Not only would there be constraints in delivering the cables, but also in the converter market and the specialist requirements that are needed as part of a HVDC installation, including access to cable-laying ships and equipment to do it. These are under extreme worldwide pressure with a number of companies seeking to use the limited HVDC resources that are available. The availability of HVDC circuit breakers is another technical limitation at the current time. This restricts any generation connecting to a HVDC network to 1,800 MW because, without the circuit breakers, the whole network would be lost. This would result in widescale transmission system problems and would be a breach of the National Electricity Transmission System Security and Quality of Supply Standards, which is a requirement in the Applicant's licence, Condition D3: Transmission system security standard and quality of service. The 'Essex Coast Generation Group' subsection in Section 3: Need case, pages 40-41, of **7.17 Strategic Options Backcheck and Review [APP-355]** explains that the Applicant has also contracted connections for new generation and interconnectors located off the Essex Coast:

Ref	Name	Matter Raised	Applicant's Response
			• Five Estuaries Offshore Windfarm (1,080 MW by 2030) • North Falls Offshore Windfarm (1,000 MW by 2030) • Tarchon Energy Limited Interconnector (1,400 MW By 2030). This 3,480 MW of total generation requires connection in the region. The 1,800 MW HVDC infeed ceiling should be measured against the 3,480 MW already contracted from the Essex Coast alone — a figure more than double the technical limit. This makes the deliverability of an offshore/HVDC alternative even more acute than is apparent from the general argument. EN-1 (2024) offshore coordination argument is also directly addressed. NPS EN-1 also states: '*3.3.81 The importance of accelerating coordination does not, however, militate against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits*.' Table 15.4, page 122 in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** showed a summary of the options that in combination could meet the need. An updated version of the table is attached to show how the Majority Overhead Line information has been calculated utilising Appendix D: Economic Appraisal pages D1 -D14 l of **7.19 2023 - Strategic Options Backcheck and Review [APP-**

Ref	Name	Matter Raised	Applicant's Response

357] to provide full transparency of the numbers provided in the hearing.

Image 1.2 Cost Table from **7.19 2023 - Strategic Options Backcheck and Review [APP-357**] with Post Consultation Cable Assessment

7.19 2023 Strategic Options Backcheck and Review [APP-357] includes Table 15.4 page 122 in 2020/21 Cost Base

Boundary or Group	2020/21 Onshore Options				Offshore
EC5N	EAN 1 Necton to Pelham	EAN 2 Necton to Twinstead	EAN 3 Necton to Bramford	EAN 4 Norwich Main to Bramford	Offshore 1 Norwich Main to Tilbury
Economic Technology (Capacity)	OHL 115km (6930 MW)	OHL 90km (6930 MW)	OHL 85km (6930 MW)	OHL 80km (6930 MW)	
Capital Cost including non-circuit works	£494.5m	£494.2m	£375.1m	£355.2m	
Circuit 40yr Lifetime NPV Cost	£787m	£616m	£582m	£548m	
EC5 & LE1	EAS 1* Twinstead to Tilbury	EAS 2 Bramford via new substation to Tilbury	EAS 3 Bramford via Bradwell to Tilbury		
Economic Technology (Capacity)	OHL 80km (6930 MW)	OHL 100km (6930 MW)	OHL 130km (6930 MW)		HVDC 220km (6000 MW) [4000 MW]
Capital Cost including non-circuit works	£454.4m	£539.3m	£658.7m		£4,096.5m [£2,882.4m]
Circuit 40yr Lifetime NPV Cost	£548m	£684m	£890m		£4,661m [£3,232m]
SC2, EC5 & Sizewell	Sea Link Sizewell area to Richborough area				
Economic Technology (Capacity)	HVDC 145km 2000 MW				
Capital Cost including non-circuit works	£1,420.8m				
Circuit 40yr Lifetime NPV Cost	£1,197m				

2020/21 Cost Base Post Consultation inclusion of OHL and AC Cable section of 20kms added to EAS 2

EAS 2 Cable Section (after detailed appraisal and consultation outside SOR assessment) Bramford via new substation to Tilbury		
OHL	Cable	Total
80km	20km	100km
(6930 MW)		
£459.7m	£815.4m	£1,275.1m
£547m	£845m	£1,392m

The cost differential between the proposed Project and all HVDC alternatives is stark, and is set out from the transparent economic appraisal in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. The following costs were set out in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139],** with all data from **[APP-357]** and all cost information defined by the fully

Ref	Name	Matter Raised	Applicant's Response
			transparent cost model for circuit alternatives in its Appendix D - Economic Appraisal: • Wholly Overhead Line — Project Total: £894.50m • Wholly 4-Ended HVDC Option Project Total: £5,854.50m • Offshore 1 — Sub-optimal 2-Ended HVDC Option Norwich to Tilbury: £4,096.50m • Offshore 1 — 3-Ended HVDC Option Norwich to Bramford to Tilbury: £5,361.10m. The additional cost of making the offshore option technically comparable is also quantified. Paragraph 14.4.6, page 111 of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** states: '*Should this circuit at full 6,000 MW capacity be made multi-terminal to provide the same system flexibility as the AC circuit options, there would be a need for an additional three sets of HVDC convertor stations and three sets of 50km HVDC cable to connect to Bramford, to make multi-terminal HVDC links. This would add an additional £1,265.1m of capital cost and increase circuit lifetime cost by £1,587m. This would give overall capital costs of £5,361.1m (£4,096.5m + £1,265.1m), and overall lifetime cost of £6,248m (£4,661m + £1,587m).*' There is no evidence that the cost differential between these alternatives will improve over time. In fact, due to the materials, manufacturing and technical requirements of alternatives, alongside the market constraints set out above, the gap between technologies is currently likely to increase rather than decrease.

Ref	Name	Matter Raised	Applicant's Response
			Furthermore, **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** notes that the offshore option in its basic configuration cannot achieve the full need case: '*The reason it is suboptimal is because it does not have the connection with Bramford Substation, and therefore would not facilitate the connection of generation customers or give the same transmission capabilities as are provided in the proposed connection.*' The real-world consequences of that delay in terms of energy generation are made explicit in the independent NESO Clean Power 2030 Report, Annex 2, '*There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas*'. **Conclusion:** The Applicant explored a number of Onshore and Offshore alternatives, considering technologies including AC Overhead Lines, AC Gas Insulated Lines, AC Cables and HVDC solutions. **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** and **7.17 Strategic Options Backcheck and Review [APP-355]** have set out these alternatives and how the Applicant evaluated the options, taking into account the environmental assessment, socioeconomic aspects, technical

Ref	Name	Matter Raised	Applicant's Response
			benefits and the capital lifetime costs. The cost element of the evaluation is supported by a transparent cost model in Appendix D: Economic Appraisal, pages D1-D14, of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]**. This concluded that the need case was met by the onshore AC solution, in line with NPS EN-1 and the Electricity Act 1989. It also integrates new customer connections within the Norwich to Tilbury Project, in line with the transmission and licence obligations. The conclusion remains that the nearest proxy for the Project at £1,630.3m remains best way to deliver the Project, with the urgent requirements set out in NPS EN-1 and EN-5, alongside the Electricity Act 1989 and Transmission Owner Licence requirements recognised within the NPS and Applicant's obligations. **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** provides a comprehensive response to the offshore/HVDC alternative case advanced by several authorities such as ECC, SCC, and Brentwood. The HVDC circuit breaker constraint alone — limiting generation infeed to 1,800 MW against 3,480 MW of contracted Essex Coast generation — demonstrates that an offshore alternative cannot deliver the full need case regardless of any delay in the Project timetable. The cost differential of approximately £4.5 billion against the proposed Project provides a further powerful independent response.

Ref	Name	Matter Raised	Applicant's Response
REP2-054	Pylons East Anglia Ltd	Appendix B Acid sulphate soils. The Agricultural Land Classification is irrelevant to the issues in hand: that is to say engineering, ecology, and even agricultural product, so class 3 land can yield as much wheat and barley as class 1 land, although it may be unsuitable for celery. One of us is the author of the definitive text: Acid sulphate soils. A baseline for research and development published in 1986 by the International Institute for Land Reclamation and Improvement in Wageningen and remains an active member of the International Society of Soil Science working group on the topic.	The Agricultural Land Classification (ALC) system divides land into six grades (Grades 1,2,3a, 3b, 4 and 5) based on the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. The assessment of grade takes into account climate, site and soil factors and how these may affect the range of crops which can be grown, the level of yield, the consistency of yield and the cost of obtaining it. It is the established system used to define land grade and is referred to in relevant policy documents. The expertise available to Pylons East Anglia Ltd in this technical area is recognised and has not been questioned by the Applicant.
REP2-054	Pylons East Anglia Ltd	Appendix B Acid sulphate soils. One critical issue is that the conspicuous, straw-yellow mineral jarosite is definitive only for actual, active acid sulphate soils that have already been drained so that the dangerous iron pyrite and/or monosulphide has already generated its potential acidity. The issue at present is potential 11 acid sulphate soils that have not yet been disturbed. The do not exhibit jarosite. They will generate sulphuric acid and oxygen-hungry iron (II)and, subsequently exhibit jarosite, only when they are disturbed. There are two simple tests for potential acid sulphate soils: soil samples may be incubated for a month or so under oxygenated conditions or treated with hydrogen peroxide which produces an immediate reaction. In either case, the sample will become severely acid, the usual cutoff being taken as pH 3.5. Why cannot National Grid do these tests, and tell us where and	The aspects of actual and potential acid sulfate soils which have been described by Pylons East Anglia Ltd are understood. The desk based information indicates that it is the Mendham Soil Association, comprising potentially acid sulphate peats, which occur within the Order Limits across and near to the Waveney Valley, as shown on **6.6.F6 Environmental Statement Figure 6.6 - Soil Association Map [APP-146]**. Once the presence of peaty soils was confirmed through the ALC survey (see **6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report Figure A6.1.1 - Detailed Agricultural Land Classification (ALC) [REP1-062]**), a peat survey on a 50 m grid was undertaken to further investigate peat extent and the potential presence of acid sulphate soils. The survey used an extended Dutch auger, enabling sampling to depths of up to 2.0 m. The peat survey confirmed the presence of peat and loamy

Ref	Name	Matter Raised	Applicant's Response
		how many they have done, and show us the actual results? Would they like us to do the necessary survey for them?	peat, consistent with the results of the ALC survey. The survey did not identify the presence of jarosite within the soil profile, including in locations where desk based information suggested a potential risk of acid sulphate soils. This was specifically looked for as these soils had potentially experienced drainage as a result of agricultural use. The survey further found that the peat and loamy peat are predominantly underlain by calcareous loamy sand, confirmed by reaction with 10% hydrochloric acid. As such, there is no evidence to indicate the presence of actual acid sulphate soils within the surveyed areas from field survey and no further specific laboratory testing was therefore undertaken at the time of the surveys. However, it is accepted that this does not fully rule out the potential for acid sulphate soils to occur locally, as such acidic sulphate soils can be sporadic in distribution. Should any evidence of acid sulphate soils arise during construction, appropriate investigation and mitigation measures would be implemented in accordance with best practice. Any occurrences encountered during construction would be managed as required by **7.2 Outline Code of Construction Practice (Revision C)** (commitments GH02 and GH08) to include activities such as toolbox talks, isolation of areas and treatment/off-site disposal of acidic materials. In addition, emerging research and evidence will be reviewed to detail procedures for any testing required – for example in March 2026 a Special Issue of the European Journal of Soil Science titled 'New horizons for acid sulfate soils research' was published by the British Society of Soil Science (through the publishers Wiley).

Ref	Name	Matter Raised	Applicant's Response
REP2-054	Pylons East Anglia Ltd	Appendix B Acid sulphate soils. There is a further issue with their desk studies. Acid sulphate soils were unknown to the Soil Survey of England and Wales until Dr Dent's 1979-82 surveys for the Broads Authority. They do not feature in any earlier compilations. The definitive Soil Map England and Wales was compiled between April 1979 and March 1982 and, to our knowledge, acid sulphate soils were a last-minute addition only to mapping in the Waveney valley and the Fens.	Soil Alert 1: Acid Sulphate Peats and Alluvium (available on the LandIS website) identifies the multiple soil series that may be acid generating; within the Study Area, however, only the Wallasea 1 and Mendham Soil Associations are present, with the Wallasea 1 Soil Association comprising potentially acid sulphate alluvium soils and the Mendham Soil Association comprising potentially acid sulphate peats. Within the Order Limits, the Mendham Soil Association is only present across and near to the Waveney Valley, as shown on **6.6.F6 Environmental Statement Figure 6.6 - Soil Association Map [APP-146]**. The Wallasea 1 Soil Association is only present within the Agriculture and Soils Study Area near Tilbury and is not identified within the Order Limits, as shown on **6.6.F6 Environmental Statement Figure 6.6 - Soil Association Map [APP-146]**. As stated in **8.4.6 Applicant's comments on submissions received at Procedural Deadline A [REP1-136]**, the ALC surveys within the Waveney Valley did not identify any acid-generating soils down to 1.2 m below ground level (bgl). As stated in **6.6.A1 Environmental Statement Appendix 6.1 – Agricultural Land Classification Report [APP-139]**, the detailed Agricultural Land Classification (ALC) surveys were undertaken in line with the revised ALC guidelines (see **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]** for reference). Once peaty soils were identified during the ALC survey, a peat survey on a 50 m grid was undertaken to further investigate peat extent and the potential presence of acid sulphate soils. The survey used an

Ref	Name	Matter Raised	Applicant's Response
			extended Dutch auger, enabling sampling to depths of up to 2.0 m. The peat survey confirmed the presence of peat and loamy peat, consistent with the results of the ALC survey. The survey did not identify the presence of jarosite within the soil profile, including in locations where desk based information suggested a potential risk of acid sulphate soils. The survey further found that the peat and loamy peat are predominantly underlain by calcareous loamy sand, confirmed by reaction with 10% hydrochloric acid. As such, there is no evidence to indicate the presence of actual acid sulphate soils within the surveyed areas from field survey and no further specific laboratory testing was therefore undertaken. However, it is accepted that this does not fully rule out the potential for acid sulphate soils to occur locally, as such acidic sulphate soils can be sporadic in distribution. Should any evidence of acid sulphate soils arise during construction, appropriate investigation and mitigation measures would be implemented in accordance with best practice. Any occurrences encountered during construction would be managed as required by **7.2 Outline Code of Construction Practice {Revision C)** (commitments GH02 and GH08) to include activities such as toolbox talks, isolation of areas and treatment/off-site disposal of acidic materials. In addition, emerging research and evidence will be reviewed to detail procedures for any testing required – for example in March 2026 a Special Issue of the European Journal of Soil Science titled 'New horizons for acid sulfate soils research' was published by the British Society of Soil Science (through the publishers Wiley).

Ref	Name	Matter Raised	Applicant's Response
REP2-054	Pylons East Anglia Ltd	Appendix D Email to Natural England expressing concern about advice given to the Applicant.	The discussions between Natural England and the Applicant can be found in **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**.
REP2-055	Pylons East Anglia Ltd	The failure to include any ecosystem service of natural capital assessment means that "providing wider environmental and societal benefits as part of the Project" is entirely hypothetical and unsubstantiated. If the Applicant is going to refer to 'environmental and societal benefits', then measure them via a statutory ES and Nat Cap assessment. If not, then remove all reference to environmental benefits, as they are tantamount to greenwash.	**7.1 Biodiversity Net Gain Report [APP-299]** sets out the Applicant's overall approach to BNG, the assessment methodology used and the mitigation and enhancement proposed in the absence of BNG guidelines for NSIPs. This approach was broadly agreed in principle with Natural England. This includes all details on the locations of on- site habitat replacement planting and areas of habitat creation/enhancement (Environmental Areas). Illustrative landscape designs for the Environmental Areas are provided within **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. The Applicant supports the delivery of Environmental Net Gain, of which BNG is an essential component, and will continue to explore a range of options to deliver BNG which provide the best choices and outcomes for nature and wider environmental and societal benefits, in addition to providing value for money for consumers. As part of the offsite procurement process, suppliers will be asked to confirm that they can deliver a range of biodiversity gains, that provide wider environmental and societal benefits, including environmental education, learning and skills. Co-benefits could include, but not be limited to, ecosystem services, climate adaptation and resilience, species abundance, and societal benefits. Whilst it is not possible to quantify this additional value at this stage, full details of the off-site solution and added environmental and societal value would be

Ref	Name	Matter Raised	Applicant's Response
			reported through the final iteration of the off-site BNG Report. This approach is in line with NPS EN-1 (2024) paragraph 4.6.12 which states that '*when delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies*'. Whilst the Applicant seeks to deliver Environmental Net Gain in line with national policy, there is no statutory or policy requirement to quantify the gains or a standardised single metric to do so, in contrast to BNG. A proportionate approach has therefore been adopted, seeking to deliver such benefits without quantifying them numerically.
REP2-055	Pylons East Anglia Ltd	No mention of impacts on species…e.g. powerline collision risk of IUCN NT species known to be present along the route (e.g. Northern lapwing), or the Amber and Red list (national scale) recorded along the route. No mention of or allusion to UK requirements under Bonn Convention (CMS) and impact on migratory species.	The Applicant notes the comment that the previous response focused on designated sites rather than explicitly referencing potential impacts on individual bird species, including IUCN Near Threatened species, UK Red and Amber listed species, and migratory species protected under international conventions. Clarification is provided below. Potential impacts on bird species associated with internationally and nationally designated sites have been considered within **6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026], 6.8.A8 Environmental Statement Appendix 8.8 – Wintering and Passage Bird Report [APP-167 to APP-170]** and **5.3 Habitats Regulations Assessment Report [APP-082]** to assess collision and disturbance risk for species

Ref	Name	Matter Raised	Applicant's Response
			groups with recognised susceptibility to overhead lines, including wildfowl, waders, large waterbirds, raptors, gulls and terns. This includes species of national and international conservation concern, such as Northern lapwing (IUCN Near Threatened; UK Red List), which is a qualifying feature of several nearby designated sites, including the Stour and Orwell Estuaries SPA and Ramsar. Species occurrence, behaviour and movement patterns were informed by a comprehensive desk study of over 26,000 bird records from the British Trust for Ornithology, the Royal Society for the Protection of Birds and local records centres, together with targeted wintering and passage bird surveys. The assessment did not identify regular commuting movements or flight corridors at conductor height connecting designated sites with the Project alignment, outside of specific inland features that were taken forward for targeted assessment. The potential for collision risk to affect the conservation objectives of nearby SPAs and Ramsar sites was specifically assessed through **5.3 Habitats Regulations Assessment Report [APP-082]**. Those National Site Network (NSN) and Ramsar sites where potential impact pathways could not be ruled out at screening stage, including the Stour and Orwell Estuaries SPA and Ramsar Site and the Thames Estuary and Marshes SPA and Ramsar Site, were taken forward to detailed screening. The HRA concluded that, with embedded design measures and mitigation included within **7.2 Outline Code of Construction Practice (Revision C)**, the Project would not result in adverse effects on the

Ref	Name	Matter Raised	Applicant's Response
			integrity of any NSN or Ramsar site, either alone or in combination. Precautionary measures such as bird diverters are proposed at specific locations associated with larger waterbodies and wetland features to further reduce collision risk, notwithstanding the conclusion that baseline risk is low and not significant.
REP2-055	Pylons East Anglia Ltd	NG's approach to the mitigation hierarchy (avoid, reduce, restore, offset), in that order of preferability) seems to favour restore and offset over avoid and reduce, yet in the text, 'avoid' is invoked a great deal. Can NG please detail where the route has been explicitly modified in order to avoid biodiversity impact.	The **Design Development Report [APP-122]**, **ES Chapter 3: Alternatives [APP-127], Design and Access Statement [APP-353]** and **Design Approach for Site Specific Infrastructure [APP-354]** provide an overview of the design rationale for the Project. It outlines how the design choices have sought to reduce the environmental effects of the Project and demonstrates that the design has incorporated mitigation measures in order to avoid or reduce significant environmental effects wherever practicable. These set out how different options compared when considering effects to ecology and whether designated ecological sites would be avoided or impacted by the different options. Following the 2023 consultation a factor leading to a change of route to reduce biodiversity effects was the potential effect on woodland which is now lower than it may otherwise have been.
REP2-055	Pylons East Anglia Ltd	One of the major issues in relation to this is the record of white-lipped crayfish (*Austropotamobius pallipes*), that was overlooked in NG's biodiversity desktop assessment, but has nonetheless been recorded recently along the proposed route. It is not mentioned in the response. This seems a considerable oversight given its national and international conservation status.	Please see the response on crayfish noted above.

Ref	Name	Matter Raised	Applicant's Response
REP2-055	Pylons East Anglia Ltd	Are the 2025 surveys available to public or on request please.	The 2025 survey data is included within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and the following appendices: • **6.8.A13 Appendix 8.13: Otter and Water Vole Report [AS-039]** • **6.8.A1 Appendix 8.1: Habitat Report [AS-028]** • **6.8.A7 Appendix 8.7: Breeding Bird Report [AS-030]** • **6.8.A9 Appendix 8.9: Bat Roost Report [AS-034]** • **6.8.A10 Appendix 8.10: Bat Activity Report [AS-036]** • **6.8.A15 Appendix 8.15: Badger Report [AS-043].** This information was submitted to the Planning Inspectorate in November 2025 and is publicly available.
REP2-055	Pylons East Anglia Ltd	"County and Local Wildlife Sites within the Order Limits are predicted to experience minor, reversible impacts during construction, with negligible residual impacts post-mitigation. Operational phase impacts on designated sites are assessed as negligible" Does this include powerline collision risk for birds and bats utilising these habitats and the wider landscape?	Bats and birds are considered as separate ecological receptors to County/Local Wildlife Sites within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Any potential impacts to either bats or birds, including collision risk, have been assessed under the bat or bird receptor.
REP2-055	Pylons East Anglia Ltd	Are these available to view please?	See answer above regarding the 2025 survey data.
REP2-055	Pylons East Anglia Ltd	"Long-term management of these off-site BNG habitats would fall to the third party providers in line with the habitat management plan for the specific site.	BNG delivered off-site would be delivered through expert partners and biodiversity units purchased by the Applicant from commercially registered providers.

Ref	Name	Matter Raised	Applicant's Response
		Following delivery of BNG, the Applicant would submit a BNG Verification Report to the Local Planning Authorities, confirming that BNG has been delivered. Updated ecology survey reports that include the 2025 survey data were submitted to the Planning Inspectorate in November 2025. This included an update to **6.8 Environmental Statement Chapter 8 -** **Ecology and Biodiversity [AS-026**] and the following appendices Who funds this long-term? What timescales? What surety of biodiversity success? And what implications and adjustments if required/specified biodiversity success is not achieved?	This approach means that, for the most part, responsibility for implementation, management and reporting of BNG rests with experienced nature conservation organisations and land managers for which this is their area of expertise and core business. All off-site BNG will be managed by third-party providers as per the habitat management and monitoring plan prepared specifically for the off-site location and agreed with Natural England, this will include any adaptive measures. Registered BNG providers are already legally obligated to deliver the required biodiversity units, within a set time frame, on the purchase of a biodiversity unit. No further legal commitments are needed for the monitoring and management of off-site BNG sites with local authorities.
REP2-055	Pylons East Anglia Ltd	The examples included in the referenced 2023 report outlining occurrences of suspected collisions with power lines, are situated on or close to the coast, and in very close proximity to Special Protection Areas (SPAs) designated for internationally important numbers of birds. It appears that you may be referring the Stevens 2023, report. The report that utilised eBird 'Hotspot' data ('Bird species recorded at eBird Hotspots along proposed Great Grid Upgrade, Norwich to Tilbury - A report for Essex, Suffolk, Norfolk Pylons Action Group July 2023') was focussed entirely on inland sites. Please check this report in relation to your response, especially this statement: "The Project is located further inland, with alignment allowing sufficient distance from European Sites	The Applicant acknowledges the comment raised regarding the distinction between bird occurrence data derived from eBird hotspots and published collision evidence and will provide further clarification. The Applicant's assessment does not seek to characterise the eBird hotspot report as coastal or inland in focus, and it doesn't rely on that report to draw conclusions on collision risk. Rather, **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** adopts an approach consistent with established guidance, whereby collision risk is assessed based on the interaction between bird behaviour, flight height, movement patterns and habitat / connectivity context, rather than on species occurrence data alone.

Ref	Name	Matter Raised	Applicant's Response
		wherever possible. The Project is located outside the Impact Risk Zone for the majority of European Sites along the coast, except for the Stour and Orwell Estuaries SPA / Ramsar Site and the Thames Estuary and Marshes SPA / Ramsar Site (located 3.1 km and 1.7 km from the Project respectively)"	Publicly available datasets such as eBird hotspots provide valuable information on species presence within the wider landscape, and many of the species identified within third party submissions overlap with those identified through the Applicant's desk study, which reviewed over 26,000 records from the British Trust for Ornithology, the Royal Society for the Protection of Birds and local records centres. However, species presence data do not, in isolation, identify collision risk locations. Collision risk has been demonstrated to be highest where bird movements are concentrated, predictable, and constrained by habitat such as estuaries, wetlands, reservoirs or river corridors, particularly where these features intersect with overhead infrastructure. Accordingly, the Applicant's assessment focused targeted wintering and passage surveys on those inland features most likely to function as movement corridors, informed by desk study data and professional judgement, using an approach consistent with NatureScot (2016) guidance and the CIEEM Guidelines for Ecological Impact Assessment. The reference in the Applicant's earlier response to published examples of overhead line collisions in coastal or estuarine contexts was intended to illustrate the types of habitats in which collision risk has been empirically documented in the literature, rather than to characterise the scope or focus of the eBird hotspot report. This clarification does not alter the conclusions of **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. The Project's alignment which

Ref	Name	Matter Raised	Applicant's Response
			is a sufficient distance from Special Protection Area's and Ramsar sites, and the absence of inland landscape features that would channel flight activity at conductor height outside identified corridors support the conclusion that collision risk in open farmland areas would be low. All Special Protection Area's and Ramsar sites where potential pathways could not be ruled out were taken forward to Habitats Regulations Assessment screening (**5.3 Habitats Regulations Assessment Report [APP-082]**), and no likely significant effects were identified. The Applicant therefore considers that the assessment methodology remains robust, proportionate and evidence-led, and that focusing on species lists or occurrence data alone does not provide a sound basis for determining collision risk along the Project route.
REP2-055	Pylons East Anglia Ltd	"*In the case of Dungeness, this is also situated within the vicinity of a bird observatory and a large RSPB wetland nature reserve, which provide important wintering grounds and passage routes for birds*." The Stevens 2023 study did indeed include data from the BTO study at Dungeness, but it also contained data from the wider countryside for ringed bird mortality in Norfolk, Suffolk, Essex (and is therefore highly applicable to avifauna impacts of NG's proposed development). Please refer to Table 4 in revisiting your response to this point.	The reference in the Applicant's earlier response to Dungeness was intended to illustrate an example of a habitat context in which collision risk has been evidently demonstrated to be elevated, namely locations where very high bird densities, constrained flight corridors and established monitoring effort coincide, such as large wetlands associated with bird observatories and major reserves. It was not intended to imply that collision evidence within the 2023 report is limited to Dungeness alone. It is recognised that the 2023 report also presents ringed bird mortality data from the wider countryside, including records from Norfolk, Suffolk and Essex, as summarised in Table 4. However, the presence of wider countryside collision records does not define

Ref	Name	Matter Raised	Applicant's Response
			collision risk along a specific development corridor. As reflected in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, collision risk is not determined by the existence of collision records within a broad region as presented by the data within the 2023 report, but by the interaction of species specific flight behaviour with local landscape features and infrastructure layout. As set out in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [AS-030 and APP-167 to APP-170]**, the Applicant's assessment includes a Project focussed approach that distinguishes between: • Evidence that collisions have occurred somewhere within the wider countryside; and • Evidence of repeated, predictable bird movements at conductor height along the Project alignment that would give rise to a notable collision risk. The assessment therefore adopts a proportionate, site specific approach, focusing on detailed collision risk assessment on habitat and landscape features known to concentrate or channel bird movement, such as rivers, reservoirs and wetland features. This approach is consistent with established guidance and recognises that while collisions are known to occur in the wider countryside relating to existing infrastructure, they are the same everywhere and are strongly influenced by local ecological and topographical context.

Ref	Name	Matter Raised	Applicant's Response
			Accordingly, the inclusion of wider countryside collision records within the 2023 report does not undermine the Applicant's conclusions. The data was considered as part of the broader understanding that collisions can occur, but they do not supersede the need for, or the outcomes of, a site specific assessment of collision risk based on behaviour, movement patterns and habitat context along the Project.
REP2-055	Pylons East Anglia Ltd	On a precautionary basis, mitigation in the form of orange spacers and bird diverters on the earth wire is proposed at the River Waveney and Ardleigh Reservoir as detailed in **7.4 Outline Landscape and Ecological Management Plan**. We endorse the use of bird diverters, but they shouldn't be seen as a panacea… arguably the most exhaustive meta-analysis on the subject found an average global mortality reduction of 50%, meaning that there are still likely to be high levels of operational mortality: Bernardino, J., Martins, R. C., Bispo, R., & Moreira, F. (2019).Re-assessing the effectiveness of wire-marking to mitigate bird collisions with power lines: A meta-analysis and guidelines for field studies.	The Applicant agrees that bird diverters and spacers are not a panacea and are not expected to eliminate collision risk entirely. As highlighted by the meta analysis by Bernardino et al. (2019), wire marking measures typically reduce collision mortality rather than removing it altogether. However, in the context of the Project, bird diverters are proposed on a precautionary basis at the River Waveney and Ardleigh Reservoir to further reduce a collision risk that has already been assessed as low and not significant. In accordance with the CIEEM Guidelines for Ecological Impact Assessment, mitigation is applied proportionately to the scale and significance of predicted effects. The diverters are therefore not relied upon to make an otherwise significant impact acceptable, but instead serve to reduce the likelihood of collision in locations where bird movements may be more varied. With this precautionary mitigation in place, **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** concludes that operational collision risk would remain negligible, with no significant residual effects.

Ref	Name	Matter Raised	Applicant's Response
REP2-055	Pylons East Anglia Ltd	The 'value for money' statement is pertinent given that NG have said in these response documents (**8.4.6 Applicant's comments on submissions received at Procedural Deadline A**) that ecosystem service valuation (an economic value of public goods lost due to proposed development) will not be undertaken! How will NG determine the 'wider environmental and societal benefits', if it does not assess natural capital and ecosystem service implications of the proposed development? This is a failure against EN-1, which states: "*Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capital Committee's 'How to Do it: natural capital workbook', the government's guidance on Enabling a Natural Capital Approach, and other tools that aim to enable wider benefits for people and nature*" Section 4.6.16 in both the 2023 and 2025 NPS's.	The Applicant supports the delivery of Environmental Net Gain, of which BNG is an essential component, and will continue to explore a range of options to deliver BNG which provide the best choices and outcomes for nature and wider environmental and societal benefits, in addition to providing value for money for consumers. As part of the offsite procurement process, suppliers will be asked to confirm that they can deliver a range of biodiversity gains, that provide wider environmental and societal benefits, including environmental education, learning and skills. Co-benefits could include, but not be limited to, ecosystem services, climate adaptation and resilience, species abundance, and societal benefits. Whilst it is not possible to quantify this additional value at this stage, full details of the off-site solution and added environmental and societal value would be reported through the final iteration of the off-site BNG Report. This approach is in line with NPS EN-1 (2024) paragraph 4.6.12 which states that '*when delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies*'. Whilst the Applicant seeks to deliver Environmental Net Gain in line with national policy, there is no statutory or policy requirement to quantify the gains or a standardised single metric to do so, in contrast to BNG. A proportionate approach has therefore been adopted, seeking to deliver such benefits without quantifying them numerically.

