

AENC-NG-CNS-REP-0292

Norwich to Tilbury

Volume 8: Examination Documents

Document: 8.9.1 Applicant's Responses to First Written Questions

Final Issue A

April 2026

Planning Inspectorate Reference: EN020027

nationalgrid

Contents

Introduction	1
1. General and cross-topic questions	3
2. Design parameters and other details of the proposed development	36
3. Alternatives	63
4. Air quality and emissions	77
5. Biodiversity ecology and natural environment	81
6. Compulsory acquisition temporary possession and land rights	131
7. Draft Development Consent Order	160
7.1 Articles	164
7.2 Schedules	193
8. Historic environment	229
9. Health and wellbeing	417
10. Land use and soils green infrastructure	450
11. Landscape and visual	496
12. Minerals and Waste	577
13. Noise and vibration	583
14. Public Rights of Way	595

15.	Safety and security	601
16.	Socio-economics tourism and recreation	629
17.	Traffic and transport	658
18.	Water environment: flood risk hydrology and drainage	702

Table 1.1	General and cross-topic questions	3
Table 2.1	Design parameters and other details of the proposed development	36
Table 3.1	Alternatives	63
Table 4.1	Air quality and emissions	77
Table 5.1	Biodiversity ecology and natural environment	81
Table 6.1	Compulsory acquisition temporary possession and land rights	131
Table 7.1	Draft Development Consent Order	160
Table 7.2	Articles	164
Table 7.3	Schedules	193
Table 8.1	Historic environment	229
Table 9.1	Health and wellbeing	417
Table 10.1	Land use and soils green infrastructure	450
Table 11.1	Landscape and visual	496
Table 12.1	Minerals and Waste	577
Table 13.1	Noise and vibration	583
Table 14.1	Public Rights of Way	595
Table 15.1	Safety and security	601
Table 16.1	Socio-economics tourism and recreation	629
Table 17.1	Traffic and transport	658
Table 18.1	Water environment: flood risk hydrology and drainage	702

Appendix A.

Supplement 1 - GEN1.14 & DES1.8 – EACN and customer connection proposals with Landscape proposals

Appendix B.

Supplement 2 & 3 - GEN 1.15 Norwich Main and Bramford substations and Tilbury North site – other developments Appendix C.
Supplement 4 - GEN 1.23 Dunton Hills Garden Village
Appendix D.
Supplement 5 - ALT 1.8 - CA 1.21 Additional Detailed Design Requests
Appendix E.
Supplement 6 - GEN 1.21 Full Answer
Appendix F.
Supplement 7 - LV 1.24 - Supplementary table
Appendix G.
Supplement 8 - PRoW 1.7 Supplementary table
Appendix H.
Supplement 9 - PRoW 1.9 Supplementary table
Appendix I.
Supplement 10 - SET 1.15 WMEL Community Benefit Survey
Appendix J.
Supplement 11 - LV 1.33 Supplementary table
Appendix K.
Supplement 12 - TT 1.15 - AIL Route Structures Summary Table (External - Examination Support)

Introduction

Document Purpose

This document provides the Applicant's responses to the **Examining Authority's Written Questions 1 [PD-014]**, published on 20 March 2026 for Norwich to Tilbury. This document contains responses to all of the questions addressed to National Grid Electricity Transmission plc (here on referred to as 'the Applicant').

The Applicant has noted the comments of the Examining Authority (ExA) in the introduction to the Written Questions about the need for comprehensive answers and has generally provided detailed responses. The exception to this is where a response to the same point was made in one of the Applicant's Deadline 2 submissions, for which a cross-reference is supplied to the earlier response. This is in accordance with the ExA's request not to resubmit the information and to signpost where the information can be found using the Examination Library reference.

Structure of the Document

This document is structured to align with the numbering used in the **Examining Authority's Written Questions 1 [PD-014]**. For each section there is a response table, and within each table there are three columns:

- The first column provides the reference number of each question.
- The second column provides the full wording of the question.
- The final column provides the Applicant's response.

Additional Documents

In some cases the question requires the Applicant to provide documents that are not included in this document. The following documents are submitted separately:

- Updated Draft Statement of Common Ground Overview Document (as requested by ExQ1 GEN-1.18).
- Schedule of Affected Persons Objecting to CA or TP of their Lands or Rights (as requested by ExQ1 CA 1.3).
- Crown Land Schedule Tracker (as requested by ExQ1 CA-1.4).

- Special Category Land Schedule (as requested by ExQ1 CA-1.6).
- Updated Statutory Undertaker Tracker (as required by ExQ1 CA1.7 to include an additional column). It replaces the previous version.

Also, in some cases a response to a question requires an appendix. These appendices are at the end of the document and relate to the following questions.

- GEN 1.14 and DES 1.8
- GEN 1.15
- GEN 1.21
- GEN 1.23
- ALT 1.8 and CA 1.21
- TT 1.15
- SET 1.15
- LV 1.24
- PRow 1.7
- PRow 1.9
- LV 1.33

Updated visualisations to accompany questions HE 1.13, LV 1.23 and LV 1.24, HE1.5 have been submitted separately due to file size limitations.

1. General and cross-topic questions

Table 1.1 General and cross-topic questions

Reference	Question	Applicant's Response
GEN 1.1	Responses to submissions by Interested Parties It is essential for the successful delivery of the timetable of the examination that all parties are able to easily interpret the applicant's responses to comments made by interested parties (IPs) in their submissions both in writing and orally. The ExA issued a Rule 17 letter on 3 March [PD-012] and responded to the applicant's response to that letter on 6 March [PD-013]. The letters set out the ExA's concerns relating to the lack of detail in the applicants response to relevant representations (RRs) [REP1-132], and there were similar issues with the applicants response to submissions to the open floor hearings (OFH) [REP1-140]. The ExA accepts that a number of issues are common to a large number of IPs. Nonetheless, those responses which include specific locational detail (for example to a	The Applicant acknowledges the Examining Authority's comments regarding the clarity and level of detail required in responses to submissions made by Interested Parties, including in writing and orally. The Applicant recognises the importance of ensuring that responses can be easily interpreted by all parties in order to support the efficient and effective progress of the examination. The Applicant has carefully considered the Examining Authority's Rule 17- Request for further information relating to the Applicant's Comments on Relevant Representations [PD-012] of March 3 and the subsequent response of 6 March, Rule 17 - Response to applicant's response to rule 17 letter [PD-013], including the concerns raised in relation to the level of detail provided in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] and 8.5.4 Applicant's Response to the Open Floor Hearings [REP1-140]. The Applicant responded to general themes raised at Open Floor Hearings (OFHs) in 8.5.4 Applicant's Response to Open Floor Hearings [REP1-140], submitted at Deadline 1. Within that document the Applicant confirmed it will be reviewing the written submissions provided by third parties at Deadline 1 and will consider specific points raised in its response at Deadline 2. 8.5.5 Applicant's Response to Oral Submissions Made at the Open Floor Hearings [REP2-028] was submitted at Deadline 2 and provides the Applicant's further written response to the written summaries of the oral submissions made by Interested Parties at the OFHs. This document sets out the Applicant's responses to specific points raised, including responses to Interested Parties that did not submit summaries of their cases. This was done based on the transcripts available. In terms of Relevant Representations, at Deadline 2, the Applicant submitted a revised 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] and 8.4.1.1 Addendum to Applicant's Comments on Relevant Representations [REP2-025] in response to [PD-012]. The

Reference	Question	Applicant's Response
	certain natural environment designation, landscape feature, heritage asset, affected business and so on) which is not common to other submissions should be specifically responded and not grouped with the issues which arise from the project as a whole. Submissions by all statutory consultees should also be responded to in appropriate detail. Statutory consultees include parish councils. Responses should not only refer to the relevant section of the Environmental Statement (ES) or other application document, but should also provide a brief summary so that the applicants response can be easily interpreted by all parties. The ExA expects this approach to be taken throughout the examination. In doing so, the applicant and other parties are advised to title issues as they are listed in the initial assessment of principal issues (IAP) as set out in annex C of the Rule 6 letter [PD-009], and other issues as titled in the categories within these written questions.	Applicant will submit a further addendum with its response to the remaining statutory consultees (including Parish Councils) and MPs imminently. The Applicant notes the ExA's agreement in Rule 17 - Response to applicant's response to rule 17 letter [PD-013] that a thematic approach to responding to submissions can be acceptable. However, the Applicant also accepts that the ExA has expressed a clear preference that where submissions include clear and specific locational detail that is not common to other representations, these should be responded to on an individual basis. This includes matters relating to identified environmental designations, landscape features, heritage assets, businesses or other location-specific receptors. The Applicant also recognises the need to respond to submissions made by statutory consultees, including parish councils, with an appropriate level of detail reflecting their statutory role. The Applicant also notes that, in some instances, representations or associated correspondence are published in redacted form, or do not explicitly identify the relevant pylon reference, land parcel, drawing number, or precise geographic location. Where locational details are not explicit, the Applicant cannot be certain of the specific location or receptor being referred to and does not consider it appropriate to make assumptions within the statutory examination process. In those circumstances, the Applicant has sought to respond to the underlying issue raised by grouping it within an appropriate theme, so that the substance of the concern is addressed in a way that can be clearly understood by all parties. Where a representation clearly and unambiguously identifies a location or receptor (for example through a specific feature, designation, asset name, plan reference or other unique identifier), the Applicant notes the comments by the Examining Authority and will seek to provide a location-specific response where it is deemed required as the examination progresses. Accordingly, the Applicant confirms that, for the remainder of the examination, it will adopt the following approach: Where representations clearly identify a specific location, feature or receptor after any redaction has been applied, the Applicant will provide a location-specific response addressing the matter raised where it is deemed required and/or cross-reference to where a response on this matter has already been provided.

Reference	Question	Applicant's Response
		- Where issues are common to the Project as a whole and do not rely on unique locational circumstances, these may be addressed thematically, with sufficient explanation to enable the response to be clearly understood. - Responses will not rely solely on signposting to the Environmental Statement or other application documents, but will include a brief summary of the relevant information. - Submissions from statutory consultees will be responded to individually. - Issues will be titled consistently with the Initial Assessment of Principal Issues as set out in Annex C of Rule 6 letter - Notification of the Preliminary Meeting and matters to be discussed [PD-009], and with the categories used in the Examining Authority's written questions. In relation to submissions already made earlier in the examination, the Applicant has reviewed its approach in light of the Examining Authority's comments. Where it is apparent that a representation contains clearly identifiable location-specific matters that would benefit from further clarification, the Applicant will address these more explicitly in future responses as required. The Applicant considers that this approach provides an appropriate balance between clarity, proportionality and procedural efficiency, and will support the Examining Authority and all parties for the remainder of the examination timetable. Where Interested Parties wish the Applicant to consider a location-specific matter, the Applicant would encourage inclusion of an unambiguous identifier (for example a pylon reference, plan reference, land parcel reference, or a clearly named feature) within the published representation, to enable an accurate and targeted response. At the same time the inclusion of specific addresses, plans or names that are likely to be redacted should be avoided.
GEN 1.2	Artificial Intelligence The Planning Inspectorate issued updated guidance in relation to the use of artificial intelligence (AI) on 20 March 2026. All parties are asked to review the guidance carefully, and ensure that in	The Applicant was fully aware of the original Planning Inspectorate guidance on the Use of Artificial Intelligence (AI) in casework evidence dated 6 September 2024 when preparing the application for development consent and is also aware of the updated guidance that was published on 20 February 2026. As set out in 1.2 Application Cover Letter [APP-002], which was written when the original guidance applied, the Applicant did not use artificial intelligence to generate any application text or images.

Reference	Question	Applicant's Response
	any answers to ExQ1 or in other written submissions where AI has been used a short statement is provided. In particular, the ExA requests that you make checks on the submission and take responsibility for the factual accuracy of its content. All parties are directed to the ExA's procedural decision in annex F(1) of the Rule 6 letter dated 13 January 2026 [PD-009]. The ExA's position on this was also set out at the preliminary meeting on 10 February 2026 [EV3-001] to [EV3-005].	The updated guidance now asks about the use of AI used to '<i>produce a summary or analysis</i>' and also, if used, to specify which tool was used, what it was used for and what checks were made. 8.6.1 Deadline 1 Cover Letter [REP1-141] was submitted on 26 February 2026 and had regard to the updated guidance. That stated: <i>'As previously advised the Applicant does not use artificial intelligence to generate written or visual material. The new guidance goes further and also asks about data analysis. The Applicant does on occasion use artificial intelligence for data analysis, but that analysis does not enter into the Applicant's submissions. For example, the summaries of the Relevant Representations are prepared by the project team. The Applicant therefore declares that it uses artificial intelligence packages Copilot and Legora to look at material that it has produced and to check for consistency.'</i> The Applicant remains aware of the procedural decision in Annex F (page 1) of the Rule 6 letter - Notification of the Preliminary Meeting and matters to be discussed [PD-009]. The Applicant continues to use AI in this way in responding to these written questions. For the avoidance of doubt, the Applicant declares that it does not use AI to create any application material in written or visual formats. It does use some AI tools to analyse incoming data, but this analysis does not become part of any submission.
GEN 1.5	Local government reorganisation Local elections are to take place in a number of the host local authorities on 7 May 2026, and many will be undergoing local government reorganisation and/ or devolution. The listed local authorities are asked to set out: a) any implications for their continuing involvement in the examination and how a consistent approach to their responses can be assured	The Applicant's understanding of the 2026 local elections taking place in the host local authorities is as follows: • Norfolk County Council – all seats up for election • Suffolk County Council – all seats up for election • Essex County Council – all seats up for election • Thurrock Council – all seats up for election • Brentwood Borough Council – one third of seats up for election • Basildon Borough Council – one third of seats up for election. These are elections based on the current local authority areas with some division boundary changes. In relation to local government reorganisation, our understanding is that the government's intention is for elections for the new unitary authorities to take place in

Reference	Question	Applicant's Response
	b) any implications for their role as a discharging authority post-consent, and whether any changes to the draft Development Consent Order (DCO) would be necessary The applicant: explain any changes to its ongoing dialogue with the affected local authorities and how it intends to deal with any changes in the draft DCO.	May 2027 with changes coming into effect from April 2028, subject to parliamentary approval. On technical matters including planning, we have been engaging with the host local authorities since late 2021, during which time there have been elections and changes to technical staff. At each such change new councillors and technical specialists have been offered briefings by the Project team to bring them up to date on the development of the Project and work undertaken to date. These have been well received. We propose to take the same approach to the 2026 elections with regard to new councillors and will continue to work alongside the technical officers who, based on our understanding, will continue in their posts after the local elections. In relation to how the Applicant intends to deal with any changes in the draft Development Consent Order, at Deadline 2 we updated the definition of 'relevant planning authority' within Article 2 (Interpretation) of 3.1 Draft Development Consent Order [REP2-004] and paragraph 3.6.13 of 3.2 Explanatory Memorandum [REP2-006] to include reference to '<i>any successor in function</i>' to reflect any local government re-organisation. The definition of '<i>relevant planning authority</i>' has since been revised in 3.1 Draft Development Consent Order [Revision C], however, the reference to '<i>any successor in function</i>' remains.
GEN 1.7	Centralised Strategic Network Plan (CSNP) Chapter 3 of NPS EN-1 (2025) makes reference to the forthcoming CSNP (paragraph 3.2.5). Noting that the consultation period for responding to the approach by the National Energy System Operator (NESO) to strategic energy planning closed in January 2026, and that the	Timing of Centralised Strategic Network Plan (CSNP) publication To the question of how the publication of the CSNP might affect the progression of the proposed development through Examination, and implications for the Secretary of State's decision, the Examination will conclude and the Secretary of State's decision on the Project will be expected to be issued before the CSNP is planned to be published by the National Energy System Operator (NESO) by the end of 2028¹. It is anticipated that the Examination for the Project will close in August 2026, with a decision being issued up to six months later in February 2027. This means that the Examination and decision will have been issued before the CSNP is published.