Ref	Name	Matter Raised	Applicant's Response
REP2-055	Pylons East Anglia Ltd	"The habitat across the Order Limits is primarily farmland, and it was considered that the main species present would be farmland passerines. The risk of collision to such species is considered low, particularly during the breeding season. Passerines are manoeuvrable in flight and in general, likely to fly at low levels while breeding and feeding young." Data from the BTO, and summarised in Stevens, 2023, indicates that passerines are vulnerable to mortality from overhead powerlines - for instance, a BTO study of avian powerline collision at Dungeness, Kent between January 1964 and November 1970, found numerous passerine casualties. NG are correct in their assessment that the areas in question are predominantly farmland. However, such is the nature of the mosaic of habitat types, that the avian assemblage does not just consist of farmland passerines. Non-passerine species recorded during We would urge NG to rethink the tenuous proposition that a) passerines are low collision risk, and b) farmland passerines are the dominant group in such landscapes.	The Applicant acknowledges that passerine collisions with overhead power lines are documented in the literature, including studies cited by Pylons East Anglia Ltd such as BTO collision data summarised by Stevens (2023). The Applicant does not dispute that passerines can be involved in collisions with power lines. However, **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** does not conclude that passerines are not at risk of collision in all circumstances. Rather, it concludes that farmland passerine species are not considered to be at significant risk of collision in the context of the Project, having regard to species behaviour, landscape context and likely impact pathways. This distinction is clarified within **6.8.A8 Environmental Statement Appendix 8.8 – Wintering and Passage Bird Report [APP-167 to APP-170**]. The examples cited, including those from Dungeness, relate to highly specific habitat and landscape settings characterised by very high bird densities, extensive wetland habitat and constrained, predictable movement corridors. Such conditions are not representative of the majority of inland farmland along the Norwich to Tilbury alignment. The Applicant agrees that farmland landscapes comprise a mosaic of habitats and may support both passerine and non-passerine species. Accordingly, non-passerine species with recognised collision susceptibility, including wildfowl, waders, raptors and large waterbirds, were explicitly included within the collision risk assessment presented in **6.8.A8 Environmental Statement Appendix 8.8 –**

Ref	Name	Matter Raised	Applicant's Response
			Wintering and Passage Bird Report [APP-167 to APP-170]. For passerines, collision susceptibility is generally lower because these species are small and highly manoeuvrable in flight. This approach is consistent with NatureScot (2017, updated 2025) guidance on assessing impacts of power lines on birds and with the CIEEM Guidelines for Ecological Impact Assessment (2023). The NatureScot (2017, updated 2025) guidance states passerine species are not generally considered to be significantly impacted by wind farms [and overhead cables]. Targeted wintering and passage bird surveys focused on features where collision risk is most likely to arise, including rivers, reservoirs and wetland features. Outside such locations, collision risk in open farmland was assessed through desk study evidence and professional judgement of species specific flight behaviour, rather than targeted collision surveys along the full alignment. In these areas, non-passerine movements are typically characterised by higher altitude transit flights or diffuse foraging activity, resulting in a lower likelihood of collision. Taking account of the species assemblage present, the assessment set out in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** concludes that collision risk for passerine and non-passerine species within farmland areas would be negligible and not significant. This conclusion remains robust.
REP2-057	Pylons East Anglia Ltd	Appendix H - North Essex Authorities Local Plan Examination Report 2020	The Applicant has no comment to make on this document.

Ref	Name	Matter Raised	Applicant's Response
REP2-058	Pylons East Anglia Ltd	*Appendix I – Bat Activity* Short Review of Bat Activity Report 6.9 Para 1.3.3 – How was building roost potential assessed without visiting buildings adjacent to the DCO? What was the definition of "significant gap", was this consistent at all locations on the route?	There are no direct impacts to any buildings or structures as a result of the Project. Therefore, no surveys for bat roosts in buildings/structures were undertaken. The bat survey scope was agreed with Natural England in advance of surveys being undertaken, as included within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**. Bat activity has been assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and specifically within **6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036]**. Bullet point three in paragraph 1.3.3. refers to any building with connectivity to suitable habitat. A 'significant gap' would be incurred by habitat removal associated with construction activities perceived to have higher impacts such as vegetation removal due to clearance for the 400 kV overhead line.
REP2-058	Pylons East Anglia Ltd	*Appendix I – Bat Activity* Para 1.3.13 – This paragraph is incorrect. The "Crest Advantage" setting is not implemented on the SM4BAT detector, it is available on a different brand of detector, the Batlogger series manufactured by Elekon AG. Why is there any confusion about the hardware used for detection? Was this represented to Natural England?	The Applicant acknowledges that the SM4BAT detector does not have a pre-determined 'crest advantage' setting. The use of 'Crest Advantage' in paragraph 1.3.13 is in error and has been addressed in **8.1 Errata List (Issue B).** The static detector settings used during surveys are standardised and those outlined in Appendix B of **6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036]** are correct and represent what have been utilised. SM4BAT detector is a full spectrum bat detector and the settings used are suitable for purpose, in line with Bat Conservation Trust Good Practice Guidelines (2023).

Ref	Name	Matter Raised	Applicant's Response
REP2-058	Pylons East Anglia Ltd	*Appendix I – Bat Activity* Para 1.3.16 – In the user guide for Kaleidoscope, the developers state: "Kaleidoscope Pro can be used to analyze recordings of bat calls for the purpose of automatic species identification. Automated identifications, though largely accurate, should not be relied on solely as a basis for scientific research or land management decisions. It should be expected there will be false positive and false negatives identifications. Because bats use echolocation for navigation and hunting, they adapt their calls in real time to respond to their situation (e.g. hunting insects and avoiding collisions). Additionally, individual species of bats can display extremely variable repertoires of call types, and some calls of some species are very difficult to differentiate from calls that can be produced by other species. The automatic identification function is intended only as a suggestion to facilitate analysis, not to replace human expert vetting of calls." The use of automatic identification, the limited "quality control" sample checking and the subsequent analysis of quantities of calls by species in the report is inconsistent with this warning. There are no metrics provided to estimate the proportion of erroneously tagged recordings.	Bat Sound analysis was undertaken in line with the Bat Conservation Trust (BCT) Good Practice Guidelines (2023). BCT acknowledge that automated analysis is a more effective and efficient way to handle a large volume of data achieving consistency across the data set. These tools were not solely relied upon and all data analysed using Kaleidoscope Pro was subject to a comprehensive quality assurance process. The auto analysed files were manually identified by a competent ecologist experienced in the use of the Kaleidoscope Pro software. The calls were randomised and then the following percentage of calls were subject to further Quality Assurance review: • All unidentified (NOID) • 10% barbastelle • 5% all other calls (including Noise files). Where the Auto-ID label was incorrect, the correct species label was attributed to the call. Each file may contain calls of multiple bat species; however, the Auto-ID function is only capable of labelling one species. This was corrected during manual checks by duplicating the file and labelling each species separately. If 50% of the 5% Noise files were bats, then all Noise files were manually reviewed. BCT suggest a quality assurance approach that reflects the ease of identification of each sub-group and give more weight to species that are of particular interest or have a lower level of confidence. The quality assurance process adopted for the Project has followed such BCT guidance. Furthermore, given all NOID calls were manually checked, the correct classification rate (CCR) is considered to be high

Ref	Name	Matter Raised	Applicant's Response
			(>80% confidence) for the auto-ID of species recorded within the Survey Area. The only exception to this is Myotis species (<80% confidence) due to overlapping call characteristics and have been grouped together to overcome this constraint.
REP2-058	Pylons East Anglia Ltd	*Appendix I – Bat Activity* Para 1.3.16 – The AutoId function can be set to one of three levels of sensitivity "More Sensitive", "Balanced" and "More Accurate". These have a critical impact on the performance of the tool. "More Sensitive" is biased towards separating a signal from background noise but will also incorrectly tag species to the signal more frequently. "More Accurate" will correctly tag species more frequently but will incorrectly tag more recording as noise without isolating a valid signal. It is not stated anywhere which of these settings was chosen for the analysis and the rationale informing the choice.	Balanced (neutral) sensitivity was used with a robust quality assurance approach, as outlined in the text above, in relation to Paragraph 1.3.16 of **6.8.A10 Environmental Statement Appendix 8.10 - Bat Activity Report [AS-036]** and the use of Kaleidoscope Pro.
REP2-058	Pylons East Anglia Ltd	*Appendix I – Bat Activity* Para 1.3.17 – Did the agreement with Natural England include an expectation for multiple recorders to be used at each site? The result in the paper used to support the metric for identifying Barbastelle roosts in the agreement was derived from the use of grids of static recorders arranged within single pieces of woodland. Quoting from the papers conclusion: "The effect of detector density on woodland classification was highly significant for each woodland ($p < 0.001$), with the survey effort required to reliably detect a colony varying depending on the woodland surveyed. Overall, there was a 90% chance of a woodland being correctly identified as having a colony	The bat survey scope was agreed with Natural England in advance of surveys being undertaken, as included within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034].** The agreed scope was based on one static detector per location in line with the Bat Conservation Trust Best Practice Guidelines (2023). Bat activity has been assessed within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and specifically within **6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036].**

Ref	Name	Matter Raised	Applicant's Response
		with a density of 0.16 detectors ha−1 (Fig. 3). The adjusted-R2 value for the model was 0.936. When only a single detector within a woodland was selected via our random subsampling approach, we found that there was just a 32% chance of detecting a colony based on the average survey effort." Were Natural England made aware that with only single detectors being used in each location there was only a 1 in 3 chance that roost sites would be correctly identified?	The Applicant acknowledges that the scientific study (O' Malley *et al*., 2023)[14] focusses only on woodland habitats ranging in size. The study showed that a density of 0.16 detectors per ha of woodland is required to have a 90% chance of correctly being identified as having a colony. This extrapolates to one bat static detector per c.6ha of woodland, which is acknowledged in the abstract of the scientific paper (O' Malley *et al*., 2023). No static locations sample a woodland area of larger than 6 ha that would be impacted by the Project. Therefore, the use of one static detector at each location is considered to be ample survey effort as agreed with Natural England. The survey locations identified for the bat static detectors, also includes a range of different habitat types, not just woodland, including other linear habitats. These linear habitats were included due to the potential connectivity between adjacent woodlands which might provide important barbastelle habitat. The above bat activity survey scope therefore presents a higher survey effort than that presented in the scientific paper (O' Malley *et al*., 2023)[15].
REP2-058	Pylons East Anglia Ltd	*Appendix I – Bat Activity* Para 1.3.24 – Were the historic record providers asked to confirm that no errors were made when their data was filtered by National Grid to provide baseline information?	The data that was sent to National Grid, by local record centres, was taken at face value. Local record centres perform their own rigorous quality assurance with records being verified by a network of expert verifiers/county recorders. Verifiers check the record

[14]O' Malley, K. D., Schofield, H., Wright, P. G. R., Hargreaves, D., Kitching, T., Palacios M. B. & Mathews, F. (2023) An acoustic-based method for locating maternity colonies of rare woodland bats. PeerJ 11:e15951 http://doi.org/10.7717/peerj.15951

[15]O' Malley, K. D., Schofield, H., Wright, P. G. R., Hargreaves, D., Kitching, T., Palacios M. B. & Mathews, F. (2023) An acoustic-based method for locating maternity colonies of rare woodland bats. PeerJ 11:e15951 http://doi.org/10.7717/peerj.15951

Ref	Name	Matter Raised	Applicant's Response
			including geographic location, rarity and common identification errors and may contact the supplier of the record in order to establish more details of the record if it is an exception in its normal temporal or geographic range or if it is difficult to identify.
REP2-058	Pylons East Anglia Ltd	*Appendix I – Bat Activity* Para 1.3.34 – This statement is not correct: "Wildlife Acoustics gives an 82% TPR for barbastelle species on detectors with balanced recording settings. This means that Kaleidoscope Pro's AutoID function correctly identifies barbastelle calls at a rate of 82%." The TPR was generated by feeding the tool 217 known Barbastelle echolocation calls, in 178 cases it tagged the recording as being a Barbastelle. As the training data for the tool does not include localisation or social calls (which tend to be most frequently expressed near roosts) and there is no metric on the impact of extracting the signal from background noise the correct version of this statement would be "This means that Kaleidoscope Pro's AutoID function correctly identifies previously known to be barbastelle calls at a rate of 82%" Even with the stylised training data used to generate the SM4BAT manufacturers TPR data there is significant variation in true positive and false positive proportions by species.	The Applicant agrees that the True Positive Rate (TPR) is generated from previously known barbastelle recordings. This is how the AutoID function is generated. The Bat Conservation Trust (BCT) acknowledge that automated analysis is a more effective and efficient way to handle a large volume of data achieving consistency across the data set. The AutoID was suitably quality assured (see above response) in line with BCT Guidance. Kaleidoscope Pro is given as an appropriate sonogram analysis software in the BCT Best Practice Guidelines (2023).
REP2-058	Pylons East Anglia Ltd	*Appendix I – Bat Activity* Para 1.4.5 – As previously noted, using a single detector results in only a 1 in 3 chance that the metric agreed with Natural England will correctly identify a nearby roost presence. Are Natural England aware	The bat survey scope was agreed with Natural England in advance of surveys being undertaken, as included within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034].** The agreed scope was based on one static detector per location in line with the Bat Conservation Trust Best Practice Guidelines (2023). Bat activity has been assessed

Ref	Name	Matter Raised	Applicant's Response
		that the discriminatory power of the test as implemented is so poor?	within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]** and specifically within **6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036].** The Applicant acknowledges that the scientific study (O' Malley *et al*., 2023)[16] focusses only on woodland habitats ranging in size. The study showed that a density of 0.16 detectors per ha of woodland is required to have a 90% chance of correctly being identified as having a colony. This extrapolates to one bat static detector per c.6 ha of woodland, which is acknowledged in the abstract of the scientific paper (O' Malley *et al*., 2023). No static locations sample a woodland area of larger than 6 ha that would be impacted by the Project. Therefore, the use of one static detector at each location is considered to be ample survey effort as agreed with Natural England. The survey locations identified for the bat static detectors, also includes a range of different habitat types, not just woodland, including other linear habitats. These linear habitats were included due to the potential connectivity between adjacent woodlands which might provide important barbastelle habitat. The above bat activity survey scope therefore presents a higher survey effort than that presented in the scientific paper (O' Malley *et al*., 2023)[17].

[16] O' Malley, K. D., Schofield, H., Wright, P. G. R., Hargreaves, D., Kitching, T., Palacios M. B. & Mathews, F. (2023) An acoustic-based method for locating maternity colonies of rare woodland bats. PeerJ 11:e15951 http://doi.org/10.7717/peerj.15951

[17] O' Malley, K. D., Schofield, H., Wright, P. G. R., Hargreaves, D., Kitching, T., Palacios M. B. & Mathews, F. (2023) An acoustic-based method for locating maternity colonies of rare woodland bats. PeerJ 11:e15951 http://doi.org/10.7717/peerj.15951

Ref	Name	Matter Raised	Applicant's Response
REP2-058	Pylons East Anglia Ltd	*Appendix I – Bat Activity* Para 1.5.17 – Given the uncertainty in the accuracy of species identification, the data in Table A8.10.18 is unreliable although it is a critical input to the scheme of mitigation measures set out in Document 6.8 - Environmental Statement Chapter 8 - Ecology and Biodiversity.	The Applicant disagrees that the data in Table A8.10.18 of **6.8.A10 ES Appendix 8.10 Bat Activity Report [AS-036]** is unreliable. The bat activity data was collected using full spectrum detectors using standardised bat detector recording settings and the approach to sonogram analysis is acceptable in accordance with Bat Conservation Trust Best Practice Guidelines (2023).
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* A review of the submitted Drainage Strategy has identified a number of deficiencies across both the methodology and the level of information provided.	**8.2 Drainage Strategy DCO [REP1-072]** documents the assessment and design undertaken by the Applicant to understand the impact the Project may have on the existing surface water flow paths and the existing field drainage networks within the vicinity of the Project and provides a high-level drainage strategy to mitigate these impacts. Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)** sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of Requirement 4 of the DCO. This Plan will be substantially in accordance with the Drainage Strategy but will reflect the detailed design of the Project and the Plan will be developed liaising with the LLFAs and statutory undertakers, with ongoing dialogue during implementation of the measures. The purpose of the drainage design undertaken for submission is to provide sufficient confidence that the project has concluded that: • Flood risk is acceptable • Environmental effects are understood and controlled

Ref	Name	Matter Raised	Applicant's Response
			• The scheme is deliverable within the proposed limits • No show stoppers remain for later stages The drainage design is not a detailed design, and it is acknowledged that the drainage design will be developed at a later stage of the project when the details of the project are confirmed and additional survey information is available. Many of the comments made are associated with a detail not required at this stage of the DCO submission. The commitment above covers the development of the drainage design under and agreed plan post consent. In liaison with the LLFAs a revised Drainage Strategy shall be submitted at a later deadline.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* The rainfall analysis relies on outdated methodologies. The use of the Flood Studies Report (FSR) rainfall method is no longer considered appropriate; current guidance from both Norfolk County Council and Essex Design Guide requires the use of FEH 2022 data, and this should be updated accordingly.	Essex Design Guide allows for FSR to be used, and this has been agreed with Essex LLFA. We note that Norfolk LLFA have requested FEH data is used, and this has been used in the assessment for all ponds except for one pond near Norwich Main Substation. Note that within the Drainage Strategy issued a single pond within Norfolk was calculated using FSR, however this pond was descoped to coordinate with the drainage strategy of other developers. In line with the SuDS hierarchy, it now uses linear drainage features, this will be clarified within the updated Drainage Strategy at a future deadline. Please note that the drainage attenuation within Suffolk has been assessed using FEH data.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Similarly, Suffolk Design Guidance requires the submission of BRE 365 infiltration testing data, a	The purpose of the drainage design undertaken for DCO submission is to provide sufficient confidence that the project has concluded that:

Ref	Name	Matter Raised	Applicant's Response
		Phase 1 Contamination Assessment, and associated exploratory logs at pre application stage — none of which have been provided.	• Flood risk is acceptable • Environmental effects are understood and controlled • The scheme is deliverable within the proposed limits • No show stoppers remain for later stages The drainage design is not a detailed design, and it is acknowledged that the drainage design will be developed at a later stage of the project when the details of the project are confirmed and additional survey information is available. BRE 365 infiltration testing data is therefore not required at this stage of the project, room for attenuation and outfall has been allowed for within the order limits however the SuDS hierarchy will be applied at detailed design. Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of Requirement 4 of the DCO. This Plan would be informed by ground investigation and infiltration testing where appropriate and would be developed whilst liaising with the LLFAs and statutory undertakers.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* The topographic analysis underpinning the drainage design is based on OS Terrain 5, a coarse dataset that is not suitable for outfall and channel assessment. Ground truthing and/or a topographic survey should be used to confirm outfall locations and drainage flow paths, particularly in low-lying areas	The purpose of the drainage design undertaken for DCO submission is to provide sufficient confidence that the project has concluded that: 1. Flood risk is acceptable 2. Environmental effects are understood and controlled

Ref	Name	Matter Raised	Applicant's Response
		where gravity-fed drainage viability has not been demonstrated. Outfall levels must be established at this stage rather than deferred.	3. The scheme is deliverable within the proposed limits 4. No show stoppers remain for later stages The drainage design is not a detailed design, and it is acknowledged that the drainage design will be developed at a later stage of the project when the details of the project are confirmed and additional survey information is available. Full topographical surveys are not required to inform the drainage design at this stage of the project. Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. Further survey information would be used to inform the detailed design. Where required micrositing for outfalls has been allowed for within the order limits for the project.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* The SuDS drainage hierarchy has not been adequately addressed. There is no evidence of feasibility assessment for rainwater harvesting or reuse, infiltration viability has not been confirmed through testing in accordance with BRE 365, and the assumption that 50% of surfaces are permeable is not justified given the reported poor infiltration. Until infiltration testing is completed, all surfaces should be treated as impermeable. Additionally, pond side slopes are proposed at 1:3, contrary to Suffolk Design Guidance which requires a maximum of 1:4.	Where the ground the scheme sits upon can be considered, for drainage purposes, as equivalent to existing ground due to the scheme elements being permeable, the ground is considered "permeable" in that pluvial runoff will take its natural course. This means that the scheme does not need to consider all of its assets as impermeable. A maximum 1 in 3 slope has been specified so that the detailed designer has flexibility within the design, and will be applied on a case by case basis. C753 which is referred to states that a 1 in 3 slope is appropriate for ponds on p.490 p.651; in Figures 23.5 and 23.6 of C753 this is shown diagrammatically. Risk assessment for specific methods of maintenance is to

Ref	Name	Matter Raised	Applicant's Response
			be carried out by the operator, and will be a section of the Surface Water Management Plan. Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan which will be developed in liaison with the LLFAs.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Further outstanding information includes pre- and post-development catchment area calculations (absent from Appendix A), half drain time analysis for infiltration features, maintenance schedules that address infiltration-specific requirements, freeboard provisions for all pond and basin features, and details of any balancing basins required to manage diverted field drain flows.	As is typical for a NSIP, the drainage information presented within the consent application is not a detailed design, rather an outline strategy. Catchment areas are provided for all attenuation assets within Appendix A which meets the needs of the level of design required at this stage. It is acknowledged that the drainage strategy will be developed into a detailed design at a later stage of the Project informed by additional survey information, including from ground investigations. Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. This Plan would include the required level of specific design detail, as well as all supporting hydraulic calculations to demonstrate how runoff across the site will be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* In summary, the submitted strategy contains multiple areas where the design falls short of current guidance	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. This would

Ref	Name	Matter Raised	Applicant's Response
		and where essential supporting information has not been provided.	include development of the specific mitigation measures for the Project. The Applicant notes the respondents comment and would like to draw attention to the purpose of the Drainage Strategy and the updated commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**. The purpose of the Drainage Strategy is to document the assessment and design undertaken to understand the impact the Project may have on the existing surface water flow paths and the existing field drainage networks within the vicinity of the Project, and the Drainage Strategy provides a high level drainage strategy to mitigate these impacts. The updated commitment provides clarity that the Surface Water Management Plan produced by the Main Works Contractor(s) will be substantially in accordance with **8.2 Drainage Strategy DCO [REP1-072]**.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* The above points are matters which could be raised as grounds for objection and/or as conditions requiring resolution prior to any drainage approval being granted.	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. This would include development of the specific mitigation measures for the Project.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 9 (Section 2.3.5) - (FSR Rainfall) - Generally outdated now. Should use FEH22 as stated in the Norfolk County Council's Drainage Design Standards Page - This assessment should use up to date data	We note that Norfolk LLFA have requested FEH data is used, and this has been used in the assessment for all ponds except for one pond near Norwich Main Substation. Note that within the Drainage Strategy issued a single pond within Norfolk was calculated using FSR, however this pond was descoped to coordinate with the drainage strategy of other

Ref	Name	Matter Raised	Applicant's Response
		i.e. FEH 2022 online rainfall / catchment characteristics.	developers. In line with the SuDS hierarchy, it now uses linear drainage features, this will be clarified within the updated Drainage Strategy at a future deadline. Evidence of this engagement is provided in the Statement of Common Ground between the Applicant and Norfolk County Council, which will be updated at Deadline 4.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 9 (Section 2.3.6) - FEH rainfall was used; however, Suffolk Design Guidance states that BRE 365 data, groundwater data, and the Phase 1 Contaminated Land Assessment Report should be provided at the pre-application stage. This information is outstanding. • Preliminary Site Investigation Report • Trial pits across the site to BRE365 with minimum infiltration rate of 10mm/hr if infiltration is to be the sole method of drainage. • Associated exploratory logs (including depth to peak seasonal groundwater). Phase 1 Contamination Assessment Report.	As is typical for a NSIP, the drainage information presented within the consent application is not a detailed design, rather an outline strategy. It is acknowledged that the drainage strategy will be developed into a detailed design at a later stage of the Project informed by additional survey information, including from ground investigations. Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. This Plan would include the required level of specific design detail, informed by suitable testing of infiltration rates, land contamination and groundwater data, as applicable.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 9 (Section 2.3.7) - Essex (FSR) - Generally outdated now. Should use FEH22	Through engagement with the relevant drainage authorities, the Applicant has agreed the respective rainfall analysis methods. Evidence of this engagement is provided in Table 2.1 of **8.2 Drainage Strategy [REP1-072]** and in the Statement of Common Ground between the Applicant and Essex County Council, which will be updated at Deadline 4.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review*	Drainage outfalls have been indicatively sited based on available data, but would be micro-sited within the

Ref	Name	Matter Raised	Applicant's Response
		Page 15 (Section 3.1.2) - OS terrain 5 data used. Ground truthing should be considered. - OS Terrain 5 is a coarse dataset and should not be relied upon for outfall/channel assessment.	Order Limits, based on additional data collected from topographical surveys. Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. This Plan would include final details for outfall designs.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 37 (Section 5.3.4) - SuDS drainage hierarchy. - No investigation / feasibility study undertaken with regards to rainwater re-use / harvesting	Opportunities for rainwater collection and re-use during construction of the Project would be explored and described in the Surface Water Management Plan, that is secured by commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C).** It is noted however, that opportunities may be relatively limited due to the nature of the proposed Project.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 39 (Section 5.4.13) - No freeboard for shallower ponds - Freeboard should be included for all pond / basin features	The detailed design of the proposed drainage basins, including requirements for freeboard provision, will comply with the relevant LLFA guidance. This will be described in the Surface Water Management Plan that commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, secures will be prepared by the Main Works Contractor(s) to inform discharge of the DCO Requirement.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 44 (Section 5.4.54) - Assuming 50% of footprint is permeable. Report indicates that infiltration is likely unviable. Finished platform levels mentioned to have "unbound free draining subbase and a minimum 75 mm top layer of	Where the ground the scheme sits upon can be considered, for drainage purposes, as equivalent to existing ground due to the scheme elements being permeable, the ground is considered "permeable" in that pluvial runoff will take its natural course. This means that the scheme does not need to consider all of its assets as impermeable.

Ref	Name	Matter Raised	Applicant's Response
		stone chippings, allowing for storage of storm water during a storm event and drainage to existing ground." Surfaces should be 100% impermeable unless infiltration testing (in accordance with BRE 365) deems that infiltration is viable.	
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 45 (Section 5.4.58) - Outfall locations based on OS terrain 5 lidar - OS Terrain 5 is a coarse dataset and should not be relied upon for outfall/channel assessment.	Indicative outfall locations have been selected based on OS data. However, the final locations would be informed by the results of additional surveys, including topographical surveys, which would be collected at the detailed design stage of the Project. Final outfall locations would be defined in the Surface Water Management Plan that commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, secures to inform discharge of the DCO Requirement. Micrositing for outfalls has been allowed for within the Order Limits.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 45 (Section 5.5.3) - The permeable platform construction shall naturally retain runoff, where runoffs will be lost to the soils or the atmosphere. - Infiltration testing must confirm this viability.	Where the ground the scheme sits upon can be considered, for drainage purposes, as equivalent to existing ground due to the scheme elements being permeable, the ground is considered "permeable" in that pluvial runoff will take its natural course. This means that the scheme does not need to consider all of its assets as impermeable.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 47 (Section 5.6.5) - "In low-lying areas where the elevation is flat and there is proximity to a watercourse, currently available topographic levels may not allow for gravity-fed drainage to the outfall location. In these cases, the pond depth has been limited to 0.5 m, which also reduces the risk of groundwater ingress from the likely high water table.	As discussed in Section 3.1, **8.2 Drainage Strategy DCO [REP1-072]** and paragraph 5.4.48, LiDAR data has been used to inform the catchment areas, attenuation / infiltration pond locations and the outfalls for the Project. The proposed locations for the attenuation ponds have been based on the existing ground level and a gravity system where practicable (i.e. following the fall

Ref	Name	Matter Raised	Applicant's Response
		In the rest of the areas, a general pond depth of 1 m is proposed. More detailed, topographic data will be obtained from ground surveys at a later stage." - Outfall levels should be determined at this stage and if a gravity fed system is viable, using LiDAR and / or topographical survey data.	of the land), gravity fed systems are viable, in all instances except where otherwise stated.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 47 (Section 5.6.7) - "Attenuation ponds will be designed with a maximum gradient of 1:3" - Suffolk design guidance states that Sides slopes should not exceed 1 in 4 unless specific site/safety/maintenance arrangements allow for steeper slopes (C753 p.490 & 651).	A maximum 1 in 3 slope has been specified so that the detailed designer has flexibility within the design, and will be applied on a case by case basis. C753 which is referred to states that a 1 in 3 slope is appropriate for ponds on p.490 p.651; in Figures 23.5 and 23.6 of C753 this is shown diagrammatically. Risk assessment for specific methods of maintenance is to be carried out by the operator, and will be a section of the Surface Water Management Plan. Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Page 50 (Section 5.7.11) - Diverted field drains should discharge to the closest watercourse or via balancing basins if required to mitigate flood risk at receiving watercourses. These balancing basins are not currently included in the drainage design and will need to be addressed at a future stage. - Further information is required regarding potential balancing basins. Retain natural flow pathways as much as possible.	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. This would include hydraulic calculations to demonstrate how runoff across the site will be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review*	Table 9.1 of **8.2 Drainage Strategy DCO [REP1-072]** shows an example SuDS maintenance plan, and does

Ref	Name	Matter Raised	Applicant's Response
		63 (Table 9.1) - Maintenance Tables - Needs expanding. There is no mention of specific maintenance requirements for infiltration features, which is essential to prevent siltation and performance compromise.	not cover all asset types. As written in paragraphs 9.2.1 to 9.2.3 of **8.2 Drainage Strategy DCO [REP1-072]**, a SuDS asset maintenance plan will be produced by the Applicant in the detailed design stage, in accordance with the requirements of the National standards for SuDS.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Appendix A - No calculations / catchment areas provided. Must be included as part of final report. - No pre and post development catchment areas or calculations have been provided.	**8.2 Drainage Strategy DCO [REP1-072]** will be further updated and submitted at a future deadline to include further information. In addition, commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan, based on the detailed design of the Project to inform discharge of the DCO Requirement. This would include refined hydraulic calculations to demonstrate how runoff across the site will be controlled to prevent any off-site increases in flood risk and/or pollution, including consideration of exceedance flow routes.
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Other - Norfolk specific data - Norfolk state the following should be submitted as a minimum to enable checks of the design: "Site investigation details including; topographic surveys, ground investigation surveys, infiltration testing, seasonally high groundwater levels, assessment of connection to wider watercourse networks and any CCTV survey of existing drainage networks. Drainage design details including; discharge location, catchment area of the drainage system (pre and post	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. Furthermore commitment GG22 requires the construction drainage measures to be developed whilst liaising with the LLFAs and statutory undertakers. The proposed approach to securing consents is documented in **5.5 Consents and Licences Required Under Other Legislation [APP-084].**

Ref	Name	Matter Raised	Applicant's Response
		development), officers may request long sections and cross sections as necessary, hydraulic calculations and modelling results, flow paths/extent/depth of expected water above ground, pipe schedule, maintenance plan and inspection access proposals with appropriate easements showing distance from adjacent dwellings, structures, utilities and carriageway. Evidence of any consents including permits from Environment Agency, IDB, LLFA or Anglian Water. Agreements from adjacent landowners may also be requested."	
REP2-059	Pylons East Anglia Ltd	*Appendix J – Flood Risk / Drainage Strategy Review* Other - Half Drain Times - Any infiltration feature must show that half drain time can be achieved within 24 hours. No information regarding this has been provided.	Commitment GG22 in **7.2 Outline Code of Construction Practice (Revision C)**, sets out the requirement for the Main Works Contractor(s) to prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. This would include hydraulic calculations to demonstrate half drain times for infiltration features.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 3. Planning Policy, Legal Duties, and the Planning Balance 3.1 Critical National Priority Infrastructure The Applicant reiterates that the scheme is a Critical National Priority (CNP) project and that the need for energy security and meeting national net zero targets outweighs residual heritage effects. However, the Pylons East Anglia notes that: The Applicant's scoping methodology has excluded a substantial number of heritage assets on the basis of distance thresholds alone.	The historic environment study area parameters were discussed and agreed with stakeholders including Historic England and the historic environment advisors to the Local Authorities along the route of the Project (**6.19 Scoping Report [APP-288** to **APP-296], 6.20 Scoping Opinion [APP-297**]). The agreed study areas are considered to representative of industry standards in the given landscape, and the Applicant considers them to be appropriate and proportionate. It should be noted that intervisibility alone does not mean the setting of an asset extends to the Order Limits. The setting of a heritage asset is

Ref	Name	Matter Raised	Applicant's Response
		As a consequence, the overall scale of heritage impact is materially understated in both individual and cumulative terms. 3.2 Assessment of Harm The Applicant concludes that the scheme would result in no more than "Moderate Less than Substantial Harm" to any designated heritage asset. However, a range of statutory and non-statutory consultees have set out evidence indicating that, in several cases, impacts may reach the higher end of the less-than-substantial spectrum or, in certain cases, constitute substantial harm.	not defined solely by whether it is visible from or has visibility to a development. The Project would lead to no harm or less than substantial harm to listed buildings within the study areas (**6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**, **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**). Embedded and standard mitigation proposals for listed buildings are set out in **7.2 Outline Code of Construction Practice [Revision B]** and **7.4 Outline Landscape and Ecological Management Plan [Revision C]**.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 3.3 Policy Compliance The Applicant states that its methodology accords with NPS EN-1, NPS EN-5, the National Planning Policy Framework (NPPF), and statutory duties. A number of representors, including the Pylons East Anglia, dispute this position.	Pursuant to Section 104(3) of the PA 2008, the Application must be decided in accordance the relevant NPS(s). Further to the transitional arrangements applicable to the Application, the relevant NPSs to the Project for the purposes of section 104(3) are EN-1, EN-3 and EN-5 (January 2024). The recently adopted updated EN-1, EN-3 and EN-5 (January 2026) are important and material considerations for the determination. This is highlighted only to assist in avoiding uncertainty where paragraph and text references may deviate between the 2024 and 2026 iterations of the NPSs. **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068**] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. The Project will not result in any substantial harm to designated heritage assets.

Ref	Name	Matter Raised	Applicant's Response
			Paragraph 7.2.57 of **5.6 Planning Statement [APP-085]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering critical national priority (CNP) infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or

Ref	Name	Matter Raised	Applicant's Response
			loss of significance to heritage assets should be exceptional or wholly exceptional.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 4. Compliance with Legislation and Policy To satisfy the Rule 17 request, the Applicant must demonstrate compliance with the following. 4.1 Planning (Listed Buildings and Conservation Areas) Act 1990 – Sections 66 and 72 These sections require special regard to the desirability of preserving listed buildings, their settings, and the character and appearance of conservation areas. Pylons East Anglia considers that the Applicant has not demonstrated that such special regard has been given.	The Applicant has complied with relevant statutory and policy requirements in relation to heritage applicable to the DCO Application including Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 - see **5.6 Planning Statement [APP-085]**. Through routeing and siting, the Applicant has sought to reduce as far as practicable potential impacts on the historic environment within the Project study area. The Applicant acknowledges that the settings of some designated assets fall partially within the Order Limits and this is assessed within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report (Final Issue A) [APP-209]**. Where this occurs, the Applicant has assessed the significance of effect on the value of these assets within **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**. The Project has also assessed the level of harm on designated assets in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** where land that forms part of the setting of these assets falls within the Order Limits. **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in the Project study area. The Project will not result in any substantial harm to designated heritage assets –

Ref	Name	Matter Raised	Applicant's Response
			this statement is also supported by Historic England's Written Representation **[REP1-191]**.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 4.2 Infrastructure Planning (EIA) Regulations 2017 The Regulations require the Applicant to provide the information reasonably necessary for the Secretary of State to reach a reasoned conclusion. The scoping out of numerous assets without individualised assessment is considered insufficient to meet this requirement.	It is not clear as to which assets the respondent is referring to. However, the Applicant assumes that the respondent is referring to the heritage assets omitted from the assessment during the scoping stage and refers the respondent to documents **6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297**] and a previous comment above.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 4.3 NPPF Chapter 16 The NPPF requires: • Identification of all heritage assets likely to be affected. • Assessment of their significance, including the contribution of setting. • Allocation of appropriate weight to conservation (Paragraph 212). The Applicant has not, in the view of the Pylons East Anglia, fully complied with these requirements.	The Applicant disagrees and believes the assessment work carried out and presented in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]**, **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** and **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** is sufficiently robust and fulfils the requirements of the National Planning Policy Framework. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project will not result in substantial harm to designated heritage assets it will result in the loss of significance to heritage assets due to the introduction of temporary

Ref	Name	Matter Raised	Applicant's Response
			and/or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (2024) which provides that the Secretary of State will take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 4.4 Holford and Horlock Rules These industry principles seek to avoid areas of high amenity, including historic landscapes. Pylons East Anglia considers these have not been successfully applied along the route, given the number of conservation areas and registered parks and gardens affected. 4.5 NPS EN-1 and EN-5 NPS policy requires alternatives to be robustly assessed. Pylons East Anglia considers the Applicant has not adequately assessed reasonable alternatives (e.g., HVDC undergrounding), which could reduce or avoid harm to heritage assets.	Throughout the development of the Project, the Holford and Horlock Rules have been considered and applied in conjunction with information on the presence of constraints, homes and environmental features and the finding of the EIA process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Rules typically involves balancing alternative solutions which can present conflicting Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. In making a balanced decision it is expected that the emphasis of decision making will vary with greater emphasis on specific aspects and Rules in different cases. When

Ref	Name	Matter Raised	Applicant's Response
			also considered in the correct context of NPS EN-1 and EN-5 it is the case that certain levels of effect can occur and a project still considered to be acceptable. The Applicant is clear that reasonable alternatives have been adequately and robustly assessed and are reported upon in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**. This does not mean that every reasonable alternative needs to be developed to the same level of survey detail if comparable assessments can be made. Our decision making at specific locations and how the Holford Rules informed decision making is set out in documents including **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** published in 2022, and the Design Development Reports published as part of the 2023 non-statutory consultation (**7.20 2023 Design Development Report for the Project [APP-358]**), 2024 statutory consultation (**7.21 2024 – Design Development Report for the Project [APP-359]**) and with the application for development consent (**5.15 Design Development Report [APP-122]**). The Applicant has outlined why these other options would not meet the Project objectives in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 5. Consideration of Alternatives and Consultation Feedback 5.1 Undergrounding Options	The Applicant has outlined why these other options would not meet the Project objectives in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]**.

Ref	Name	Matter Raised	Applicant's Response
		5.2 HVDC Alternatives	
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 6. Methodological Issues and Scoping Concerns 6.1 Assessment Methodology The Applicant's heritage baseline relies primarily on desk-based and algorithmic assessments. Pylons East Anglia considers that this approach is inconsistent with best practice, including Historic England's staged approach, which requires on-site assessment to understand how setting contributes to significance. The Applicant states that the methodology was developed in consultation with Historic England and local authorities; however, ongoing requests from these consultees suggest continuing concerns.	The Applicant disagrees with the respondent's assertion that the baseline relies primarily on desk-based and algorithmic assessments. The vast majority of assessed heritage assets were visited during the assessment of their settings as per the assessment methodology set out in Annex C: Historic Environment Assessment Methodology in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**. The very few exceptions to this were where assets were located along private roads/drives to which the Applicant unable to access. Regarding the respondent's reference to 'algorithmic assessments', the Applicant is not sure what the respondent means by this term. However, if this is a reference to Artificial Intelligence, the Applicant can confirm that Artificial Intelligence was not used in the production of any documentation related to the historic environment. The status of agreement with Local Planning Authorities is set out in the Statements of Common Ground and summarised in Section 4.9 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 6.2 Non-Designated Heritage Assets (NDHAs) Pylons East Anglia remains concerned that NDHAs have been inadequately assessed. There has been no assessment whatsoever of buildings that have a	All non-designated heritage assets were assessed to determine their value in accordance with **6.19 Scoping Report [APP-288 – APP-296]**, **6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**. Those assets

Ref	Name	Matter Raised	Applicant's Response
		level of heritage interest sufficient to be identified as an NDHA. Furthermore, the scoping out of NDHAs on the basis of low or negligible value, without detailed evaluation of setting or potential interest, represents—in Pylons East Anglia's view—an incomplete assessment.	assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. EN-1 (2024) paragraph 5.9.9 includes instructions regarding the Applicant's assessment '*The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES*' and in several places refers to detail being proportionate to the importance or significance of the heritage asset. The Applicant, therefore, considers that the Project has appropriately complied with relevant policy in the NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 6.3 Distance-Based Scoping The Applicant's reliance on distance-based criteria to exclude assets from further study is considered arbitrary. Historic England guidance emphasises that setting is not solely defined by distance and requires a case-specific approach. Pylons East Anglia considers that many assets with partial setting overlap have not been properly assessed.	The only distance-based scoping took place once the Project's study areas for the historic environment were agreed. The historic environment study area parameters were discussed and agreed with stakeholders including Historic England and the historic environment advisors to the Local Authorities along the route of the Project (**6.19 Scoping Report [APP-288 to APP-296]**, **6.20 Scoping Opinion [APP-297]**). The agreed study areas are considered to representative of industry standards in the given landscape, and the Applicant considers them to be appropriate and proportionate. Once the scoping

Ref	Name	Matter Raised	Applicant's Response
			phase was complete, every high value designated asset remaining in the 3 km study area and every high and medium value designated asset within the 2 km study area was individually assessed and more were scoped out at this stage as their settings did not extend to the Order Limits. The Applicant acknowledges that the Project may potentially be seen from a given designated asset. However, the assumption that intervisibility alone means the setting of a given heritage asset extends to the Order Limits is inaccurate. In line with established heritage guidance, the setting of a heritage asset is not defined solely by whether it is visible from or has visibility to a development.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 6.4 Underestimation of Harm Across the route, Pylons East Anglia considers that the Applicant has underestimated the degree of harm to listed buildings, conservation areas, and scheduled monuments. While direct physical impact may not occur, setting impacts are still considered to be significant.	The Applicant disagrees and is confident in the assessment of harm presented in **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]** is proportionate and appropriate. The Applicant acknowledges that the Project will result in significant impacts on a small number of designated asset but those impacts do not constitute substantial harm.
REP2-060	Pylons East Anglia Ltd	*Appendix K Historic Environment* 7. Data Accuracy and Cross-Referencing A number of inaccuracies were identified during the statutory consultation phase, including errors in data tables and inconsistencies between the Historic Environment Baseline Report and the Preliminary Environmental Information Report. Pylons East Anglia	The Applicant acknowledges that on a Project of this scale, although undesirable, errors will occur from time to time across all disciplines. Where errors have been identified internally to the Project of through input by stakeholders and interested parties, they have been addressed in Issue B of the appropriate documentation or in **8.1 Errata List [REP1-070]**.

Ref	Name	Matter Raised	Applicant's Response
		is unclear whether these discrepancies have been fully addressed.	
REP2-061	Villages Against Pylons	The route through the Dedham Vale has always been conditioned on their pre-emptive decision about the location of the EACN, in respect of which only one area was ever considered. That cost is not a relevant consideration per policy when the outcome is to reduce harm to the Dedham Vale, indeed policy explicitly recognises that avoiding harm to a National Landscape may increase cable runs and costs significantly.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Villages Against Pylons.
REP2-062	Water Management Alliance	Water Management Alliance (WMA) welcomes the publication of the Drainage Strategy. Drainage for permanent and temporary aspects of the proposed Norwich to Tilbury project will predominantly be a matter for the LLFAs. However, where the project crosses Internal Drainage Board (IDB) districts – albeit small sections of the overall project area – those Boards are the relevant drainage authority. Section 5.4.6 of the Drainage Strategy lists LLFAs and Environment Agency as consenting authorities for the discharge of water into rivers or ordinary watercourses. The document should also record that IDBs are the consenting authorities for discharge of water into ordinary watercourses (i.e. not Main Rivers) within Internal Drainage Districts (IDD).	**8.2 Drainage Strategy DCO [REP1-072]** will be updated and submitted at a subsequent examination Deadline, with the text in paragraph 5.4.6 will be updated to reflect this request. The following update is proposed: '*Constructing an outfall to a river would require consent from the Environment Agency or LLFA depending on whether the outfall is to a Main River or Ordinary Watercourse respectively. Consent from the respective IDB will be required where an outfall to an ordinary watercourse within an IDD is proposed*.'
REP2-062	Water Management Alliance	The Applicant has notified WMA that temporary outfalls may be required into IDDs, that this will be confirmed during detailed design, and that where required, these outfalls will be agreed with the relevant IDB. WMA highlights that agreement of such	The Applicant notes this comment.

Ref	Name	Matter Raised	Applicant's Response
		temporary outfalls will follow the approvals process set out in the Protective Provisions to be agreed for drainage authorities within the DCO.	
REP2-062	Water Management Alliance	WMA welcomes commitment GG22, from 7.2 Outline Code of Construction Practice, that 'Main Works Contractor(s) will prepare a Surface Water Management Plan to inform discharge of the DCO Requirement', and that 'construction drainage measures will be developed liaising with the LLFAs, with ongoing dialogue during implementation of the measures'. WMA wish to be involved in liaison to develop measures and dialogue during implementation where drainage into IDDs is proposed.	The Applicant updated Commitment GG22 in **7.2 Outline Code of Construction Practice [REP2-014]** at Deadline 2 which should satisfy this request. Commitment GG22 now explicitly states that '*Construction drainage measures will be developed liaising with the LLFAs and statutory undertakers*...'
REP2-063	Whirledge and Nott on behalf of various clients	In the Lands Right Tracker Update National Grid claim they "demonstrate that the Applicant has listened to and considered landowner feedback" and they have "clearly explained the Applicants position where requests could not be accommodated". This is not our experience. As laid out in the below email, very little of our feedback has been considered and we have had no feedback from National Grid to explain why these suggestions have not been accepted. In addition to the above, National Grid state they "support timely progression to op on agreements". We do not feel this accurate, given the me taken to engage on the initial Heads of Terms.	The Applicant does not agree that **4.6 Land Rights Tracker Update [REP1-006]** overstates the extent to which landowner and agent feedback has been considered. The Land Rights Tracker is updated at each deadline. The most recent submission is **4.4 Land Rights Tracker (Revision C).** It is a live management tool intended to provide the Examining Authority with a clear, consistent snapshot of engagement status and the Applicant's current negotiating position, rather than a line-by-line record of individual drafting comments. As explained in the Land Rights Tracker Update, feedback received from landowners and professional advisers on the initial populated Heads of Terms issued in 2025 was reviewed holistically, with common themes and issues considered collectively across the Project, rather than through the issue of multiple bespoke amendments to individual Heads of

Ref	Name	Matter Raised	Applicant's Response
			Terms. This approach was adopted to avoid inconsistency between landowners and to provide a clear and settled basis for negotiations going forward. Where suggested amendments to Heads of Terms have not been accepted, this reflects the Applicant's need to maintain consistency, legal certainty and fairness across a large number of affected parties, while ensuring alignment with the statutory compensation framework and the draft DCO. The Land Rights Tracker and accompanying explanatory text set out the rationale for this approach, including why the Applicant considers it preferable to consolidation of feedback into updated template Heads of Terms, rather than responding piecemeal to individual drafting points. In relation to the progression of negotiations, the Applicant does not accept that it has failed to support timely movement towards option agreements. Heads of Terms were issued at an early stage of the Project, meetings have taken place with Whirledge and Nott and other agents to discuss feedback, and updated template Heads of Terms were issued in February 2026 following consideration of that feedback. The re-issuing of Heads of Terms was intended to improve clarity, reduce protracted or circular negotiations, and support efficient progression to option agreements, supported by defined timescales and an incentive framework consistent with the Applicant's land rights strategy. The Applicant acknowledges that pace of progress with land interests is essential and that that needs to be reviewed in the context of the scale and complexity of the Project and the volume of representations

Ref	Name	Matter Raised	Applicant's Response
			received, and engagement and negotiations with parties and their agents. However, the Applicant remains committed to ongoing dialogue with landowners and their agents and will continue to update the Land Rights Tracker at future Examination deadlines to reflect progress made and any material changes in position.
REP2-064	Whirledge and Nott on behalf of various clients	My submission highlighted the real impacts already being experienced by landowners and businesses due to prolonged uncertainty around the scheme, including the inability to make investment, land management or diversification decisions. It also identified several issues that had remained unresolved despite early engagement, including alternative routing considerations, construction methods, working clearances, irrigation requirements and the protection of soil, ecology and farm infrastructure. It is accepted that consultation does not mean that every concern raised by affected parties must ultimately be agreed. However, meaningful engagement should involve clear responses to the issues raised, transparency around decisions taken, and a willingness to resolve practical matters where straightforward solutions exist. The Applicant's response refers generally to consultation exercises and ongoing engagement with landowners. However, it does not directly address several of the specific issues raised at the hearing. In particular, there is no clear response regarding uncertainty around construction methods and programme, the handling of associated third-party utility works, protection of soils	The Applicant has acknowledged the concerns raised regarding the pace and responsiveness of negotiations, including in relation to comments submitted on proposed Heads of Terms. The Applicant has engaged proactively with Whirledge and Nott throughout the various stages of the Project and has met with representatives from the firm individually and as part of an agent's group. Engagement with affected landowners and their professional representatives is ongoing and will continue throughout and beyond the examination, recognising that several matters raised such as construction methodology, working widths, access arrangements, irrigation requirements, soil handling and third party utility interfaces are dependent on the further development and refinement of the detailed design and construction programme. At this stage, the level of detail available on these matters does not differ from other NSIPs. The Applicant has set out how it will approach many of these matters in **7.2 Outline Code of Construction Practice (Revision C)** and will continue to update and refine these methodologies as the detail design progresses and further engagement with affected parties takes place.

Ref	Name	Matter Raised	Applicant's Response
		or the provision of survey information required under existing licence arrangements. Similarly, while the Applicant notes that negotiations with landowners are ongoing and that Heads of Terms have been issued, the practical experience of those negotiations has not reflected a responsive process. Detailed comments on the proposed Heads of Terms were recently submitted by a group of professional agents representing multiple affected landowners. It took many months for a response to be provided and, when received, several even basic concerns raised in those submissions remained unaddressed and unexplained. This experience contributes to the perception that engagement has been procedural rather than genuinely responsive. In many instances there appear to be opportunities to acknowledge and resolve relatively minor practical issues now, which would help reduce uncertainty and demonstrate a willingness to work constructively with those affected. It would therefore be helpful if the Applicant could provide further clarification on how these matters will be addressed and how engagement will move beyond process to provide clearer answers and practical solutions where possible.	The Applicant firmly refutes the suggestion that its engagement has been solely procedural. Throughout the process, the Applicant's appointed land agent, Fisher German, has maintained ongoing and consistent communication with all relevant stakeholders. This has included the acknowledgement of additional comments submitted by the agent's group, particularly in response to the reissued revised Heads of Terms document. The Applicant is confident that this updated document effectively addresses many of the concerns previously raised by landowners and their appointed representatives. To ensure clarity in the understanding and interpretation of the revised Heads of Terms, the Applicant, via its appointed agent, will soon provide written guidance. In addition, further meetings will be offered to facilitate discussion of the terms and address any remaining points. This approach is intended to move engagement forward by providing clearer, site-specific responses and, where possible, agreeing proportionate solutions to relatively minor practical issues at an early stage, thereby reducing uncertainty and supporting continued land management and business planning. The Applicant remains committed to ongoing, constructive engagement to resolve outstanding matters wherever reasonably practicable.
REP2-065	Alexandra Macadam	*[Note: this is transcribed from a handwritten submission and may have inaccuracies where text was ambiguous]*	The Applicant has considered a wide range of alternatives for routeing in this location including routeing to the north of Brimlin Wood but starts by establishing if there is a policy-based imperative for a

Ref	Name	Matter Raised	Applicant's Response
		Please see Savills alternative route suggested in our earlier submission. Raydon aerodrome is hardly ever used, and I have never seen anything land or take off. The water main on 2024 route was quite alright at the western end and Raydon airfield – otherwise it would not have been suggested and considered.in the first place by the Applicant. *[annotated drawing attached with submission]*	change. With the pylon separation having been previously increased to around 1.4 km it is not considered that any remaining effects on the heritage assets around Little Wenham justify the transfer of effects to other receptors. In particular routeing to the north of Brimlin Woods would move the alignment to require routeing between for example Charit Farm and The Birches where there is around a 150 m gap between properties, additionally the alignment would instead be angled to the north of the wood instead of the south of the wood, thus wouldn't be a straight line into the proposed cable sealing end compound. The Applicant's position remains therefore unchanged on this matter.
REP2-066	Antony Rose	Raised comments on strategic options such as offshore, direct current	The Applicant has responded to points on alternatives in **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1** [**REP1-139**].
REP2-066, REP2-069, REP2-080, REP2-088, REP2-091, REP2-106	Antony Rose, Catherine Reed, Helen Dorothy Keeler, Laura Shales, Mark Shales, Steph Dodwell	Concern about overhead lines at the Waltham Gap. Undergrounding should be considered.	The consideration of the use of underground cable is set out in **5.15 Design Development Report** [**APP-122**] from paragraph 9.2.17. In the context of a strong starting presumption for overhead lines, the absence of a national designation and consideration of the effects of low height pylons arising from applying the mitigation hierarchy it was concluded that the use of underground cable was not appropriate.
REP2-066, REP2-080	Antony Rose, Helen Dorothy Keeler	Raised comments about factoring in cost to the landscape and property prices into the strategic options as part of a cost comparison.	These points are addressed in **8.5.4 Applicant's Response to the Open Floor Hearings** [**REP1-140**].

Ref	Name	Matter Raised	Applicant's Response
REP2-067	Caroline Blacker	General comments on HVDC as an alternative and the need to consider the environment in the cost comparison of options, also undergrounding in the Waveney valley.	These points are addressed in **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]**.
REP2-067	Caroline Blacker	The pylons route also includes part of the proposed UNESCO World Heritage East Coast Flyway, where birds could be affected by bird strike.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to Blacker.
REP2-067, REP2-087	Caroline Blacker, Karen Fisher	The Applicant has failed to properly address the concerns raised by Pylons East Anglia in relation to the risk to human health from potential exposure to the harm caused by acid sulphate soils and their risk of oxidisation.	These points are addressed in **Document: 8.4.6 Applicant's comments on submissions received at Procedural Deadline A [REP1-136]**.
REP2-068	Caroline Homewood	The Applicant states that moving the alignment westwards would bring the route closer to the Ford Street Conservation Area and therefore rejected that alternative. However, the preferred alignment places multiple 50m pylons on elevated ridgelines immediately surrounding Ford Street, creating prominent skyline structures that will tower above and visually encircle the historic village. It is therefore unclear how proximity to the Ford Street Conservation Area was considered a constraint in rejecting alternative routes, while the chosen alignment places highly visible ridge-top pylons directly around the settlement.	Regarding Fordstreet, both the construction and operation (and maintenance) phase of the Project are assessed to have a moderate adverse, and significant, effect on the conservation area. The assessment of conservation areas is supported by setting surveys, as documented in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209 and REP1-063]**. The details of the assessment of the 27 listed buildings in Fordstreet and Aldham are included in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209 and REP1-063]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]** and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**.

Ref	Name	Matter Raised	Applicant's Response
			5.15 Design Development Report [APP-122] provides an explanation of the main changes in the route alignment, infrastructure siting and technology incorporated into the Project following review and consideration of the feedback received to the 2024 statutory consultation and to the targeted statutory and non-statutory consultations held in 2025. **5.15 Design Development Report [APP-122]** addresses the main changes requested and those changes raised by a larger number of respondents, but which may not have led to a change of Project design. In all cases, factors relevant to the change have been considered (which can be multiple and potentially conflicting) and a balanced decision made taking into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. In this case Section 5.3 deals with the Ford Street to Aldham area.
REP2-068	Caroline Homewood	My submission identified several key concerns, including: a) the placement of 50m pylons on elevated ridgelines, breaking the skyline above villages, b) harm to the setting of designated heritage assets including Fordham Church (Grade I), Aldham Church (Grade II*) and the Ford Street Conservation Area and e) fragmentation of habitats within the Colne Valley landscape.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Homewood.
REP2-068	Caroline Homewood	Failure to Address Site-Specific Evidence Raised at the Hearing: c) potential impacts on Roman archaeological remains near pylon TB047	With regard to the active Romano-British excavation site, the Applicant is aware of the asset and has moved pylon TB047 to the north-east as a result. The results of the geophysical survey of the field in question as well as those to the north-east and the

Ref	Name	Matter Raised	Applicant's Response
			south-west indicate that the pylon bases are in 'blank areas'. The pylon bases will be further investigated through archaeological trial trenching with the result made available to the Essex's local planning archaeologist. With regard to the pulling location, pulling locations across the Project require topsoil removal or any other form of ground reduction. The pulling locations will be matted prior to use to avoid damaging the topsoil and, thereby, any archaeological remains beneath. Should the archaeological trial trenching identify significant archaeological remains, **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** sets out appropriate additional mitigation for such.
REP2-068	Caroline Homewood	Failure to Address Site-Specific Evidence Raised at the Hearing: d) impacts on the Essex Way long distance path and recreational landscape	Sequential effects on the Essex Way are assessed in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. Adverse effects on visual receptors are identified along the route, ranging from major and significant (adverse) to minor-moderate and not significant (adverse). Representative viewpoints along the Essex Way within the Colne Valley include Viewpoint 4.24 Essex Way near Fordstreet, Viewpoint 4.25 Essex Way, Mill Road, and Viewpoint 4.28 Essex Way near Poole's Farm. Significant and adverse effects are identified at these viewpoints, ranging from major adverse to minor-moderate adverse. Effects on perceptual qualities of the landscape are addressed within **6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and**

Ref	Name	Matter Raised	Applicant's Response
			Assessment [APP-228]. Significant adverse effects on landscape character within the Colne Valley Slopes Landscape Character Area (LCA) and Colne River Valley Floor LCA are identified within approximately 1.5 km of the Project during construction and operation. The assessment for Colne Valley Slopes LCA notes (paragraph 13.3.548) that construction would cause '*disturbance to 'the attractive and open' character'* of the landscape. At operation it notes (paragraph 13.3.555) that '*the Project would be introduced into the relatively pastoral valley, with resulting effects on the 'attractive and open views' across the valley'*. The Applicant acknowledges that there will be significant and adverse effects on the Essex Way and other receptors within the Colne Valley.
REP2-068	Caroline Homewood	Failure to Address Site-Specific Evidence Raised at the Hearing: f) the cumulative visual impact of pylons encircling the village of Ford Street.	The Applicant acknowledges the concerns about the Project encircling the village of Fordstreet. There are locations where pylons may be visible in more than one direction and this is acknowledged in the assessment of effects. Details of the effects on visual receptors within Visual Receptor Area (VRA) D7 Fordstreet and Aldham are set out in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**, within paragraphs 13.7.76 to 13.7.87. Significant adverse effects are identified within approximately 1.5 km of the Project during construction and operation. The assessment notes that the Project would be '*visible in close views (within 0.5 km) from the south-east of the VRA, including as it crosses over the Colne Valley south of Fordstreet*'. It also notes there would be some open views to the east, and views

Ref	Name	Matter Raised	Applicant's Response
			from parts of the Essex Way and open access land within the Colne Valley. Within close to medium views (0.5 km to 1.5 km) the assessment notes that the Project would most often be seen on the skyline, but that *'in the north-east, woodland and the valley landform within the Colne Valley would filter and screen views towards the Project in places*.' Perceptions of being encircled / surrounded when viewing the Project on maps can be very different from the actual local context. Separation is inevitably reduced in certain locations due to the presence of constraints to routeing and environmental features.
REP2-068	Caroline Homewood	4. Over-Reliance on Efficiency and Cost Considerations In addressing alternatives for the Colne Valley (Ford Street, Aldham and Fordham) National Grid states that a western alignment could reduce residential amenity effects but was rejected because it would be longer, require additional pylons and be less efficient. This reasoning is inconsistent with the policy framework governing electricity transmission infrastructure. Under NPS EN-5, overhead lines may be the starting presumption for transmission technology; however the policy also requires that routing and siting to minimise adverse effects on the environment and communities wherever reasonably possible. Similarly, Schedule 9 of the Electricity Act 1989 places a statutory duty on transmission licence holders to have regard to the desirability of preserving natural beauty, conserving flora and fauna and protecting sites, buildings and objects of architectural, historic or archaeological	The Applicant disagrees with the interpretation presented that decision making has an over emphasis on efficiency and cost considerations. The Applicant's position is that decision making takes into account the varied requirements set by planning policy (NPS EN-1 and EN-5) and duties arising under various legislation including the Electricity Act 1989 (including Schedule 9 duties), Countryside and Rights of Way Act and Levelling up and Regeneration Act. The balanced decision making encompassing technical, environmental, socio-economics and cost aspects. Section 9.2 of **5.15 Design Development Report** [**APP-122**] identifies that other factors, over and above efficiency and cost, were also part of the decision making with particular detail at paragraph 9.2.4. We would also note that the respondent's view does not present a full context and for example whilst reference to Schedule 9 is made there should be reference also to aspects such as Holford Rule 3 with

Ref	Name	Matter Raised	Applicant's Response
		interest. Efficiency and cost considerations cannot, in themselves, justify a route that creates avoidable environmental, heritage and community harm. 5. Failure to Demonstrate Compliance with the Holford Rules The Holford Rules, recognised within NPS EN-5, provide established principles for the routeing of overhead transmission lines. They advise that transmission lines should: a) avoid areas of highest amenity value b) avoid skylines and hill ridges where possible c) follow natural landform and contours. The alignment between TB047 and TB052 appears to conflict directly with these principles by placing pylons on elevated ridgelines above settlements within the Colne Valley. National Grid's response does not explain how the Holford Rules were applied in determining this alignment.	its emphasis, all things being equal, to choosing the most direct line. For clarity we summarise the Applicant's decision making approach in the below. The decision making process sits within the context of the Project's status as a critical national priority project, which does not require all impacts to be addressed and recognises that some residual effects will remain. The routeing and siting has inherently sought to avoid effects or, where not possible to avoid, to reduce them, and then considered the mitigation hierarchy where unacceptable effects are identified. The Applicant's more detailed assessment of the NPS policy framework and the mitigation hierarchy is set out in **5.6 Planning Statement [APP-085]** (see Section 8). Throughout the development of the Project the Holford and Horlock Rules have been considered in conjunction with information on the presence of constraints, homes and environmental features and the finding of the EIA process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Rules typically involves balancing alternative solutions which can present conflicting Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. In making a balanced decision it is expected that the emphasis of decision making will vary with greater emphasis on specific aspects and Rules in different cases. Therefore, it is