¹ National Energy System Operator (NESO) (2025) *NESO outlines new timelines for Strategic Energy Plans*. Accessed 26 March 2026.
<https://www.neso.energy/news/neso-outlines-new-timelines-strategic-energy-plans>

Reference	Question	Applicant's Response
	timescales for its completion are currently unknown, notwithstanding the update in the applicant's policy compliance tracker [REP1-133], the applicant (and any IPs who wish to comment) is asked to clarify its understanding of how the publication of the CSNP might affect the progression of the proposed development through examination, and implications for the Secretary of State's decision.	In summary, the timescale associated with the publication of the CSNP is not considered to be a constraint on the progression of the Project through Examination or to have any implications for the Secretary of State's decision making. Further context NESO's recent consultation was on the proposed methodology for the CSNP. The Applicant engaged with NESO and Ofgem on the development of the methodology for the forthcoming CSNP. It is anticipated that Ofgem will make a decision on the CSNP methodology in April 2026.
GEN 1.8	Community benefit The DESNZ guidance Community Funds for Transmission Infrastructure was updated in November 2025. It sets out the government's expectation for how communities that live near onshore electricity transmission infrastructure should benefit from the development of this infrastructure, with the use of community funds. The government through this document makes clear that it expects engagement with communities at an early stage. The applicant is asked to summarise any progress made in engagement with this process and its plans in progressing community funds in the future.	The Applicant is preparing a community funds package in line with the 'Guidance: Community funds for transmission infrastructure' (DESNZ, 2025). In line with this guidance, the community funds will be delivered outside the development consent process, as they are <u>not</u> a material consideration in the decision on the proposed Project nor a matter to be secured as part of the Development Consent Order. Later in spring 2026, the Applicant will begin consulting on how the community funds should be used for Norwich to Tilbury, subject to the Project receiving consent. Throughout that consultation, we will engage with local communities and elected representatives to understand local priorities and where community funds could deliver long-lasting benefits. This engagement will follow a similar approach to that taken on other National Grid projects, such as Weston Marsh to East Leicestershire, a proposed new 60 km electricity transmission line. To provide an illustration of the material to be presented the Applicant refers to Appendix A, which shows the community benefit survey used for National Grid's Weston Marsh and East Leicestershire project. Following the consultation, we will develop a community funds programme to address the key themes and priorities identified. We will outline an application process for funding, which would become available if the Project receives development consent and construction begins. The feedback we receive will help shape and inform our approach to community funds, including how we will identify the areas eligible for

Reference	Question	Applicant's Response
		community funds. In line with Government guidance, we expect to invest more than £30 million to support local communities. National Grid is accountable for the delivery of community benefit initiatives through its existing regulatory and funding arrangements. Community benefit funding is allocated to National Grid for this purpose and is subject to oversight by Ofgem, in accordance with government guidance on community funds. This will include requirements to account for expenditure and demonstrate that funds are used in accordance with agreed regulatory objectives. As a result, while community benefits are not secured through the Development Consent Order or relied upon as mitigation, their delivery is subject to external scrutiny through established regulatory reporting mechanisms. This provides transparency and accountability for the use of community funds, independently of the planning regime.
GEN 1.10	Other infrastructure projects The ExA is aware that the application for East Pye Solar has recently been submitted to the Planning Inspectorate. The applicant is asked to provide a summary of this project and any interrelationships with it, clarify whether an update to the cumulative assessment is necessary, and include this within the next version of the interrelationship report which is expected to be submitted by deadline 4. Should any other nearby projects get added to the national infrastructure project website during the examination, the applicant is asked to do the same.	6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] includes the East Pye Solar (EN0110014) project in Table A17.2.1; the Applicant's reference for this project is DCO11. Environmental Statement Appendix 17.2 confirms that the East Pye Solar project is over 3 km from the Project, and that, as this development is located outside the largest 3 km landscape and visual and historic environment Zone of Influence (ZoI), it is not considered further in the Applicant's cumulative effects assessment. East Pye Solar is therefore not included in the short list of projects in respect of the inter-project cumulative effects assessment provided in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. Although East Pye Solar's application for development consent was submitted to the Planning Inspectorate on 5 March 2026, this does not change the ZoI, therefore the Applicant does not consider that an update to their cumulative effects assessment is necessary. Reflecting the distance between the projects, the Applicant is not in direct engagement with East Pye Solar's developer, Island Green Power, which the Applicant notes neither responded to the Project's statutory pre-application consultation nor made a Relevant Representation on the Project's application for development consent. The Applicant is of the view that there is no current or anticipated functional interrelationship between the Project and East Pye Solar. The Applicant is aware that the developers of the East Pye Solar project do not have a confirmed substation position from National Grid. Their gated position is being

Reference	Question	Applicant's Response
		determined by the independent National Energy Systems Operator and will be communicated to National Grid and the developer in due course. The ExA's requirements for 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] (the Interrelationship Report) were set out in Annex F to Rule 6 letter - Notification of the Preliminary Meeting and matters to be discussed [PD-009]. These included the following requirements, which are the second and third requirements as stated in the Rule 6 letter: • <i>'a summary of the other projects identified above and in the short list, including updates to expected timings for their submission/ decision, construction phasing and expected start of operation</i> • <i>the approach taken by the applicant to coordinate the proposed development with the other projects, including a summary log of discussions with the developers of the projects both pre-application/ pre-examination and as progressed during the examination'.</i> The Applicant therefore has understood the meaning of '<i>the other projects</i>' above to refer to the Nationally Significant Infrastructure Projects (NSIPs) listed in Annex F to the Rule 6 letter as well as the shortlisted projects in 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]. Due to the requirements set out in the Rule 6 letter, and because East Pye Solar was within neither the listed NSIPs nor the short list of projects, the Applicant did not reference East Pye Solar in 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] submitted at Deadline 1 to the examination. The Applicant has been undertaking monthly reviews of local authority planning registers, and will continue to do so during the examination period. The Applicant also is monitoring the Planning Inspectorate's National Infrastructure Project website for newly added nearby NSIPs. If changes to the conclusions of the inter-project cumulative effects assessment are identified as a result of additional applications and / or proposed allocations, these changes will be submitted into the examination. If further projects are added to the Applicant's inter-project cumulative effects assessment short list during the examination, the Applicant will update the Interrelationship Report accordingly.

Reference	Question	Applicant's Response
		Whilst East Pye Solar is not included in the short list, the Applicant will include reference to it, noting the content of this response, in the next version of the Interrelationship Report due to be submitted by Deadline 4. A similar approach will be taken for other nearby projects added to the National Infrastructure Project website that are not included in the short list.
GEN 1.11	Norwich Main substation (Work No.1) The ExA noted on Unaccompanied Site Inspection (USI) 1 [EV1-002] that construction works relating to the extension of Norwich Main substation are well advanced. It is unclear where Work No.1 (b) to (e) are proposed within the existing substation and their illustrative design is not provided as it is for all other substations on the 'Design and layout plans subs and cables' [APP-041]. The applicant is asked to clarify: a) Have any of the proposed works listed under Work No.1 already taken place? b) Explain what current works are completed, under construction and are yet to be implemented at and around Norwich Main (South Norfolk Council and Norfolk CC are also invited to comment). c) Clarify whether there will be any overlap with the completion of the construction of Hornsea 3 offshore wind farm grid connection and	We assume the ExA were seeing the Norwich Main Substation extension works which were subject to a separate Town and Country Planning Act (TCPA) application that was approved by the local planning authority in September 2024. The works under this TCPA are separate to the DCO works and are primarily to connect two contracted windfarms, Hornsea Project Three and Equinor (Sheringham Shoal/Dudgeon Windfarm Extensions). The works listed in Work No.1 a-d of Schedule 1 of the draft DCO are shown on the Works Plans Section A, Sheet 1 [APP-017]. This is indicated as a hatched area as the position of these elements are yet to be finalised. The majority of the works in items Works 1 b-d were also included in the TCPA. Works are also listed in Schedule 1 to allow any necessary further works (falling within Work No.1) associated with the Norwich to Tilbury element of the substation extension to be done under the DCO and outside of the already granted TCPA permission. In response to clarifications a) and b) required by the ExA, the only element under DCO Work No. 1 that has been commenced to date pursuant to the separate TCPA permission is the busbar extension to enable the Norwich to Tilbury bays. This is currently under construction. DCO Works No.1 (e) refers to the '<i>landscaping, including mitigation planting</i>' which can be found at 'Norwich Substation Landscape Proposals (drawing No. 12055-LUC-XX-XX-DR-L-001) in 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325]. Regarding point c), no overlap is expected between Norwich to Tilbury activities and Hornsea 3 as it is expected that the latter will be completed in advance of the former's arrival on site. In a worse case scenario, if there should be any further delays to the Hornsea 3 Project, it is still only expected that this may overlap with Norwich to Tilbury enabling works.

Reference	Question	Applicant's Response
	associated works including mitigation areas.	
GEN 1.12	Solar farms and battery energy storage system (BESS) interactions The interrelationship report [REP1-134] and a number of the RRs refer to a range of solar farms and BESS which interact with the order limits or are in close proximity to the proposed development, both Nationally Significant Infrastructure Project(s) (NSIP) and planning application(s), and at differing stages of proposals or development. The promoters/ developers/ operators of a number of solar farms and BESS have indicated that their infrastructure, including grid connections, would interact with the proposed development. Could the applicant provide a summary explanation of how in practice the interaction would operate and whether the solar farms/ BESS listed in the interrelationship report [REP1-134] are reliant on the proposed development for their own developments to proceed.	Section 3: Need Case, Table 3.2, Page 26, of 7.17 Strategic Options Backcheck and Review [APP-355], which is replicated in 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134], sets out the list of generation projects which impact upon the East Anglia boundaries EC5 and EC5N, a number of which are solar and Battery Energy Storage Systems (BESS) projects. This list shows the projects which will ultimately contribute to the need for the Project. Not all the projects listed in this table are interactive with the limits and some projects set out in [REP1-134] are not on this list. This is because some solar and BESS projects are too small to be listed. The Applicant's proposal is developed to facilitate all the listed connections within 7.17 Strategic Options Backcheck and Review [APP-355] by connections at existing substations either at transmission or distribution level, and not all are dependent upon the completion of the Project. Where we electrically interact with an existing or proposed development, the Applicant would ensure agreed resolution of issues is achieved to ensure connections are secure, and that operation of the solar and BESS installations are impacted as little as possible. The Applicant is engaging with developers and owners of assets with which the Project interacts. Statements of Common Ground report dialogue and continued cooperation with the other projects, including how interfaces, and where applicable, connection-related interactions, will be managed.
GEN 1.13	BESS at Norwich Main Substation ES chapter 4 (project description) design scenario 1 (Norwich Main substation section A) [APP-130] refers to the limits of deviation and	The battery storage facility referred to in the entry for design scenario 1 in Table 4.4 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] is not the Pivoted Power site, but the Innova Renewables Limited Hall Farm site (see also 5.9.25 Draft Statement of Common Ground - Innova (Battery Storage Systems) - Letter [APP-112]). The planning application referred to is 2024/3750 (South Norfolk

Reference	Question	Applicant's Response
	order limits being widened in this location 'to allow flexibility to change the alignment should planning consent not be granted for a battery storage facility to the south of the substation', and notes that sensitivity testing has been carried out to allow an overhead line (OHL) alignment to be accommodated further east should the BESS not be granted. Could the applicant explain: • Which BESS and planning application is being referred to in the area to the south of Norwich Main substation? The interrelationship report [REP1-134] at paragraph 3.3.3 refers to a BESS in this area however the report and the SoCG with Pivoted Power [REP1-094] indicate that planning permission has been granted, with the RR from Pivoted Power LLP [RR-2963] referring to an electricity cable having been laid in 2025. Please clarify. • Why the widened order limits are necessary in this respect. Pivoted Power are asked to provide an update on the status of their project including timescales for construction.	Council) which was granted on 25 July 2025, shortly before the Project's application for development consent. Further detail of the interface is captured by paragraph 3.3.6 of 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]. The widened Order Limits were included to account for a scenario where planning permission for the battery storage facility was not granted. The Applicant is in ongoing engagement with Innova to reach a mutually agreeable design in consideration of the Innova design having been amended from what was previously communicated to, and agreed with, the Applicant which stemmed from the significant engagement the Applicant has had with Innova since 2023. Therefore, the option to utilise the eastern corridor, within the current DCO order limits, may be one the Applicant seeks to investigate further if of benefit to either party pending the outcome of the ongoing attempts to reagree a design solution.
GEN 1.14	East Anglia Connection Node (EACN) substation site and nearby	The Applicant has provided the requested plan in Appendix A to this document. As suggested by the ExA in question DES 1.8, the Applicant has combined the plan

Reference	Question	Applicant's Response
	offshore wind farm connections and other development Page 106 of the interrelationship report [REP1-134] and ES figure 17.2 short list plan 13 of 24 [APP-286] indicate the order limits for North Falls and Five Estuaries offshore wind farm however the plans are difficult to interpret. The applicant is asked to provide a separate, more readable and labelled plan to an appropriate scale which shows the Ardleigh/ Little Bromley Area ('ALBA') in more detail, including: - the indicative locations of the offshore wind farm substations and other permanent above ground infrastructure and landscaping for both North Falls and Five Estuaries - the existing Lawford substation - the existing farmsteads and dwellings which bound the sites - existing and proposed landscape features and access roads - the location of any infrastructure associated with the proposed Tarchon Interconnector, if available A standalone plan should be provided at deadline 3 and	required in response to DES 1.8 with that required in response to question GEN 1.14. The plan produced in response to both these questions has been labelled '<i>GEN 1.14 & DES 1.8 EACN and nearby offshore wind farm connections and other developments</i>'. This plan will be incorporated into the next version of 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134], due to be submitted at Deadline 4 of the examination. The Applicant advises it has relied on data provided by other parties in developing this plan, as clarified below. In producing this plan, the Applicant has used the following approach: - Scale: the plan has been produced at 1:10,000 scale - Three proposed substations: The Project's EACN together with the onshore substations for Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm have been included, shaded and labelled - Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm infrastructure: As well as the substations, the plan shows the order limits for both wind farms. The cable for the wind farms also is shown, to the south-east of the substations. Proposed landscaping for both North Falls and Five Estuaries are shown. The Applicant has been assisted in the proposed landscaping detail shown on the plan through the provision of data by Five Estuaries Offshore Wind Farm taken from the Joint Design Guide relating to the two windfarm projects. - Existing Lawford substation: this has been included, shaded and labelled - Surrounding existing and proposed developments: developments included in 6.17.F2 Environmental Statement Figure 17.2 - Short List of 'Other Developments' Considered within the Cumulative Impacts Assessment [APP-286] have been included and labelled with a reference to the development / developer name (consistent with any name used in 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]) and the planning application / NSIP reference - Existing farmsteads and dwellings which bound the sites: The plans identify locations of these buildings rather than extents of entire landholdings, which may also include land

Reference	Question	Applicant's Response
	incorporated in the next version of the interrelationship report at deadline 4.	- Existing and proposed landscape features: - Existing landscape features: existing trees and hedgerows have been included. These features along with the impact on them are detailed on 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065] at 1:2,500 scale - Proposed landscape features around the East Anglia Connection Node have been included - Access roads: Project permanent and temporary access roads have been differentiated from other Project design data and labelled - Tarchon Interconnector Project: The area shown edged pink on the plan supplied is the entire area labelled '<i>Refined Area of Search for a Converter Station Site and HVAC Cable Route (Cabling will not go under built development)</i>' on Tarchon Energy's non-statutory pre-application consultation map.
GEN 1.15	Norwich Main and Bramford substations and Tilbury North site – other developments Similar to the previous question, the ExA seeks separate labelled plans to an appropriate scale for the areas around the existing Norwich Main and Bramford substations and the proposed Tilbury North site which detail the surrounding existing and proposed developments, existing and proposed landscape features and access roads. Standalone plans should be provided at deadline 3 and incorporated in the	The Applicant has provided the requested plans in Appendix B to this document. The plans produced in response to this question have been labelled '<i>GEN 1.15 - Norwich Main and Bramford substations and Tilbury North site</i>', with separate sheets for each of the three locations. In addition, a separate plan has been provided for the area around the Norwich Main Substation that shows landscaping detail – please also see further explanation below. These plans will be incorporated into the next version of 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134], due to be submitted at Deadline 4 of the examination. In producing these plans, the Applicant has used the following approach: - Scale: each plan has been produced at 1:10,000 scale - Project: the Tilbury North plan references the Project design at application, so reflecting the design prior to the Applicant's decision to proceed with scenario B. As previously notified to the ExA, Project design information is being updated later in examination, as confirmed in Additional Submission - Letter to the Examining Authority dated 9 February 2026 [AS-084] and 8.6.1 Deadline 1 Cover Letter [REP1-141]