Ref	Name	Matter Raised	Applicant's Response
			not unexpected that some decisions may have an emphasis on technical and cost aspects with others having more emphasis on specific environmental or socio-economic considerations. Our decision making at specific locations and how the Holford Rules informed decision making is set out in documents including **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** published in 2022, and the Design Development Reports published as part of the 2023 non-statutory consultation (**7.20 2023 Design Development Report for the Project [APP-358]**), 2024 statutory consultation (**7.21 2024 – Design Development Report for the Project [APP-359]**) and with the application for development consent (**5.15 Design Development Report [APP-122]**).
REP2-068	Caroline Homewood	8. Pylon and cables next to Fordham All Saints Primary School In my submissions to National Grid, I expressed concerns regarding the placement of a pylon in close proximity to a primary school. However, these concerns have been overlooked and remain unaddressed.	An assessment of accessibility to community facilities, including education facilities, has been undertaken as part of the Environmental Statement. **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** concludes that there would be no significant adverse effects on community facilities. It is noted that Fordham All Saints Primary School is located approximately 120 m north of the Order Limits where no land take or direct access disruption is anticipated. An assessment of potential impacts relating to health and wellbeing is provided in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. The assessment includes a section relating to the perceived impacts of pylons and power lines on health. The chapter notes that the Project has

Ref	Name	Matter Raised	Applicant's Response
			been designed to comply with existing National Grid standards and relevant external guidance and processes relating to electric and magnetic fields (EMFs). Exposure guidelines have been set by independent scientific bodies and are based on decades-long studies into the effects of EMFs and ill health. The Applicant has produced **7.8 Electric and Magnetic Field Compliance Report (Revision B)** which provides an assessment and conclusions of the compliance of EMFs produced by the Project with the requirements of NPS EN-5. The assessment set out in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** therefore relates to perceived impacts associated with EMFs, which can, nevertheless impact mental wellbeing and quality of life. Community perception is that some groups are more vulnerable than others to potential health effects associated with EMFs, with concerns particularly relating to children, for example. Whilst no significant impacts have been identified, it is noted that providing opportunities for local residents to interact with clear and accessible scientific information relating to EMFs would be beneficial.
REP2-068	Caroline Homewood	9. Consultation and Transparency National Grid states that a wide range of alternatives has been considered. However, residents were not presented with any alternative route alignments in the Colne Valley. Communities were presented with a single overhead route option, with consultation focusing primarily on pylon design rather than route location or viable alternatives such as HVDC cabling or an offshore grid.	In respect of the Colne Valley the Applicant maintains it has followed the Gunning Principles (the set of legally-accepted rules for public consultation) and is also that its obligations are to present its proposals and set out the alternatives it has considered and reasons for its choice (Section 7.3 in **5.15 Design Development Report** [**APP-122**]). The Applicant remains of the view that the Project elements are routed and sited in a manner that is consistent with and justified by policy and in line with its duties. The

Ref	Name	Matter Raised	Applicant's Response
			Applicant's interpretation of NPS EN-1 and EN-5 is a clear strong starting presumption for the use of overhead line. That presumption is reversed where the connection crosses nationally designated landscapes, however the Colne Valley is not nationally designated nor within the setting of a nationally designated landscape. There is also a need to have consideration of whether the use of cable is justified in circumstances where landscape and visual effects are widespread and significant (paragraph 2.9.23 of EN-5), however the Applicant's position is this criteria is not met.
REP2-070 REP2-071 REP2-083	Charles Micklem Charles Tritton Jennifer Micklem	Consideration of the Great Waltham Alternative The Great Waltham Alternative, identified within the Design Development Report 2023, would move the alignment into open farmland and avoid both Great Waltham and Little Waltham.	These points are addressed in **8.8.1 Applicant's Comments on Written Representations** [**REP2-029**] under Charles Nicholas Micklem (page 336). The Applicant confirms that the Holford Rules have been considered, as well as the effects on the related environmental topics, and that decision-making and how the Holford Rules informed decision making is set out in the referenced application documents.
REP2-070	Charles Micklem	This submission concerns whether the Applicant has fully demonstrated compliance with its duties under Schedule 9 of the Electricity Act 1989 when selecting the alignment through Section F between TB132 and TB144. In particular, it raises the question of whether the Applicant has shown that the chosen route represents the least harmful reasonable option, having regard to the exceptional concentration of heritage assets in this location and the availability of a viable alternative alignment. In particular, on page 12 the Applicant again relies heavily on the position attributed to Historic England	The Applicant's position is that decision making is balanced to meet the varied requirements set by planning policy (NPS EN-1 and EN-5) and duties arising under various legislation including the Electricity Act 1989 (including Schedule 9 duties), Countryside and Rights of Way Act and Levelling up and Regeneration Act. The balanced decision making encompassing technical, environmental (includes landscape and views, heritage, ecology, water environment etc), socio-economics and cost aspects.

Ref	Name	Matter Raised	Applicant's Response
		as justification for not making further changes to this section of the alignment. However, as the landowners directly affected between pylons TB132 and TB144, we consider ourselves to be key stakeholders whose views should be given appropriate weight alongside those of national heritage bodies.	Section 9.2 in the **Design Development Report** [**APP-122**] identifies the factors in the decision making, with particular detail at paragraph 9.2.4. The decision making process sits within the context of the Project's status as a critical national priority project, which does not require all impacts to be addressed and recognises that some residual effects will remain. The routeing and siting has inherently sought to avoid effects or, where not possible to avoid, to reduce them, and then considered the mitigation hierarchy where unacceptable effects are identified. The Applicant's more detailed assessment of the NPS policy framework and the mitigation hierarchy is set out in Section 8 of **5.6 Planning Statement** [**APP-085**]. The Applicant's position is that the decision is correctly based in policy with Schedule 9 duties correctly considered and balanced with other factors.
REP2-070	Charles Micklem	Neither the Applicant nor Historic England have visited the site to engage with us regarding the proposed infrastructure and its effect on the historic landscape. The Applicant's reliance on views derived largely from desk-based assessments is therefore difficult to reconcile with the limited direct engagement with those who have owned and managed this historic landscape for approximately 300 years.	The Applicant has visited the property with the permission of the owners in order to undertake viewpoint photography (**7.12 Visualisations - Part 8 of 9** [**APP-350**]) and has visited the surrounding areas to inform the setting assessment (**6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report** [**APP-209**]).
REP2-070	Charles Micklem	2. Clarity of design and consultation responses The Applicant's response also appears very similar to that provided during the statutory consultation stage. This gives the impression that the Applicant's position has largely remained unchanged despite the concerns raised during consultation and examination. There	The Applicant responds to feedback where there is clear evidence of the need for change. Individual preferences are considered but decisions are also influenced by how other effects will change. In this case there is a clear basis (to reduce effects to heritage assets) to utilise four lower height lattice

Ref	Name	Matter Raised	Applicant's Response
		also remains uncertainty regarding the final infrastructure design. The Applicant states that the project will proceed using tall pylons "subject to confirming certain technical details", meaning that the precise design solution has not yet been fully confirmed. If the Applicant is unwilling to adopt the Great Waltham western alternative, our preference would be for standard-height pylons rather than low-height pylons, as these would result in fewer structures within the landscape.	pylons north of the River Chelmer. To the south of the river, the Applicant has reverted to the use of two standard pylons (replacing three lower height pylons) to reduce effects, including to the residential property close to TB141.
REP2-070	Charles Micklem	Exceptional heritage sensitivity of Section F The Applicant's response does not meaningfully address the exceptional concentration of heritage and landscape assets within Section F between pylons TB132 and TB144, and whether the alignment properly reflects the routeing principles set out in the Holford Rules for Overhead Line Routeing, particularly Rule 2.	These points are addressed in **8.8.1 Applicant's Comments on Written Representations** [**REP2-029**] under Charles Nicholas Micklem (page 336, summary provided above).
REP2-071	Charles Tritton	Discussions are ongoing between TFP and National Grid to reduce the amount of sterilisation of minerals and housing and reduce the size of the farming disruption on Tritton Farming Partnership LLP, its members and related Parties, while accepting at present this cannot be fully eradicated on the present proposed route.	These points are addressed in **8.8.1 Applicant's Comments on Written Representations** [**REP2-029**] in response to Tritton Farming Partnership LLP (pages 134 – 135).
REP2-071	Charles Tritton	Quiet Lanes / Protected Lanes The Applicant treats Protected Lanes in the same Environmental report as Quiet Lanes. They are essentially the same if not more important. Page 94 EN020027-001967-8.4.1 states that there are only two instances where "Quiet Lanes are used	Commitment H06 in **7.2 Code of Construction Practice (Revision C)** states "*Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). To support this approach, a topographic survey will be undertaken in advance of*

Ref	Name	Matter Raised	Applicant's Response
		as a vehicle crossover point between two proposed site access points, to allow construction vehicles to continue along the haul road". These are Millway Lane and Tye Lane. However, there are two additional vehicle crossover points over Protected Lanes on TFP land. These are Paulk Hall Lane and Goodmans Lane in Great Leighs.	*works/impact to each Protected Lane (Essex) and Historic Land (Suffolk) within the Order Limits, where likely to be affected by physical works. The survey will include mapping of any historic earthwork features associated with the Protected/Historic Lane, including associated banks and ditches. During construction, the Main Works Contractor(s) will seek to limit the working area at the narrower sections of impacted lanes, to that which is practicable for the works to be delivered. Any historic features associated with the lane will be reinstated at the end of construction activities to the pre-work condition, including the reinstatement of hedgerow margins and historic earthworks. Where such features cannot be retained, replacement (compensatory design elements) will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks)*". As noted in **7.3 Outline Construction Traffic Management Plan (Revision B)**, the Applicant proposes that construction traffic will not be able to join or leave the public highway from crossover points, except in an emergency or contingency scenario. As construction vehicles would only cross the protected lanes in order to progress along the proposed haul roads, there would be no increase to baseline traffic along the protected lanes. Therefore, crossover points have not been assessed within **6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271].** Preliminary designs for site crossover points have been developed to reduce highway safety risks and have been subject to the Road Safety Audit process set out in **7.11 Transport Assessment - Appendix A – Norwich to Tilbury RSA Strategy**

Ref	Name	Matter Raised	Applicant's Response
			[APP-334]. The Applicant has engaged with Local Highway Authorities in the development of these RSAs.
REP2-071	Charles Tritton	Compensation Budget NG's Funding statement shows the following (using March 2021 date, as initial date says 2020/21): a. Total costs increased from £895m to £1200, an increase of 34% b. Compensation increased from £184.9 from £180.2m, an increase of 2.6% c. Inflation has increased by 30.6% in this period d. In addition, during this time National Grid has discovered many issues such as Dunton Hills, sterilisations, increased property values, Government discounting energy bills for local residents and many other compensation issues. Therefore, is it correct to believe that compensation has only increased by 2.6% over the last 5 years? If so is that fair?	Settlements are reached based on the current market value at the time. Unresolved claims are determined by the Upper Tribunal (Lands Chamber) if not resolved beforehand. The compensation budget is adjusted from time to time if required as property settlements and determinations progress.
REP2-072 REP2-077 REP2-078 REP2-081 REP2-082 REP2-087 REP2-089 REP2-093 REP2-102 REP2-105	Cindy Eves Gillian Palmer Graeme David Crook Ian Hodgson, James Denny Crickmore Karen Fisher Lesley Sargeant Mrs Penny Lang Rachel Wells	General comments on alternatives and general environmental effects.	These points are addressed in **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]**.

Ref	Name	Matter Raised	Applicant's Response
	Sean Keeler		
REP2-072 REP2-089	Cindy Eves Lesley Sargeant	The impacts on Offton are substantial and long-term. The proposed route will bisect the village, working farms, introduce heavy construction traffic onto single track narrow rural roads, and result in the loss of hedgerows, trees, and established landscape character.	These points are addressed in **8.8.1 Applicant's Comments on Written Representations [REP1-170]**, for example in the response to Offton and Willisham Parish Council from page 15.
REP2-072, REP2-082, REP2-110 REP2-112	Cindy Eves, James Denny Crickmore, Trevor Seddon Douglas Wade	The Applicant identifies the Landscape Character Types surrounding Offton as an area that will experience a significant negative impact of the Project. Only two locations have been identified at this level of severity. The other is Dedham Vale. However, the mitigation approach differs materially between the two areas. In Dedham Vale, undergrounding is proposed. In Offton, the proposal remains overhead pylons.	The Applicant is guided by the relevant material in National Policy Statement EN-5 which identifies circumstances to vary from the strong starting presumption for overhead line. Those circumstances are identified as routeing within a Nationally Designated landscape and potentially within the setting of such an area and the Offton area is not subject to such a designation. The effects at Offton are also not considered to be sufficient to meet the thresholds set by EN-5 paragraph 2.9.23 for the consideration of underground cable. In contrast the Dedham Vale is a Nationally Designated landscape. The assessment of effect on the Landscape Character Types (LCT) within Offton is set out in **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. Significant adverse effects would occur within 1.5 km of the Project in the Ancient Plateau Claylands LCT (paragraphs 13.3.227 to 13.3.241) and Rolling Valley Farmland LCT (paragraphs 13.3.296 to 13.3.310). Significant effects have been reported for many of the landscapes within 1.5 km of the Project. **8.8.1 Applicant's Comments on Written Representations [REP1-170]** addresses comments on mitigation and the difference in approach between

Ref	Name	Matter Raised	Applicant's Response
			Offton and Dedham Vale, see the response to Offton and Willisham Parish Council from page 13.
REP2-073	Christopher John Vermont	1. NESO and cost comparables NESO's March 2024 study finds undergrounded HVDC to be cost-comparable to overhead AC pylons, and potentially cheaper if delayed, a conclusion not revised by NESO or challenged by NGET.	These points are addressed in **8.5.4 Applicant's Response to the Open Floor Hearings** [**REP1-140**].
REP2-073	Christopher John Vermont	2. Alternatives (HVDC undergrounding) Adequate consideration of alternatives not undertaken.	These points are addressed in **8.5.4 Applicant's Response to the Open Floor Hearings** [**REP1-140**].
REP2-073	Christopher John Vermont	3. Property value and compensation Independent valuations show a 20%+ property value loss from construction and operational impacts, including noise.	The Applicant's position is that there is no reliable or consistent evidence that the Project causes a reduction in property values that can be attributed directly to the development. The Applicant acknowledges that overhead lines and associated infrastructure may give rise to concern among affected communities, but that property values are influenced by a wide range of factors, making it difficult to isolate any change in value to the Project alone. The Applicant recognises that perceptions of property value loss may arise, particularly where visual effects are experienced. However, it draws a distinction between perception and legally compensable loss, noting that UK compensation law does not provide for compensation for loss of view or changes to a view arising from NSIPs. The Applicant's complies with statutory compensation, under which compensation is payable where specific legal tests are met (for example, land acquisition,

Ref	Name	Matter Raised	Applicant's Response
			injurious affection, disturbance or other recognised heads of claim), rather than for generalised reductions in market value or amenity impacts. In relation to arguments that property devaluation may arise from operational noise, the Applicant refers to its Environmental Statement noise assessments [**APP-255 to APP-264**], which conclude that significant adverse noise effects are not expected where standard mitigation measures are incorporated. Noise mitigation is secured through design commitments and DCO Requirements, and the Applicant's position is that, with mitigation in place, operational noise effects would not give rise to compensable impacts on property value.
REP2-073	Christopher John Vermont	4. Noise impacts The Applicant's own assessment is that we will have a 10db increase in background noise from the EACN after mitigation	The assessments of operational noise from proposed substations are provided in **6.14.A3 Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment** [**APP-259**] and are summarised in **6.14 Environmental Statement Chapter 14 – Noise and Vibration** [**APP-256**]. The predicted specific sound levels generated by the EACN's operation, once mitigation is applied, are expected to remain below the background sound level for all surrounding properties during both day and night. However, it's important to note that the noise rating levels, which account for an acoustic character penalty, are anticipated to slightly exceed the background sound level at two locations: Bounds Farm and Badley Hall. The assessments indicate that significant adverse effects from operational noise from proposed substations are not expected where standard noise mitigation measures are incorporated

Ref	Name	Matter Raised	Applicant's Response
			in the design. Commitment NV21 in **7.2 Outline Code of Construction Practice (Revision C)** which is secured by Requirement 4 in **3.1 Draft Development Consent Order (Revision C)** states that: '*The proposed new substations will include any required noise mitigation measures by design. This may include plant selection, screening, and enclosures, as appropriate*.'
REP2-073	Christopher John Vermont	5. Carbon and climate assessment The Applicant has not assessed the whole-life carbon impacts of alternatives such as undergrounded HVDC.	The Applicant acknowledges the concern raised regarding the assessment of whole-life carbon impacts of alternative transmission technologies. The Project has been developed to support the connection of low-carbon generation in a timely and efficient manner, and its environmental effects have been assessed in accordance with the EIA Regulations and relevant guidance. The Environmental Statement includes an assessment of greenhouse gas emissions associated with the construction and operation of the Project, together with a Greenhouse Gas Reduction Strategy setting out measures to minimise and manage emissions. The Applicant considers this approach to be proportionate and appropriate for the purposes of the DCO. In developing the Project, a range of alternatives have been considered at a strategic level, including underground and offshore options, having regard to technical feasibility, deliverability, system performance, cost, environmental effects and programme risk. While whole-life carbon has been one of a number of considerations, the Applicant does not consider that a comparative whole-life carbon

Ref	Name	Matter Raised	Applicant's Response
			assessment of all alternatives is required to justify the selected solution, particularly where alternatives have been discounted for reasons of feasibility, operability or overall environmental and system performance. The Applicant remains satisfied that the chosen design represents a balanced and proportionate solution which supports the transition to a decarbonised energy system, while managing environmental effects through mitigation secured by the DCO.
REP2-073	Christopher John Vermont	6. Heritage impacts The Applicant said our listed farmhouse could be included in their heritage assessment but never followed up.	An assessment of effects on residential visual amenity for properties within 200 m of the proposed overhead line has been provided in **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment** [**APP-233** and **APP-234**]. This study area has been based on Landscape Institute Technical Guidance Note (LI TGN) 2/19 'Residential Visual Amenity Assessment (RVAA)', which explains that breaches of the Residential Visual Amenity Threshold are unlikely to occur for a project of this nature beyond a distance of 200 m. The Applicant's data show that residential buildings at Hungerdown, which we believe the IP is referring to are located over 350 m away from the proposed overhead line, so, whilst it is recognised that impacts to residential visual amenity may occur at this property, they are not expected to breach the Residential Visual Amenity Threshold. Taking this into account the Applicant does not feel it necessary to carry out further assessment in relation to the IP's property at this point.

Ref	Name	Matter Raised	Applicant's Response
			It is not clear from the data available here as to which listed farmhouse the respondent is referring to. If, however, it is Hungerdown Farmhouse (NHLE 1112091) as suggested above, the asset is included in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. The baseline concluded that due to overall distance (over 550 m to the nearest pylon) and screening in the intervening landscape, the setting of the asset does not extend to the Order Limits. The setting of a heritage asset is not defined solely by whether it is visible from or has visibility to a development. In line with established heritage guidance, the Applicant has considered all relevant factors and has concluded that the setting does not extend to the Order Limits. Therefore, the Applicant considers the assessment undertaken within **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report** [**APP-209**] is appropriate and proportionate.
REP2-073	Christopher John Vermont	7. Health and wellbeing The lack of responses from the Applicant over the last two years has certainly impacted our mental health and wellbeing. 8. Survey licences and land engagement The emails show no meaningful engagement by the Applicant with affected landowners.	The Applicant acknowledges the concern raised regarding mental health and wellbeing and recognises, as identified in **6.10 Environmental Statement Chapter 10 - Health and Wellbeing** [**APP-192**], that uncertainty associated with the development of a NSIP has the potential to contribute to anxiety and stress for some individuals. Chapter 10 of the Environmental Statement includes a specific assessment of health and wellbeing effects during both the construction and operational phases of the Project. This assessment recognises that perceived impacts, including those arising during the pre-construction period, may occur and considers

Ref	Name	Matter Raised	Applicant's Response
			these within the wider context of community experience, engagement activity and mitigation. The assessment concludes that, with the implementation of appropriate mitigation and engagement measures, including ongoing communication, design development and secured controls through **7.2 Outline Code of Construction Practice (Revision C)**, significant adverse effects on health and wellbeing are not anticipated. The Applicant confirms that Survey access and licence requirements were addressed via email correspondence between the IP and the Applicant on 17 February 2026. The Applicant acknowledges the concerns raised regarding land engagement and recognises that the prolonged development of a NSIP can give rise to frustration for affected landowners. Throughout the Project's development, the Applicant has sought to engage with landowners through a combination of direct contact and appointed land agents, supported by public consultation events, one-to-one meetings, written correspondence and ongoing availability for dialogue. The use of professional land agents forms part of a structured and consistent approach to managing engagement across a large number of affected interests, while ensuring that queries are captured, logged and responded to appropriately. The Applicant recognises the importance of achieving a balance between perceptions of insufficient engagement and the reality that Interested Parties may not always receive the response they desire.

Ref	Name	Matter Raised	Applicant's Response
			While efforts are made to provide thorough and transparent communication, there can be instances where responses do not align with the expectations or preferences of landowners or other stakeholders. The Applicant acknowledges that this can contribute to feelings of frustration, particularly in the context of a complex and lengthy NSIP.
REP2-074	Clive Drewry	Concerned about his apiary and the effects of EMF on bees.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Drewry (pages 63 – 64).
REP2-074	Clive Drewry	National Grid stated that they had contacted or were in the process of contacting all individual landowners who spoke at the OFH. They have not contacted me.	The Applicant's land agent has offered a meeting to the IP which is arranged for 17 April 2026.
REP2-075	David Mathews	1.Is there supporting evidence (March 2026) that HVDC circuit breakers are in short supply? When are there sufficient available?	HVDC circuit breakers have not been used anywhere in the UK or Europe with no manufacturer having yet installed or demonstrated a commercial version. The Applicant is part of a Beta phase innovation project seeking to prove and utilise this technology however that project is still in-flight and has not yet yielded the development phase. The Applicant is using 525 kV HVDC technology to achieve ratings it requires for the HVDC connections, the Caithness Moray Shetland project at 320 kV is seeking to be the first multi-terminal HVDC and is running the innovation project on HVDC circuit breakers at 320 kV in Beta phase, although the multi-terminal line would not require HVDC circuit breakers should the innovation project fail. 525 kV circuit breakers would then be a step beyond this phase, so currently in Europe and UK no HVDC circuit breakers have been used, tested,

Ref	Name	Matter Raised	Applicant's Response
			demonstrated at any voltage. The NESO innovation report[18] (2024) makes it clear there have been delays and manufacturer resource is stretched and market incentives are low, but the project has been expecting tenders to start development.
REP2-075	David Mathews	"Urgent need" - but not a system/plan that crushes everything it touches to the detriment to farming, livelihoods and the general environment. Speed is to be subject to quality, long term maintenance costs and respect for inhabitants and the environment generally. "economical way" does not mean the cheapest. Must include reasonable assessment of the costs of long term maintenance, security of electricity supply, protections against severe weather, solar storms, sabotage and enemy action. (cf. Ukraine).	Appendix D: Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** pages D1-D14, sets out the economic appraisal used nationally for our Strategic Options and includes all our maintenance costs, as each circuit option has a circuit lifetime cost appraisal including capital cost, 40-year NPV of losses, 40-year NPV of maintenance costs for all technologies. All of our equipment is designed to withstand extreme weather conditions, include severe flood events, including icing events in high winds and high temperatures above 40 degrees. All transmission technologies are prone to fault and failure at times whatever the circumstances, however it remains the case that fault detection and replacement on cable and underground systems, or complex systems takes time hence damage to them is more detrimental. Overhead lines are quickly accessible, and should it be required the temporary towers we own can be deployed, installed at speed to restore the network as utilised worldwide for high-speed restoration of networks including Ukraine. National Grid holds spares and contracts for all its technologies, however some aspects of replacements require specialist capabilities such as HVDC convertor faults and failures. Solar Storms manifest their biggest

[18] Ofgem and Innovate UK (2024) Beta Phase - Annual Report

Ref	Name	Matter Raised	Applicant's Response
			impact in magnetic fields so the biggest impact there is for Power Transformers, again which are designed with highest Solar Storm withstand inherently within them.
REP2-075	David Mathews	The Applicant "concludes", states its own "presumptions" and has not shown any independently audited costs. - St. Remegious Church" – Alter the underground route! No need for a change in technology if the same technology used throughout.	An independent report published in 2025 by the Institute of Engineering Technology (IET)[19] provides a rich body of information on the characteristics and relative costs of different network infrastructure technologies. This report demonstrates with its own independent costs, the overall transmission technology landscape, the Applicant's cost benchmark well against this report.
REP2-075	David Mathews	" Less economic" Therefore shows that National Grid is seeking cheap results without forward thinking. E.g. "the strong starting presumption in favour of overhead lines is not displaced, even where there is a high potential for widespread and significant adverse effects. In those circumstances, the Secretary of State should only prefer underground or subsea where the benefits clearly outweigh any extra economic, social or environmental impacts." My opinion – that underground or subsea clearly DO have very clear all round benefits.	The Applicant is required to develop proposals in line with national policy and its regulatory duties. Paragraphs 2.5.5 to 2.5.11 in **5.15 Design Development Report [APP-122]**, set out the relevant context for onshore schemes which starts from the government's strong starting presumption in EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments.

[19] Institute of Engineering Technology (2025) A Comparison of electricity transmission technologies: Costs and characteristics: An Independent Report by Mott MacDonald in conjunction with the IET

Ref	Name	Matter Raised	Applicant's Response
REP2-075	David Mathews	"Unforeseen events……..are very rare in the U.K." More likely now due to very hot summers, flooding (undermines structures) not just in the obvious areas, war, plus the 11 year solar cycle.	All of our equipment is designed to withstand extreme weather conditions, include severe flood events, including icing events in high winds and high temperatures above 40degrees. All transmission technologies are prone to fault and failure at times whatever the circumstances, however it remains the case that fault detection and replacement on cable and underground systems, or complex systems takes time hence damage to them is more detrimental. Overhead lines are quickly accessible, and should it be required, the temporary towers we own can be deployed and installed at speed to restore the network. National Grid holds spares and contracts for all its technologies, however some aspects of replacements require specialist capabilities such as HVDC convertor faults and failures.
REP2-075	David Mathews	Planning Act 2008. 18 years and potentially 20 years out of date. So also for Electricity Act 1989. In practice this legislation was for a different age.	The Applicant confirms that the primary consenting regime for the Project is established under the Planning Act 2008. This Act provides the statutory basis for the DCO process and remains the operative and up-to-date legislative framework for the determination of NSIPs, including electricity transmission infrastructure. There have been no legislative changes which displace or supersede the role of the Planning Act 2008 in this regard. The Applicant further notes that the Electricity Act 1989 continues to form a key part of the wider statutory context for electricity infrastructure including licensing and operational regulation. As a Transmission Licence holder National Grid has specific duties to uphold in relation to the desirability of preserving amenity of certain aspects of the

Ref	Name	Matter Raised	Applicant's Response
			environment and to mitigate the effects of its activities on the environment under Section 38 and Schedule 9 of the Electricity Act 1989. National Grid is also required, under Section 38 of the Act, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires licence holders, in the formulation of proposals to transmit electricity, to preserve amenity by: • Schedule 9(1)(a) '*…have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest*;' • Schedule 9(1)(b) *'…do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*'. In terms of policy, the Secretary of State's decision-making framework under the Planning Act 2008 is guided by the designated NPS. The relevant policy documents for the Proposed Development are EN-1 and EN-5 (2024). The NPSs also reaffirm the role of the Planning Act 2008 as the statutory mechanism through which such infrastructure is to be consented.
REP2-075	David Mathews	BNG percentage. Seems to be at a minimum. The BNG policy is what the National Grid says it is therefore not in accordance with the Public's requirements.	The Environment Act 2021 introduces a mandatory requirement for a minimum of 10% BNG for development, subject to certain exemptions. While this requirement is not yet in force for NSIPs, and the application for development consent was submitted before the requirement becomes mandatory, National

Ref	Name	Matter Raised	Applicant's Response
			Grid has nevertheless committed to delivering a minimum of 10% BNG, providing wider environmental and societal benefits as part of the Project.
REP2-075	David Mathews	There is no mention of potential archaeological sites. East Anglia has already uncovered a wealth of history and artefacts; much more to be discovered.	In addition to the desk-based baseline information described in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, a programme of archaeological evaluation has been discussed and agreed with Local Planning Authority Archaeological Advisors and Historic England, as set out in **5.9 Draft Statement of Common Ground [APP-089** to **APP-100** and **APP-102]**. All completed interim and assessment reports for geophysical survey and trial trenching were submitted with the application for development consent in **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212]** and **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [AS-078 and APP-213]** along with the reports of geoarchaeological and archaeological monitoring of ground investigation works (**6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]**). The archaeological evaluation work (geophysics and trial trenching) has continued since the submission of the application for development consent, continuing the Applicant's commitment to the historic environment potentially affected by the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in

Ref	Name	Matter Raised	Applicant's Response
			January 2026 as Supplementary Environmental Information **[AS-068** to **AS-083].** The Applicant fully recognises the importance of safeguarding archaeological remains of national significance, and our approach is aligned with this principle. The approach set out in **7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]** and secured through Requirement 5 within **3.1 Draft Development Consent Order (Revision C)** already includes provision for a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.
REP2-075	David Mathews	Have the Army Aircorps, the R.A.F. and the U.S.A.F. given their assessments? 5Km seems too little.	Paragraphs 15.3.18 and 15.3.19 of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** describes the Applicant's ongoing consultation with the Defence Infrastructure Organisation (DIO) as the Ministry of Defence representative on UK planning and energy consenting matters. The DIO has responsibilities for United States Visiting Forces (USVF) assets in the UK. Within paragraph 7.2.14 of **Planning Statement [APP-085]** the Applicant recognises the need for MoD assessment of potential impacts on military assets it has identified as potentially impacted by the Project. This involves consideration of infringements to statutory safeguarding zones defined in relation to its assets, which can extend beyond 5 km. We understand the DIO is undertaking its assessments. The 5 km radius Aviation Impact Study Area described within paragraph 15.3.6 of **6.15.A2**

Ref	Name	Matter Raised	Applicant's Response
			Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] is applicable to civil aerodromes subject to Applicant impact assessment, as explained in paragraphs 15.3.1 to 15.3.2.
REP2-075	David Mathews	There is no mention of costs audit of undersea cabling nor of complete underground routing. All this should be independently verified. Also a. Maritime cabling is being used for East Coast Scotland to North East Coast of England. No explanation is made of the reason why this is not used for East Anglia. b. Similarly, LionLink could be connected much further south to the East Anglian maritime cable. c. It is not an excuse that NG have already built onshore structures in Norfolk/Suffolk.	**7.19 2023 - Strategic Options Backcheck and Review [APP-357]** sets out all the alternatives considered by the applicant including onshore options and a subsea alternative. Every onshore option evaluated capital and lifetime costs for wholly AC Overhead Line, AC Gas Insulated Line, AC underground cable and onshore HVDC. Every offshore option evaluated AC subsea Cable and HVDC subsea. Table 15.4, page 122 in **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** provided a summary of those alternatives. Showing the technical option selected for each alternative. Appendix D: Economic Appraisal of **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** pages D1-D14, sets out the economic appraisal used nationally for our Strategic Options and includes all our maintenance costs, as each circuit option has a circuit lifetime cost appraisal including capital cost, 40-year NPV of losses, 40-year NPV of maintenance costs for all technologies. As noted above, the independent report published in 2025 by the IET provides a rich body of information on the characteristics and relative costs of different network infrastructure technologies. This report demonstrates with its own independent costs, the overall transmission technology landscape, the Applicant's cost benchmark well against this report.

Ref	Name	Matter Raised	Applicant's Response
REP2-075	David Mathews	The Inspectorate would of course be aware of any attempt by the Applicant or other parties leaving out unfavourable facts and actual costings. In my opinion if this is proven then this is fraud at worst, or if not that, then devious.	The Applicant's costs are based upon high level unit costs provided as part of our regulatory submission for the Applicant's price control. **7.19 2023 - Strategic Options Backcheck and Review [APP-357]** pages D1-D14 sets out our costs in 2020/21 cost base based upon the Applicant's RIIO-T2 price control period 1 April 2021-31 March 2026 and was accepted by the Energy regulator Ofgem.
REP2-076	Gillian Ann Whittle	My husband and I live in a Grade 2 listed building in Ardleigh, with our boundary just 10m across a narrow lane from the boundary of National Grid's proposed substation site. The origins of our home date back to the 16th century, and, as was customary with properties of that period, certain parts of it have little or no foundations. What will happen to our Grade 2 Listed home when building work to the substation commences?	Construction vibration has been assessed in **6.14 Environmental Statement Chapter 14 – Noise and Vibration** [**APP-256**]. The assessment covers both vibration effects on people (i.e. disturbance), as well as potential for damage to buildings and structures. Bounds Farm has been included in the assessment and no risk of damage from vibration has been identified. The contractor is committed to undertaking further assessments prior to starting works (commitment NV05 of **7.2 Outline Code of Construction Practice (Revision C)** and is also committed to employing best practicable means to reduce the effects of vibration (as well as noise) via a range of commitments. Commitment NV04 includes provision for pre- and post- conditions surveys of buildings and structures where a risk of potential damage is identified, as well as rectifying any damage in the unlikely event that this occurs due to the Project.
REP2-076	Gillian Ann Whittle	We met with a representative from National Grid and a representative from Fisher German, together with our agent, on 19 June 2024, to put our very natural concerns to them. National Grid promised to come back to us with some answers within two weeks.	The Applicant understands the land interest is within the Book of Reference as a Category 1 landowner over Plots C-14/9, C-14/10, C-14/13, and C-14/20 and a Category 3 land interest.

Ref	Name	Matter Raised	Applicant's Response
		Since that date, twenty-one months ago, we have heard nothing from either National Grid or Fisher German.	The Applicant's land agent has offered a number of meetings to the land interest's agent, most recently on 6 March 2026, and is awaiting a response. The Applicant understands the main concerns relate to construction and operation of the EACN and the proximity to their residence. The Applicant has approached the land interest's agent to discuss these matters as part of the voluntary agreement process.
REP2-077	Gillian Palmer	Concerns about the landscape and visual impacts around Bunwell Hill and Low Common.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to G. Palmer (see pages 157 to 160).
REP2-078	Graeme David Crook	Hiorns report - National Grid say 'In summary we do not accept the Report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030.' No clear evidence is given on why they disagree and are feeling the need to push for 2030.	The Applicant disagrees with the respondent and has set out its position in material published on the Project Website, as referenced in Appendix B of **7.21 Errata 2024 - Design Development Report for the Project Appendices (Final Issue A) [REP1-069]**. The Applicant carefully considered the independent review carried out by Hiorns Smart Energy Networks in September 2023. Our response to the findings of the Hiorns Report was published in April 2024 and is available on the Project website. In summary we do not accept the Report's conclusions around the timing of need for additional capacity being closer to 2035 than 2030. National Grid Electricity Transmission is legally obliged (under our Transmission Owner License) to provide capacity at the dates formally agreed in contracts with energy generators (or customers). Contract dates are set out in the National Energy System Operator's Transmission Entry Capacity register.

Ref	Name	Matter Raised	Applicant's Response
			Furthermore, Annex 2 of the NESO Clean Power 2030 Report identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.
REP2-078	Graeme David Crook	National Grid state that it takes very special measures to allow building on the Green Belt. Why even attempt this when other options exist that will not impose on the landscape, environment and Green Belt.	The Applicant sets out its position on the alternative route-wide options most frequently raised by interested parties in sections 3.3 and 3.4 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**. In summary, and as stated in paragraph 3.3.3 of **REP2-030**, the Applicant is required to develop proposals in line with national policy and its regulatory duties. **5.15 Design Development Report [APP-122]** paragraphs 2.5.5 to 2.5.11 page 25 and 26, set out the relevant context for onshore schemes, which starts from the Government's strong starting presumption in NPS for Electricity Networks Infrastructure (EN-5)10 paragraph 2.9.20, for the use of overhead lines which form the basis of the Project, with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments. **5.6 Planning Statement [APP-085]** details the very special circumstances (VSC) applicable should it be concluded that the Project is inappropriate

Ref	Name	Matter Raised	Applicant's Response
			development in the context of Green Belt policy. The VSC for the Project are: • The UK government policy requires significant reinforcement of the transmission system to facilitate the connection of renewable energy sources to transport electricity to where it is used. • The British Energy Security Strategy sets targets for the connection of up to 50 GW of offshore wind by 2030s as a key part of a strategy for secure, clean and affordable British energy for the long term • New connections for offshore wind and nuclear power generation projects, and for interconnectors, are expected into East Anglia by 2030. These connections are being constructed or expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell • Without reinforcement, the capacity of the East Anglia existing network is insufficient to accommodate the connection of the proposed new power sources. Therefore, reinforcement of the network is required • The requirement to meet net zero by 2050, to replace the fossil fuels that once powered the economy with low-carbon electricity • By reinforcing the capacity of East Anglia, the Project will address the need to be able to accommodate the connection of the proposed new power sources, namely offshore wind and nuclear power generation projects, as required by 2030. In addition, as stated within **5.6 Planning Statement [APP-085]** the Project is Critical National Priority

Ref	Name	Matter Raised	Applicant's Response
			(CNP). Paragraph 4.2.17 of EN-1 confirms that '*…the Secretary of State will take as a starting point that critical national priority infrastructure will meet the following, non-exhaustive, list of tests:* • *Where development within a Green Belt requires very special circumstances to justify development*'.
REP2-078	Graeme David Crook	Vibrations - I do not feel the National Grid summary gives me any reassurance or the information I am looking for as to how I will not be affected by the vibrations.	The Applicant's summary was provided in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Crook (pages 119 – 120). **7.2 Outline Code of Construction Practice (Revision C)** sets out noise and vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase. **7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]** provides the overarching general principles, controls, and arrangements that will be applied to the Project with regard to noise and vibration during construction. The measures set out within **7.2 Outline Code of Construction Practice (Revision C)** will be secured via Requirement 4(a) (Construction Management Plans) of **3.1 Draft Development Consent Order (Revision C)**.
REP2-078	Graeme David Crook	Dust - I do not feel the National Grid summary gives me any reassurance or the information I am looking for as to how I will not be affected by dust.	**Environmental Statement Figure 7.4 - Air Quality Construction Dust Study Area [APP-154]** shows the construction dust assessment study area. Without any mitigation dust impacts could be experienced up to 250 m from the Order Limits. The construction dust assessment outlined in **6.7 Environmental**

Ref	Name	Matter Raised	Applicant's Response
			Statement Chapter 7 - Air Quality [APP-147] and **6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150]** determine that with the appropriate application of construction dust mitigation there would be no likely significant effect on sensitive receptors within 250 m of the Order Limits. Mitigation is detailed in **7.2 Outline Code of Construction Practice (Revision C)]** and **7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]**.
REP2-078	Graeme David Crook	EMF - National Grid direct to one of their many documents, but the words do not mean anything or give the reassurance needed for my family.	The Applicant's response was provided in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Crook (pages 118 – 119). The Applicant assures the interested party that their approach to EMF follows national and indeed international authoritative and independent scientific guidance.
REP2-078	Graeme David Crook	Flooding - the generalised information makes no effort to address my concerns about localised flooding. Our property is at risk of flooding during excess rainfall, which will be significantly increased with the thousands of tonnes of concrete and haul road just uphill from the house.	The Project's construction stage drainage design is such that there will be no contribution of additional rainfall runoff from newly created areas of impermeable or less permeable land cover e.g. the haul roads. Runoff generated within the construction swathe will be collected and contained within a range of storage features which will attenuate these volumes to infiltrate back to ground (where conditions are suitable), or be discharged to nearby watercourses at pre-construction rates. Header drains would be installed along the perimeter of the construction swathe to intercept overland flows from the upslope catchment areas. These flows would

Ref	Name	Matter Raised	Applicant's Response
			be kept separate and conveyed to discharge points downslope of the swathe. These measures will manage runoff so as to avoid contributing to any existing local flooding and drainage issues. These controls are secured through commitments included within **7.2 Outline Code of Construction Practice (Revision C)**.
REP2-078	Graeme David Crook	Traffic - it is my opinion that whilst traffic surveys have been carried out, they do not actually take into consideration what this will mean in terms of effect for local communities. Nor have National Grid been able to answer when and how long roads would be closed for, significant impacts that must be documented. For example, the Roxwell Road A1060 is at 100% capacity during peak times, how will hundreds of lorries use this route?	The Applicant has assessed driver and public transport delay to passengers in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]**. Within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]** the assessment reports a major magnitude of impact largely because the baseline number of HGVs using this route is notably low (around 2%) so any increase in HGV movements during construction will show as a large proportional change in the assessment. Although there would be a significant increase in HGVs in A1060 Rainsford Road/A1060 Roxwell Road (PAR 51), the total traffic increase is only 2-3% and the duration of the worst-case construction period is short-term (one week) as indicated on Image A16.4.51 which shows construction vehicles daily trip distribution on the A1060 Rainsford Road/A1060 Roxwell Road (PAR 51). Therefore, outside of peak construction activity the number of construction vehicle movements will be lower. **7.11 Transport Assessment [APP-333]** examines capacity, safety, and operational efficiency of the network, identifying potential bottlenecks or safety concerns. Where required, suitable mitigation

Ref	Name	Matter Raised	Applicant's Response
			measures have been proposed to minimise likely adverse impacts. As noted in **7.11 Transport Assessment Appendix E LRN AM and PM Peak Construction Traffic Construction Traffic Committed Development Impacts [APP-345],** the Applicant is proposing an additional 27 HGV movements in the AM and PM peak hours along this section of road for a peak duration of one week on PAR 51 and a total increase of traffic of 3%. Junction modelling undertaken along the A1060 is detailed in Section 7.11 of **7.11 Transport Assessment [APP-333].** Three junctions were assessed which included Site 70 (A1060 Rainsford Rd / Park Avenue), Site 71 (A414 Greenbury Way / Highwood Road roundabout) and Site 69 (A1060 Roxwell Rd / Lordship Rd roundabout). It was identified that only Site 69 operated at or over capacity. However, there is no predicted step change in junction performance as a result of the Project construction flows, with changes of Ratio of Flow to Capacity from 0.90 to 0.93 in the AM peak hour and 1.03 to 1.05 in the PM peak hour. The Applicant is proposing a short-term temporary road closure of A1060/Roxwell Road (less than four weeks) with the proposed diversion route via lines SMD-F-045, SMD-F-044, SMD-F 043, SMD-F-042, SMD-F-041, SMD-F 039, SMD-F-038, SMD-F-037 and SMD-F-036 as shown on Section F, Plan D **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-036]**. Mitigation at these junctions has been proposed to minimise delay as set out in **7.3 Outline**

Ref	Name	Matter Raised	Applicant's Response
			Construction Traffic Management Plan (Revision B).
REP2-078	Graeme David Crook	Mental Health - National Grid say 'The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings.' To date, I have never been proactively contacted by National Grid to discuss any of my concerns, presumably as they see me as unaffected, despite being surrounded by the draft order limits and just over 100m from the nearest proposed pylon.	The Applicant understands the Land Interest is within **4.3 Book of Reference** [**AS-018**] as a Category 3 landowner. The land interest's ownership therefore falls outside of the Order Limits. The Applicant's land agent has spoken with the IP ahead of Deadline 3 and assisted with guidance for navigating the suite of documents available which address the varied concerns raised.
REP2-078	Graeme David Crook	Property price – The Applicant states '*The Applicant recognises that visual impact from overhead lines and pylons can cause concern for communities and may lead to perceptions of property value loss. However, property values are influenced by many factors, making it hard to attribute depreciation to a single cause like infrastructure development*.' I have factual evidence from local estate agents that my property has a significantly decreased value since even the announcement of pylons. It is not a perception, it is a reality that I have lost a six figure sum on my property - but I am 'unaffected' apparently.	The Applicant understands the land interest resides on Ongar Road in Writtle (Section F, Sheet 8 of the Land plans). The land interest's ownership falls outside of the Order Limits. Matters relating to injurious affection or diminution in value are compensation matters. Such matters would be assessed on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code and are not matters to be determined through Examination. The Applicant would recommend the land interest appoints an agent to act on their behalf and who will be able to advise and assist you in the process in respect of any claim for compensation which the land interest may be entitled to bring.
REP2-079, REP2-095	Graham Moore, Nicola Moore	I've tried engaging with you and you've agreed you've made mistakes but said you need to rush your application. You don't listen to any suggestions to mitigate what you're doing to me and ruining me financially with my business, farm and home and you	The Applicant understands the land interest is within the Book of Reference as a Category 1 landowner (as shown on Sheet 10 of Section A). The Applicant has met with the land interest on a number of occasions and continues to engage with

Ref	Name	Matter Raised	Applicant's Response
		haven't contacted me like you have stated in your reply that you're going to contact landowners and listen. You just quote various things that cover a wide range of questions and say you've replied which you haven't. Your reply is incompetent and you are not listening!	them and their agent on the Heads of Terms (including the latest meeting on 23 January 2026). The Applicant's has reached out to the IP's land agent to arrange another meeting to discuss the Heads of Terms, a mitigation proposal to the permanent access right required, and resolve misunderstandings regarding operational constraints during the option period. This is scheduled for 9 April 2026. The Applicant remains committed to explore appropriate and proportionate options to mitigate the effect of temporary construction works on farming operations. The Applicant will not be able to settle the precise measures with the land interest until the detail design stage of the Project where the more detailed construction methodology, land areas and timescales are known.
REP2-079, REP2-095	Graham Moore, Nicola Moore	I have also raised the matter of access they say is needed for seven years through our home driveway and straight through my farm and business yard.	As stated in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to G. Moore, it appears there is a misunderstanding around the seven-years' time frame, which relates to length of the proposed Option Agreement. The Applicant does not require nor seek to prohibit the IP from maintaining their business activities during the Option period. Ongoing discussions around the HoT document would seek to mitigate the impact to the IP's businesses where appropriate, having full regard to daily operations before any construction impacts commenced.
REP2-080	Helen Dorothy Keeler	The Applicant considers that there will not be a RVVA effect on the property and the proposals are therefore within the planning guidelines. I strongly disagree that	**6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA)** recognises that this property

Ref	Name	Matter Raised	Applicant's Response
		their proposal does not constitute a breach of guideline. The guidelines states that pylons/infrastructure must not be "overwhelming in all direction" for a residential property. The Applicant is proposing 3 pylons, all 60 -100m of the property in 3 different directions. The house only has views in these 3 directions and therefore in this case the Applicant is ignoring planning guidelines and the project is overwhelming in all directions for this property.	would experience a high magnitude of effect to views, and therefore a detailed assessment has been carried out for this location, which states: '*This property would experience visibility of the Project in three directions. The full extents of the nearest pylon TB141 (39.98 m AOD) would be clearly visible from the side elevation (south facing) windows on both floors with a direct, open view at a distance of 80 m. Although pylon TB142 (36.25 m AOD) is further away (approximately 300 m) and shorter, the full extents would be clearly visible from the rear (primary outlook) elevation (south-west facing) from eight windows across both floors and a large feature window which spans the middle portion of the first floor and roof with direct, open views. The full extent of a second pylon in this direction would also be visible from the rear elevation, at a distance of approximately 480 m. The upper extents of a few more distant pylons would also be expected in a clustering of pylons and wires central to the view, as the overhead line route staggers left and right of the line of sight. These pylons would also be visible from all aspects of the large garden and large patio area directly behind the property, although a boundary hedge would filter the lower extents of the structures. In addition, from the front elevation (north-east facing) the full extent of pylon TB140 (42.25 m AOD) would be clearly visible central to views from 13 windows with open and direct visibility, although at a distance of approximately 300 m. The upper reaches of a few more distant pylons would be filtered by vegetation on the rising ground. The pylons would be permanent, motionless and visually permeable structures, which*

Ref	Name	Matter Raised	Applicant's Response
			would still allow for visibility of the surrounding landscape in the background of the views. Pylons would be visible from three elevations and the large rear garden with open, direct views which is an accumulatively noticeable change to the visual amenity of the property. However, due to distance and the permeable structure of the pylons through which the wider landscape is still visible it is considered the pylons would not have such an overbearing or unpleasant effect on the views so that the effect on visual amenity would be unacceptable.' When coming to a final professional judgement as to whether these effects breach the RVAT or not, consideration has been given as to whether the effects at a property are so great that they would become a matter of 'public interest'. Paragraph 5.2 of **Landscape Institute Technical Guidance Note (LI TGN) 2/19 'Residential Visual Amenity Assessment (RVAA)**' states '*The threshold at which a residential property's visual amenity becomes an issue of Residential Amenity has sometimes been described as the point when 'the effect(s) of the development on the 'private interest' is so great that it becomes a matter of 'public interest''*. In this case, whilst it is recognised that the Project would introduce distinct new features into views from all elevations of this property, overall, the visually permeable nature of the pylons proposed would lightly filter, rather than screen, existing views of the surrounding landscape and open skies, which would still occupy the backdrop (and larger proportion) of these views. It is also noted that the Project is anticipated to sit at a distance of approximately 300 m from both the front and rear

Ref	Name	Matter Raised	Applicant's Response
			(primary) elevations, at the closest point; effects beyond 150 m are generally not considered to be 'overwhelming' for a Project of this nature. Therefore, effects on visual amenity are not considered to be so unpleasant that they would become a matter of 'public interest'.
REP2-080 REP2-105	Helen Dorothy Keeler Sean Keeler	The Applicant agrees there will be residual permanent effects from the project on the landscape at The Waltham Gap. They have concluded that as the project is a Critical National Project (CNP) there should not be any changes to their planning proposal. At The Waltham Gap the number of disadvantages are greater than in other areas and there are a greater number of permanent residual effects which will affect a greater proportion of the population than at other areas in the project. At The Waltham Gap the balance of RR and excessive long-term residual effects on a large population (>5000) should define The Waltham Gap as an "exceptional case" and the choice of transmission infrastructure be converted to underground cable [EN-1 paragraph 4.1.7]	The Waltham Gap is underlain by the Chelmer Valley Landscape Character Area (LCA). An assessment of effects on the Chelmer Valley is set out in paragraphs 13.3.699 to 13.3. 717 of **6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]**. Significant adverse effects are reported within 1.5 km of the Project during operation (and maintenance). This is a similar level of significant effect felt across many of the landscapes the Project passes through. Low height pylons (40 m) are proposed in this location to mitigate effects on views. The visual effects on people within the Waltham Gap are set out in Visual Receptor Areas (VRAs) F3 Great Waltham and F4 Little Waltham in paragraphs 13.9.25 to 13.9.50 in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]**. This sets out that there would be significant adverse effects within 1.5 km of the Project, which would reduce to not significant adverse effects from Howe Street, Great Waltham, Langleys Registered Park and Garden, the south and eastern edges of Little Waltham, Blasford and Broomfield. The Waltham Gap is not within a nationally designated landscape and not within the setting of a nationally designated landscape. Therefore NPS EN-1

Ref	Name	Matter Raised	Applicant's Response
			(2024) para. 5.10.34 and the reversed assumption to use underground cables as per EN-5 2.9.20 are not engaged. The Applicant's position is that the test against paragraph 2.9.23 of EN-5 (2024) is also not met, on the basis that landscape and visual effects are not widespread in this location, and neither are the effects arising from lattice pylons considered unacceptable in policy terms. Even if a contrary view was taken (which is not accepted by the Applicant), any such scheme of undergrounding is expected to require around a 2.5 km section of cable at a cost of around £80 to £100 million (**5.15 Design Development Report [APP-122]**, paragraph 9.2.17), which is not considered to be justified.
REP2-080	Helen Dorothy Keeler	All views from Langleys House and deer park will have visible pylons from the run of pylons TB135 – TB143. This is based on the laws of physics that light and sight travels in straight lines, the flat geography of Essex meaning that all structures over 30m will be visible on the slightly elevated sides of the Chelmer Valley and the size of trees in Essex which are only 20 metres on average. This directly contradicts the Visual assessment that the impact on Langleys by pylons can be adequately mitigated.	As stated above, low height pylons (approximately 40 m) are proposed in the Waltham Gap specifically to mitigate the effects on heritage assets. Viewpoint 6.18 Langleys Park, north of Great Waltham is a representative view from Langleys House and deer park, set out from page 101 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232].** The assessment states that the "proposed overhead lower height line would be well filtered and screened by existing intervening vegetation and trees. Upper sections of the overhead line would be just perceptible in the gaps between vegetation" and concludes there would be a minor-moderate and not significant (adverse) effect on views. The VRA F3 Great Waltham states that there would be '*close to medium distance views from areas within Langleys RPG and*

Ref	Name	Matter Raised	Applicant's Response
			parkland. At these distances, the upper section of the pylons would most often be seen on the skyline, with lower sections sometimes screened or filtered in views due to intervening buildings, strips of riparian vegetation along the watercourses, woodland strips and tree lines on the edge of the RPG, and intervening landform'. Visual effects reported in and around the western half of the Chelmer Valley report likely major and significant effects within 0.5 km of the Project, to minor and not significant within 0.5-1.5 km from the Project. Heritage Viewpoint HE7 Langleys and Viewpoint HE8 Langleys Park on pages 45 -54 of **7.12 Visualisations - Part 8 of 9 [APP-350]** also illustrate the change to the settings of the listed building and registered park and garden resulting from the Project. This illustrates that only the top of one pylon would be visible from the back of Langleys House and, in line with the landscape and visual impact assessment, the Project would be more highly visible from the eastern part of the registered park and garden. Consequently, the historic environment assessment concluded a moderate adverse, and significant, effect to Langleys registered park and garden and a minor adverse, not significant, effect to Langleys House.
REP2-080	Helen Dorothy Keeler	The Applicant's assessment of visual effects considers effects on the visual amenity of people and is presented in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4** [**APP-229**]. The Applicant is incorrect in the conclusion that the pylons will be obscured by riparian vegetation along the water course – again	VRA F3 Great Waltham in **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]** states that the lower sections of the pylons would '*sometimes* [be] *screened or filtered in views due to intervening buildings, strips of riparian vegetation along the watercourses, woodland strips and tree lines on the*

Ref	Name	Matter Raised	Applicant's Response
		based on physics and topography and tree growth, all properties within 750m of this run of pylons will see the pylons multiple times a day from their houses, from their recreational activities and normal activities of daily living.	*edge of the RPG* [Registered Park and Garden]*, and intervening landform'.* The level of effect within 1.5 km of the Project within VRA F3 Little Waltham are assessed as being significant and adverse to the south-eastern edge of Great Waltham, and not significant (adverse) from Howe Street and Great Waltham. VRA F4 Little Waltham states that there would be close views for properties near Lark's Lane, Chelmsford Road, and for users of Sheepcotes Lane, the A131 and B1008. An example is the major and significant (adverse) effect reported for Viewpoint 6.13 B1008, Little Waltham on pages 87-89 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 4 of 4 [APP-232]**. A not significant (minor) adverse effect does not mean that the pylons would not be visible. Table A13.1.12 in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** sets out a minor level of visual effect as '*The Project would result in a small change in view over a long-term duration and is likely to affect a smaller geographic extent and/or fewer people'.* The number of times a pylon is seen by an individual per day is not part of the LVIA.
REP2-080	Helen Dorothy Keeler	The route the pylons TB135 – TB 143 takes out approximately 4000 square metres of Best Most Versatile (BMV) agricultural land based on each pylon = 20m x 20m: the legs of the pylon preventing the use of machinery for cultivation so removing the land from cultivation; leaching of strongly alkaline chemicals from the concrete base which is an alkaline composite material; removal of all of trees and shrubs near the	Provisional Agricultural Land Classification (ALC) mapping shows the land to potentially comprise BMV land (mapped as a mix of Grade 2 and Grade 3), as shown on **6.6.F2 Environmental Statement Figure 6.2 - Provisional Agricultural Land Classification (ALC) Mapping [APP-142]**; this was confirmed through the detailed ALC assessment (as shown on **6.6.F3 Environmental Statement Figure 6.3 -**

Ref	Name	Matter Raised	Applicant's Response
		pylon removing habitat for pollinators. This is again a negative effect caused by the current choice of pylons	**Detailed Agricultural Land Classification (ALC) Mapping [APP-143]**). These nine pylons would affect 3,600 m^2 of agricultural land, equating to 0.36 ha. This land would not be possible to manage as arable land and is included in the assessment of permanent land take as set out in **6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]**, irrespective of any potential that the land could still be grazed. As set out in **5.6 Planning Statement [APP-085]**, it is acknowledged that the Project would result in a loss of Best and Most Versatile (BMV) land and is therefore contrary to NPS EN-1 (2024) paragraph 5.11.12, as well as the National Planning Policy Framework[20] and relevant local planning policy. The extent of BMV land across Norfolk, Suffolk and Essex significantly constrains the ability to avoid this particular resource. On balance, **5.6 Planning Statement [APP-085]** considers that the significant benefits arising from this critical national priority infrastructure justify the permanent loss of BMV agricultural land. With regard to the leaching of strongly alkaline chemicals from the concrete base of pylons, the Applicant recognises that when rainwater or groundwater pass through porous concrete it can dissolve calcium hydroxide, formed during the curing process. In a similar way sulphates and other chemicals within the soil can infiltrate the foundation causing a chemical deterioration of the concrete. For these reasons concrete foundations (which are widely

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

Ref	Name	Matter Raised	Applicant's Response
			used across the construction industry) are designed to limit these chemical interactions, protecting the environment and the foundation. The detailed designs would include consideration of the right concrete mix for the environment and function, providing suitable drainage to reduce the risk of water ingress and may also include applying sealants or coatings to the foundations. The detailed design stage of the project would identify any site specific requirements needed as part of the foundation design. **7.4 Outline Landscape and Ecological Management Plan (Revision D)** includes mitigation measures to avoid or reduce impacts on valuable habitats and species, which will include pollinators and their habitats, and mitigation measures as appropriate. Following the implementation of mitigation measures there will be no significant residual effects on any ecological receptors. In addition, the Applicant has committed to deliver 10 % BNG with environmental and societal benefits.
REP2-080	Helen Dorothy Keeler	The Applicant justifies that the pylons will have a low impact as "the area is sparsely settled". The area is a large community, with a moderate sized settled population with two primary schools, two churches, a shop, a busy doctors' surgery. The small wedge of the Chelmer Valley and the Waltham Gap has been designated a small area of green space as a recreational amenity for the population of Broomfield and The Walthams. Inserting nine huge pylons across this small area is very damaging. The Applicant has selectively interpreted the population and amenity use of this location and harm from the project at The	**6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** notes that physical activity is important for both physical and mental health and wellbeing, with recreational routes and areas of open space providing opportunities for relaxation, stress reduction, and mental restoration, all of which are relevant to overall wellbeing. It is noted that, during the construction period, a relatively small minority of the population would be affected in each ward through which the Project route passes. Whilst physical activity is a local public health priority and there is established evidence connecting

Ref	Name	Matter Raised	Applicant's Response
		Waltham Gap. The negative effects of the current planning proposal for this location reaches the threshold for reconsideration on the planning proposal at The Waltham Gap.	the benefits of physical activity to both physical and mental health, the level of change due to the Project is low and appropriately mitigated by standard good practice construction management measures. As such, the duration of effects that may potentially affect people's ability to be physically active (e.g. closures of Public Rights of Way) are generally short-term, with rapid reversal / diversions in place and no significant effects on health and wellbeing have been identified during construction. No impacts on this area of green space – in terms of its ability to be used as a recreational area – have been identified in **6.15 Environmental Statement Chapter 15 – Socio-Economics, Recreation and Tourism [APP-265]** for the operation phase.
REP2-082	James Denny Crickmore	The economic impact for households, businesses and the environment has not been addressed especially important in Offton where the village will be cut in three.	Assessments have been undertaken on the local economy, local employment, tourism economy and businesses and are set out in **6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]** and **6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266]**. No significant adverse effects have been identified on local economy, local employment, tourism economy or business receptors within Offton.
REP2-083	Jennifer Micklem	The Applicant claims to have responded to feedback from Historic England and other stakeholders. However, it is unclear who these stakeholders are. Historic England did not meet with us to discuss the devastating impact the pylons will have on these heritage assets.	In this instance 'other stakeholders' refers to other statutory stakeholders comprising the archaeological advisors to the Local Planning Authorities.

Ref	Name	Matter Raised	Applicant's Response
REP2-084	Joanne Lesley Elliott	General comments on consultation, alternatives and impacts on landscape, listed buildings and wildlife including bird strike.	These points are addressed in the thematic response provided in **8.5.4 Applicant's Response to the Open Floor Hearings** [**REP1-140**].
REP2-084	Joanne Lesley Elliott	We have been through three consultations, submitted copious feedback, met with the Applicant's agents and expressed our concerns, not one of our questions has been answered.	The Applicant has engaged with the IP directly and attended an on-site meeting with the IP and their land agent on 24 July 2025, to directly answer questions and hear concerns. Since the Open Floor Hearing, the Applicant's land agent has met with the land interest's agent to progress negotiations, including most recently on 11 March 2026. The only interaction with the project on the IP's land is with the UK Power Networks works. This third party will be escalated to engage with this IP at the earliest opportunity.
REP2-084	Joanne Lesley Elliott	Concerns about the specific flooding risks to the IPs land where there is a watercourse together with the impact of run off on a steep hill prone to heavy water flow and road erosion and the possible impact of both of these on the ability to access to our home. There is no reference to the land around our home or roads or access in the Flood Risk Report. In fact, the first pylon referenced in the Flood Risk Report in the area is TB44, the issues I have raised are resulting from the siting of pylons TB38 to TB40, as far as the Flood Risk Report is concerned these raise no concerns at all.	Between pylons TB38 and TB40 the following are embedded into the Project design to manage surface water runoff and land drainage: • Three temporary culverts, suitably sized to convey existing land drains under the haul road and maintain their connectivity to the wider drainage network; • Construction sustainable drainage system in proximity to TB39 and TB40 to collect, store, attenuate and treat runoff from the construction swathe. These ponds are sized to accommodate runoff from a storm event with a 1% annual chance, with the addition of a 25% uplift as a factor of safety and to account for climate change. A 100% impervious value has been assumed in the calculations for the full width of the haul road swathe;

Ref	Name	Matter Raised	Applicant's Response
			• Header drains along the perimeter of the construction swathe to intercept overland flows from the upslope catchment areas and convey these to discharge points downslope of the swathe. These measures will manage runoff so as to avoid contributing to any existing local flooding and drainage issues. The controls detailed in the Strategy are secured through commitments that are included within **7.2 Outline Code of Construction Practice (Revision C)**.
REP2-085	John Foster	The Applicant's errata list, along with other Errata documents, fail to correct errors and omissions detailed in my 'Relevant Representation' (26 November 2025). Errors include: A property known as 'The Bungalow', opposite The Palms, is omitted, despite the significant impact accepted for nearby properties including The Palms. Rose Cottage is recorded as a detached property. In reality it is semi-detached and adjoins West Cottage which is thus omitted. Land associated with West Cottage is within the order limits and compulsory purchase notices apply. It is thus a relevant property. Finjaro is included but is a guest house and there would thus be a socio-economic impact which should be appropriately referenced. The residual visual amenity assessment for the immediate area is therefore incorrect and the conclusions are flawed.	An addendum to **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]** will be provided at Deadline 4, within which these errors will be rectified, however, this is not anticipated to change the overall conclusions drawn in the assessment.