Reference	Question	Applicant's Response
	next version of the interrelationship report at deadline 4.	- Surrounding existing and proposed developments: developments included in 6.17.F2 Environmental Statement Figure 17.2 - Short List of 'Other Developments' Considered within the Cumulative Impacts Assessment [APP-286] have been included and labelled with a reference to the development / developer name (consistent with any name used in 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]) and the planning application / Nationally Significant Infrastructure Project reference - Existing and proposed landscape features: - Existing landscape features: existing trees and hedgerows have been included. These features along with the impact on them are detailed on 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065] at 1:2,500 scale. - Proposed landscape features: features proposed at Norwich Main substation have been included on the additional version of the plan for that location. Plans for Norwich Main with and without proposed landscaping have been included due to the amount of information shown on the plans, to assist the Examining Authority's identification of the landscaping aspects. No landscaping is proposed for Bramford Substation due to space constraints. Proposed landscaping relating to Tilbury North earlier shown on application documents including 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325] has not been included on the plan for that location, as updated detail is due to be produced and provided to the examination subsequent to the Applicant's notification to proceed with scenario B - Access roads: Project permanent and temporary access roads have been differentiated from other Project design data and labelled - Existing farmsteads and dwellings which bound the sites: The plans identify locations of these buildings rather than extents of entire landholdings, which may also include land
GEN 1.18	Statements of Common Ground - 1	The Applicant notes the Examining Authority's request to include at the beginning of each Statement of Common Ground (SoCG) an 'at a glance' summary of matters

Reference	Question	Applicant's Response
	A large number of draft SoCG were added to the examination at deadline 1 together with updates to those submitted with the application. The overview document [REP1-008] indicates that there are now 96 SoCG in progress (tables 1.1 and 1.2), with two of these finalised and signed. The ExA notes that a significant number of points within the majority of the SoCG set out that discussion is ongoing. In each of the SoCG where discussion is ongoing, the applicant is asked to: - Clearly set out at the beginning of each statement an 'at a glance' summary of the matters which are under discussion together with a deadline by which such matters are expected to be resolved. The applicant is also asked to amend the summary tables in the overview document as follows: - Include both the name of the organisation as well as the location/ name of the development which the SoCG relates to (if relevant), such as the location/ name of the solar farm or housing proposal.	which are under discussion, together with a deadline by which such matters are expected to be resolved. This addition will be included in SoCGs submitted from Deadline 4. The Applicant has updated the SoCG overview document for Deadline 3 to include: - Both the name of the organisation as well as the location/name of the development which the SoCG related to (if relevant), such as the location/name of the solar farm or housing proposal - Statement on whether the organisation is a statutory consultee, an Affected Person (AP), and whether they are a non-IP - Numbering each of the SoCGs in the table consecutively - All examination library references.

Reference	Question	Applicant's Response
	- State whether the organisation is a statutory consultee, an Affected Person (AP), and whether they are a non-IP. - Number each of the SoCG in the table consecutively 1 to 96. - Include all examination library references. The next versions of the overview document and SoCGs are expected at deadline 4. Notwithstanding this, the ExA requests an 'at a glance' summary table to include the above additions to the overview document to be submitted at deadline 3.	
GEN 1.19	Statements of Common Ground - 2 The SoCG overview document [REP1-008] indicates that a SoCG with the Fire and Rescue Service for each county are not being produced, given that they have not responded to statutory consultation, however, may be captured as part of the County Councils' SoCG. No RRs have been submitted by the Fire and Rescue Services. Each of the County Councils are asked to clarify whether they have any comments on the proposed development in respect of their Fire and Rescue Service.	The Applicant will include any matters relating to Norfolk and Suffolk Fire and Rescue Services in the next versions of the respective County SoCGs, should matters arise. Should Essex Fire and Rescue Service raise any matters that should be captured within a SoCG, the Applicant will work with the Service to develop an additional SoCG. Essex Fire and Rescue Service is not part of Essex County Council (ECC) and therefore it would not be appropriate to capture their feedback within the ECC SoCG.

Reference	Question	Applicant's Response
	The applicant is asked to include such matters in the next version of the SoCG.	
GEN 1.20	Statements of Common Ground - 3 Table 1.3 of the SoCG overview document [REP1-008] sets out 30 potential SoCG which are not currently proposed or unlikely to be produced. The applicant is asked to review the need for SoCG with the following consultees, given that representations have been received in relation to their operations: Non-IPs: - East Anglian Air Ambulance - Broomfield Hospital (Air Ambulance) - Civil Aviation Authority (CAA) (Safeguarding and Airfield Advisory Team) IPs: - General Aviation Awareness Council - British Gliding Association The applicant is also asked to review the need for SoCG with North Falls and Five Estuaries. Whilst the ExA	Air Ambulance Operators With regard to the Air Ambulance services, within 5.7 Policy Compliance Document [APP-086] the Applicant recognises paragraph 5.5.59 of National Policy Statement EN-1 (2024) relating to aviation, refers to the Secretary of State's consideration of residual harm to emergency services needs, after reasonable mitigation, operational changes, obligations and requirements. Furthermore, within paragraph 15.2.12 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267], the Applicant notes the National Planning Policy Framework requirement² to take into account the economic value of general aviation airfields in servicing emergency service needs. The Applicant notes various representations received regarding potential Project impacts on aviation safety and operational risk in relation to Broomfield Hospital aerodrome specifically, air ambulance use of other aerodromes for fuelling and training purposes, and broader impacts on air ambulance emergency response operations within the region. Table A15.2.1 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] recognises Broomfield Hospital helipad is within the 5 km radius Aviation Impact Study Area. Table A15.2.4 refers to the Applicant's engagement with the operator of the principal air ambulance trust that utilises the helipad, and agreement of respective assessments that helicopters overflying the overhead line can achieve clearances significantly exceeding minimum requirements³, concluding that operations will not be impacted. It is understood East Anglian Air Ambulance are occasional users of the helipad (being primarily based at Norwich and Cambridge Aerodromes). Impacts are assessed to be as per Essex and Herts Air Ambulance as similar aircraft types and flight procedures will be used.

² Ministry of Housing, Communities and Local Government (2025) National Planning Policy Framework, paragraph 111.f

³ UK Air Operations Regulation (EU) 965/2012 as relates to HEMS aircraft, and Civil Aviation Authority (2026) CAP1264: Standards for helicopter landing areas at hospitals refer

Reference	Question	Applicant's Response
	are aware that work underway on protective provisions is confidential until such point that terms are agreed, there are a number of other matters which affect the final design and co-ordinated approach to construction of these other NSIPs, which would benefit from being set out in a SoCG.	The Applicant's impact assessments for other aerodromes in scope has considered their use by a wide range of aircraft, including Helicopter Emergency Medical Service (HEMS), where identified. The Applicant recognises (and is supported by engagement with HEMS operators) that helicopter approach and take-off procedures are achieved at shorter distances and greater angles than for fixed wing aircraft, and that minimum vertical and horizontal clearances are readily achieved. In recognition of the assessed minimal impact of the Project on HEMS operations, and the assurances of the Essex and Herts Air Ambulance operator specifically, the Applicant does not consider it necessary to secure Statements of Common Ground (SoCGs) with the Broomfield Hospital or any of the Air Ambulance operators, including East Anglian Air Ambulance. Civil Aviation Authority and Associated Advisory Teams Paragraph 15.3.14 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] explains how, in accordance with EN-1 (see para. 5.5.39) and Planning Act 2008, the Applicant notified the Civil Aviation Authority (CAA) of the Statutory Consultation but recognises the focus of the CAA's regulatory responsibilities relate to licensed and officially safeguarded civil aerodromes, which were not identified in the study area. Furthermore, CAP 738⁴ (paragraph 7) states that the CAA does not hold a view on the safeguarding of non-licensed sites. No responses have been received from the CAA. On this basis, the Applicant considers a SoCG with the CAA itself to be unnecessary. Paragraphs 3.17.3 to 3.17.17 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] provide a detailed account of the Applicant's engagement with the Civil Aviation Authority Airfields Advisory Team (CAA AAT) prior to its disbandment in March 2025. The Applicant sought to progress a SoCG with the CAA AAT, prior to and following the disbandment, but this was not achieved due to the cessation of the Team's remit. In the absence of a SoCG, the Applicant considers the CAA AAT's Position Statement (March 2025) to remain extant, as recognised within 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [Revision A] in response to the General Aviation

⁴ Civil Aviation Authority (2020) CAP7 38 Safeguarding of Aerodromes

Reference	Question	Applicant's Response
		Awareness Council Written Representation [REP2-050]. The Applicant does not consider it possible to progress a SoCG with the CAA AAT as it is now defunct. The CAA's Combined Aerodrome Safeguarding Team (CAST) has not provided representations in relation to the Project, although its General Aviation focus group Chair was present at an August 2025 meeting between the Applicant and the operators of Tibenham and Priory Farm aerodromes. The Applicant would welcome insight from CAST but does not see value in pursuing a SoCG with the body at this stage unless and until its remit is clarified and its likely contribution confirmed to be additional to that of aviation stakeholders (including operators) already directly engaged. General Aviation Awareness Council (GAAC) General Aviation Awareness Council Written Representation [REP2-050] demonstrates its focus on provision of support to General Aviation aerodromes navigating planning-related matters. Whilst not a statutory body, the GAAC has represented operator interests from an early stage in the Project's development and offered a general perspective on the Project and aviation matters. The Applicant notes the GAAC is not providing a collaborative perspective nor technical insights additional to that of the operators and we do not consider, therefore, that effort to progress a SoCG will likely result in the resolution of key site-specific matters already being addressed via SoCGs with the operators themselves. 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [Revision A] provides the Applicant's detailed response to the General Aviation Awareness Council Written Representation [REP2-050]. British Gliding Association (BGA) 8.8.1 Applicant's Comments on Written Representations [REP2-029] responding to the Norfolk Gliding Club Written Representation [REP1-256] reflect the Applicant's position that there is now opportunity to progress outstanding matters regarding gliding-specific risk factors relevant to Tibenham aerodrome, including aerotow take-offs, forced landings and competition finishes. Further to its engagement with the BGA to date, the Applicant has drafted a SoCG responding to British Gliding Association Relevant Representation [RR-0412] and proposed focused joint engagement with Norfolk Gliding Club and the BGA to consider these technical matters in detail. This is with the aim of identifying areas of agreement as well as

Reference	Question	Applicant's Response
		clarifying matters of difference to further inform the Examining Authority. We plan to submit the draft SoCG at a future deadline. The Applicant has reviewed the ExA's request but does not consider that Statements of Common Ground (SoCGs) with North Falls or Five Estuaries are necessary. The same position was taken during the Five Estuaries Development Consent Order (DCO) Examination, where National Grid did not enter into a SoCG with the offshore wind projects, as it would not have added value beyond the coordination arrangements already in place. The three projects – Norwich to Tilbury (EACN), North Falls, and Five Estuaries - have already proactively coordinated on all matters relevant to final design and potential construction interfaces. This includes: • Tripartite Position Statement - setting out jointly developed measures to avoid significant cumulative effects across three key topics: traffic and transport (particularly construction traffic); landscape screening; and operational noise • Outline Protocol (Onshore Substations Operational Noise and Noise Complaints Protocol) - confirming that a joint maximum permissible noise level at sensitive receptors has been agreed and apportioned between the three projects • Parallel DCO requirements and protective provisions - ensuring consistent and enforceable cross-project controls are embedded directly within each scheme's DCO. Given these established and effective collaboration mechanisms, a SoCG would simply duplicate information already secured through binding requirements and agreed technical documents and therefore would not provide further clarity or benefit to the Examination. In addition, the nature of the interfaces between the three projects and the timings of their respective construction activities do not indicate any material overlap or dependency that would necessitate additional documentation such as a SoCG. The Applicant therefore sees no merit in producing a SoCG on this basis. The Applicant will continue its constructive and proactive coordination with both offshore projects but does not propose to prepare a SoCG.

Reference	Question	Applicant's Response
GEN 1.21	Legal Agreements A number of the LIRs refer to the need for legal agreements in order to secure a range of mitigation and compensation measures and packages in each local authority area. The applicant is asked to: a) Provide a summary document/tracker of all requests for agreements with local authorities including the type of agreement, what it relates to and how each would meet the relevant tests. b) Justify its intended use of unilateral undertakings in the instances where a bilateral (section 106) agreement would be preferable. c) Consider whether one local authority's request for a certain agreement would also be appropriate for the same to be applied in any (or all) of the other local authority areas. All local authorities are invited to provide a list of and their understanding of the current status of any agreements which it has requested, together with a timescale for completion of any agreements which require sign off by the local authority	The response has been provided in the form of a table (Appendix E) with the requests identified from the Local Impact Reports (LIRs) grouped by the themes identified by the Examining Authority in their Initial Assessment of Principal Issues (IAP). It was not always clear within the LIRs whether the Local Planning Authority was requesting a measure be secured by a legal agreement or alternative measure, and if a legal agreement was requested, what form of legal agreement was being requested. The Applicant has therefore taken a conservative approach and where the Local Planning Authority has indicated in their LIR that the measure could be secured by a legal agreement, even if alternative mechanisms have also been identified in the LIR, this has been included within the table. Measures which would require a financial contribution or necessitate the involvement of other developers have also been included in the table. If the mechanism by which the agreement would be secured has not been specified by the Local Planning Authority, the Applicant has made the assumption that the stakeholder is seeking a bilateral s106 agreement. The relevant tests for s106 agreements are outlined in Regulation 122 of The Community Infrastructure Levy Regulations 2010. The obligation must be: • Necessary to make the development acceptable in planning terms • Directly related to the development • Fairly and reasonably related in scale and kind to the development.

Reference	Question	Applicant's Response
GEN 1.22	Option East 7 ES chapter 3 Alternatives [APP-127] and the CPRSS [APP-356] refer to the Sea Link project and the Tilbury to Grain reinforcement project as being one of the three elements of the 'strategic solution and three-project approach' as set out in ES chapter 3 section 3.4 (the Eastern theme; 'Option East 7'). The Sea Link project is an NSIP currently in examination. Paragraph 3.4.18 of ES chapter 3 indicates that the Tilbury to Grain project received planning permission in March 2025. The applicant is asked to clarify: a) If any of the other projects included in Option East 7 are reliant on the proposed development proceeding. b) To what extent have the other projects affected the strategic assessment of alternatives, i.e. whether they represented a constraint on the consideration of the offshore 1 option for Norwich to Tilbury. c) In the event that all three projects are granted consent and are constructed concurrently,	a) The integrated nature of the National Electricity Transmission System makes it necessary to consider the network holistically, albeit with individual projects responding to specific reinforcement needs. The Applicant can confirm that neither of the other projects within East 7 (these are the Sea Link project currently being examined and Grain to Tilbury which is under construction) are reliant on the Norwich to Tilbury Project proceeding. The cessation of any one project would have consequences for network management that may change how the remaining projects operate and lead to constraint costs being incurred. b) The other projects did not represent a constraint to the consideration of strategic alternatives for implementing a connection for the Norwich to Tilbury Project. As set out in the various Strategic Options Backcheck and Review documents (7.19 2023 - Strategic Options Backcheck and Review [APP-357], and 2024 and 2025 are covered within 7.17 Strategic Options Backcheck and Review [APP-355]) offshore options have been included within the consideration of the appropriate design solution. The Grain to Tilbury project is via a tunnel and there would not have been interface with an offshore solution for Norwich to Tilbury. Any interface of an offshore solution for Norwich to Tilbury with the Sea Link project would be expected to be limited to cable crossings. There is nothing unusual about crossings, of which there will be several across existing cable and pipeline infrastructure, so this is not perceived to be a constraint. c) An inter-project cumulative assessment for the Project is provided as 6.17 Environmental Statement Chapter 17 Cumulative Effects [APP-281]. The assessment was undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297]. In accordance with the Planning Inspectorate's Guidance⁵ the Study Area for inter-project effects comprised a number of Zones of Influence (Zols). A Zol is the geographic area within which a project is likely to affect environmental receptors. As such, the Zol varies for different types of receptors (including socio-economic receptors). The Zol used for the Environmental Statement of the DCO application was based on relevant distances (according to the individual environmental topics) extending from the Order Limits. The maximum Zol for each aspect was then used to determine other developments which should be

⁵Planning Inspectorate (2025) Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment

Reference	Question	Applicant's Response
	implications for wider cumulative effects such as construction traffic and socio-economic implications (noting that neither project is included in the cumulative assessment due to distance).	taken forward to a short list for assessment and to help focus the assessment on those other developments that are more likely to result in significant inter-project cumulative effects. The largest Zol was determined to be 3 km. The Sea Link Project is located outside this Zol, therefore it was not included within the long list (in line with guidance) as it would not result in significant inter-project cumulative effects (including socio-economic effects). The Grain to Tilbury reinforcement project is located approximately 2.3 km from the Order Limits, however, this development was not appraised as part of the shortlisted applications due to the nature and scale of the project (with the majority of the development being undergrounded), and distance from the Norwich to Tilbury Project, meaning it would not give rise to cumulative effects. Committed developments were included within traffic data used in the Environmental Impact Assessment and these are listed in 7.11 Transport Assessment - Appendix D - Committed Developments [APP-337]. The Sea Link Project is noted therein as being excluded from inclusion within the traffic data. The Grain to Tilbury project received consent in early 2025 and is already under construction with the sinking of the vertical shaft south of the existing Tilbury Substation site complete. Tunnelling under the River Thames would create volumes of spoil which would be removed using river transportation. Final construction of the project including the reconductoring of the overhead line in Kent is expected in 2028/29. Taking into account the timing and location of these works, no wider cumulative traffic and transport effects with the Norwich to Tilbury Project are anticipated.
GEN 1.23	Dunton Hills Garden Village 1 A number of IPs have made submissions in respect of the allocated site Dunton Hills Garden Village (DHGV), including Essex CC [RR-1083] and [REP1-161], Basildon BC [RR-0335] and Brentwood BC [RR-0391] and [REP1-150]. The site is included in the cumulative assessment [REFs] and the interrelationship report [REP1-134],	The Applicant has provided the requested plan in Appendix C to this document. The plan produced in response to this question has been labelled '<i>GEN 1.23 – Dunton Hills Garden Village</i>'. Noting the issues raised by Interested Parties, the Applicant confirms the Project has considered Dunton Hills Garden Village during routeing and refinement of the alignment, resulting in the Applicant's decision to route the Project within an existing gas pipeline safety corridor. By doing so, and subject to final micro-siting, the total quantum of housing will not be affected. The Applicant also draws attention to the positions set out in 8.3.12 Draft Statement of Common Ground - LIH Dunton Hills Limited [REP1-082]. LIH Dunton Hills Limited has recently acquired the development interest for the land comprising Dunton Hills Garden Village.