Ref	Name	Matter Raised	Applicant's Response
REP2-085	John Foster	The Applicant's thematic responses fail to address many detailed issues raised in my representation relating to: • Problems of access for the construction of tower 16 • The mitigation afforded by micropositioning • Lack of mitigation proposals where the Applicant has accepted there are significant residual visual impacts.	The Applicant understands the land interest is within the Book of Reference as a Category 2 landowner (as shown on Sheet 2 of Section C). A permanent right of access is being sought by the Applicant. The Applicant's position on landscape mitigation and compensation is set out at Section 3.10 of **8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]**.
REP2-086	John Stacey	With reference to the Treasury Green Book, National Grid has failed demonstrate that the project is not in some way financed by the public purse.	These points are addressed in **8.5.4 Applicant's Response to the Open Floor Hearings** [**REP1-140**] (see page 15).
REP2-086	John Stacey	The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. We were not given options.	These points are addressed in **8.5.4 Applicant's Response to the Open Floor Hearings** [**REP1-140**] (see pages 16 - 17).
REP2-086	John Stacey	In response, the Applicant has implemented a comprehensive engagement strategy to ensure that all affected parties have been identified, informed and given opportunities to engage in dialogue. The Applicant has not engaged in dialogue.	The Applicant understands the land interest is within the Book of Reference as a Category 1 landowner (as shown on Sheet 4 of Section E). The Applicant's land agent met again with the IP and their land agent most recently on 25 February 2026 to review and discuss the existing concerns around the equestrian set up and the operation of a working farm. A further meeting will be arranged upon receipt of the HoT pack which was issued ahead of the Easter break to progress negotiations and further review mitigations.
REP2-086	John Stacey	The Applicant makes the claim that "***7.2 Outline Code of Construction Practice*** *sets out noise and*	The main construction noise and vibration assessment considers the proposed locations of the

Ref	Name	Matter Raised	Applicant's Response
		vibration limits, monitoring protocols, and reporting requirements for all construction activities to minimise adverse impacts during the construction phase." Unfortunately, there is only one mention in the document for noise limits and that is that "*Each item of plant used should be selected to comply with the noise limits* " Looking at **Appendix F - Outline Noise and Vibration Management Plan** Page 10 "*Construction Noise The assessment presented in ES Chapter 14: Noise and Vibration identified potential significant adverse effects, without mitigation, at: 144 NSRs during daytime and weekend/ bank holiday works 25 NSRs during potential night-time works*." How can this be established with the degree of variation with the LoD of the pylon positions?	pylon working areas, as shown on **6.4.F1 Environmental Statement Figure 4.1: Proposed Project Design [APP-133]**. However, the LoD for overhead lines (and associated pylons) is considered in Section 9 of **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]**. It is stated and agreed that movement within the LoD would lead to changes in construction noise and vibration levels (increasing if movement is towards noise sensitive receptors, and reducing if further away), without mitigation. However, the mitigation measures would vary accordingly to ensure that significant effects are avoided and adverse effects minimised in line with policy (EN-1, Noise Policy Statement for England, the National Planning Policy Framework and Planning Practice Guidance for Noise). Additional details on construction noise assessments are presented in.**4.1 Applicant's Comments on Relevant Representations [REP2-023]**.
REP2-086	John Stacey	"Soils and best and most versatile land." This has not demonstrated anything about BMV Land.	The Applicant is unsure what point it needs to respond to here, but notes there is a further response in relation to agricultural land in the line below.
REP2-086	John Stacey	The Applicant's lack of engagement has only increased the anxiety and this needs this needs to have an increased weight in the planning balance.	The Applicant refutes the suggestion there has been a lack of engagement, having carried out multiple rounds of consultation since 2022, considering feedback and refining the proposals at each stage. Throughout, our approach to consultation has fully complied with both statutory requirements and the statutory guidance on consultation relevant to applications for development consent (which has

Ref	Name	Matter Raised	Applicant's Response
			been developed by Government and Planning Inspectorate in accordance with the Gunning Principles). As stated above, the Applicant's land agent met again with the IP and their land agent most recently on 25 February 2026.
REP2-086	John Stacey	Impact on Public Rights of Way "*As a result, no PRoWs would be closed without a diversion in place, and no severance of the overall network is anticipated*". This is not compatible with the earlier published document: 7.6 Outline Public Rights of Way Management Plan on Page 11 states: Temporary Closure with No Diversion 4.1.5 "This would be used in some instances where there may be no suitable or safe available diversion for PRoWs and hence temporary closures may be required."	The Applicant notes the reference to paragraph 4.1.5 of **7.6 Outline Public Rights of Way Management Plan [APP329]**. Section 4.1 of the report sets out the five management regimes that the Applicant could use in relation to PRoWs that are affected by the Project. Paragraph 4.1.5 as referenced sets out reasons why a PRoW might be temporarily closed with no diversion, including circumstances where no suitable or safe diversion route may be possible, or where a short section of PRoW may become 'redundant' during construction because a temporary diversion creates a new temporary connection point between routes. It does not state that the 'Temporary Closure with No Diversion' regime will be used during the Project. Section 4.2 of **7.6 Outline Public Rights of Way Management Plan [APP329]** defines the overall approach to management regimes that has been taken and gives examples of where and how they would be used in relation to the Project. It notes that the intention has been to minimise disruption to PRoW users as far as reasonably practicable, with PRoW kept open and closures with no diversion only being considered as a last resort. For the Norwich to Tilbury Project, bearing in mind the overall approach identified in Section 4.2 of **7.6 Outline Public Rights of Way Management Plan**

Ref	Name	Matter Raised	Applicant's Response
			[APP329], no PRoWs are proposed to be temporarily closed without a diversion due to there being no suitable or safe available route. A number of short PRoW sections will become temporarily redundant due to the works but these will subject to the provision of connecting diversion routes, so the PRoW network as a whole will remain connected, with continuous access maintained either along the existing alignment under managed access (identified as Temporary Closure (Managed)) or via a temporary diversion (identified as Temporary Closure With Diversion).
REP2-086	John Stacey	6.8.A15 Environmental Statement Appendix 8.15 Badger Report – Redacted text.	Full badger surveys across the Project Order Limits (97 %) have been undertaken. Further pre-construction badger surveys will be undertaken as set out within **7.4 Outline Landscape and Ecological Management Plan (Revision D)**, to identify any new setts that may have been created since the surveys were completed.
REP2-086	John Stacey	"The funding statement confirms that the estimated cost of the project is approximately £1,200 million (2025/26 price base) and the mechanisms National Grid has to secure the necessary funding." This is considerably less than was announced at the hearings.	There is no doubt that the Project will be funded. As set out in the response to question CA 1.14 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**, the funding required to deliver the Project is in place. As set out in the response to question CA 1.15 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]** there is a Licence Obligation on the company to deliver the Project. As set out in the response to question CA 1.16 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**, the commitment to deliver the Project is independent of any cost base. It is important to compare 'like with like' when looking at the costs estimated using any particular price base.

Ref	Name	Matter Raised	Applicant's Response
			The full details of (i) the original Project cost using a wholly overhead line, and (ii) a 'mostly overhead line (with 20 km cable)' are set out in the response to question CA 1.19 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**. A summary of the comparable alternatives is set out below. <table><tr><td>Project description in CA 1.19</td><td>**2020/21 cost base**</td><td>**2025/2 base**</td></tr><tr><td>**Wholly overhead line**</td><td>£894.5m</td><td>£1,200</td></tr><tr><td>**Mostly overhead line (with 20 km cable)**</td><td>£1630.3m</td><td>£2,223</td></tr></table>
REP2-086	John Stacey	Comments on the draft Statement of Common Ground – Braintree District Council.	The Applicant has no comments to make on the Council's position at this Deadline.
REP2-086	John Stacey	National Grid Position "Pylons could not be constructed on the outer extremities of the LoD." There is potential for the works to be up to the edge of the draft order limits.	The Order Limits form the boundary within which the infrastructure must be positioned. The conductors can swing to the side (by several metres) under side wind conditions and when swung out they still need to be within the Order Limits. As such the pylon bases must be positioned sufficiently close to the centre of the Order Limits such that the side swing distance and width of crossarms is still retained within the Order Limits.
REP2-086	John Stacey	My opinion National Grid had [REDACTED] house being 174m, then 164m and now 158m. Elsewhere National Grid claims it 200m from the dwelling in their assessment when considering and rejecting the line being moved. The filtering suggested by National Grid by the evergreen hedge will be very limited when you consider a pylon that could be nearly 60m high and	The Applicant does not agree that the pylons, at the distance shown on plans and within LoD, would be dominant in views. The IP is referred to **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA)** which considered this specifically for this property and concluded '[...] *Overall, considering the distance between the*

Ref	Name	Matter Raised	Applicant's Response
		the hedge is between 2m to 3m high. It would be inescapably dominant in views from the property.	*property and pylons, direction of views, that they are mostly oblique, and visual permeability of the structures which would be introduced, the Project is not anticipated to have such an unpleasant, overwhelming or unavoidable effect on the views that the effect on visual amenity would be unacceptable'* Small changes to pylon position and whether measurements are to the nearest pylon, the centreline or conductor may account for the different numbers being cited. The Applicant's position is that the proposals are not inconsistent with planning policy noting that there is no minimum distance specified in guidance.
REP2-086	John Stacey	Braintree District Council suggested locations for site inspections.	The Applicant has no comments to make on the Council's suggestions.
REP2-086	John Stacey	The Applicant's response "*Given the size of the Project, and the several thousand responses received at each consultation, the Applicant noted that it had taken an approach of not responding directly to every individual response. However, feedback on individual requests was provided to instructed land agents and reported in various documents, all of which are publicly available- ensuring those that have specifically sought changes can see and understand how their requests have been engaged with*." The feedback was not reported back directly to land agents, any feedback, if given had to be found in the numerous publications.	The Applicant continues to engage directly with the land agent, Whirledge & Nott and provide advice on the location of responses and information within the suite of documents available online. As stated above, the Applicant's land agent met again with the IP and their land agent most recently on 25 February 2026.
REP2-086	John Stacey	"*The Applicant explained that RIIO4 funding has already been provided from central government*."	These points are addressed in **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]** (see page 15).

Ref	Name	Matter Raised	Applicant's Response
		This demonstrates that the Green Book must be used as it is Publicly funded.	
REP2-086	John Stacey	National Grid uses the term "dialogue "and elsewhere "negotiations", this is far from the truth. The lack of willingness to engage and the fact that National Grid have no commitment to negotiate seriously harm the delivery of the project. A direct example of this experience of our land agent Whirledge and Nott. They have been meeting with Fisher German to discuss commitments that landowners are seeking such as crossing points. The first meetings are now seven weeks ago and Whirledge and Nott have still not had a response via Fisher German from National Grid of any promises of any commitments. The Applicant is not wanting to negotiate.	The Applicant refutes the suggestion that they are not wanting to negotiate. Specifically, the Applicant's agent met with the land interest on 25 February 2026, to discuss accommodation works and mitigation measures including the creation of a crossing point during the temporary construction works. The Applicant will continue to engage with both the land interest and their agent on how they can best mitigate the impacts of the temporary construction works.
REP2-086	John Stacey	Lastly, it is interesting to note that a large proportion of land has been reclassified a lower grade by National Grid. This is demonstrated in comparison made between TB55 and TB170 in The reports below. [**APP-142**] **6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification Mapping**: The area between TB55 and TB170 is predominantly Grade 3A. [**APP-143**] **6.6.F2 Environmental Statement Figure 6.2 - Provisional Agricultural Land Classification Mapping** The area between TB55 and TB170 is predominantly Grade 2. In practice it does not strengthen National Grid's case of complying with EN1. At the design stage they had a duty to use the ALC map to choose the lower graded soils, but they admitted that soil was scoped out.	Provisional ALC mapping, as shown on **6.6.F2 Environmental Statement Figure 6.2 - Provisional Agricultural Land Classification (ALC) Mapping [APP-143]** is at a scale of 1:250,000 and does not distinguish between Grades 3a and 3b (and cannot be used to inform site-specific assessments) but provides an indication of the likely land classification. Detailed ALC surveys undertaken for the Project, with auger borehole locations set out at 100 m intervals along the central alignment of the Project, with a plot density of one auger per hectare at wider areas (e.g. substation), provide a greater level of refinement than using the Provisional ALC mapping alone. Detailed ALC surveys confirmed the presence of Best and Most Versatile land between TB55 and TB170, classifying the area as predominantly Grade 3a land, as shown on **6.6.F3 Environmental Statement**

Ref	Name	Matter Raised	Applicant's Response
		Looking at the Agricultural Land Classification map Eastern Region (ALC008) the route chosen to comply with EN 1 must have been further to the east on the bottom half of the route.	**Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-142]**. During route optioneering the impacts on agricultural land, including on agricultural land-take and on agricultural activities / operations, as far as was understood based on the data available at the time, were a consideration in the route selection process, as outlined in **6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]**.
REP2-087	Karen Fisher	The Applicant has failed to address the question in relation to the difference in costings of the Norwich to Tilbury project and the Bramford to Twinstead project. How can Norwich to Tilbury be five times cheaper?	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Fisher (pages 148 – 150).
REP2-087	Karen Fisher	The Applicant has not responded to the question raised in my oral submission asking why the computer generated visualisations of the proposed route through Forncett provided at the consultations did not include the existing pylon line to show the true cumulative effect.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Fisher (pages 147 – 148).
REP2-087, REP2-097, REP2-102	Karen Fisher, Norman Stevens, Rachel Wells	The Applicant has failed to properly address the risk to the endangered white clawed crayfish in the River Tas and how they propose to protect them from pollution from run off in Forncett.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Stevens (pages 174 – 175). Also see further details in response to **REP2-097** Norman Stevens below.
REP2-088, REP2-089 REP2-091 REP2-093	Laura Shales, Lesley Sargent Mark Shales Mrs Penny Lang	Concerned about house prices and devaluation.	These points are addressed in **8.8.1 Applicant's Comments on Written Representations** [**REP2-029**] under J. Nichols and T. Nichols.

Ref	Name	Matter Raised	Applicant's Response
REP2-089	Lesley Sargeant	The only conclusion that can be drawn from the consultation programme is that National Grid made up its mind before consulting with the public. Indeed, we see evidence National Grid has already started to implement its plan. For example, in the last few days a wireless energy monitoring system that measures electricity, gas, water and has been installed on a post at the junction of Burgate Road, Bugg's Road and Furze Way. It is directed towards the land that National Grid has earmarked as a working area for "construction equipment and machinery, site offices, welfare, storage and temporary construction access." National Grid is already implementing the only option it is prepared to consider.	The Applicant disagrees with the characterisation in this submission and has been open to make changes throughout the Project to date. We have carefully considered every item of feedback provided through multiple consultations and in the examination process. Numerous modifications have been made to the project as a consequence of this feedback with changes encompassing modifications in the proposed technology, overhead line and underground cable alignment, permanent and temporary works positioning and design detail. We would also note that the absence oof change should not be conflated with a pre-determined view or unwillingness to change. The Applicant has no knowledge of the reported wireless energy monitoring system referred to and neither it nor its delivery partners have deployed such equipment.
REP2-089	Lesley Sargeant	Breaches of Holford Rules National Grid is supposed to follow the Holford Rules when planning a pylon route. It has broken five of these rules in the area in and around Burgate Little Green. 1. National Grid should choose the most direct line, with no sharp changes of direction. 2. National Grid should choose tree and hill backgrounds in preference to sky backgrounds 3. In all locations, National Grid should minimise confusing appearance 4. National Grid should choose routes that minimise the effects on the setting of areas of architectural, historical and archaeological interest.	The Applicant disagrees with the implication that the Holford Rules have not been followed. Throughout the development of the Project they have been considered in conjunction with information on constraints, homes and environmental features and the finding of the EIA process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on

Ref	Name	Matter Raised	Applicant's Response
		National Grid should avoid routing to residential areas as far as possible	which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. Our decision making and how the Holford Rules informed decision making is set out in documents including **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** published in 2022, and the Design Development Reports (**7.20 2023 - Design Development Report for the Project [APP-358]**, **7.21 2024 - Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]**).
REP2-089	Lesley Sargeant	Impact on Little Green Burgate, its residents and wildlife: Contamination, destruction and disruption of habitats: threat to water voles, great crested newts (GCN), pipistrelle bats and yellow hammers The underground drainage from the hard standing area on the proposed haul road (adjacent to Bullocks Ley on Burgate Road) runs into a drainage ditch that feeds our pond. Our pond drains into the large pond on the common (Little Green). Construction of the haul road and its subsequent use threatens to contaminate the ground water that feeds into these ponds and harm the habitat for wildlife that includes water voles and great crested newts. Yellow hammers nest in the hedges along the Burgate Road leading to Gislingham in the area where the proposed pylon route crosses the road twice. If National Grid's plan goes ahead their habitat will be destroyed and the population made extinct in the area.	An assessment of potential impacts to protected species including water voles, bats, great crested newt and birds is included within **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. There will be no direct impacts to the ponds referenced and impacts to the connecting ditch network are limited to a culvert crossing to facilitate the haul road. Mitigation measures for water vole are included within **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. Pre-construction surveys will be undertaken at each watercourse crossing point to identify the presence/absence of water vole and to map any burrow locations. The haul road will be micro-sited to avoid direct impacts to water vole burrows where possible. Where water vole presence is confirmed within a works area and impacts to the burrows cannot be avoided, water vole will be displaced into adjacent habitat in accordance with a licence that will be obtained from Natural

Ref	Name	Matter Raised	Applicant's Response
			England. A draft licence has been issued to Natural England and a Letter of No Impediment received in respect to water vole. Following the implementation of mitigation there will be no significant effects on water vole. Impacts to GCN will be mitigated through District Level Licencing. A GCN Impact Assessment and Conservation Payment Certificate has been obtained and countersigned by Natural England. Standard pollution prevention measures are included within **7.2 Outline Code of Construction Practice (Revision C)** to ensure no indirect impacts on the riparian habitat. Following the implementation of mitigation there will be no significant effects on GCN. No structures or buildings will be directly impacted by the Project. There will be no direct impact to the identified bat roosts. The hedgerows along Burgate Road will be trimmed to provide appropriate visibility splays where the road is crossed by the haul road. Vegetation removal will be reduced as far as practicable through micro siting at the detailed design stage. Where vegetation loss is unavoidable, removal will be undertaken outside of the nesting bird season of March to August or will be supervised by a suitably qualified ECoW as outlined in **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. The short section of hedgerow that will need to be removed to accommodate the haul road will be replanted on completion of construction with no permanent loss of hedgerow habitat and no long-term effect on yellow hammer. Following the implementation of mitigation there will be no significant effects on yellow hammer.

Ref	Name	Matter Raised	Applicant's Response
REP2-089	Lesley Sargeant	Health and wellbeing: The scale of work proposed for in and around Burgate is overwhelming and disproportionate. It is already causing a great deal of concern and anxiety in the community. If National Grid's proposal are allowed to go ahead the impact on our mental and physical health and wellbeing will be immeasurable. We will have to witness the damage to our precious environment and its wildlife, endure the noise and disruption of the construction process and watch our house prices plummet. We will then need to live with the risks to health posed by the electric and magnetic fields (EMFs) emitted by the pylons: childhood leukaemia, brain tumours and Alzheimer's. According to the World Health Organisation, adverse health effects caused by high level short-term exposure to EMFs have been scientifically established (ICNIRP, 2003). The evidence is less clear for long-term exposure at a lower level, but there's still a risk. Any risk is unacceptable to us.	An assessment of how the Project could potentially affect the health and wellbeing of local residents is contained in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. This includes an assessment of the potential impacts of the Project on mental health and wellbeing during the construction phase. The assessment notes that this may result in heightened levels of stress and anxiety for local residents as a result of potential environmental impacts in their local area (for example, noise, dust, traffic and visual impacts). A wide variety of measures have been identified to mitigate these impacts (for example use of best practicable means to reduce noise and air quality impacts) and these are outlined in **7.2 Outline Code of Construction Practice (Revision B)** and in **7.3 Outline Construction Traffic Management Plan (Revision B)**. With appropriate mitigation, it is not considered that there will be significant health and wellbeing impacts at a population level. The Project has been designed to comply with existing National Grid standards and relevant external guidance and processes relating to EMFs. Exposure guidelines have been set by independent scientific bodies and are based on decades-long studies into the effects of EMFs and ill health. The Applicant has produced **7.8 Electric and Magnetic Field Compliance Report (Revision B)** which provides an assessment and conclusions of the compliance of EMFs produced by the Project with the requirements of NPS EN-5. The assessment set out in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]** therefore relates to perceived

Ref	Name	Matter Raised	Applicant's Response
			impacts associated with EMFs, which can, nevertheless impact mental wellbeing and quality of life. Community perception is that some groups are more vulnerable than others to potential health effects associated with EMFs, with concerns particularly relating to children, for example. Whilst no significant impacts have been identified, it is noted that providing opportunities for local residents to interact with clear and accessible scientific information relating to EMFs would be beneficial.
REP2-089	Lesley Sargeant	Access to the haul roads and local flood risk: All three lanes to and from the proposed haul roads in Little Green Burgate are unsuitable heavy construction vehicles. They are extremely narrow with few passing spaces, particularly on the road between Gislingham and Burgate. The short stretch of road that runs past St Mary's Church contains three 90-degree bends that are tricky to navigate safely even for cars. The roads are not safe for the use of heavy vehicles and will endanger residents. The lanes are also prone to flooding. During the winter of 2023/24, Bugg's Road was impassable on three occasions; Burgate Road from Bugg's Road to St Mary's Church Burgate twice; and Burgate Road leading to Gislingham once. During Storm Babette all three access roads were impassable. While the flooding is obviously worse during the wet winter months, they flood at other times of year too. On 21 May, flooding on Burgate Road was particularly bad on the sharp bend by St Mary's Church with cars struggling to get through.	The Applicant has developed a construction routeing strategy detailed in Section 5.4 of **7.3 Outline Construction Traffic Management Plan (Revision B)**. Construction traffic will use the Strategic and Major Road Network to access the region, onto Primary Access Routes to the site access points. From these site access points; traffic will be routed off the public highway along haul roads to access the construction sites. The Applicant is not proposing a Primary Access Route on Burgate Road (between Gislingham and Burgate) or Buggs Road or on the section of Burgate Road past St Marys Church. Therefore, when these routes are subject to flooding, the Projects primary construction access routes would not be disrupted. The Applicant is proposing crossover points on Burgate Road, to allow construction vehicles to continue to travel along the haul road. Burgate Road will be temporarily closed during construction, with a proposed diversion route via lines SMD-B-025, SMD-B-024, SMD B-021, SMD-B-014, SMD-B-010, SMD B-016 and SMD-B 017 as shown on Section B, Plans B

Ref	Name	Matter Raised	Applicant's Response
			and C in **2.5 Access, Rights of Way and Public Rights of Navigation Plans [APP-034**]. Construction vehicles are not permitted to join or leave the public highway at these locations, unless detailed within a scenario within **7.3 Outline Construction Traffic Management Plan (Revision B)**, including emergencies.
REP2-089	Lesley Sargeant	According to maps given in National Grid's background document St Mary's church, Burgate is outside of the area that National Grid says will be affected by noise and vibration. It is inevitable that the church will be affected by noise and vibration from construction work and from the massive increase in traffic (a 25,100% increase if National Grid's surveyors had recorded one car instead of zero on the day the survey was carried out). National Grid estimates that there will be an average increase of 251 vehicles a day on Burgate's narrow lanes, 84 of which will be lorries. The maps do not give units for noise or any indication of the level of vibration. It is therefore not possible to check it is a reasonable or safe level, particularly for such an old, important building.	The Applicant has responded to this in its response to question HE 1.11 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**.
REP2-090	Mark Pym	General comments on consultation and consideration of alternatives including use of Green Book. Also comments on resilience of overhead lines from weather and interference.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Pym.
REP2-090	Mark Pym	Inadequate survey coverage: Less than 1% of the land has been surveyed.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Pym. The ecological survey coverage suggested here

Ref	Name	Matter Raised	Applicant's Response
			as 1% is inaccurate. As part of the EIA process for the Project, a suite of ecological field surveys has been undertaken over the 2022 2025 period. This includes surveys across 97% of the land within the Order Limits, as well as a suite of protected species surveys.
REP2-090	Mark Pym	Hedgerows, trees and wildlife corridors	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Pym. **7.4 Outline Landscape and Ecological Management Plan (Revision D)** sets out in paragraph 9.2.1 that reinstatement planting will occur at the earliest opportunity and no later than the first available planting season after that part of the authorised development is first brought into operational use. Planting shall be carried out in winter (November to March) and shall be timed to avoid periods of frost, drought, or other inclement weather, as far as practicable. Paragraph 9.3.1 notes that replacement tree planting will commence at the earliest suitable time of year following the completion of works for each relevant section; this will generally be between November and March when the trees are dormant. Paragraph 9.4.1 notes that following completion of works, hedgerows will be reinstated at the earliest appropriate opportunity within the correct planting season. Paragraph 9.5.1 notes that grasslands will be reinstated at the earliest appropriate time of year following the completion of works. Further details relating to aftercare, re-establishment and monitoring are set out in Sections

Ref	Name	Matter Raised	Applicant's Response
			10 and 11 of **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. There will be a five-year monitoring period for replacement planting (outside the Environmental Areas) to ensure successful plant establishment. **7.4 Outline Landscape and Ecological Management Plan (Revision D)** states the planting will be undertaken by suitably experienced contactors in line with British Standards and follow general best practice principles outlined in Section 9.2 of the document. For example, Section 11.2 of BS 8545:201432 states 'Post-planting management and maintenance is important if longevity in the landscape is to be achieved. A full young tree management programme with budgetary provision should be in place for all planting schemes. This management programme should be in place for at least 5 years.' The Applicant's commitment to a five-year aftercare period adheres to the recommendation set out in the British Standard. Further details are set out in Section 10.1: Aftercare of **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. Table 3.1 of Section 3.2 of the document identifies the overall roles and responsibilities relevant to the Outline LEMP, including monitoring activities and overseeing of the implementation and establishment of landscape works.
REP2-092	Matt Day	My submission raised specific concerns about how the project was presented to the public during consultation. My concern was not about how many consultations took place, but about how the information was	The Applicant's intention throughout the consultation was to provide information in a way that is accessible to a wide range of audiences, including members of the public, landowners and more technical stakeholders. To support this, the interactive map was

Ref	Name	Matter Raised	Applicant's Response
		presented within them. The interactive maps used during consultation had the temporary access roads (and other key project impacts) deactivated by default. A member of the public looking at the map would see the pylon route but not the approximately 2 million square metres of stone haul road required to build it. The line markings on the maps were also not intuitive for anyone unfamiliar with technical plans, and the digital visualisations do not reflect the true scale of the impact. I ask the Applicant to explain why the temporary access roads were hidden by default on the interactive map, and whether they consider that the consultation materials gave the public a fair and accurate picture of the full scope of construction works.	designed so that the initial view remained as simple and uncluttered as possible, with the ability for users to turn on additional layers that were most relevant to their individual interests. Temporary access routes, along with other construction-related layers, were available throughout the consultation period. These layers were not removed or withheld; rather, they were located behind clearly signposted toggles to give users control over the level of detail they wished to explore. This approach helps prevent non-technical users from becoming overwhelmed, while still enabling those who wish to examine the full construction footprint to do so. In addition to the interactive map, the Applicant also provided more technical and detailed mapping within the full suite of consultation documents. These materials included engineering-level plans setting out the extent and nature of temporary works, including haul roads, construction areas and associated impacts. This ensured that all stakeholders - whether looking for a high-level overview or detailed construction information, had access to material appropriate to their needs. The Applicant does not seek to minimise the impact of the Project and recognises the importance of transparency in enabling the public to make informed representations.
REP2-092	Matt Day	Off-Book Property Acquisition Costs I ask the Applicant to respond directly on the following:	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Day (page 145).

Ref	Name	Matter Raised	Applicant's Response
		(a) Whether property acquisition costs associated with the Norwich to Tilbury project are being recorded in full against the project budget, or whether any such costs are allocated to a separate corporate budget or portfolio. (b) Whether any vendors of properties acquired in connection with the project have been asked to sign non-disclosure agreements, and if so, the rationale for this. (c) Whether the cost comparisons presented in **7.19 2023 Strategic Options Backcheck and Review** and **7.17 2025 Strategic Options Backcheck and Review** include the full cost of all property acquisitions associated with the overhead line option.	
REP2-092	Matt Day	Sulphur Hexafluoride (SF6) Emissions I ask the Applicant to set out the SF6 emissions attributable to this project and how these have been factored into the environmental assessment.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Day (page 146). The Applicant acknowledges the global warming potential of SF6. It has been assumed that no SF6 equipment will be used in the Project, as presented in **6.4.A1 Environmental Statement Appendix 4.1 - Greenhouse Gas Assessment [APP-131]** in accordance with National Grid policy. SF6 alternatives such as C4 or G3 have a 99% lower global warming potential than SF6.
REP2-092	Matt Day	AC Technology Obsolescence and Constraint Payments My submission raised a question about whether it is appropriate to build a new AC pylon network at a time when the energy system is moving to direct current (DC). Solar generation is DC. Battery	As the response noted there is a lot of technology which uses Direct Current (DC) electricity at the moment and also a lot which uses Alternating Current (AC) electricity, including many home appliances and industry. The earliest electricity distribution systems in

Ref	Name	Matter Raised	Applicant's Response
		storage is DC. Electric vehicles charge on DC. Data centres operate on DC. Meanwhile, the UK is paying billions of pounds annually in constraint payments to turn off wind farms because the existing AC network cannot handle peak loads efficiently. The Applicant's response to HVDC alternatives focuses narrowly on capital cost differentials and the absence of commercially available HVDC circuit breakers. It does not engage with the broader strategic question: whether investing in AC overhead line infrastructure represents the right long-term technology choice, or whether it risks locking the UK into an increasingly outdated transmission architecture at enormous public expense. The Eastern Green Link projects (subsea HVDC cables between Scotland and England) demonstrate that HVDC is a proven, deliverable technology for long-distance bulk power transfer in the UK. The Applicant has not explained why that approach is appropriate for those projects but not for this one. I ask for a response that addresses the strategic technology question, not simply the capital cost comparison.	the world were DC systems, like for example in New York, which exposed some of the shortfalls of transmitting and distributing electricity with DC. DC does not transport electricity very well where safe distribution of low domestic voltages is required, which may lead to losses and voltage drop - for example in New York the DC system required many generators being for each building. HVDC is required to make the transport of electricity efficient, however this is at voltages above hundreds of kilovolts. DC also has the problem that it cannot easily be changed from high voltages to lower voltages, because, unlike AC, there is no transformation possible. The reason AC is used world-wide to transport energy is due the efficiency of being able to transform electricity from, for example, 400 kV to 132 kV to 66 kV to 11 kV and finally 415 V 3 phase (230 V single phase for domestic supply). AC can do this through the use of electricity transformers, which use the alternating magnetic field generated by AC currents to reduce the voltage which DC cannot do. With all the DC applications presented in the response, they all operate at different voltages and use different systems so they cannot be connected together. Therefore, they all use invertors/convertors to change electricity to AC so that the energy can flow onto or off the AC electricity system after being transmitted and distributed at the right voltage level to be the most efficient way to transport energy. For example, the HVAC system, using 400 kV for example, is over 97% efficient meaning the majority of the energy that enters the system, leaves the system

Ref	Name	Matter Raised	Applicant's Response
			via distribution transformers taking the energy to our homes and businesses. In the example of HVDC, it is very good over long distances at voltages over for example 525kV, but to be able to use the energy it requires large convertor stations at each end at a very high cost, that need to change the electricity from AC to DC and back to AC again before the energy can be transformed through the AC transformers to useable voltages. Therefore, worldwide the transmission, distribution and transformation of electricity through AC systems remains and will remain the most highly efficient way to move energy from generator to home/business regardless of the technology used to generate the energy, the largest contributor of which remains three phase AC generators. The final issue with HVDC in particular is that there is no commercially available HVDC circuit breakers at voltages such as 525 kV. The AC system has circuit breakers at voltages such as 400 kV. On the AC system when there is a fault, the system is isolated from the fault by the AC circuit breaker at each end of the faulted network opening and the rest of the system can continue operating. HVDC cannot use AC circuit breakers and the technology to break HVDC current is not commercially available, meaning a fault on an interconnected HVDC system would cause the whole system to shut down. This is another reason why HVDC systems are not linked together and why the AC system ensures that, for faults at transmission or distribution levels, no or very small numbers of customers lose their supply when a fault happens as the AC system isolates the faults.