Reference	Question	Applicant's Response
	and ES chapter 15 [APP-265] details this and other allocations on pages 115 and 116. These include North Billericay, Queens Park (AS1 Allocation) (Section G); DHGV (Section G); and Land West of West Mayne (Section G). The applicant is asked to provide a clear plan of a suitable scale which overlays the proposed development with the allocations and the DHGV approved masterplan (or outline plan), as well as other constraints including the existing gas pipeline and the Build Protect Design corridor.	In producing this plan, the Applicant has used the following approach: • Scale: the plan has been produced at 1:10,000 scale • Allocations: – North Billericay, Queens Park (AS1 Allocation) (Section G): This proposed allocation was included within Basildon Borough Council's Regulation 18 Part 2 consultation. However, it has since been removed as a proposed allocation within the Regulation 18 Part 3 consultation, replaced with a smaller site identified as H31 (Land at Mountnessing Road), which does not interact with the Project's Order Limits. Due to the removal of the site that had interacted physically with the Project's Order Limits, and to avoid confusion about interrelationships, the Applicant has not shown the proposed allocation AS1 on the plan provided in response to this question. – Land West of West Mayne (Section G): There are two allocations east of Dunton Hills Garden Village that interact physically with the Project – Friern Manor Farm (E5) and Land West of West Mayne (H11). Both have been shown and labelled on the plan. • Dunton Hills Garden Village approved masterplan: As well as the boundary for planning application 21/01525/OUT, the plan provided in response to this question includes detail from the Dunton Hills Garden Village Illustrative Masterplan dated August 2022 (developer references: job number 31057, drawing number 400, revision H). Please note that the developer's masterplan shows housing as white blocks, and this has been replicated in the plan being the Applicant's response to this question. • The existing gas pipeline and the Build Protect Design corridor (80 m buffer around the pipeline) have been shown on the plan. • Other constraints: There are a number of Listed Buildings in the vicinity of the Project and the above allocations / proposed developments, which have been shown on the plan. • Access roads: Project permanent and temporary access roads have been differentiated from other Project design data and labelled.

Reference	Question	Applicant's Response
		Existing farmsteads and dwellings: The plan identifies locations of these buildings rather than extents of entire landholdings, which may also include land.
GEN 1.24	Dunton Hills Garden Village 2 The RRs and LIRs from Essex CC [RR-1083] and [REP1-161], Basildon BC [RR-0335] and Brentwood BC [RR-0391] and [REP1-150] make detailed comments regarding potential effects on the viability and delivery of the DHGV allocation which may be affected by the OHL infrastructure. Existing pylon infrastructure is in place on and around DHGV. Work no. 33 includes the replacement of part of an existing overhead distribution electric line. The works include removal of 1.9 kilometre (km) of existing pylons and OHLs (route PSC) and the installation of 1.6km of new underground distribution electric line, with a temporary diversion of the existing line. These works are shown on works plans section G (sheet 6 of 6) [APP-023] and section H (sheet 1 of 7) [APP-024]. However the submissions include limited consideration of the existing OHL which crosses the allocation, and the proposals by the applicant to remove and underground part of the existing electric lines.	It is noted that part a) of this question is addressed to the Applicant: The Applicant agrees with the description in the question which notes that the Project only requires the existing 132 kV PSC (UK Power Networks) overhead line to be placed underground due to the proposed 400 kV TB route overhead line needing to cross it. This is reflected by Work No. 33 on sheet 6 of 6 in 2.3 Works Plans - Section G [APP-023] and sheet 1 of 7 in 2.3 Works Plans - Section H [APP-024]. The second existing 132 kV PUB (UK Power Networks) overhead line that crosses the western part of the Dunton Hills Garden Village (DHGV) allocated site is unaffected by the Project and therefore the Applicant has made no proposals to underground it. The Applicant does, however, understand that a core premise of the DHGV proposal is to remove the two existing 132 kV (UK Power Networks) overhead lines that cross the site. The Applicant is not aware of the details regarding the more western PUB overhead line and has not been party to discussions between LIH Dunton Hills Limited and UK Power Networks on the matter. The image below provides an overlay of the temporary and proposed Project works on the Dunton Hills Garden Village proposals.

Reference	Question	Applicant's Response
	applicant's commentary on the Savills Report and theoretical effects on gross development value as set out in paragraph 3.8.47 to 3.8.57 of the applicant's response to LIRs [REP2-030]. e) The local authorities and BTSurveyors for LIH Dunton Hills Limited are also asked to clarify updated timescales for a planning decision to be issued relating to application 21/01525/OUT, for reserved matters applications to be submitted, and for expected commencement (and phasing) of the DHGV development, so that the ExA is able to make a more informed review of cumulative construction effects.	
GEN 1.25	Dunton Hills Garden Village 3 Clarify the location of the play area to the south eastern corner of DHGV site (as shown on in appendix 8 [RR-0421] and provide comment as to whether it is feasible for this area to be designed around or relocated within the proposed development when detailed plans are submitted.	Based on the current plans, the Project will not directly affect the location of the play area (referred to as a Local Equipment Area for Play or LEAP). Land around and underneath the proposed overhead line can be utilised by DHGV as open space as per the relevant masterplan. The Applicant understands that the Dunton Hills Garden Village (DHGV) development shall be delivered in three phases broadly building out from west to east following a 17-year phasing strategy. The DHGV site is still at the formative stage and the play area in question is located in phase 3A, planned for development in years 13-15. The Applicant is of the opinion that given the phasing, it is likely that phase 3A of DHGV would move into detailed design and the associated planning application(s) with the new overhead line in operation, therefore the play area could be located sensitively to the Project and both can co-exist accordingly. The plans contained within appendices 6, 7 and 8 of BIH's relevant representation [RR-0421] illustrate the large extent of the recreation open space available for the detailed design and location of the play area.

Reference	Question	Applicant's Response
GEN 1.26	Assessment of cumulative effects The ExA notes that the interrelationship report [REP1-134] is a useful document however this does not form part of the ES. The ExA considers that the assessment of inter-project effects for certain issues in section 17.5 of ES Chapter 17 [APP-281] would appear quite cursory. Justify the assessment methodology you have used to assess inter-project cumulative effects in ES Chapter 17. In particular, explain how you have reached the conclusion that for certain areas of the proposed development, such as in the vicinity of the EACN substation and Tilbury North substation, you have reached the conclusion that the cumulative inter-project effects would be “negligible” and “not significant” for matters such as air quality, biodiversity, socio-economics, recreation and tourism, and health and wellbeing; with the noise effects assessed as being slight adverse within the 300 metre (m) zone of influence.	The methodology used to undertake the inter-project cumulative effects is in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. It is also structured using the staged assessment approach detailed in the Planning Inspectorate’s Cumulative Effects Assessment Guidance⁶. The detail provided in the assessment is similar to inter-project cumulative effects assessments undertaken for other linear Nationally Significant Infrastructure Projects (NSIPs). At the proposed new EACN Substation the bullet points below explain how conclusions were reached in the inter-project cumulative effects assessment: • Air Quality – There would be no significant residual inter-project cumulative effects as a result of construction dust at the proposed new EACN Substation as standard mitigation measures would be implemented by the Main Works Contractor(s) during construction. This includes coordination of mitigation with other nearby projects in construction that have the potential for overlapping impacts. Other developments in the vicinity would also implement their own standard mitigation measures (in accordance with guidance) which cumulatively would ensure there would be no residual effects. Mitigation is secured within 7.2 Outline Code of Construction Practice [REP2-014] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]. In terms of construction traffic there were no predicted exceedances of the standard for annual mean NO₂, PM₁₀ and PM_{2.5} at human receptor locations selected along the affected road network near the proposed new EACN Substation. It is therefore considered that inter-project cumulative effects are not significant. Further assessment is set out in 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] (as other developments were included as committed developments within the traffic data used in the assessment) • Ecology and Biodiversity - Assessed the effects from Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm and other NSIP projects that would connect to the EACN Substation. The effects that the footprint of these developments would have on habitats and the effect these developments would have on mobile species were reviewed to identify whether there was potential for

⁶ Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment

Reference	Question	Applicant's Response
		inter-project cumulative effects. The other developments have identified potential for effects associated with noise and lighting, but the implementation of standard mitigation delivered through 7.2 Outline Code of Construction Practice [REP2-014] would ensure that inter-project cumulative effects would not be significant. Where residual effects were identified by the other developments these related to ecological receptors such as farmland birds that would not be significantly affected by the Norwich to Tilbury Project and so no inter-project cumulative effects were identified • Socio-economics, Recreation and Tourism - The proposed new EACN Substation is likely to have an inter-project cumulative effect with the Five Estuaries Offshore Wind Farm and North Falls Offshore Wind Farm developments as the construction period of these developments are likely to overlap with the Project between 2027 and 2030. Detailed assessment is set out in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284], Rows 'DCO8' and 'DCO09' respectively, under the column for '<i>Assessment of Inter-Project Cumulative Effects between the Project and other developments</i>'. Standard mitigation measures would be implemented by the Main Works Contractor(s) during construction. 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 [REP2-014] and 7.3 Outline Construction Traffic Management Plan [APP-309]. There is likely to be a cumulative effect on identified Public Rights of Ways (PRoWs). It is expected that the Main Works Contractor(s) and the other developments would apply PRoW management measures to minimise disruption, including diversions where practicable. Therefore, it is anticipated that the cumulative effects on recreational routes would be not significant. During the construction and operation phases, no cumulative impacts have been identified on community facility, business and tourism receptors • Health and Wellbeing – The assessment of inter-project cumulative effects presented in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] notes the likely areas of impact that are relevant to the health and wellbeing assessment. This information has been drawn from

Reference	Question	Applicant's Response
		information provided by other environmental topics, notably air quality, noise and vibration, and socio-economics (in relation to PRowS). For both air quality and noise and vibration, no significant impacts have been identified (the air quality impact is assessed as negligible, and the noise impact is predicted to be negligible at all nearby receptors with the use of best practicable means). In relation to socio-economics, an inter-project cumulative effect has been identified in relation to a number of PRowS; the health and wellbeing assessment concludes that both developments are expected to apply PRow management measures to minimise disruption, including diversions, and as such it is anticipated that the effects would be not significant on access or opportunity for physical activity. The impact on landscape and visual has been identified as significant; paragraph 17.5.47 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] does identify that, in a number of instances, adverse effects on mental health and wellbeing may be relevant as a result of the scale of other development and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phase • Noise and Vibration - The assessment of inter-project cumulative effects presented in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] notes the likely areas of impact that are relevant to the noise and vibration assessment. With regards to construction noise and vibration, the cumulative assessment considers the predicted noise and vibration levels from all nearby projects at each nearby noise and vibration sensitive receptor (NSR) to determine whether the resultant level would exceed the threshold for potential significant adverse effects. With regards to operational noise from the proposed EACN substation, the assessment presented in 6.14.A3 Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259] directly considers the cumulative effects of operational noise from the proposed EACN substation, along with the North Falls and Five Estuaries substations. Each substation has been assigned an individual respective noise limit such that the cumulative noise level does not cause a significant adverse effect. At the proposed new Tilbury North Substation the bullet points below explain how conclusions were reached in the inter-project cumulative effects assessment:

Reference	Question	Applicant's Response
		Air Quality – There would be no significant residual inter-project cumulative effects as a result of construction dust at the proposed new Tilbury North Substation, as standard mitigation measures would be implemented by the Main Works Contractor(s) during construction. Other developments in the vicinity would also implement their own standard mitigation measures (in accordance with guidance) which cumulatively would ensure there would be no residual effects. Mitigation is secured within 7.2 Outline Code of Construction Practice [REP2-014] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]. In terms of construction traffic, there were no predicted exceedances of the standard for annual mean NO₂, PM₁₀ and PM_{2.5} at human receptor locations selected along the affected road network near the proposed new Tilbury North Substation. It is therefore considered that inter-project cumulative effects are not significant. Further assessment is set out in 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Results [APP-150] (as other developments were included as committed developments within the traffic data used in the assessment) Ecology and Biodiversity - The Tilbury North Substation would directly affect an area where woodland planting is proposed as mitigation for impacts arising from Lower Thames Crossing (LTC). The purpose of the planting is mitigation for loss of ancient woodland and to compensate for air quality impacts to Sites of Special Scientific Interest as result of the LTC scheme. The Norwich to Tilbury Project has no air quality impacts that would affect ancient woodland or lead to the loss of ancient woodland. 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] illustrates the location for LTC mitigation planting within the Norwich to Tilbury Order Limits, and just like the original area identified for woodland planting, this new location will provide habitat connectivity between Local Wildlife Sites including a potential ancient woodland site. As a location for the planting had been identified within the Order Limits close to its original location that would maintain connectivity, relocating this planting was not considered to give rise to cumulative effects related to ecology and biodiversity and so the fact that this area of planting would need to be moved was not mentioned in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. No

Reference	Question	Applicant's Response
		other NSIP schemes were identified in this location that could give rise to cumulative effects on ecology and biodiversity • Socio-economics, Recreation and Tourism – The Tilbury North Substation is likely to have an inter-project cumulative effect with the Lower Thames Crossing scheme in particular. Detailed assessment is set out in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284], row 'DCO3', under the column '<i>Assessment of Inter-Project Cumulative Effects between the Project and other developments</i>' • Health and Wellbeing - The assessment of inter-project cumulative effects presented in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] notes the likely areas of impact that are relevant to the health and wellbeing assessment. This information has been drawn from information provided by other environmental topics, notably air quality, noise and vibration, and socio-economics (in relation to PRoWs). For both air quality and noise and vibration, no significant impacts have been identified (the air quality impact is assessed as negligible, and the noise impact is not significant with the use of best practicable means. In relation to socio-economics, a cumulative effect has been identified in relation to three PRoWs; the health and wellbeing assessment concludes that both projects are expected to apply PRoW management measures to minimise disruption, including diversions and as such it is anticipated that the effects would be not significant on access or opportunity for physical activity. The impact on landscape and visual has been identified as significant during the construction phase only; paragraph 17.5.47 of 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] does identify that, in a number of instances, adverse effects on mental health and wellbeing may be relevant as a result of the scale of other development and associated perceived effects on neighbourhood quality / sense of place / uncertainty during the construction phases • Noise and Vibration - The assessment of inter-project cumulative effects presented in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284] notes the likely areas of impact that are relevant to the noise and vibration assessment. With regards to construction noise and vibration, the cumulative assessment considers the predicted noise and vibration levels from all

Reference	Question	Applicant's Response
		nearby projects at each nearby noise and vibration sensitive receptor (NSR) to determine whether the resultant level would exceed the threshold for potential significant adverse effects. With regards to operational noise from the proposed Tilbury North substation, there are no other comparable projects in the area where there are likely cumulative effects from noise. Additionally, operational noise levels from the proposed Tilbury North substation are predicted to be negligible at nearby NSRs, well below background noise levels. A subjective appraisal of the likely cumulative effects of the proposed Lower Thames Crossing (LTC) project has determined that there are no significant cumulative effects, and in fact, the LTC project would serve to reduce impacts of the proposed Tilbury North Substation due to the additional masking noise it would generate.

2. Design parameters and other details of the proposed development

Table 2.1 Design parameters and other details of the proposed development

Reference	Question	Applicant's Response
DES 1.1	NESO Electricity Transmission Design Principles Provide an update on the development of the new ETDP, and if applicable provide a summary of how the proposed development accords (or does not) with those Design Principles.	In 2023 the Electricity Networks Commissioner proposed recommendations on how to accelerate the deployment of strategic electricity transmission infrastructure in Great Britain. The UK government adopted these recommendations which now form the basis of the Transmission Acceleration Action Plan (TAAP)⁷. The TAAP sets out 43 recommendations, which collectively seek to reduce build time of electricity transmission network infrastructure from 14 to 7 years. Recommendation 'RD1' of the UK government's TAAP states that: <i>'Electricity Transmission Design Principles (ETDP) should be created to provide greater clarity on the type of asset to be used in different environments.'</i> The National Energy System Operator (NESO) led the development of the ETDP. The draft principles were the subject of a public consultation by NESO that ended on 26 October 2025. On page 12 of the consultation document⁸ it was said that: <i>'Following publication of the Principles, all new electricity transmission projects in Great Britain, identified from January 2026, will be expected to have regard to the Principles. This will include, but is not limited to, network reinforcement options entering network planning processes from the first iteration of the Centralised Strategic Network Plan (CSNP). Designers will not be expected to apply the Principles retrospectively to projects currently in development.'</i> (Applicant's emphasis).

⁷ Department for Energy Security and Net Zero (2023) *Transmission Acceleration Action Plan*

⁸ NESO (2025) *Electricity Transmission Design Principles. Consultation on Principles*

Reference	Question	Applicant's Response
		In November 2025 new energy National Policy Statements (NPSs) EN-1, EN-3 and EN-5 were laid before Parliament, and these came into force on 6 January 2026. Although the Norwich to Tilbury application for development consent will be determined against the previous NPSs the new documents are referenced here as they are relevant to the question and could be a relevant consideration in the decision making process. EN-5 (2026) states at paragraph 2.9.20: <i>'NESO will consult on and publish Electricity Transmission Design Principles (ETDP), which will apply to onshore and offshore electricity transmission infrastructure. The ETDP will provide guidance on transmission technology choices available to mitigate the impact of transmission infrastructure on the landscape, environment and communities whilst embedding innovation into design. Once the ETDP is published, developers should have regard to the ETDP as relevant, in addition to the Holford and Horlock rules.'</i> This paragraph is subject to footnote 24 which states: <i>'Projects will seek to apply the ETDP to the strategic planning stage and project development stage. The strategic planning stage is typically part of the Centralised Strategic Network Plan (CSNP), Connections, or Business Plan process and defines the high-level characteristics of future transmission infrastructure. It sets broad parameters such as technology type, connection points to the existing network, and capacity requirements. The project development stage involves translating strategic intent into design, routeing, and consenting activities. It prepares the project for planning and regulatory approvals ahead of construction. Any project that has been through the strategic planning stage before the ETDP are published will not be expected to have had regard to them.'</i> (Applicant's emphasis). Although the NESO consultation document anticipated that the final ETDP would be published in January 2026, this has not been the case and the latest information available to the Applicant suggests publication will likely be in June 2026. It is clear from the NESO consultation documents and the new NPS EN 5, both referred to above, that the ETDP are intended to apply to projects identified from the date of the publication of the ETDP. It is the Applicant's clear view that the ETDP will not apply to the Norwich to Tilbury Project as the project went through the strategic planning stage long before the publication of those design principles. They are not

Reference	Question	Applicant's Response
		expected to apply to projects currently in development, in particular those already in examination. As the ETDP are not applicable to the Norwich to Tilbury Project, the Applicant has not sought to provide a summary of how the proposed development accords (or does not) with ETDP not yet published nor would it be appropriate to do so.
DES 1.2	Design and Access Statement Chapter 5 of the design and access statement [APP-353] details Good Design Process, with paragraph 5.3.29 stating “National Grid’s design principles are rooted in legal, safety, technical, cost effectiveness and policy frameworks. While there may be scope for aesthetic considerations, the overarching priority is the safe, secure, and efficient delivery of infrastructure, which significantly limits opportunities for design innovation especially in standard, non-protected locations” The ExA understands the restrictions based on legal, safety, technical and policy frameworks. However, why are opportunities for design innovation limited in ‘standard, non-protected locations’ as opposed to protected locations? Is it only cost effective to innovate in protected locations?	The Applicant acknowledges that the phrasing in paragraph 5.3.29 of the 7.15 Design and Access Statement [REP2-020] could have been clearer. The intention was to explain the relationship between National Grid’s statutory duties, the relevant policy framework, and the practical constraints that shape the extent of design innovation available for different parts of the electricity transmission network depending on where it is located. Outside of protected areas regulatory and policy considerations limit opportunity for design innovation whereas in protected areas there can be more scope for design innovation in direct response to the nature of the protection that exist in those areas. This is explained further below. In this regard the ExA’s interpretation is broadly correct though perhaps implementation is less stark between protected and non-protected locations. To expand further, National Policy Statement (NPS) EN-5 (2024) guides to a strong starting presumption for overhead lines in non-protected locations (for example not subject to a National Landscape designation or Special Protection Area). Section 4.7 of NPS EN-1 (2024) states that good design should ensure functionality, sustainability, and aesthetic quality. Paragraph 4.7.1 is particularly relevant, stating that <i>‘The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.’</i> Paragraph 4.7.2 of NPS EN-1 states: <i>‘Applying good design to energy projects should produce sustainable infrastructure sensitive to place ... efficient in the use of natural resources ... and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible’.</i> The NPS EN-1 recognises (paragraph 4.7.6) that there may be limited choice in physical appearance of energy infrastructure, but there could be opportunities to demonstrate good design

Reference	Question	Applicant's Response
		in terms of siting. It also suggests that functionality (fitness for purpose and sustainability) and aesthetics should be considered (paragraph 4.7.10). NPS EN-5 expands on the above setting out at Paragraph 2.4.3 that '<i>...the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure.</i>' NPS EN-5 makes it clear that the government considers overhead lines should be the '<i>strong starting presumption for electricity networks developments in general</i>', although '<i>this presumption is reversed when developments will cross part of a nationally designated landscape</i>' (paragraph 2.9.20). It is also noted that EN-5 identifies that there may also be instances outside the nationally designated landscapes, where '<i>a high potential for widespread and significant adverse landscape and/or visual impacts</i>' (paragraph 2.9.24) may result in the use of underground cables in certain sections. The mitigation hierarchy (which responds to our duty to be economic and efficient) guides to the use of steel lattice pylons as the starting position. In general, therefore, in these non-protected locations there is limited potential to justify the additional costs of design innovation. Further justification may be driven by the potential level of effect and the potential to sequentially consider the mitigation hierarchy (to other pylon types) or where there is a need to consider change from the overhead line starting presumption in line with the tests in paragraph 2.9.23 of NPS EN-5. In contrast within, and in close proximity to, protected locations (which are subject to designations such as a National Landscape designation, Special Protection Area for example) policy supports a greater level of investment in methods to mitigate effects. Whilst the use of underground cable may be the natural technique for the connection in such cases, the potential need for a greater level of mitigation may lead to greater investment in innovation not just a switch to underground cable. This may encompass new methods of construction and in some circumstances this may extend further with innovation potentially considering more radical design or installation options in response to the effects, specific site circumstances and level of mitigation required to achieve an acceptable design solution.

Reference	Question	Applicant's Response
DES 1.3	Independent design review The Design and Access Statement [APP-353] states in Appendix B that in the context of independent design review there is no intention to include design reviews post-consent (if consent is granted) as the project is “deemed to be achieving and meeting Good Design”. In addition to the above, the ExA note that a number of IPs have indicated the need for an independent design review to be secured as part of any DCO made. In the light of the applicant's Design and Access Statement [APP-353], especially Appendix B – Internal Design Review Note, the ExA is not persuaded, on the basis of the evidence provided to date, that a non-independent design champion(s) would be adequate or that a full independent Design Review Panel for the Proposed Development is not required. Provide further justification for your view that independent design review is not needed for the proposed development. Refer in your reasoning to the Planning Inspectorate Guidance Note Advice on Good Design. The ExA also note that the development consent order for the Five Estuaries offshore wind farm	The Applicant acknowledges in the table at paragraph 1.4 of Appendix B – Internal Design Review Note of the 7.15 Design and Access Statement [REP2-020], that the entry ‘No’ could be interpreted as implying that there is ‘no intention to include design reviews post-consent (if consent is granted)’. This was not the intention. The Applicant can confirm that post-consent design reviews will be overseen through the Applicant's established governance structures, including the Delivery and Detail Design Champion (DDDC), rather than through a separate independent design review panel. The anomaly will be corrected in the next update to the errata. Paragraph 4.7.2 of NPS EN-1 states: <i>‘Applying good design to energy projects should produce sustainable infrastructure sensitive to place ... efficient in the use of natural resources ... and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible’</i>. NPS EN-1 also recognises under paragraph 4.7.6 that there may be limited choice in physical appearance of energy infrastructure, but there could be opportunities to demonstrate good design in terms of siting. This can all be achieved through the appointment of Design Champion and post-consent design reviews. For the type of infrastructure proposed, NPS EN-5 expands on the above setting out at Paragraph 2.4.3 that <i>‘...the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure’</i>. Good design process (to date) A clear narrative explaining how the Project's design has evolved through an iterative good-design process is provided within: • 7.15 Design and Access Statement [REP2-020] • 5.15 Design Development Report [APP-122] • 7.16 Design Approach for Site-Specific Infrastructure (DASSI) [APP-354]. This iterative process has been informed by extensive stakeholder engagement, engineering and environmental surveys, technical assessments and refinement. It has culminated in the identification of Limits of Deviation through careful routing and siting – now narrowed to detailed design and construction considerations.

Reference	Question	Applicant's Response
	included a provision within requirement 5 to ensure that the onshore substation for that project will be subject to an independent design review and this should be referred to in your reasoning.	The DASSI is the Applicant's design guide that has been shared with North Falls and Five Estuaries to support coordination, and that the design parameters set out within the DASSI are consistent with, and in agreement with, the emerging North Falls and Five Estuaries offshore wind farms Joint Substations Design Guide (JSDG). The reviews led by North Falls and Five Estuaries have been ongoing to ensure there is no conflict between the projects' designs. The Applicant was named a co-operating partner in the first round of JSDG consultation and provided feedback on 29 September 2025 and has remained an active participant in its development, which is subject to independent design review. The Applicant submitted comments on the most recent JSDG iteration on 17 March 2026, which will be appended to the next version of the 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] at Deadline 4. The JSDG is guidance only; detailed design for the Project will still be finalised at a later stage. The Applicant's engagement demonstrates a commitment to work collaboratively and transparently in shaping best practice for transmission infrastructure. These responses have been coordinated through a multi-disciplinary tripartite process. In accordance with the Advice Page on Good Design, this collaborative and multi-disciplinary approach, having regard to environmental and social considerations, achieves a design outcome that secures a clearly understood, integrated design, using consistent design language, and sustainability between all three projects. This further reduces the justification for establishing a separate independent review panel for this project. The Applicant notes the Examining Authority's reference to Requirement 5 of the Five Estuaries Offshore Wind Farm DCO, which secures an independent design review for that project's onshore substation. That provision reflected the specific circumstances of the Five Estuaries project, including the particular siting, landscape sensitivities and degree of post consent discretion anticipated for that development at the time of determination. It does not establish a general precedent that independent design review panels are required for all electricity transmission infrastructure projects. In contrast, the Norwich to Tilbury project is subject to a comprehensive and mature design framework, with its routing, siting and key design principles fixed through the Order limits and certified documents, leaving only limited scope for post consent

Reference	Question	Applicant's Response
		design variation. The Applicant is also actively engaged in the JSDG process alongside North Falls and Five Estuaries, which itself is informed by independent design review. In this context, and having regard to the functional and safety led nature of transmission infrastructure, the Applicant considers that the established internal design governance arrangements, including the Development Design Champion role secured through the DASSI, provide a proportionate and effective mechanism for securing good design outcomes without the need to replicate the Five Estuaries DCO requirement. The Applicants position is also that the specific locational context of the different sites is an important consideration in defining the design oversight requirement. In this case the arrangement of the different projects is such that the EACN benefits from existing screening by hedges and trees from all sides that can be reinforced. This is in contrast to the North Falls and Five Estuaries sites which do not benefit from screening to the same degree and which indeed will also provide additional screening to the EACN. Therefore the applicant does not consider it necessary to take forward an independent design review as its plans are finalised. Nonetheless we recognise the value from being a co-operating partner with North Falls and Five Estuaries on the detail of landscape reinforcement and ecological mitigation proposal. Securing good design outcomes The Applicant has appointed a Development Design Champion (DDC) from within National Grid's existing design governance structure. The role of the DDC is to ensure a consistent design language in line with National Policy Statement (NPS) EN-1 (2024), NPS EN-5 (2024), the Holford and Horlock Rules, and other relevant guidance will be followed through in post-consent decisions. National Grid has extensive experience in the design, siting, engineering and delivery of the type of electricity transmission infrastructure proposed. It also has established internal design governance processes covering transmission design, landscape integration, environmental mitigation and delivery. The Great Grid Partnership enterprise delivery model also has a clear vision to drive sustainability outcomes. The DDC, while an internal appointment, is independent of the day-to-day project delivery functions that fall under the remit of the DDDC. The DDC therefore provides a

Reference	Question	Applicant's Response
		structured and impartial design-challenge function consistent with the Planning Inspectorate's Advice on Good Design⁹. The Advice Note does not mandate independent design review panels for Nationally Significant Infrastructure Projects (NSIPs); rather, it identifies a range of mechanisms through which good design outcome may be achieved. Independent design review is one such mechanism, but not a requirement, and the choice of mechanism should be proportionate to the type of infrastructure and the scope for design influence. The non-statutory advice also applies across all NSIPs, including, for example, airports, reservoirs and nuclear power stations – contexts where there may be a clear end-user interface or architectural outcomes that warrant bespoke design review. By contrast, the proposed Project comprises operational infrastructure with no public access and no requirement for reinstated public realm. On this basis, the Applicant continues to consider that a dedicated independent design review panel is not necessary. Good design at the examination stage and post consent At this stage of the Project, following the extensive pre-application routing and siting process, there is very limited scope for any meaningful design variation that would warrant an independent design review or additional community input. Opportunities for influence were appropriately and proportionately addressed during the pre-application design process, when the key decisions were made. The Design Champion function will oversee the areas where there is a limited scope for variation for the site specific infrastructure, for example: layout based on the LoD or the landscape mitigation proposals - as detailed in the DASSI. The core responsibilities and oversight will be formalised in a brief for the DDC and DDDC that will be included in the DASSI [APP-354] which is a certified document under Schedule 19 in the draft Development Consent Order (DCO) [APP-056]. This will ensure the influence of the Design Champion is also enforceable when securing implementation of the design principles through the final design and construction of the Project. More information is provided within the Applicant response to written question DES1.4