Ref	Name	Matter Raised	Applicant's Response
REP2-092	Matt Day	My submission noted that National Grid is a publicly listed company that generated over £4.5 billion in operating profit in its most recent financial year, with operating margins of approximately 38%. Its largest shareholders are institutional investors including BlackRock and the Vanguard Group. I raised the concern that the Applicant's primary fiduciary duty is to these shareholders, not to UK energy consumers or the communities affected by this project. This matters because the Applicant is simultaneously the promoter of the project, the entity that will profit from building it (through the regulated asset base), and the party presenting the cost-benefit analysis that justifies the chosen delivery method. There is, at the very least, a perceived conflict of interest when a monopoly operator advocates for the most capital intensive onshore option while dismissing alternatives. The Applicant's response does not acknowledge this point. I am not saying that the corporate structure is inherently improper. But it is a relevant consideration when assessing how much weight should be placed on cost comparisons produced and presented by the same organisation that stands to profit from the outcome.	The concerns in the response are noted, but are mistaken for two reasons: '*...advocates for the most capital intensive onshore option while dismissing alternatives...*' The proposal is the most economic and efficient option for the consumer. The alternatives are significantly more expensive - further details about the cost of the Project and the potential alternatives are set out in the response to question CA 1.19 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**. '*...how much weight should be placed on cost comparisons produced and presented by the same organisation that stands to profit from the outcome...*' Consenting - It is correct that National Grid produces and presents the information to explain the various Project options and the costs linked to them to the Examining Authority. Cost recovery - However, the independent regulator, Ofgem, controls the ability to recover any of the costs incurred in developing and delivering the Project. This control is achieved through the Project Assessment process, which is described in more detail in the response to question CA 1.15 in **8.9.1 Applicant's Responses to First Written Questions [Revision A]**. Unless Ofgem believes the Applicant has delivered the most economic and efficient solution for the electricity consumer, National Grid will not be paid for the costs and work that can be disallowed when the Project Assessment determination is made by Ofgem.

Ref	Name	Matter Raised	Applicant's Response
			The apparent conflict noted in **[REP2-092]** was anticipated by the Government when the Electricity Act 1989 was passed, which is why decisions taken by licensed Transmission Operators such as National Grid are subject to independent scrutiny by the Regulator, Ofgem.
REP2-092	Matt Day	Failure to Monetise Permanent Environmental and Social Losses. In my original submission, I argued that the Applicant's cost comparison between overhead lines and alternatives is based purely on capital expenditure. The comparison assigns zero monetary value to the permanent losses created by the overhead line option. I am arguing that these permanent losses need to be quantified and included in the cost comparison between delivery options. I note the Applicant's position that Treasury Green Book methodology is not applicable to National Grid as a private entity. But the Planning Inspectorate and the Secretary of State, who will determine this application, are public decision-makers acting in the public interest. The fact that the promoter is a private company does not relieve the decision-maker of the need to consider the full range of costs and benefits, including those borne by the public.	The response on the Green Book is provided in **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]** (page 15).
REP2-092	Matt Day	In my submission, I provided specific calculations on the scale of the visual impact of this project across the flat landscape of East Anglia: • Over 200 square miles where a 50m pylon becomes the dominant landscape feature (approximately 1 mile radius)	The approach to the LVIA follows professional guidance as set out in **6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]** and was shared, discussed and agreed with stakeholders. This methodology sets out the justification for the study area of 3 km from lateral LoD used for the assessment. This has been determined by the nature and scale of the Project and

Ref	Name	Matter Raised	Applicant's Response
		• An area comparable in size to Dartmoor National Park where pylons would be prominent (approximately 2 mile radius) • A total visual footprint roughly the size of the county of Kent or Suffolk (approximately 6 mile visibility in flat terrain) The Applicant's response on landscape and visual matters is entirely generic, referring to the LVIA methodology and professional guidance. It does not engage with the cumulative, route wide scale of the visual impact. The LVIA approach, by its nature, assesses individual viewpoints and character areas in isolation. My point was about the total visual transformation of a very large area of lowland England. I ask the Applicant to respond to these scale calculations specifically.	the nature of the surrounding area, and considers the landscape and/ or views that the Project may influence in a significant manner. Professional experience of assessments of overhead lines and field assessment have shown that there are instances when steel lattice pylons can be discerned at distances up to 10 km (roughly 6 miles) from open and elevated viewpoints, however in most instances the perception of overhead lines beyond 3 km (1.8 miles) is likely to be relatively limited, and beyond 5 km (3 miles) barely perceptible. The LVIA recognises that there will be significant visual effects within 1.5 km (approximately 1 mile) of the Project. At a distance of 3 km (2 miles), a 50 m pylon would appear approximately 1 cm high in the landscape, which the Applicant concludes would not be prominent in the landscape. Given the overall length of the Project and the fact there will be effects along its length, the Applicant can appreciate the respondent may deem effects to be widespread in that sense. However, given the linear nature of the project, the way effects will be experienced in practice will be through change experienced more locally. The Project will traverse a large area but its influence, perpendicular to the proposed 400 kV overhead lines, will be relatively limited. This is owing to the fact that steel lattice pylons are designed to be visually permeable and not to be widely visible, as would be the case for example for a tall building such as a power station which would have a solid appearance. The Zones of Theoretical Visibility (ZTV) mapping in **6.13.F8 Environmental Statement Figure 13.8 -**

Ref	Name	Matter Raised	Applicant's Response
			ZTV of Proposed 400 kV Overhead Line by Project Section heat mapping number of structures theoretically visible version [APP-244] sets out the 'visual footprint' of the Project across the route. The LVIA recognises that there will be significant landscape and visual effects across the whole route of the Project.
REP2-092	Matt Day	Inconsistency in Planning Controls for Listed Building Settings. I raised a specific point about the inconsistency between the strict planning controls applied to listed building owners (for example, being restricted to a 4ft open fence to preserve the visual setting from the roadside) and the absence of equivalent scrutiny when a 50m steel pylon is proposed within the setting of the same property. This is not an abstract heritage policy point. It is a concrete example of a double standard in how the planning system treats individual householders compared to major infrastructure promoters. The Applicant's response addresses heritage matters in generic procedural terms, referencing the Environmental Statement methodology and engagement with Historic England. It does not address this inconsistency. I ask the Examining Authority to consider whether the Applicant has given adequate weight to the settings of listed buildings along the route, when assessed by the same standards that would be applied to the occupiers of those buildings.	The Project is defined as a NSIP, under s14(1)(b) and s16 of the PA 2008, and as amended by the Planning Act 2008 (Nationally Significant Infrastructure Projects) (Electric Lines) Order 2013, as it involves the installation of a new electric line above ground of more than 2 km, which would operate at 400 kV in England. For an NSIP, the grant of development consent is required by the making of a DCO under the Planning Act 2008. A DCO may include a range of consents and powers. The grant of development consent will remove the need for certain separate consents, including those under the Ancient Monuments and Archaeological Areas Act 1979 and Planning (Listed Buildings and Conservation Areas) Act 1990. NSIPs require development consent from the relevant Secretary of State rather than separate planning permission or listed building consent from the local planning authority. The principal and relevant statutory instruments made under the powers in the Planning Act 2008 currently includes The Infrastructure Planning (Decisions) Regulations 2010. These regulations prescribe a list of matters to which the decision-maker must have regard when taking decisions on applications for

Ref	Name	Matter Raised	Applicant's Response
			NSIPs. When deciding an application which affects a listed building or its setting, the decision-maker must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.
REP2-092	Matt Day	My submission raised a concern about the political and corporate narrative framing this project, specifically the assertion that any alternative will result in higher energy costs for consumers. At a time when energy costs are a serious burden on household budgets, this narrative has the effect of vilifying those who oppose the chosen delivery method. It creates community conflict and suppresses legitimate public objection. The Applicant's response does not address this. I accept it is a difficult matter for them to respond to, but I ask the Examining Authority to be mindful of the power imbalance between a £60 billion multinational corporation and the individual residents and communities who are being asked to bear the permanent consequences of this project.	The Applicant notes the concern raised regarding the wider narrative around energy costs and the implications this may have for public perception and community relations. The Applicant wishes to clarify that, in developing proposals for the Norwich to Tilbury project, it is required to follow relevant national policy and regulatory guidance. This includes the need to consider overall system efficiency and the long-term costs borne by consumers. A core purpose of the project is to enable the connection and transmission of increasing volumes of home-grown, secure, low-carbon energy. Facilitating this transition is intended to support downward pressure on consumer bills over time by reducing reliance on fossil fuels. This context was reflected in consultation materials because it forms part of the strategic need case set out in national policy. The Applicant does not seek to vilify individuals or communities who may disagree with elements of the proposal, nor to limit legitimate objection. The Applicant has sought throughout the consultation to provide clear, factual information to support informed representations. This has included presenting the policy framework within which the project must be developed and explaining the drivers that shape the options available.

Ref	Name	Matter Raised	Applicant's Response
REP2-092 REP2-094	Matt Day Nicola Maguire	An independently audited, third party cost analysis covering the full lifecycle costs of the proposed overhead line option and the leading alternatives would significantly improve the quality of evidence available to the Examining Authority and the Secretary of State.	The Applicant recognises the importance of robust cost estimation and transparency, particularly where different technology options are being compared as part of the strategic optioneering process. In developing the Norwich to Tilbury proposals, the Applicant is required to follow relevant national policy and regulatory guidance, including the need to assess strategic options using a consistent and clearly defined methodology. This methodology is set out in **Appendix D: Economic Appraisal** (pages D1–D14) of **7.19 2023 – Strategic Options Backcheck and Review** [**APP-357**]. This methodology considers a full range of lifetime cost issues, including capital expenditure, maintenance requirements and the capacity needed to meet system demand. Details on the characteristics, materials and cost profiles of each technology are provided in **Appendix C – Technology Overview** of the same document. The Applicant also notes that whilst all technologies—including overhead lines—require materials sourced through global markets, the cost and lifetime cost assessment explicitly accounts for these factors as part of the comparative evaluation. This approach is consistent with the Institution of Engineering and Technology (IET) report[21], which provides an independent and detailed assessment of the cost structures associated with different transmission technologies. The Applicant considers that the current approach already incorporates independent evidence, including

[21] Institution of Engineering and Technology (2025) A comparison of electricity transmission technologies: Costs and characteristics An Independent Report by Mott MacDonald in conjunction with the IET

Ref	Name	Matter Raised	Applicant's Response
			the IET report and established national policy requirements for economic appraisal. The Applicant reiterates that its cost projections are prepared in accordance with national policy, apply a consistent methodology across all strategic options, and are based on both internal and independent technical evidence.
REP2-092	Matt Day	I estimate I have invested significant personal time into this process. My time is not a free commodity, and I don't value it lightly. The Applicant has teams of salaried consultants, lawyers and planning professionals whose full-time job is to produce these documents. I don't begrudge them that, but the Examining Authority should keep this imbalance in mind. If the process demands this level of time and effort from individual residents just to keep up, then most people simply won't take part. The weight given to the volume of public response should reflect that.	The Applicant acknowledges the point raised regarding the personal time and effort required for individuals to participate meaningfully in the Examination process. The Applicant recognises that members of the public, including those who are employed or have other significant commitments, may need or want to invest time to review documents, attend events and consider the project. The Applicant does not underestimate this and is grateful to those who have taken the time to engage. The Applicant also recognises that it operates within a formal statutory framework that necessarily involves the production of detailed and technical documentation. These requirements are set out in national policy and guidance and apply to all NSIP. The Applicant understands the concern about the difference between project teams and individual residents. The Examination process is designed to take this into account. The Applicant reiterates its commitment to engaging openly and respectfully with all stakeholders, and to ensuring that people have the information they need to express their views. The Applicant appreciates the time you have invested in the process and will

Ref	Name	Matter Raised	Applicant's Response
			continue to support public participation in line with its statutory obligations.
REP2-093	Mrs Penny Lang	I note the addition of orange spacers and bird diverters above the Waveney river and Ardleigh Reservoir. Yet, here are flocks of geese which daily fly over the village of Aldham: morning from NW-SE, presumably from night-time field roosts to Abberton Reservoir, which is not far; and always return at dusk from SE-NW. This has been a regular occurrence for some years now. So not only passerines, but also large birds: buzzards, owls and red kites. The East Atlantic Flyway is also a little to the East of us. There should be bird diverters all along the route: there are many other rivers and watering-places – this is the countryside.	Collision risk has been assessed within **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167** to **APP-170]**. This includes a comprehensive desk study of bird records with data obtained from the British Trust for Ornithology, Royal Society for the Protection of Birds and local records centres, resulting in over 26,000 bird records, across a lengthy species list which is broadly similar to the species listed (inclusive of buzzards, owl and red kites). NatureScot (2016) guidance was used to determine Target Species and Secondary Species with regard to collision risk, and the distribution of these records have been mapped to determine hotspots and assess risk. Wintering / passage bird surveys have been undertaken along rivers and watering-places to determine whether the proposed overhead lines could fragment corridors that are used by birds when moving between habitats along the estuaries / coast and inland, or cause mortality along such routes. The use of orange spacers and diverters has to be informed by the assessment which did not identify locations that pose notable collision concern. On a precautionary basis (as reference by Mrs Penny Lang), mitigation in the form of orange spacers and bird diverters on the earth wire are proposed at the River Waveney and Ardleigh Reservoir as detailed in **7.4 Outline Landscape and Ecological Management Plan (Revision D)**. Although flocks of geese have been observed by residents flying over the village of Aldham the assessment work determined that in most instances

Ref	Name	Matter Raised	Applicant's Response
			geese were flying high and outside of the collision risk zone. In terms of The East Atlantic Flyway (as mentioned is to the east), the Project is located further inland, with alignment allowing sufficient distance from European Sites wherever possible. The Project is located outside the Impact Risk Zone for the majority of European Sites along the coast, except for the Stour and Orwell Estuaries SPA / Ramsar Site and the Thames Estuary and Marshes SPA / Ramsar Site (located 3.1 km and 1.7 km from the Project respectively) which were taken forward to Stage 1 Screening of **5.3 Habitats Regulations Assessment Report [APP-082]**. Survey results did not identify areas of notable concern as detailed above.
REP2-093, REP2-068	Mrs Penny Lang, Caroline Homewood	There is a new, un-consulted, Construction Compound on a floodplain behind Ford Street requiring compulsory purchase of large part of resident's garden, as late as 13 February 2026, appears to be a dereliction of duty. This area is within a Conservation Area and also in an area known to flood each year.	This likely refers to a site that was part of a Category 3 Land Interest Questionnaire issued to the affected landowner to confirm ownership of a property and other details. The Applicant is not proposing to purchase this land for a construction compound. The construction compound remains as proposed in the same location that was consulted on during the Applicant's statutory consultation in 2024.
REP2-093	Mrs Penny Lang	Local Economy / Tourism "Through routeing and siting, the Applicant has sought to avoid, as far as practicable, locations that are important for leisure and tourism". This is unbelievably complacent – one paragraph, on a topic where the economy will suffer hugely. It is well known through other reports we have submitted that many businesses, including the hundreds of tourism related ones: hospitality in the form of hotels, restaurants,	The Applicant has applied a mitigation hierarchy, including embedded mitigation to avoid or reduce significant effects, standard mitigation to apply management activities and techniques to limit effects, and additional mitigation to identify requirements to further reduce significant environmental effects. The Applicant's approach is to work with affected landowners and businesses, through ongoing engagement to minimise disruption, where reasonably

Ref	Name	Matter Raised	Applicant's Response
		cafes, pubs, bed & breakfasts, etc. will suffer greatly from not only construction but the mere existence of pylons. People visit because of the beauty and peace of the area; they will stop during construction and may never return to our then industrialised landscape.	practicable. This includes engagement on construction phasing, access arrangements and timing, with the objective of reducing impacts on landowners and businesses, where this can be achieved without prejudicing safe and efficient delivery of the Project. Matters relating to loss of business income are compensation matters. Such matters would be assessed separately, on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code, and are not matters to be determined through the Examination of the DCO. Under the Compulsory Purchase Code, businesses may be able to claim compensation for any loss in value directly caused by the Project if they meet the criteria.
REP2-093	Mrs Penny Lang	Impacts on the local road network / PRoWs All the roads along the route are already too busy, often jammed, including small lanes being used as rat runs. There is nowhere for the vast numbers and sizes of the expected HGVs to go. No possible mitigation, it will be years of chaos. Trees and hedges ripped out randomly for access (huge carbon storage lost), and some paths/lanes closed both temporarily and permanently.	The Applicant has developed a construction routeing strategy detailed within Section 5.4 of **7.3 Outline Construction Traffic Management Plan (Revision B)**. Construction traffic will route along Primary Access Routes (PARs) from the strategic and major road network to the site access points. Construction vehicles will then continue on the off-line haul road, using crossover points to cross the public highway, where required. The PARs have been assessed for suitability of construction vehicles, and any proposed mitigation is detailed in **7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans [APP-312 to APP-320]**. With regard to Public Rights of Way (PRoWs), all affected PRoWs will remain accessible throughout construction either through managed access on their

Ref	Name	Matter Raised	Applicant's Response
			existing alignment or through appropriate temporary diversions. The temporary impacts on PRoWs will be managed, minimised and mitigated, where possible, via the measures contained in **7.6 Outline Public Rights of Way Management Plan [APP-329]**. These measures will be secured through the DCO process. Requirement 4 of **3.1 Draft DCO (Revision C)** states that a final PRoW Management Plan must be prepared and submitted to and approved by the relevant Local Highway Authority before the commencement of the works and that the final document must be substantially in accordance with **7.6 Outline Public Rights of Way Management Plan [APP-329]**. This process ensures that the PRoW management arrangements set out in **7.6 Outline Public Rights of Way Management Plan [APP-329]**, including maintaining access either on the existing alignment under managed access or via short temporary diversions, will be implemented. No PRoW is proposed to be closed without a diversion in place, and any temporary management measures will be removed and PRoWs reinstated as soon as practicable.
REP2-093	Mrs Penny Lang	Cumulative Effects. Ardleigh heritage country village will be ruined for ever, swamped by electrical infrastructure. Hearing NG responding to questions about coordination and cumulative effects were clearly not communicating adequately with LTC, Highways, crucial oil pipe crossing the route, Wildlife Trusts.	**6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281]** has been undertaken in accordance with **6.19 Scoping Report [APP-288 – APP-296]** and **6.20 Scoping Opinion [APP-297]** by competent and professional experts, including ecological, heritage and landscape experts. Liaison has taken place with Lower Thames Crossing, National Highways and the Wildlife Trusts throughout the development of the Project and continues.

Ref	Name	Matter Raised	Applicant's Response
REP2-094	Nicola Maguire	The Green Book - 'This has been tried and tested through numerous previous projects, the formal Examination process', Maybe projects haven't been scrutinised to this level before. Just because you haven't been made to use The Green Book in the past, certainly doesn't make it right - for best practice and best outcome this book SHOULD be applied. New cost should be included. Only 10% contingency is ridiculous on such a large project - The Green Book states 40%. Socio-economic impact and natural capital impact. This is why an independent audit is critical to find out the true cost this project.	These points are addressed in the thematic response provided in **8.5.4 Applicant's Response to the Open Floor Hearings** [**REP1-140**] (page 15).
REP2-094	Nicola Maguire	BNG - you are saying its voluntary – it's now compulsory and community benefits!	The Applicant has committed to delivering at least 10% BNG with wider environmental and societal benefits, despite it not yet being mandatory for Nationally Significant Infrastructure Project applications.
REP2-094	Nicola Maguire	Pacemakers and also the Government has been warned not to build pylons near homes but our homes are already here and should be protected.	The Applicant has responded on electric and magnetic fields (EMF) and pacemakers in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to Maguire (pages 129 – 130). The Applicant has also responded on the points raised within Professor Henshaw's presentation in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028**]. Specifically, the Government's scientific advisors UKHSA review the scientific literature and advise on appropriate protective measures that should apply to electricity infrastructure based on the outcomes of these reviews. These review processes consider the totality of the scientific evidence, rather

Ref	Name	Matter Raised	Applicant's Response
			than being based on selected individual studies, though all relevant individual studies are taken into account. UKHSA continues to monitor the evidence applicable to exposure to power frequency electromagnetic fields and will update its advice as necessary, which have already included the Draper report detailed. The UK has in place exposure limits covering the non-ionising electromagnetic frequency spectrum, including static and radio-frequency EMFs discussed in Professor Henshaw's presentation, ensuring appropriate protection is provided. The exposure limits applying to this project cover 50 Hz fields which is the frequency of the power transmitted via the UK transmission system. The Government's EMF policies and exposure limits, based on advice from the UKHSA are included within the requirements of NPS EN-5. The project complies with these requirements as detailed in **7.8 Electric and Magnetic Fields Compliance Report (Revision B)**. Irrespective of the technology option (HVAC or HVDC) used to facilitate any new transmission project, it is National Grid's policy to ensure the assets would comply with the relevant exposure limits, set by Government. As discussed in the Applicant's response in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**], the introduction of 'corridors' or restrictions on building homes close to overhead lines and vice versa has been considered by the Stakeholder Advisory Group to Government on Extremely Low Frequency EMFs. In addition to 'corridors', SAGE looked at a range of

Ref	Name	Matter Raised	Applicant's Response
			precautionary measures and made recommendations to Government on those which should be adopted. The Government adopted several of the recommendations SAGE had made for precautionary measures. Those measures specific to high voltage power lines include 'optimal phasing' of power lines and providing more advice on EMFs. Other precautionary measures, specifically the introduction of corridors around new and existing overhead lines, were considered but were judged to be disproportionate in light of the evidence and were not adopted.
REP2-094	Nicola Maguire	The Applicant says it has also sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement throughout the development of the Project, but this is so untrue - none of my emails have been answered regarding this issue.	The Applicant understands the Land Interest is within **4.3 Book of Reference** [**AS-018**] as a Category 3 landowner. The land interest's ownership therefore falls outside of the Order Limits. The Applicant has had email exchanges with the land interest and is willing to discuss any concerns about the project proposals.
REP2-094	Nicola Maguire	Although trees have a mention in the Waveney Valley response, the harm this project will cause to 180kms of trees and hedges is killing any benefits this project brings.	**6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA** [**APP-236**] is based on a reasonable worst case scenario of vegetation loss, based on a standard overhead line and underground cable design. **7.4 Outline Landscape and Ecological Management Plan (Revision D)** and **7.2 Outline Code of Construction Practice (Revision C)** both include commitments to ensure the mitigation hierarchy is applied, with the priority of avoiding impacts to habitats including trees and hedgerows, where practicable.

Ref	Name	Matter Raised	Applicant's Response
			7.2 Outline Code of Construction Practice (Revision C) contains commitment GG14, which states '*Following detailed design and prior to construction (of relevant parts of the Project), relevant surveys will be undertaken of arboricultural features that may be impacted or need to be removed to ensure any tree/ hedgerow removal is reduced as far as practicable*.' **7.4 Outline Landscape and Ecological Management Plan (Revision D)** sets out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities. In addition, the Applicant has committed to deliver 10 % BNG with environmental and societal benefits on all construction projects. The 10 % BNG target for the Project is currently voluntary and aligned with National Grid's corporate sustainability commitment.
REP2-097	Norman Stevens	It appears that National Grid have failed to identify this priority species in their surveys. Because of the protected status of the Crayfish, National Grid must carry out thorough surveys and tests in the River Tas according to regulations and relevant to the wellbeing of this endangered species.	Surveys for white-clawed crayfish at the River Tas were scoped out, as presented within **6.19 Scoping Report** [**APP-296**], following a review of the desk study data and an assessment of potential impacts. While white-clawed crayfish are known to be present within the River Tas catchment, no desk study records of the native crayfish have been obtained within 2 km of the Order Limits. However, desk study records of the invasive signal crayfish have been recorded throughout the Order Limits. This invasive species is a threat to native, white-clawed crayfish populations as they are in direct competition and carry the crayfish plague that is fatal to the native species. Direct impacts to the River Tas are limited to one crossing

Ref	Name	Matter Raised	Applicant's Response
			between RG49-RG50 for a temporary construction haul road. This crossing will be a clear span bridge, which will not directly impact the riverbanks, the riverbed, the natural water flow or substrate and will therefore have no impact on any white-clawed crayfish that may be present within the wider area. The River Tas and its tributaries would be protected from pollution during construction of the Project by the standard pollution control and management measures that are secured through inclusion of commitments within **7.2 Outline Code of Construction Practice (Revision C).** Measures include those to control runoff from worksites that may contain elevated concentrations of silt, as well as controls on potentially polluting activities such as refuelling and working with concrete, including protocols for unplanned events/spillages. In addition, due to the known presence of white-clawed crayfish within the River Tas in the wider area, specific biosecurity measures have been included within **7.4 Outline Landscape and Ecological Management Plan (Revision D)** to ensure no spread of crayfish plague as agreed with the Environment Agency. There will be no significant residual effects to the white-clawed crayfish at the River Tas or any other river within/adjacent to the Order Limits.
REP2-098	Paul Whittle	The creation of a large area of "wirescape" in substantial breach of the Holford and Horlock Rules.	The Applicant has applied the Holford and Horlock Rules but here as elsewhere there are different balances struck by different routes and arrangements with different, often subtle, variations in Holford and Horlock Rule Compliance informing decision making.

Ref	Name	Matter Raised	Applicant's Response
			Throughout the development of the Project the Holford and Horlock Rules have been considered in conjunction with information on constraints, homes and environmental features and the finding of the EIA process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Rules typically involves balancing alternative solutions which can present conflicting Rule compliance. For example, whist favouring lower ground may be guided by Holford Rules 4 and 5 it may conflict with the presence of environmental features which Rule 2 guides to avoid. Equally the low ground may lead to a more angled less direct route in conflict with Rule 3. Whilst it is not clear which perceived wirescape is of concern to the IP, the Applicant has considered this potential when the proposed overhead line is in proximity to other similar infrastructure. In several locations we have responded with measures increasing the extent of undergrounding or adopting the alignment of the other connection after its assumed replacement by underground cable.
REP2-098	Paul Whittle	The Applicant has ignored the effect on a nearby Grade 2 listed building. Despite attempts to engage with the Applicant there has been no recognition of the damage that could be caused to the building during the construction process.	The Applicant has responded to the concerns regarding Bounds Farmhouse (1147743) in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to P. Whittle. The Applicant's land agents have offered a number of meetings to the land interest's agent (Clarke & Simpson) and are awaiting a response. The Applicant

Ref	Name	Matter Raised	Applicant's Response
			most recently requested a meeting with their agent on 6 March 2026.
REP2-098	Paul Whittle	The Applicant has also failed to consider the impact of the substation noise on the listed building.	The Applicant has responded to the concerns regarding noise from the substation on Bounds Farmhouse in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to P. Whittle.
REP2-098	Paul Whittle	The Applicant has refused to consider moving the EACN further East to reduce the impact or build an underground substation, as it has agreed to do so in the case of the Orsett substation.	The Applicant has responded to the concerns regarding noise from the substation on Bounds Farmhouse in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to P. Whittle.
REP2-098	Paul Whittle	The Applicant's plan involves both overhead and underground cables crossing Hungerdown Lane to the immediate south of the listed property using a 50 yard wide pinch point. Hungerdown Lane is a popular walking, cycling and riding route. The Applicant has failed to say how they will minimise any blockage or provide alternative routes for public access.	The Applicant is proposing to temporarily close Hungerdown Lane during construction, between points TR-C-049 and TR-C-061 as shown on Section C, Sheet 14 **2.4 Traffic Regulation Order Plans [APP-026]**. The proposed diversion is for a short term duration, of an indicative duration of less than four weeks. The Applicant's proposed diversion route via lines SMD-C-063, SMD-C-065, SMD C-071, SMD-C-076 and SMD-C-077 as shown on Section C, Plan D **2.5 Access, Rights of Way and Public Navigation Plans [APP-034]**. As noted in **7.3 Outline Construction Traffic Management Plan (Revision B)**, where safe and practicable to do so, cyclists and pedestrians will be able to continue to use the closed roads. The schedule of works will be communicated with local communities (via newsletters/emails), and they will be updated on amendments to the schedule during construction.

Ref	Name	Matter Raised	Applicant's Response
REP2-098	Paul Whittle	Such a concentration of cables into and out of the EACN may raise safety and health issues and be in breach of National Grid's own rules on such matters.	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has a carefully thought-out set of policies for managing EMFs, which are incorporated into the decision-making process for Nationally Significant Infrastructure Projects in NPS EN-5. These policies, which include exposure limits, have been set by an independent authoritative scientific body (UK Health Security Agency) who carefully review all science around magnetic fields and health. After decades of research into EMF and health there are no established health effects below the exposure limits. All of the infrastructure proposed as part of this project complies with the requirements of NPS EN-5. Evidence of compliance is available in **7.8 Electric and Magnetic field Compliance Report (Revision B)**, and the cumulative impacts of the cables and overhead lines entering the EACN are included in Section 6.3 of the report. In terms of safety, the Project is designed to comply with design safety standards including the National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) and the suite of National Grid policies and processes which contains details on design standards required to be met when designing, constructing, and operating its projects. These design safety standards constitute an embedded mitigation measure as reported in **6.4 Environmental Statement Chapter 4 - Project Description** [**APP-130**].