⁹ Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Good Design*

Reference	Question	Applicant's Response
		On this basis, the Applicant believes an appropriate level of design detail together with clarity over how future post-consent approvals will be assessed and secured had been provided. Therefore, the Applicant continues to consider that a dedicated independent design review panel is not necessary. Independent design review processes can also, in some cases, be perceived by local communities as somewhat removed from practical decision-making and may not always be the most direct means of capturing local preferences. The primary purpose of the environmental areas adjacent to the substations is landscape screening and ecological enhancement. These areas are unlikely, in practice, to accommodate recreational use without compromising their screening performance or ecological function Community-related enhancements identified through the JSDG process – such as public art, interpretation boards or small-scale recreational features, can instead be considered through National Grid's Community Benefits Fund, if a community collectively identifies these as priorities. Community Benefits Fund sits outside the DCO process. The Applicant does not anticipate that an independent design review panel will be required to support implementation of the Proposed Development post consent. The Applicant has demonstrated a clear and sustained commitment to achieving good design in accordance with NPS EN-1, particularly Section 4.7, and NPS EN-5, which recognise that the form and appearance of electricity transmission infrastructure are heavily influenced by functional, safety and security requirements, with opportunities for good design primarily arising through routing, siting, landscape integration and mitigation. The Project's approach to good design is embedded within a comprehensive and mature design framework, including the Design and Access Statement, the Design Development Report(s), and the Design Approach for Site Specific Infrastructure. Together, these documents provide a clear narrative of the Project's iterative design evolution and define the design principles, parameters and Limits of Deviation that will govern detailed design. The 3.1 Draft Development Consent Order [APP-056] secures this framework through certified documents and enforceable requirements, ensuring that the design principles established during the examination are implemented through final design and

Reference	Question	Applicant's Response
		construction. Post consent design decisions will be overseen through the Applicant's established design governance arrangements, including the Design Champion roles, providing proportionate and effective design oversight consistent with the Planning Inspectorate's Advice on Good Design. In this context, and having regard to the limited scope for post-consent design discretion, the Applicant considers that a dedicated independent design review panel is not necessary to secure good design outcomes for the Proposed Development.
DES 1.4	Design Champion(s) Paragraph 5.6.8 of the Design and Access Statement [APP-353] states that a design champion will be appointed to provide independent oversight and will act as a critical friend. Explain how the appointed design champion will provide independent oversight. Detail in the Deadline 2 updated Design and Access Statement [REP2-020] is noted but the Development Design Champion appears to be from the existing project team and the question therefore remains. In the light of the above, explain how the role of a design champion will influence, in an enforceable manner, the design of the proposed development post	The Applicant notes that neither National Policy Statement EN-1 (2024) nor the Planning Inspectorate's Advice on Good Design¹⁰ requires the design champion to be independent. The role of the design champion for the proposed Project has been defined in accordance with the guidance set out in Defining and Developing the Design Champion Role¹¹, which explains that the role – and the level of resource required to support it – will evolve to reflect different phases of a project. As explained in the updated 7.15 Design and Access Statement [REP2-020], the Design Champion function is delivered through two complementary roles whose emphasis changes over time. The Development Design Champion (DDC) a senior internal figure appointed from the existing project will be independent of the Great Grid Partnership (GGP). The Delivery and Detail Design Champion (DDDC) will be contracted into National Grid from the Arup–AECOM Joint Venture (AAJV) under the Lot 1 Design Consenting & Environmental Partner of the GGP. The appointment of the DDDC from the AAJV provides additional client-side assurance outside the internal National Grid project team. The GGP have been onboarded in a design review capacity and have been engaged in the Project during the pre-submission stages. Taken together, these arrangements provide a transitional Design Champion function across the Project lifecycle, with intentional overlap and a two-way flow of knowledge to maintain continuity of design intent and delivery of Good Design. The role of the Design Champion(s) is set out in the updated 7.15 Design and Access Statement [REP2-020]. Consistent with the Institution of Civil Engineers

¹⁰ Planning Inspectorate (2024) *Nationally Significant Infrastructure Projects: Advice on Good Design*

¹¹ Institution of Civil Engineers (2023) *Defining and Developing the Design Champion Role*

Reference	Question	Applicant's Response
	making of a DCO; and how the design champion is to be secured within the DCO, should it be made.	recommendations, the Design Champion fulfils an advisory role independent of the design team, within a tripartite governance structure comprising: • The Design Champion • The Design Executive (the design team at delivery phase) • Design review input. The role of both Design Champions extends beyond the Development Consent Order (DCO) stage into the detailed design and construction phases to ensure that the design principles secured within 7.16 Design Approach for Site Specific Infrastructure (DASSI) [APP-354] are consistently applied. Both Design Champions will monitor performance of the Project design against these principles and will challenge detailed design proposals where they do not align with the commitments secured through the DCO in the DASSI. The responsibilities and expectations associated with the Design Champion roles as set out in 7.15 Design and Access Statement [REP2-020] (see 5.6.15 - 5.6.17) – including the requirement for individuals who are respected, experienced, skilled and capable of exercising critical judgement – ensure that the appointed Design Champions will hold an authoritative position in reviewing detailed design and securing adherence to the agreed design principles. 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 the 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.
DES 1.5	Design Approach for Site Specific Infrastructure (DASSI) [APP-354] The DASSI [APP-354] seeks to justify the choice of Air Insulated	The Applicant notes the Examining Authority's introductory statement. The Applicant has assessed both Air Insulated Switchgear (AIS) and Gas Insulated Switchgear (GIS) during the design development of the proposed East Anglia Connection Node (EACN) Substation. The rationale for selecting AIS at EACN is set out in 7.16 Design

Reference	Question	Applicant's Response
	Switchgear (AIS) for the proposed EACN substation rather than use Gas Insulated Switchgear (GIS). Are the proposed substations for the Five Estuaries and North Falls wind farms AIS or GIS? What technology is the Tarchon Interconnector likely to employ (AIS or GIS). Explain how the design choices for each of the substations are assimilated and how they will tie in together.	Approach for Site Specific Infrastructure (DASSI) [APP-354], including landscape and visual considerations (para 5.2.34), land availability (para 5.2.35), flexibility for future expansion (paras 1.4.10-1.4.11) and cost efficiency (para 1.4.10) and is not repeated in full here. The role of the EACN Substation as a multi-user connection node is set out in 7.16 Design Approach for Site Specific Infrastructure (DASSI) [APP-354], in particular paragraphs 1.3.25–1.3.26 and Section 1.4, which describe its function in accommodating connections from Five Estuaries, North Falls and the Tarchon Interconnector. The DASSI further explains in paragraphs 1.4.10–1.4.11 and Section 5.2 that AIS and GIS technologies are routinely used across the National Electricity Transmission System and can interface through standard high voltage alternating current (HVAC) infrastructure. Regarding the choice of AIS or GIS technology for Five Estuaries, North Falls and Tarchon that Applicant understands that: • Five Estuaries Offshore Wind Farm is proposing to use AIS technology. The Project Description¹² paragraph 1.5.2 states – ‘<i>Onshore substation compound (OnSS) The area in which the OnSS footprint will be located. The footprint assessed allows for either Air Insulated Switchgear (AIS) or Gas-Insulated Switchgear (GIS) technology</i>’ and paragraph 1.5.6 – ‘<i>...The choice of AIS or GIS will be part of the detailed design process and a decision will be made post-consent prior to construction commencing.</i>’ This choice is further echoed in the Joint Design Guide for the onshore substations with North Falls Offshore Wind Farm, where Five Estuaries has indicated it is proposing to use AIS technology. The Joint Design Guide sets out how the detailed substation designs will be developed to ensure that there is coherence between the two wind farm projects.

¹² Five Estuaries Offshore Wind Farm (EN010115) 6.3.1 Onshore Project Description [AS-004]

Reference	Question	Applicant's Response
		• North Falls Offshore Wind Farm will also be using AIS technology. The Project Description¹³ paragraph 272 states that – ‘The onshore substation will be an AIS design where the high voltage equipment is installed outdoors with open air terminations.’ • The Applicant is not aware that Tarchon Interconnector has selected a technology choice between AIS or GIS at the point of drafting this response. Their converter station is proposed within a 5 km distance to the east of the EACN Substation; however, the exact location has not been determined within this area. Irrespective of whether any of the connecting projects ultimately adopt AIS or GIS at their substations, they can connect to the proposed AIS EACN Substation via the proposed buried HVAC cable connections and standard interface equipment. The technology choices for Five Estuaries, North Falls and Tarchon do not alter the Applicant's decision to adopt AIS at the EACN Substation, which is based on requirements specific to the Project. Further information on how other aspects of the project in relation to design will assimilate together can be found in responses DES 1.8 and GEN 1.14.
DES 1.6	Holford Rules Set out how Holford Rule 1 been applied in designing the route of the proposed development, specifically for the following areas: • Dedham Vale National Landscape • Waveney Valley • Great and Little Waltham • Mellis Also provide further information on the application of Rule 4 for the route of the proposed development, including details of where the route crosses ridge lines.	In respect of Rule 1, the published Holford Rules state: <i>‘Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the first line in the first place, even if the total mileage is somewhat increased in consequence. Note on Rule 1:</i> <i>Investigate the possibility of alternative routes, avoiding if possible the areas of the highest amenity value. The consideration of alternative routes must be an integral feature of environmental statements. Areas of highest amenity value are:</i> • <i>Areas of Outstanding Natural Beauty</i> • <i>National Parks</i> • <i>Heritage Coasts</i> • <i>World Heritage Sites’</i> The Waveney Valley, Great and Little Waltham and the Mellis areas do not meet the descriptor of ‘Areas of Highest Amenity Value’ therefore Rule 1 is not applicable. However, Rule 1 is relevant to the Dedham Vale National Landscape and was considered as part of the decision making. This is presented in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] from paragraph 3.5.34 to 3.5.52 with

¹³ North Falls Offshore Wind Farm (EN010119) 3.1.7 Environmental Statement Chapter 5 Project Description [APP-019]

Reference	Question	Applicant's Response
		further detail within the 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]. Image 3.6 on page 38 of 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] shows the consideration of corridors routeing either around the National Landscape (corridor combination of C or D with E and F) or routes through the National Landscape (various combinations of all or part of A, AB, B with F) with the route around approximately double the distance of the route through. For clarity the route around the designated area would have passed through the Stour Valley Project area (identified as an area of potential expansion for the National Landscape). Decision making preference is summarised in paragraph 3.5.48 of 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] as: <i>'It was concluded that Option BE5 (northern part of Section A, Section AB and the eastern part of Section F, shown on Image 3.6) was the preferred option due to its greater distance from particularly highly valued parts of the Dedham Vale National Landscape, less potential for adverse effects on the historic environment and as it presents lower risk of Likely Significant Effects on the internationally designated sites (Stour and Orwell Estuaries SPA and supporting Cattawade Marshes SSSI) and their qualifying features compared to other options through the National Landscape. Additional factors supporting this selection included the direct route being approximately half the length of western avoidance alternatives, while western routes presented significant technical challenges including greater technical complexity with multiple constrained sections and increased construction complexity.'</i> In respect of Rule 4, the published Holford Rules state: <i>'Rule 4: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees.'</i> The route of the overhead line has relatively limited elevation change throughout its 180 km length with a low point of approximately 9 m AOD at TB246 and a high point of approximately 88 m AOD at TB178. The Applicant's position informed by site visits and as is also apparent from Figure 4.1 (page 50), Figure 5.1 (page 71) and Figure 7.1 (page 103) of 7.18 2022 - Corridor and Preliminary Routeing and Siting Study

Reference	Question	Applicant's Response
		[APP-356] which provide topographical maps for the Project study areas, is that whilst some valleys are crossed the profile does not comprise a sufficient change to be considered as a ridge where the guidance to secure opaque backgrounds is helpful. The route does though follow relatively more elevated ground in a number of locations where it may be perceived to be against a sky background from some viewpoints. Throughout the development of the Project the Holford Rules have been considered in conjunction with information on the presence of constraints, homes and environmental features and the findings of the Environmental Impact Assessment process to inform balanced decision making through which we define our proposals that are refined in response to feedback. We would note that application of the Rules typically involves balancing alternative solutions and considerations which can present conflicting Rule compliance. For example, routeing over relatively higher ground rather than in an adjacent valley may conflict with Rules 4 and 5 but may be appropriate if the valley contains relatively more residential properties with unavoidably close routeing (reducing consistency with the Supplementary Notes) or contains extensive areas of unavoidable ancient woodland or other sensitive environmental receptors, effects on which would conflict with Rule 2. As an example, the first consultation corridor through the Wid Valley (to the east of Ingatestone covering pylons from about TB180 to TB203) was envisaged to be routed through the base of the valley. It has subsequently been modified to pass to the valley side in response to the presence of Grade I heritage assets and areas of ancient woodland with routeing restricted by adjacent residential properties. Inevitably as a consequence of this movement there will be certain views from the base of the valley where the pylons will be seen against more of a sky background. 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. 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

Reference	Question	Applicant's Response
		[APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]).
DES 1.7	Horlock Rules – North Falls and Five Estuaries Were the Horlock rules applied to the proposed substations for North Falls and Five Estuaries? Do they take account of cumulative effects, and if so, explain how.	The Applicant can confirm that its siting studies for the East Anglia Connection Node (EACN) applied the Horlock Rules in a manner that, to the extent that detail was available, considered co-location with customer infrastructure. The ExA's attention is drawn to paragraph 6.3.3 of the 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] which states <i>'The areas included on the short-list were subject to further analysis regarding their potential to accommodate the EACN substation and windfarm substations infrastructure. This analysis considered whether all infrastructure could be co-located within one area, or whether areas within close proximity to each other (approximately 1km) could combine to accommodate all infrastructure. As a result of this analysis, nine areas, grouped into four zones were taken forward to Options Appraisal.'</i> The Applicant would also note that the Horlock Rules (as with the Holford Rules) should be recognised as providing guidance to make a balanced decision given the potential for conflicting consistency with different Rules. Each of the projects must complete its own assessment of effects including the consideration of cumulative effects with other projects. The timing of project submissions means that more detail is available for the later projects than was available for the first. The Applicant acknowledges that these considerations (to the extent they were known at the time) have been examined within the Five Estuaries and North Falls respective DCO submissions, including the relationship between the proposed substations, their siting, scale, and design, and the broader landscape and visual context in which they sit. Given that the location, design and assessment of substations form part of the respective projects' applications, and where the infrastructure is the subject of separate Development Consent Order applications promoted by other parties, the Applicant relies on the assessments and responses provided by Five Estuaries and North Falls in respect of their roles in responding to DES 1.7. The Applicant's own assessment of cumulative effects is set out in 6.17 Environmental Statement Chapter 17 - Cumulative Effects (Final Issue A)[APP-281]

Reference	Question	Applicant's Response
		The Applicant has developed its response in collaboration with North Falls and Five Estuaries and directs the ExA to their individual responses on the application of the Horlock Rules to the proposed substations for those schemes.
DES 1.8	EACN The ExA note the details of the discussions between the proposed development and the two offshore wind farms of Five Estuaries and North Falls, specifically the details within the Interrelationship report [REP1-134]. This states that the projects are liaising to ensure compatibility with landscape mitigation. Provide a plan showing the three proposed substations and combined planting proposals at this stage and state how good design will be provided for cumulatively. Include the Tarchon Interconnector in the same plan or provide justification for not doing so. You may wish to combine your answer with your answer to question GEN1.14. In addition to the above, explain how the design of the EACN would be consistent with Paragraphs 4.7.5 & 4.7.6 of NPS EN-1, especially in the light of Essex CC's comment '...opportunity exists to ensure the appearance of any substantial structures across the proposal... are appropriate for the locations through innovative design and approach to	The Applicant has provided the requested plan in Appendix A to this document. As indicated by the ExA, the Applicant has combined the plan required in response to this question with that required in response to question GEN 1.14. How good design will be provided for cumulatively Good design will be delivered cumulatively across the Norwich to Tilbury Project, North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm, through an established and ongoing collaborative design process. The three projects have entered into a Cooperation Agreement, which extends to providing cooperation in relation to detailed design on landscape and drainage matters, along with other matters. The Applicant shared 7.16 Design Approach for Site Specific Infrastructure (DASSI) [APP-354] with North Falls and Five Estuaries to support coordination. The design parameters set out in the DASSI continue to be reviewed against updates to the offshore wind farm projects' emerging Joint Substations Design Guide (JSDG), led by North Falls and Five Estuaries, to ensure consistency and avoid any conflict between the three projects. The Applicant was named a co-operating partner in the JSDG consultation, has provided formal feedback, and has remained an active participant in the development of the JSDG, which itself is subject to an independent design review. The Applicant provided the offshore wind farm projects with their most recent comments on the second iteration of the JSDG on 17 March 2026, and these will be appended to the next version of the 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134], which is due to be submitted to the examination at Deadline 4. The Applicant's engagement demonstrates a clear commitment to shaping best practice for transmission infrastructure through transparent, multi-disciplinary, and cross-project collaboration. This tripartite approach enables: • A coherent and integrated design language across all three substations • Coordinated landscaping and boundary treatments

Reference	Question	Applicant's Response
	external appearance.” ([RR-1083], paragraph 6.4.3). Also please explain how noise mitigation is to be incorporated into the proposed design of the EACN.	• And a consistent approach to visual mitigation, materials, and layout logic. Together, these measures ensure that good design outcomes are not only achieved individually but are aligned cumulatively between the three projects, resulting in a coordinated design solution across the area. Explain how the design of the EACN would be consistent with Paragraphs 4.7.5 & 4.7.6 of NPS EN-1, especially in the light of Essex CC’s comment ‘...opportunity exists to ensure the appearance of any substantial structures across the proposal... are appropriate for the locations through innovative design and approach to external appearance.’ ([RR-1083], paragraph 6.4.3). The Applicant considers that the answers to first written questions DES 1.3 and DES 1.4 provide the necessary details showing compliance with National Policy Statement (NPS) EN-1 (2024) paragraph 4.7.5. A Design Champion Brief will be included in a future revision of the Design Approach for Site Specific Infrastructure (DASSI) to ensure the site-specific design principles for the East Anglia Connection Node (EACN) Substation are applied post-consent and into operation. The DASSI is a certified document under Schedule 19 in 3.1 Draft Development Consent Order (DCO) [Revision C]. The DASSI clearly demonstrates compliance with NPS EN-1 paragraph 4.7.6 in relation to the design of the EACN Substation, and that it directly addresses Essex County Council’s point about ensuring appropriate appearance through innovative and sensitive design. First, the siting of the EACN has been landscape-led. The DASSI explains that the location benefits from existing vegetation, landform and shelterbelts, and was selected using the Horlock Rules specifically to minimise visual prominence and integrate with the surrounding rural character. Second, visual considerations formed an important part of the decision to adopt Air Insulated Switchgear (AIS) technology at EACN. AIS avoids a large Gas Insulated Switchgear building, reduces massing and height, and provides a more open arrangement that is significantly easier to screen. This is a clear example of taking opportunities to improve the appearance of the development. Third, the DASSI describes substantial Environmental Areas around the substation, including woodland belts, strengthened hedgerows, native planting and landform

Reference	Question	Applicant's Response
		mounding. These deliver both long-term visual integration and biodiversity enhancement. The Year-15 visualisations in the DASSI show how these measures effectively screen the infrastructure. Fourth, the design incorporates nature-inclusive principles, with the Environmental Areas forming part of the Project's Biodiversity Net Gain commitments and long-term ecological management. Finally, the DASSI confirms that there is scope for refinement at detailed design stage, to be secured by Requirement 4 in 3.1 Draft Development Consent Order [Revision C] through the approval of the detailed Landscape and Ecological Management Plan, in terms of detailed layouts and types of proposed planting. Taken together, these measures demonstrate that the Applicant has taken all reasonable opportunities to ensure the appearance of the EACN Substation is appropriate to its setting, fully consistent with EN-1 paragraphs 4.7.5 and 4.7.6 and responsive to Essex County Council's comments. Explain how noise mitigation is to be incorporated into the proposed design of the EACN The proposed EACN Substation would include any required noise mitigation measures by design. Mitigation may include plant selection, siting, screening, and enclosures, as appropriate. Typically, the only equipment generating noise would be the transformers, shunt reactors and the respective cooling equipment as detailed in 6.14.A3 Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259], Section 14.8. Provision has been made for noise enclosures, if required, within the indicative EACN Substation Layout, depicted in 2.6.1 Errata Design and Layout Plans - Subs and Cables [REP1-003]. Further noise assessment would be undertaken based on detailed design information to inform the specific noise mitigation measures for the site. Further detailed assessment is secured in 7.2 Outline Code of Construction Practice [REP2-014], commitment NV21.
DES 1.9	Lighting of new and upgraded substations The ExA notes the rural context of the proposed EACN substation and	As detailed in 7.16 Design Approach for Site Specific Infrastructure (DASSI) [APP-354], paragraph 1.3.33, lighting columns would typically be 12.5 m tall, and all lighting would be designed in accordance with the appropriate design standards.

Reference	Question	Applicant's Response
	notes that there is limited detail in relation to operational lighting in relation to this and other upgraded substations in the Design Approach for Site Specific Infrastructure (DASSI) [APP-354]. • Provide additional detail in terms of the height and type of any lighting installations and light contour plans. • Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity, and potential effects on ecology. If the applicant considers that an assessment is not required, provide a detailed explanation of your reasoning. Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not? Affected Local Authorities may also like to comment.	Luminaires would be directional Light-Emitting Diodes (LED) type fittings. The minimum exterior lighting requirements as set out in the NGET Technical Specifications (TS 1.10.04) are as follows: • Maintained average illuminance: 6.0 lux • Maintained minimum point illuminance: 2.5 lux. Light spillage will be managed by minimising the provision of lighting: keeping to where it is required for tasks, specifying fittings that avoid light spillage, and using controls such that it only comes on when required. This will follow the dark skies strategy: to cut light pollution, its impact on wildlife, prevent wasting electricity, and mitigating visual impact at night. Windows will be fitted with blinds to control light spill if the facility is occupied after dark. During normal operational conditions, all National Grid substations are typically unmanned, therefore the use of the substation lighting on substation buildings or High Voltage compounds during the evening or night time is limited to fault response activities by the call out engineers or security call outs when the security team or police respond to a security alarm; in all other circumstances the substation lighting is off, outside of working hours. Infrequent additional task lighting may be required when undertaking specific maintenance activities. The potential impacts of operational lighting on ecological receptors at the new and upgraded substations (East Anglia Connection Node (EACN), Norwich Main, Bramford and Tilbury North), have been fully assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The potential ecological impacts of operational lighting primarily relate to the disruption to bat foraging and commuting routes. Appropriate bat mitigation for the substation sites, during the operational phase, has been included within the 7.4 Outline Landscape and Ecological Management Plan [REP2-018] which refers to sensitive lighting design for bats. Commitment B06 within the 7.2 Outline Code of Construction Practice [REP2-014], also sets out the lighting design considerations that need to be followed to protect ecological receptors. With mitigation in place the assessment has identified no significant residual effects on any ecological receptors, as a result of lighting at any

Reference	Question	Applicant's Response
		new or upgraded substations, including the EACN Substation, during the operational phase. With regard to night-time effects, the key parameters and assumptions for the landscape and visual assessment are set out in paragraph 13.4.20 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. As noted above, the use of operational lighting associated with the substations and substation extensions would be limited to fault response activities or security call outs, and the default position would be for lighting to be off. No assessment of operational lighting on landscape and visual receptors was therefore undertaken, due to the limited potential for significant effects. Lighting during construction is considered in the landscape and visual assessment in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] and 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]. The Applicant has considered whether it would be appropriate for operational lighting schemes to be subject to approval through a Development Consent Order Requirement. However, in light of the limited and intermittent nature of operational lighting at substations, the absence of routine night-time lighting during normal operation, and the fact that ecological and landscape effects of lighting have been assessed and mitigated through the application documents, the Applicant does not consider such a Requirement to be necessary to make the development acceptable in planning terms. Further detail on lighting parameters and indicative light contours will nevertheless be provided during the Examination by Deadline 4 to assist the Examining Authority and Interested Parties.
DES 1.10	T-pylons (1) The ExA note that in [REP1-069] you imply that it is technically possible to use T-pylons in combination with standard steel lattice pylons, and whilst you have discounted their use, the ExA wish to explore this further:	• In response to the first two bullets a) How were the eight areas identified and why were other areas not chosen? And b) whether areas around Ingatestone were considered? – 7.21 Errata 2024 - Design Development Report for the Project Appendices [REP1-069] This document includes Appendix C that reports on a review of the whole route of the Norwich to Tilbury Project for locations where T-pylons may provide the potential (through applying the mitigation hierarchy) to mitigate

Reference	Question	Applicant's Response
	Therefore, please explain: • How the eight areas assessed were chosen and why other areas were not; what was the criteria for choosing these sections of the route for consideration and were any other stretches of the route considered for their use, and if not, why not? • Were they considered for the area around Ingatestone, and if not, why not? • Whether the use of both pylon types would be a simple hybrid solution or whether additional infrastructure is required between the two types of pylons. • If additional transition infrastructure is required, explain what this is and provide plans showing the appearance of these structures and where they would need to be located for each transition. • Are there any technical constraints to a more recessive colour being used (noting that they are generally light grey). • In addition, provide visualisations to support your claim that T-pylons would not mitigate landscape and visual effects. Use	landscape and visual effects and which were not expected to be limited by technical constraints such as excessive angle of directional change or presenting additional challenge to the requirements for additional vehicular access. They are taken forward as part of the mitigation hierarchy because of their additional cost (see paragraph 2.5.9 in 5.15 Design Development Report [APP-122]) and other considerations noting they are not a solution suitable for every location. – Because of their consideration via the mitigation hierarchy the initial consideration was focussed on excluding sections where the general alignment characteristics and technical suitability of T-pylons was compromised by, for example, sharp angle changes. As such there were no inclusion criteria to identify sections to consider because the whole route was considered. The following five broad sections were identified as having potential suitability for T- pylon: ○ Tacolneston to Shelfanger ○ Diss ○ Gislingham to Stowupland ○ Fuller Street to Coggeshall ○ Bulphan to Horndon on the Hill. It follows that the remainder of the route including the following sections do not meet all aspects of the context specific circumstances where T-pylon may have some potential, in particular the greater changes of direction, crossings of electrified rail lines, etc. This includes: ○ EACN Substation to Great Horkesley ○ Chelmsford North ○ Brentwood to Ingatestone. – In respect specifically of the area around Ingatestone this requires crossing of the A12 and two sections of electrified rail line as well as a number of larger changes of direction. Taken together they are considered to provide a technically unsuitable area for the use of T-pylon.

Reference	Question	Applicant's Response
	some of the following VP's to illustrate this (worst-case scenario examples): 1.07 to 1.12; 1.14, 1.15, 2.06 to 2.12; 5.04, 5.05, 6.13 to 6.16; 7.08, 7.09, 7.12	Having identified locations with potential for the use of T-pylons, the Applicant then applied the mitigation hierarchy. It does this in response to its duties to be economic and efficient and in light of the independent report on the Comparison of Electricity Transmission Technologies: Costs and Characteristics¹⁴ which identified the T-pylon lifetime costs are around 1.6 to 1.7 times that of a conventional overhead line. Ultimately the conclusion drawn, where overhead line was the preferred connection technology, was that lattice pylons were consistent with planning policy and the need to mitigate for unacceptable effects is not engaged. Can the two pylon types be used as a hybrid solution or is additional infrastructure required? They can be used as a hybrid solution; however, transitions from lattice to T-pylon sections are generally via two additional angle structures. In other words, we would need to go from a lattice angle pylon to a T-pylon angle structure where these might not have been required (suspension pylons would have been sufficient) if the transition was not made. There would be changes to the maintenance access requirements due to the different access needs for the T Pylons. Also, the conductors will go from vertical configuration to delta configuration with a more complex (criss-cross arrangement in that transition span potentially increasing visual effects. The image below shows the transition from lattice pylon to T-pylon on the Hinkley Connection Project adjacent to the M5. 

¹⁴ Institution of Engineering and Technology (2025) *Comparison of Electricity Transmission Technologies: Costs and Characteristics*

Reference	Question	Applicant's Response
		Transition pylon requirements and plans With the conclusion reached that lattice pylons were the appropriate pylon type for the Project, there was no further development of detailed design arrangements, modified directional changes nor consideration of preferred locations for transitions between pylon types. Are there technical constraints to use of a more recessive colour? No, any colour scheme can be adopted. Across the world vertical tubular supports are noted to adopt different colour schemes. Graduated changes from darker to lighter as well as other solid colours such as green schemes have been used. It is generally accepted that matt grey shades seem to recede into the background best over time given average UK climatic conditions. To date T-pylons have only been adopted for one the National Grid Electricity Transmission Network on the Hinkley Connection Project. The National Grid (Hinkley Point C Connection Project) Order 2016 includes at Requirement 36 'All T-pylons must be painted Agate Grey (RAL 7038) in a low reflectivity finish unless a different colour or surface finish is otherwise agreed with the relevant planning authority' T-ylon visualisations that support the claim that T-pylons would not mitigate landscape and visual effects. The Applicant's position is that the appropriate basis for decision-making between pylon types is not a comparative exercise intended to demonstrate a reduction in landscape and visual effects through the use of one type against another. Rather, in accordance with the mitigation hierarchy and established NSIP policy, alternative design solutions such as T-pylons only arise for consideration where the effects of the assessed solution (in this case lattice pylons) are found to be unacceptable in policy or environmental terms. The Applicant's assessment is that this threshold is not met. The landscape and visual effects of the proposed lattice pylons have been fully assessed within the Environmental Statement, supported by viewpoint photomontages that are representative and proportionate to the scale of the Project and the receiving landscapes. That assessment concludes that, while effects are acknowledged, they are not unacceptable in policy terms.

Reference	Question	Applicant's Response
		Given this position, and noting that the Project has been optimised or lattice pylons, no equivalent optimise T pylon design is available. The Applicant does not consider it necessary or proportionate to prepare additional visualisations for an alternative pylon form that has not been selected and is not relied upon to make the Project acceptable. However, the Applicant will continue to engage constructively with the Examining Authority should further clarification be required on the assessment approach or the application of the mitigation hierarchy.
DES 1.11	T-pylons (2) Provide further information on the decision to not utilise T-pylons. Specifically: - It is stated that Ofgem funding requires that the lowest cost acceptable design is taken forward rather than a more expensive design even if that design is perceived to reduce the level of effect. What and who defines 'acceptable' in this context? - The list of advantages of T-pylons does not include design benefits. Is there any evidence that the design of T-pylons is preferred in general to that of standard lattice pylons? - Does the single construction/anchoring point of T-pylons have land use benefits? - How has the reduced construction time and reduced footprint of T-	The Applicant's responses to the various elements of the question are set out below. Basis for decision not to use T Pylons The decision-making is in response to our duties under the National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024) policy framework, including the further critical national priority presumption in Section 4.2 of EN-1. The NPS position is also consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. It also draws on duties under the Electricity Act 1989 to be economic and efficient which is under the oversight of Ofgem who confirm the acceptability of the Project funding. To support this decision making in a consistent manner we adopt an evidence-based approach informed by the Environmental Impact Assessments from technical topic experts. In particular there is an emphasis from assessments being undertaken by specialists in Landscape and Visual and Historic Environment. We consider the assessment findings in the context of the application of the mitigation hierarchy. As an example, to the west of Little Waltham we assessed that the standard lattice pylon would be considered to lead to less than substantial harm (but at the higher end of that scale) on the adjacent Grade II Langleys Registered Park and Garden and less than substantial harm (but at the mid part of that scale) for Grade I Langleys. We then applied the mitigation hierarchy and considered alternative pylon types. In this case we concluded that effects were reduced to mid or lower ends of the scale of less than substantial harm respectively by the use of lower height lattice pylons and we did not therefore need to consider further progression up the hierarchy to T-pylons. The basis for not continuing up the mitigation hierarchy lies with the residual effects that remain following the application of the mitigation hierarchy which therefore fall to

Reference	Question	Applicant's Response
	pylons been assessed in the cost/benefit exercise?	the planning balance. Paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. NPS EN-5 (2024) paragraph 2.9.11 is also explicit that mitigation is not expected to result in the removal of landscape and visual effects for overhead lines <i>‘and the impossibility of full mitigation in these cases does not countermand the need for overhead lines’</i>. The above aligns with the Bramford to Twinstead Development Consent Order, where the Examining Authority and the Secretary of State were similarly satisfied that there is no requirement in policy to compensate all residual landscape and visual effects. Evidence of design preference Through the consultation process we did not gather any statistical evidence for this preference. However, based on anecdotal evidence we would suggest • There were mixed views expressed with some stating preference for lattice and others for monopole – the latter often based on a preference based on perceptions of T-pylon's modernity • Opinions appeared to modify when the potential to view against different backdrops was discussed with perhaps some recognition that different types may sit better in different landscapes. The Applicant does not take the stance that the design of T-pylons is preferred in general to that of standard lattice pylons. The use of T-pylons is not the standard starting point for National Grid, reflecting the additional constraints they introduce, including higher construction costs, greater access requirements for maintenance which in some cases require the need for additional permanent land take. These points are expanded on further below. As a result, the selection of T-pylons is not driven by design preference. Rather, T-pylons may be considered selectively where, through application of the mitigation hierarchy, landscape and visual mitigation is identified as necessary in a specific location, and where the use of T-pylons is essential despite the additional constraints they bring. Any such benefits are therefore context-specific, relate to their potential role in avoiding or reducing effects in particular circumstances, and do not amount to evidence of a general or inherent preference for T-pylons over standard lattice pylons.