Ref	Name	Matter Raised	Applicant's Response
REP2-099	Paul Winston Thompson	The Applicant has requested more surveys on my land as passed surveys have lapsed. This will require me to have more time off work. That are only willing to pay me for the time they are at my property, even though I will need to take the whole day off. I need to protect my livestock and horses and make sure they are not stressed. The mental stress and anxiety is causing us to suffer because they have mistimed their surveys. My property has been devalued by hundreds of thousands of pounds. I cannot sell it. I will need financial help soon as I my home is my pension	The Applicant understands the land interest is a Category 1 land interest located within Section E of the route (Sheet 1). The offer of a survey licence provides advance compensation and the opportunity to claim additional losses (subject to reasoned evidence) should the losses exceed the original level. Matters relating to injurious affection or diminution in value are compensation matters. Such matters would be assessed on a case-by-case basis, in accordance with the Planning Act 2008 and the statutory Compensation Code and are not matters to be determined through the Examination of the DCO. The Applicant would recommend the land interest appoints an agent to act on their behalf and who will be able to advise and assist them in the process in respect of any claim for compensation which the land interest may be entitled to bring.
REP2-100	Peter Finnie	NG has completely misrepresented my open floor comments and simply given the Government narrative.	The Applicant has no further comments to make in relation to the merits of national policy.
REP2-101	Phillip Palmer	I have given specific listed properties that will be affected and challenge the Applicant over their dismissal of the pylon impact. They have again ignored this by making broad sweeping heritage and listed building statements.	The Applicant has responded to the specific listed buildings noted by the IP, comprising Banyard's Hall (1373609), Persehall Manor (1049610) and Quakers Farmhouse' (1373606), in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings** [**REP2-028**] in the response to P. Palmer.
REP2-101	Phillip Palmer	For their 2024 consultation, the Applicant produced a heritage evaluation defining the impact on the settings of Banyard's Hall and Quaker Farm as 'significant	The 2024 assessment was based on the Preliminary Environmental Impact Report (PEIR). The PEIR is the first stage of assessment and is intended to identify if

Ref	Name	Matter Raised	Applicant's Response
		negative'. However, in the 2026 submission, the impacts are now 'low adverse', as they are now for almost all listed properties along the length of Norwich to Tilbury. This change requires scrutiny.	there are any major implication for the Project. The PEIR has since been superseded by **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**, **6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212]**, **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [AS-078 and APP-213]** and **6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report (Rev B) [AS-078]**, and **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**. These documents comprise a much more detailed assessment of the historic environment and it is not extraordinary for the assessment expressed in the PEIR to be upgraded or downgraded accordingly. The Applicant has responded to the specific listed buildings noted by the IP, comprising Banyard's Hall (1373609) and Quakers Farmhouse (1373606), in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to P. Palmer.
REP2-101	Phillip Palmer	I have questioned the pylons crossing the Tas valley around pylons RG 49 and 50 and they have ignored any specifics.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028**] in the response to Palmer.
REP2-102	Rachel Wells	The failure to carry out full EIA, using invalid approaches to monitoring biodiversity that has underestimated the impact of overhead lines on passerines.	The scope and methodology of the ornithological assessment were developed in accordance with industry best practice guidance, including Assessing the Impacts of Power Lines on Birds (NatureScot, 2016) and Bird Survey Methods to Inform Impact Assessment of Onshore Wind Farms (NatureScot,

Ref	Name	Matter Raised	Applicant's Response
			2017; updated 2025). As set out in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**, this guidance does not normally require passerine species to be included within collision risk assessments due to their low sensitivity, flight behaviour and lack of evidence for population-level collision impacts. A comprehensive desk study and targeted field surveys were undertaken to inform the EIA, as documented in **6.8.A7 ES Appendix 8.7 - Breeding Bird Report [AS-030]** and **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]**. The desk study reviewed over 26,000 bird records from the British Trust for Ornithology, Royal Society for the Protection of Birds and relevant local record centres, covering a 10-year period. Survey coverage focused on habitats and locations with greatest potential to support species sensitive to collision risk. Collision risk assessment focused on species groups with a recognised vulnerability to overhead lines, including raptors, wildfowl, waders, herons, gulls and terns, as reported in **6.8.A8 Environmental Statement Appendix 8.8 - Wintering and Passage Bird Report [APP-167 to APP-170]**. and summarised in **6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]**. Passerines were considered within the EIA through the breeding bird assessment, which addressed the relevant impact pathways of habitat loss and disturbance. Survey results did not identify collision risk as a concern for passerine species.

Ref	Name	Matter Raised	Applicant's Response
			The survey scope and approach, including the scoping out of passerines from the collision risk assessment, were agreed with Natural England and documented within **5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]**. The EIA is therefore complete, proportionate and evidence-led, and the methodologies used are valid and consistent with accepted guidance and consultee agreement.
REP2-103	Richard James Guy Davies	Concerns around EMF's and the possible impact on his health, in their response National Grid have invited concerned individuals to contact them. We have done this already, time after time both directly and through their land agent – with just broad-brush responses that EMFs are not an issue.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to Davis.
REP2-103	Richard James Guy Davies	We also expressed the impact this project is having on our general and mental health.	An assessment of how the Project could potentially affect the health and wellbeing of local residents is contained in **6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]**. This includes an assessment of the potential impacts of the Project on mental health and wellbeing during the construction phase. The assessment notes that this may result in heightened levels of stress and anxiety for local residents as a result of potential environmental impacts in their local area (for example, noise, dust, traffic and visual impacts). A wide variety of measures have been identified to mitigate these impacts (for example use of best practicable means to reduce noise and air quality impacts) and these are outlined in **7.2 Outline Code of Construction Practice (Revision C)** and in **7.3 Outline Construction Traffic Management Plan (Revision**

Ref	Name	Matter Raised	Applicant's Response
			B). With appropriate mitigation, it is not considered that there will be significant health and wellbeing impacts at a population level.
REP2-104	Robert David Wass	Application of the Holford Rules Please explain how the Holford Rules were applied in determining the alignment between pylons TB047 and TB052 affecting Ford Street, Aldham and Fordham, including: • whether alternative alignments following lower ground or natural landform were assessed; • why the preferred alignment places pylons on elevated ridgelines above nearby settlements; and • how skyline impacts on villages were considered in the routes election process.	The Applicant has applied the Holford Rules but here as elsewhere there are different balances struck by different routes with different, often subtle, variations in Holford Rule Compliance informing decision making. Throughout the development of the Project the Holford Rules have been considered in conjunction with information on constraints, homes and environmental features and the finding of the EIA process to inform the balance and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, whist favouring lower ground may be guided by Rules 4 and 5 it may conflict with the presence of environmental features which Rule 2 guides to avoid. Equally the low ground may lead to a more angled less direct route in conflict with Rule 3. In the area identified, routes following the river valley to the south then along the Colne Valley were considered (these would have performed more strongly in regard to Rules 4 and 5 but less well on rule 3) but were too restricted to the north of Fiddlers Wood. Other western alternatives were also considered as set out in Section 7.3 of **5.15 Design Development Report** [**APP-122**]. This more extensive diversion that could slightly lower some

Ref	Name	Matter Raised	Applicant's Response
			environmental effects was somewhat longer and less consistent with Rule 3 and also routed on more elevated ground reducing consistency with Rule 4. On the basis of the Project route comprising an acceptable design in terms of NPS EN-5 this was taken forwards.
REP2-104	Robert David Wass	Question 2 — Assessment of the Western Alignment Alternative The Applicant states that an alternative alignment west of Ford Street and Fordham was considered. Please provide: • information as to whether ANY comparative environmental assessment has been undertaken between the preferred alignment and the western alternative; • the heritage, landscape and residential amenity effects associated with each alignment; and • the extent to which the western alternative may have reduced impacts on Ford Street, Aldham and Fordham.	The Applicant has completed proportionate consideration of alternative alignments. This was completed by technical topic team considering the implications of alternative alignments. This applied professional judgement in a proportionate manner to review the differing effects. These are set out from paragraph 5.4.136 of **7.21 2024 - Design Development Report** [**APP-359**] in the case of the western alternative. Paragraph 5.4.143 concluded as: '*Overall whilst noting some potential for a reduction in the number of residential properties with potential amenity effects if the western alternative was taken forward, this would be a longer less economic and efficient route with more pylons and angle pylons. It would also potentially increase effects in respect of construction within a flood zone (but subject to micrositing this difference may be avoided) and be likely to increase effects on heritage assets including a Grade I listed building and several moats associated with listed buildings. It is also noted that the 2023 preferred draft alignment is consistent with policy and overall, it is considered that there would be insufficient benefits from potentially reduced residential amenity and landscape effects of the western alternative to offset the technical concerns and additional infrastructure required for delivery it. On that basis the 2023 preferred draft alignment, subject to localised*

Ref	Name	Matter Raised	Applicant's Response
			modifications, remains preferred and has been taken forward as the 2024 preferred draft alignment.'
REP2-104	Robert David Wass	Question 3 — Ford Street Conservation Area The Applicant states that shifting the alignment westwards would bring the route closer to Ford Street and the Ford Street Conservation Area. However, land within Ford Street itself is proposed for construction infrastructure (including a compound behind The Maltings which generally floods for 2 months of the year). National Grid needs to fully explain: • how the Ford Street Conservation Area was treated as a constraint during route selection; • why proximity to the conservation area was considered problematic for the route alignment but acceptable for construction infrastructure; and • how the setting of the conservation area and nearby listed buildings has been considered in both cases.	The points on the construction compound are addressed in **8.8.1 Applicant's Comments on Written Representations** [**REP2-029**] in response to David Wass. Conservation areas within 2 km of the Order Limits are considered in the historic environment assessment for the Project, Fordstreet Conservation Area is therefore included in the assessment, which considers both direct and indirect impacts. The impacts of the Project on the historic environment are assessed in **6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]**. The assessment considers the potential impact on archaeology, historic buildings and historic landscapes and includes assessment of potential for physical impact and impact through change to setting that affects the value of a heritage asset. Regarding Fordstreet, both the construction and operation (and maintenance) phase of the Project are assessed to have a moderate adverse, and significant, effect on the conservation area. The assessment of conservation areas is supported by setting surveys, as documented in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209 and REP1-063]**. The details of the assessment of the 27 listed buildings in Fordstreet and Aldham are included in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209 and REP1-063]**, **6.11.A2 Environmental Statement Appendix 11.2 - Historic**

Ref	Name	Matter Raised	Applicant's Response
			Environment Assessment Tables [AS-070] and **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]**. The Project has engaged with Historic England and relevant planning authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. The Project would not result in any substantial harm to designated heritage assets. Paragraph 7.2.57 of **5.6 Planning Statement [APP-85]** addresses the policy consideration of heritage impacts. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on heritage assets. Pursuant to the statutory requirement outlined in The Infrastructure Planning (Decisions) Regulations 2010, the Secretary of State, when making a decision, is duty-bound to have regard to whether a scheme preserves or affects heritage assets, with this being afforded great weight against the Project due to this statutory duty and the NPSs. Given that **6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets** [**APP-214**] demonstrates that the Project results in less than substantial harm, this is afforded moderate negative weight in the planning balance. Whilst the Project would not result in substantial harm to designated heritage assets it would result in the loss of significance to heritage assets due to the introduction of temporary and / or permanent plant, machinery and infrastructure into the setting. However, this harm is necessary to achieve the substantial public benefit of delivering CNP

Ref	Name	Matter Raised	Applicant's Response
			infrastructure that outweighs the heritage impact. This is supported by paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which provides that the Secretary of State would take as a starting point that CNP infrastructure meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. Paragraph 4.2.17 provides that this includes a test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.
REP2-105	Sean Keeler	**Document: 8.4.1 Applicant's Comments on Relevant Representations** NG confirm in the document that heritage, including listed and unlisted, assets within 1.5km of the route will suffer permanent, serious harm.	The Applicant disagrees. **8.4.1 Applicant's Comments on Relevant Representations (Rev B) [REP2-023]** does not identify 'permanent, serious harm' for any heritage asset assessed by the Project. Assessment is undertaken on an individual basis for each heritage asset and is not determined on the basis of distance from the Project alone.
REP2-105	Sean Keeler	A cross-check between Google Maps and the N2T interactive map shows a very large no. of grade I and II listed assets in that scope, including almost all of Little Waltham, Great Waltham, Howe Street and Broads Green and their respective conservation zones - a total of over 70 "permanently and significantly damaged" assets. Despite this, NG still offer no additional mitigations or alternatives that would reduce that enormous impact, no direct engagement with the owners of a large no. of them.	The Applicant disagrees, no heritage assets are identified as being 'permanently and significantly damaged' by the Project in **8.4.1 Applicant's Comments on Relevant Representations (Rev B) [REP2-023]**. **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]** provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Little Waltham, Great Waltham, Howe Street and Broads Green and their respective conservation zones. The assessment concludes that the Project will not result in any substantial harm to designated heritage assets.

Ref	Name	Matter Raised	Applicant's Response
REP2-105	Sean Keeler	The Applicant highlight's their view that the most severe permanent impacts will be to properties and assets within 500m of the route (i.e. all of the population formally involved in consultations) while throughout the rest of the document continuing to disregard almost all of the specific issues raised by people living so close to the route. Our house will be less than 50m from the currently proposed route so even on a linear scale of rising impact: more than 10 times more affected than the further properties within the 500m distance. For a squared law impact like that for FMG radiation that equates to more than 100 times the impact and risk of other properties already regarded as permanently and significantly affected. Again, the Applicant has done little more than continue to disregard these issues, pointing only to the designation of the project as a Critical NSP.	It is recognised that properties within 150 m of the Project centreline may experience a high magnitude of change to existing views, and a potential breach to the Residential Visual Amenity Threshold (RVAT) as result of the Project. A Residential Visual Amenity Assessment has therefore been undertaken for properties which fall within this distance, and this assessment and its conclusions are presented within **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA)**. The purpose of this assessment is to determine whether the Project *'is likely to change the visual amenity of a residential property to such an extent that it becomes a matter of 'Residential Amenity'.'* (**Landscape Institute Technical Guidance Note (LI TGN) 2/19 Residential Visual Amenity Assessment (RVAA)**, paragraph 5.1). However, it should be noted that it is not just the distance from the Project that determines the magnitude of change, and whether the RVAT would be breached, at a particular property or not. Details such as the angle of the views, proportion of the views which are affected by the Project (and how much of the existing view will still be visible), whether the elements within the view would be static or mobile, effects on light and shadow, etc. are all elements which affect the outcome of the assessment, and, when making a judgement as to the level of effect, impacts on views are considered in the round. The UK has a carefully thought-out set of policies for managing EMFs, which are incorporated into the decision-making process for Development Consent in EN-5. These policies, which include exposure limits,

Ref	Name	Matter Raised	Applicant's Response
			have been set by an independent authoritative scientific body (UK Health Security Agency) who carefully review all science around magnetic fields and health. After decades of research into EMF and health there are no established health effects below the exposure limits. All the infrastructure proposed as part of this project complies with the requirements of NPS EN-5 and evidence of compliance even when located directly underneath the overhead line is available in **7.8 Electric and Magnetic field Compliance Report (Revision B).** In addition to compliance with the Government's exposure limits, the overhead line design, as detailed in Section 6.2 of **7.8 Electric and Magnetic field Compliance Report (Revision B)** ensures that the EMF reduces quickly with distances from overhead line.
REP2-105	Sean Keeler	A simple viewing of the Chelmer Valley section of the route from our property, both up and down the route, shows that the shift from the original proposal to shorter "denser" lattice pylons significantly worsens the visual impact for almost all residents and other users transiting the area. The Applicant's response on that change still do not reflect the actual situation when viewed properly at the site. The Applicant has confirmed in its response that it is considering a reversion to the original pylon type and locations though this is not by any means confirmed and subject to the "get out of jail" caveat, also mentioned in the responses that despite all the issues raised and discussions thereof they reserve the right to change it and use different pylons, locations and technologies if they choose.	Consideration has been given to the use of low height pylons in circumstances where standard lattice pylons are considered to be inconsistent with policy. These low height design lattice pylons are useful where height is a strong consideration, however, they also occupy a greater footprint and have a bulkier and denser profile. They can therefore provide visual benefits in some scenarios, for example where a reduction in pylon height means that views of the tops of pylons are screened by intervening woodland. In other scenarios they can increase adverse visual effects, for example where relatively close to visual receptors without intervening filtering vegetation where they are likely to appear more noticeable in views from residential receptors.

Ref	Name	Matter Raised	Applicant's Response
			Low height lattice pylons have been proposed as necessary to reduce effects in two locations. To the north-west of Little Waltham a section of pylons north of the River Chelmer are proposed as low heights to reduce effects on the adjacent Langleys (Grade I listed building) and the adjacent registered park and garden. Feedback about three pylons extending south of the River Chelmer is being considered to revert to standard lattice pylons. The second section of low height lattice is to the east of Thurrock airfield where the change to low height pylons alongside existing 132 kV lattice pylons allows continued flying activity at Thurrock airfield. It is noted that if there is a change in the use of the airfield (it is subject to an appeal against refusal of housing proposals) then a reversion to standard lattice pylons may occur, subject to timing. The latest independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics (Institute of Engineering and Technology, 2025) confirms that whilst T-Pylons may in certain locations provide an alternative to conventional overhead lines with potential benefits in visual impact and reduced land-take, this comes at a higher cost. The build cost is approximately 2 to 2.5 times that of an equivalently rated conventional overhead line, and the lifetime costs are around 1.6 to 1.7 times higher. The current arrangements for the oversight of funding by Ofgem require that the lowest cost acceptable design is taken forward rather than a more expensive design even where the latter is perceived to reduce the level of effect. As such, consideration of the use of T-pylons follows after establishing a need to mitigate effects of the standard

Ref	Name	Matter Raised	Applicant's Response
			lattice design and after considering the benefits of adopting a low- height lattice pylon design. T- pylons themselves are also less adaptable to varied terrains and require more substantial access infrastructure. Furthermore, while their resilience and environmental impact are comparable to conventional overhead lines, they have increased carbon intensity due to construction materials used. Attention also needs to be given to the transitions between pylon types. Given it is the surrounding context that drives the need for alternative design mitigation, where this is not required along the entire route, any visual break and transition in pylon design also needs to be carefully sited. Assessment findings have concluded that, where there is not a reversal of the presumption to use overhead lines, the use of lattice pylons (either standard or low height) is consistent with planning policy throughout the route. Whilst there may be some locations (for examples see Appendix A of **5.15 Design Development Report [APP-122]**) where there may be a design option for the use of T-pylons, the need to mitigate unacceptable effects from lattice pylons is not engaged. On this basis, T-pylons are not proposed for the Project.
REP2-105	Sean Keeler	NG persist in not clarifying how the removal of a large no. of trees (including many mature and valuable specimens) from the Walthams area will be mitigated nor what any proposed mitigation (such as planting new, immature ones of less valuable species several hundred miles away as they have previous	The project has committed to a 3:1 ratio of replacement planting for individual trees and small groups of trees and is in discussions with relevant local planning authorities to identify/agree on suitable local locations where tree planting can be achieved.

Ref	Name	Matter Raised	Applicant's Response
		mentioned) might do to benefit the people and animals who lost the originals!	
REP2-105	Sean Keeler	On page 147 NG state: "The 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP233 and APP-234] (RVAA) was prepared in line with the Landscape Institute's Technical Guidance Note 2/19 Residential Visual Amenity Assessment. The RVAA recognises that the Project would have a large magnitude of effect upon the visual amenity of the residents of some of the properties in the Chelmsford City Council administrative area. In all such cases, following the required more detailed assessment, it was found that the Project would not block the only available view from any property, would not be overwhelming in views in all directions from any, would not be unpleasantly encroaching upon any, and would not be inescapably dominant in views from any. Consequently, the Project was not found to breach the 'residential visual amenity threshold' of any property in this area." With respect to my house this statement is completely false and effectively utter nonsense. The house is a converted ex-public house in a prominent location and one of the most affected along the entire route given its proximity to it. It is well known in the area due to its prominent position and can quite reasonably be regarded as a non-listed heritage asset. Almost all of its more than 30 windows directly face either the point where the route crosses the Chelmer or the section that climbs the southern part of the valley behind us towards Broads Green.	When assessing impacts of the Project on residential visual amenity and whether the Residential Visual Amenity Threshold (RVAT) has been breached or not, changes to views are considered in the round. It is recognised that significant adverse visual effects may be experienced from the property mentioned, but this does not automatically give rise to a breach of the RVAT. The angle of the view towards the Project, proportion of the views which are affected by the proposed pylons and overhead lines, how much of the existing view will still be visible, whether the elements within the view would be static or mobile, etc. are all elements which affect the outcome of the assessment; the purpose of which is to identify situations where '*the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before*.' Due to the scale of this Project, the RVAA was based on available 360 degree drone footage along the Project corridor. Where this was unavailable or lacking in detail, site visits were carried out from public locations, to understand baseline conditions. Due to the redaction, we are unable to review the assessment undertaken for the specific property referred to, but if address details can be provided, the assessment within **6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual**

Ref	Name	Matter Raised	Applicant's Response
		Only three windows (one of them above head height in a store cupboard and one opaqued glass in a toilet - so to all intents and purposes only one in total affected) are not impacted by the pylons/route. For ALL of the others there is no effective screening at all and ALL of the pylons proposed to be changed to lower height/side lattice ones at the Walthams will be fully visible and will absolutely unquestionably be the dominant feature seen from the house from, effectively, all our windows. The statement says clearly that all the houses located close to the route were properly assessed and the impacts are minor and mitigable - whoever authored that report clearly had no idea of the extreme level of impact we are facing less than 50m from the route and with all our views looking directly at the pylons. I have to add that I am shocked that this statement could have been made with any even cursory knowledge of the landscape. As commented previously when we stood at the windows in our house referred to above, on the ground floor, first floor and loft levels, with Fisher German surveyors they saw first hand how much it affects not only our own views but also those of the many houses in Little Waltham whose windows are visible from ours.	**Amenity Assessment [APP-233 and APP-234]** can be reviewed updated as necessary. With regard to the Respondent's comment regarding their property as a 'non-listed heritage asset', the property was not identified in any of the sources on the agreed list as noted in **6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297]**, **6.11 Environmental Statement Chapter 11 - Historic Environment [AS 068]** and **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]**. Had the property been identified as a heritage asset, it would have been attributed a low value and so its setting would not have been considered as explained in the following paragraph. All non-designated heritage assets were assessed to determine their value in accordance with **6.19 Scoping Report [APP-288 – APP-296], 6.20 Scoping Opinion [APP-297]** and the methodology set out in **6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]**. Those assets assessed to have a low or negligible value and located outside the Order Limits did not have a settings assessment undertaken. As they would not experience physical impacts there is no potential for significant effects as a result of change to setting for assets of these values. While some harm would still be possible, given their value and nature of potential impacts this would be at the very lowest end of the harm scale. NPS EN-1 (2024) paragraph 5.9.9 includes instructions regarding the Applicant's assessment '*The applicant should undertake an assessment of any likely significant heritage impacts*

Ref	Name	Matter Raised	Applicant's Response
			of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES' and in several places refers to detail being proportionate to the importance/significance of the heritage asset. The Applicant therefore considers that the Project has appropriately complied with relevant policy in the NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets.
REP2-107	Suzanne Bolwell-Davies	The ESN pylon Group pro bono environmental adviser has put together a table, which shows the birds that NG has actually established live along the route and the risks to those species in previous bird collision studies.	The Applicant has responded to this item under its response to Pylons East Anglia Ltd **[REP2-054]** above.
REP2-108	Suzanne Bolwell-Davies	The "Applicant" states under Human Health and Wellbeing page 35 – highlighted in blue - "The Applicant has also sought to reduce concern or uncertainty about the proposals through inclusive and transparent engagement with residents, communities and stakeholders throughout the development of the project". This process is a very clear example to the Inspectors that the "Applicant" has not been inclusive and the engagement limited and has certainly not been transparent, I'm frankly exhausted looking for the answers to my questions.	The Applicant has developed its proposals and carried out consultation in accordance with relevant legislation and statutory guidance. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation.
REP2-108	Suzanne Bolwell-Davies	Farmland Birds: Can I ask the Applicant why they have not included Farmland birds in any of their 400 documents? What mitigation are they going to put in place for Farmland birds?	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to Bolwell-Davies.

Ref	Name	Matter Raised	Applicant's Response
REP2-108	Suzanne Bolwell-Davies	Bird Strikes: The "Applicant" states that Farmland birds (mentioned now as Farmland Passerines) are not likely to be impacted by bird strikes on overhead lines. The Applicant should be required to complete full surveys.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to Bolwell-Davies.
REP2-108	Suzanne Bolwell-Davies	Red List Protected birds: Bird strikes as Red List Protected birds are at Risk of Powerline Collisions, that's if their habitats haven't been destroyed by haul roads and destruction of the Draft Order limits.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to Bolwell-Davies.
REP2-108	Suzanne Bolwell-Davies	Vintage Trees and Hedgerows: The Applicant refers to 10% Biodiversity Net Gain, but I cannot see how those whips will replace mature trees that store 22-50Kg of Carbon annually and provide homes to 1,000 's of species.	The BNG metric takes into account the complexity of replacing a specific habitat type, as well as the length of time taken to achieve the target condition (including tree habitats). This is an inherent consideration factored into the standard BNG metric, therefore the amount of habitat to be created/enhanced is significantly more than that temporarily or permanently lost. The additional proposed habitat creation and enhancement measures therefore compensate for the time lag before vegetation reaches maturity. Full details are presented within **7.1 Biodiversity Net Gain Report [APP-299]**.
REP2-108	Suzanne Bolwell-Davies	Oil Pipelines: Unable to find the documentation referring to Oil Pipelines.	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to Bolwell-Davies.
REP2-108	Suzanne Bolwell-Davies	Holford Rules: The Applicant states that in some areas they have been unable to follow the Holford Rules and they think that apparently is ok. Consideration of rules is not the same as applying	The Applicant disagrees with the implication that the Holford Rules have not been followed. Throughout the development of the Project they have been considered in conjunction with information on constraints, homes and environmental features and the finding of the EIA process to inform the balance

Ref	Name	Matter Raised	Applicant's Response
		them, which they have not and those rules are in place for a reason.	and define our proposals that we take forward, and which are also informed by feedback. We would note that application of the Holford Rules typically involves balancing alternative solutions which can present conflicting Holford Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rule 4 and 5 but may be appropriate if the valley contains extensive areas of unavoidable ancient woodland, effects on which would conflict with Rule 2. A balanced decision is taken which is not the same as not considering the Holford Rules. Our decision making and how the Holford Rules informed decision making is set out in documents including **7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356]** published in 2022, and the Design Development Reports (**7.20 2023 Design Development Report for the Project [APP-358]**, **7.21 2024 – Design Development Report for the Project [APP-359]** and **5.15 Design Development Report [APP-122]**).
REP2-108	Suzanne Bolwell-Davies	National, Royal, Military and Commemorative Fly-past over proposed Norwich 2 Tilbury. Page 34 references Airfields but no mention of fly-pasts! Has the Applicant informed the Ministry of Defence the location of the Norwich to Tilbury Pylon line and that the National, Royal, Military fly-past fly low over the pylon route? How is the Applicant going to mitigate the fly-past?	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to Bolwell-Davies.
REP2-108	Suzanne Bolwell-Davies	Flooding: I refer to the ESN Pylon Group expert who has written a report which is attached. (Drainage Report).	The Applicant has responded to this item under its response to Pylons East Anglia Ltd **[REP2-054]** above.

Ref	Name	Matter Raised	Applicant's Response
REP2-109	Tessa Rose	This project will devastate the countryside for ever more. It will concrete huge sections of our farmland, ruin already scarce wildlife habitats, cause bird striking into thousands of miles of live wires, tumble house prices and generally wreck the countryside. The option to go underground is the only way.	These points are addressed in the thematic response provided in **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]**.
REP2-110	Trevor Seddon	Q2) Offshore coordination, improved cabling techniques and HVDC undergrounding should be independently evaluated alongside the Applicant's proposed technology.	These points are addressed in the thematic response provided in **8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]**.
REP2-110	Trevor Seddon	Q3) The project proposes to demolish the existing 132kV line on the west of the hamlet and to re-route this underground to the east of the hamlet. The new 50m high pylons will then run in the line vacated by the 132kV line. Can we please have an explanation of why this has been proposed, rather than burying the 400kV line to the east of the hamlet and leaving the existing 132kV pylons in place?	These points are addressed in **8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]** in the response to Seddon.
REP2-111	Burstall Parish Council (William Petersen)	The concentration of infrastructure planned and existing substations; the ability to restore service in line with regulatory requirements in the event of a large scale outage; and, worst case planning scenarios and suitable mitigation. Specifically, Bramford Substation as a key node, which has become a hub responsible for a substantial percentage of the UKs power, and is rapidly becoming surrounded by the UK's greatest concentration of lithium batteries, merits its own resilience discussion/ response.	These points are addressed in **8.8.1 Applicant's Comments on Written Representations [REP2-029]** in response to Burstall Parish Council.

Ref	Name	Matter Raised	Applicant's Response
REP2-111	Burstall Parish Council (William Petersen)	1. South of the Bramford Substation, the Applicant's plan is to bury 2/3 low voltage lines and erect a high voltage line. Our request is an analysis/ costing, in line with the mitigation hierarchy, of retaining the lower profile low voltage lines and burying the larger profile high voltage line. It seems to us, both in terms of cost and mitigation, burying one line rather than three, makes sense. 2. The Applicant's plan is for an exit south from the west of the Bramford Substation. We have proposed an exit east, by utilising Gas Insulated Line (GIL), which would reduce the number of pylons by 5/6 as they wouldn't need to traverse the entire frontage of the substation, with substantial cost savings. Has this option been costed and what are the results? 3. An exit east would negate the requirement for a right angle turn south, therefore allowing a straight line of lower profile pylons to be used all the way beyond the A1071. Given this is the highest ground in the area visible for many miles, contrary to Holford and Horlock Rules, the use of lower profile pylons should be prioritised	The Applicant's response is as follows: Regarding 1) The differential in cost and construction requirements are stark. At a practical level the width of the cable swathe required for the 18 buried cables of the 400 kV connection is in the order of 55 m for the six trenches within a working corridor of 120 m width. Each 132 kV would require a working width of 30 m with a cable swathe of around 5 m. The cost comparisons are also stark with 132 kV undergrounding at a fraction of the cost of 400 kV. The IP is incorrect in their assumptions regarding the undergrounding of the 400 kV relative to the 132 kV. Regarding 2) and 3) The layout of the substation does not support an exit from the eastern side of the substation as this is occupied by 132 kV substation infrastructure. Low height pylons cannot not be used for the exit from the substation because of the Angle of direction change that is required. GIL is also not an appropriate basis for design given the implications of the 132 kV infrastructure, as no AC gas insulated line has been constructed anywhere in the world above 10 km in length. It is not a technology that has reached sufficient maturity at transmission level for this proposal.
REP2-112	Douglas Wade	The proposed route will bisect the village, working farms, introduce heavy construction traffic onto single track narrow rural roads, and result in the loss of hedgerows, trees, and established landscape character. It will place permanent industrial infrastructure within a historic rural setting containing listed buildings, ancient woodland, and valued public rights of way.	These points are addressed in **8.8.1 Applicant's Comments on Written Representations [REP1-170]**.

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com