Reference	Question	Applicant's Response
		Monopole and land use benefits T-pylon foundations comprise a buried concrete foundation to which the monopole is attached, whereas lattice pylons typically have columnar foundations at each corner to which the legs are fixed. In grazed land, the loss of productive land is likely to be broadly comparable between the two pylon types (with stock able to graze under the lattice pylon). In cropped land, there may be greater loss of productive land associated with lattice pylons due to the footprint of the multiple foundations. However, the configuration of conductors on T-pylons has implications for inspection and maintenance activities. Unlike lattice pylons, which can generally be accessed by climbing, T-pylons are not climbable and therefore require the use of a Mobile Elevated Work Platform for routine maintenance and inspection, and in some circumstances a crane. This results in more extensive access and working area requirements, including access tracks capable of accommodating heavier vehicles and suitably stable work pads where ground conditions require. By contrast, maintenance access to lattice pylons can typically be achieved using lighter vehicles, often a four wheel drive vehicle with a trailer, with more limited access and ground preparation requirements. As a result of these operational considerations, the overall land use requirements associated with T-pylons and lattice pylons are considered to be broadly comparable, and there is therefore no overall land use benefit arising from the adoption of T-pylons. Reduced time and footprint implications for cost/ benefit decision making. The use of T Pylons has been on one project to date in the early stages of its operational life. The Applicants experience indicating that any potential reductions in footprint for T pylon are countered by the access requirements for maintenance. On balance the Applicant's position is that it is neither seeing particular advantages nor disadvantages that lead to a modification of the position of T pylons towards the upper end of the mitigation hierarchy.

3. Alternatives

Table 3.1 Alternatives

Reference	Question	Applicant's Response
ALT 1.3	Strategic options: Offshore 1 Many of the local authorities and a large number of IPs have expressed that they would prefer the offshore option as an alternative to OHL infrastructure between Norwich and Tilbury. Could the local authorities please clarify if they have reviewed the strategic options appraisal and the 2025 updates to the Strategic Options Backcheck and Review (SOBR) (including Appendix B: 2024 version, section 14) [APP-355] in relation to 'Offshore 1'. The ExA is aware of the local authorities' assessment of cost and timing as set out in the Hiorns Report as appended to the RR from Norfolk CC [RR-2753]. However the ExA seeks the views of local authorities in relation to the constraints (environmental, social and technical) which may affect the delivery of this option as set out in the SOBR (as set out in section 14 and summarised in	The Applicant can update the ExA in respect of paragraph 6.1.2 from 7.17 Strategic Options Backcheck and Review [APP-355] which noted that '<i>routeing a new connection from an offshore cable route into the Tilbury substation is becoming increasingly constrained. New built development, approved development applications (such as Tilbury Freeport), undetermined, as of July 2025, planning applications and the potential for environmental designation, are all providing increasingly restrictive constraints to future connections seeking to make a landing point from the marine environment into Tilbury substation.</i>' It is noted that the paragraph was drafted following the 2024 statutory consultation and consideration of feedback ahead of the Development Consent Oder (DCO) submission. Since this time the Applicant can confirm the following: • The A122 (Lower Thames Crossing) Development Consent Order 2025 was granted and came into force on 15 April 2025. This infrastructure is crossed by the Project alignment to the south of Orsett Golf Course and also routes past the east side of the existing Tilbury Substation • 25/00598/FUL - Land Part Of Tilbury Energy Centre (Tilbury 3) Fort Road Tilbury Essex - Hybrid planning application, comprising (1) in the Outline element the following phased development: B2 General Industrial and B8 Storage & Distribution including external storage and ancillary offices, Port-related uses including general haulier parking and a CMAT (Construction Materials and Aggregates Terminal); AND (2) in the Full element the following enabling infrastructure and other works: access and Port estate roads, a rail terminal connecting to the Tilbury2 railway siding, land re-grading and development platforms, utilities, drainage and ecological mitigation. This is shown on the plan below but is awaiting a decision.

Reference	Question	Applicant's Response
ALT 1.4	Contracted connections: the Essex Coast Generation Group Paragraphs 3.7.17 and 3.7.18 of the SOBR [APP-355] refer to National Grid's contracted connections for a total of 3,480 Megawatts (MW) of total newmgeneration from the following energy projects (the 'Essex Coast Generation Group'). • North Falls Offshore Windfarm (1,000 MW by 2030) • Five Estuaries Offshore Windfarm (1,080 MW by 2030) • Tarchon Energy Limited Interconnector (1,400 MW By 2030) At the time of writing, there has been no decision on the North Falls application, and the Planning Inspectorate's National Infrastructure Project webpage for Tarchon Interconnector indicates that submission of the application is expected in January 2028. The applicant is asked to: a) Provide an update to whether it is feasible that any of the above projects would provide the expected amount of new energy generation by 2030, and if not, how any delays would affect its assessment of alternatives.	Response to Part a The Applicant pursuant to its Transmission Owner Licence Condition D4A '<i>Condition D4A: Obligations in relation to offers for connection etc</i>' is obliged to provide the following information to the National Energy System Operator (NESO): • Indicative date of connection • Indicative point of connection • Such further information that may be appropriate. It is then the NESO obligation under its System Operator Licence E12 '<i>Requirement to offer terms</i>' to give the customer an offer for connection which they sign. This then becomes our contractual obliged offer of connection that NESO, the Applicant and customer are required to meet. The Applicant's Transmission Owner Licence Condition D5 '<i>Prohibition on engaging in preferential or discriminatory behaviour</i>' does not allow us then to discriminate in any form '<i>in meeting its obligations under standard condition D4A (Obligations in relation to offers for connection etc)</i>'. This includes public comment on generation abilities to meet dates, such that any comment may discriminate on any generator's ability to fund, consult or gain required permissions for their project As of 26 March 2026 the Applicant's contracted position as recorded on the NESO Transmission Entry Capacity (TEC) Register and the NESO Interconnector Register is: • North Falls Offshore Windfarm (1,000 MW by 2030) • Five Estuaries Offshore Windfarm (1,080 MW by 2030) • Tarchon Energy Limited Interconnector (1,400 MW By 2030). The application for an electricity connection is completely independent of the planning requirement for such a connection. Applications for connection to the transmission system are often made before any planning application and a planning application is not required to receive an offer for connection. It is for the company applying for a connection to manage their own planning application and seek to modify the dates of their transmission connection offer should that process provide different timescales to the contractual connection date. They would need to do this to avoid penalties and costs associated with paying for the transmission capacity that they have secured by

Reference	Question	Applicant's Response
	b) Clarify the reasons for initial selection of the Tendring peninsula (and then for zone A) for the EACN together with the East Coast Generation Group. c) Provide details of the timing of the selection of the sites for the three projects in respect of the production of the strategic options in the Corridor and Preliminary Routeing Siting Study (CPRSS) in 2022, given that North Falls and Five Estuaries were not submitted to the Planning Inspectorate until 2024 and Tarchon Interconnector is yet to be submitted. The applicant is also directed to ExQ1 GEN 1.20 which requests SoCGs with North Falls and Five Estuaries.	their contracted date. This is known as a termination charge and includes any liability fees incurred if a project is cancelled or reduced in capacity, covering costs for work already carried out, paid to the NESO. Any changes to contractual dates are reflected in the TEC and Interconnector Register. A customer can undertake a change in date through a modification application to their contract, at which point the applicant is free to reflect changes in Need or Timing, based upon information the customer provides which may reflect information which may be in the public domain, this would not change the connection location or works if only a date change is required. Response to Part b We would note at the outset that the Applicant is only responsible for the siting of the EACN Substation, but acknowledges that as the EACN provides the connection point to generation customers there is a reasonable assumption that the substations of those other developments (the Essex Coast Generation Group) will be located in close proximity. At the initial siting stage we obtained information on permanent land requirements from the contracted customers and factored this into the process to ensure that there was potentially enough space for multiple substations. The securing of consent for the two other substations for North Falls and Five Estuaries rests with their respective developers and similarly it rests with Tarchon to site and secure consent for its convertor station. The Project responds to a two part need case to reinforce boundary transfers with a Norwich to Bramford to Tilbury double circuit connection and to connect the Essex Coast Generation Group. An integrated solution is one of many factors in reaching a preliminary preferred 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] providing the connection with less infrastructure than separate projects. This required the identification of an EACN location which is summarised in overview with further detail in the Design Development Report (APP-122) and the ES alternatives chapter (APP-130). The general location of a connection point reflects the location of the generation sources and the Transmission System. The independent NESO (then ESO) identifies the general location and issues Connection Offers which, once signed by the customer, are responded to by the Applicant who completes detailed siting (either on the existing Transmission System or at a new location linked by new 400kV

Reference	Question	Applicant's Response
		connections) and routeing (of the 400kv connection if required) to identify an optimum solution. EACN (general siting) is set out in page 22–23 of 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] and provides the reasoning for the selection of the Tendring Peninsula for the connection in view of, at the time, the North Falls and Five Estuaries wind farm connection agreements, due to the location of these generators and the customer connection works indicating the general location for connection. The conclusions from page 23 were <i>‘Overall the appraisal concluded that options associated with Clacton landing points and EAC nodes in Tendring District are preferred. These locations, in combination with the required onshore connections from the node to the NTS, are more compliant with Holford and Horlock routeing and siting guidance, in particular by offering greater potential to avoid and minimise effects on AONBs than would be the case with Felixstowe landing points.’</i> Potential sites were identified throughout the Tendring Peninsula with Zone A (combining a number of adjacent blocks for potential development) emerging as being preferred following a selection process. This is then subject to ongoing back-check and review. Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. In making decisions the Applicant notes that: • Siting and routeing should consider the effects and costs of 400kV connection infrastructure as well as how that influences the customer connection infrastructure and make a balanced decision. • Connections closer to the coast require two points of connection to the Transmission System. • The absence of nationally designated landscapes means the strong starting presumption for overhead lines (NPS EN-5) for connections on the Tendring Peninsula is not reversed. As a result, any site, beyond where they may impact the setting of a Nationally Designated landscape, is expected to require parallel 400kV overhead line connections. The preliminary location for the EACN Substation (Zone A) was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] in Section 6 as part of an iterative process. That document identifies the alternative sites

Reference	Question	Applicant's Response
		considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant's position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. The selected location east of Ardleigh balances the effects arising from 400 kV connection corridors and substation for the Applicant and the needs of those with signed connection agreements who will connect at the EACN. It took into consideration the installation of one of the Applicant's connections by underground cable to Zone A but the likely need for an onward double overhead line down the Tendring Peninsula to progress sites closer to the coast. Given the potential for co-location of customer infrastructure, sites were not progressed if they were individually too small and were subsequently clustered into zones. Zone A had the scale to potentially accommodate both the Applicant's and some of the other customer infrastructure. The Tarchon interconnector signed connection agreement came in after the CPRSS but as it sought to make landfall in a similar location to North Falls and Five Estuaries, with the proposed EACN having sufficient capacity to accommodate this connection, it was highly coordinated, economical and efficient to offer Tarchon a connection to EACN. At the time of responding (Prior to deadline 3) no information on Tarchon siting was available. Response to Part C Chapter 6. 'East Anglia Connection Substation Study Options Appraisal' pages 87–101 in 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] sets out in detail the selection of locations for the EACN given the generation and interconnection offers made at EACN: • North Falls Offshore Windfarm (1,000 MW by 2030) • Five Estuaries Offshore Windfarm (1,080 MW by 2030) • Tarchon Energy Limited Interconnector (1,400 MW By 2030). Pursuant Transmission Owner Licence Condition D4A '<i>Condition D4A: Obligations in relation to offers for connection etc</i>' as detailed in Part a above. Also set out in Part a, is that this process is independent of the planning process for the named connections

Reference	Question	Applicant's Response
		above, which is for the developers of those projects to seek any funding or permissions required to deliver their projects. As noted in Part b above Five Estuaries and North Falls were the first connections to require the EACN substation to be developed as referred to within 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]. The Tarchon connection was subsequent to this date and not referred to within the CPRSS; however, it was captured in both 7.19 2023 - Strategic Options Backcheck and Review [APP-357] and 7.17 Strategic Options Backcheck and Review [APP-355]. As referred to in Part b, the Tarchon interconnector connection agreement was signed after the CPRSS but as it sought to make landfall in a similar location to North Falls and Five Estuaries, with the proposed EACN having sufficient capacity to accommodate this connection, it was highly coordinated, economical and efficient to offer Tarchon a connection to EACN. The timing and submissions to the Planning Inspectorate in respect of these projects is a matter solely for these developers, who may seek to modify their connection dates through the connections application process if they are at risk of missing contractual date, which will then be reflected in the relevant NESO TEC or Interconnector Register. The Applicant is compelled to respond to the contracted dates within connection agreements, and is aware of no information to suggest that the dates will not be met. However it is essential to repeat the point made at the start of response (a) above, which is that there are two parts to the need case which are responded to through an integrated connection. Even if one or other customer did not meet the connection date, the wider reinforcement is needed to the identified programme.
ALT 1.5	Direct current underground cables The CPRSS [APP-356] sets out that direct current underground cables have advantages over alternative current (AC) cables in respect of the land-take required, but would require specialised cable infrastructure and above ground and permanent	7.18 2022 - Corridor and Preliminary Routing and Siting Study [APP-356] states that <i>'HVDC onshore cables have advantages over AC cables having significantly less land take, and therefore somewhat lower environmental impact.'</i> (paragraph 1.3.11). However, this comment only applies where HVDC onshore cables are used over a long distance, which is their typical use. The benefit in terms of land take of high voltage direct current (HVDC) onshore cables as opposed to high voltage alternating current (HVAC) onshore cables is the potential reduction in construction swathe due to the lower number of cables required. For a

Reference	Question	Applicant's Response
	structures in the form of converter stations to be constructed which have financial as well as environmental costs. Testing of this option in the CPRSS was based on a whole-route solution in strategic options within the eastern theme, however it is unclear if this has been costed for the underground section of the proposed development through the Dedham Vale National Landscape (NL). The applicant is asked to provide a summary of the difference in costs between an AC and direct current option through the NL, with an indication of the potential location and scale of converter stations that would be required at each end of the cable route in order to connect up with the OHL as proposed.	comparable 6 GW HVDC connection an illustrative construction swathe of 85 m would be expected for standard open cut installation; details are provided in 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139] Annex C Figure C1. In comparison 2.6.1 Design and Layout Plans - Subs and Cables [APP-041] National Grid Drawing Reference AENC-MMAC-ENG-DWG-0085-01, shows an illustrative construction swathe of 120 m. The reduction in temporary land take of the construction swathe for an HVDC installation is therefore 3.5 ha per km less than the equivalent HVAC installation. Due to the transmission network within the UK being an HVAC system, any HVDC connection would require converter stations to be constructed at either end of the HVDC onshore cable section. Based on 2 GW converter stations currently proposed on HVDC projects within the UK, a typical footprint for the 2 GW converter compound would be 8.75 ha. Three 2 GW converter stations would be required at each end of the cable section to accommodate the 6 GW capacity required. Therefore, a typical footprint for a 6 GW system would be 26.25 ha at each end. In addition to this compound area (fenced compound) for the converter stations, additional land take is required for drainage, landscaping, access and construction enabling works such as a construction compound. Given these additional land take requirements, a total typical area of 45 ha is considered suitable at each end of the cable section, in assessing the land take needs for a 6 GW group of converter stations. Therefore, the total additional land take required for an HVDC onshore cable project, in comparison to an HVAC onshore cable project, is 90 ha. The additional land take required for HVDC converter stations is only balanced in land take terms with a project length of 25.7 km. However, given that the majority of the HVDC additional land take is permanent and the majority of the reduction in land take is temporary use only, in reality a much longer cable section would be required to balance the environmental impacts. The Applicant has not considered the siting of converter stations for these short sections of underground cable, but for the purposes of comparison assumes locations aligned with the CSE to the north of the Dedham Vale and the EACN to the south. A section of HVDC onshore cable through the Dedham Vale National Landscape would require a 45 ha area for the northern converter stations in the proximity of the

Reference	Question	Applicant's Response
		Wenham Grove Cable Sealing End Compound (6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] Section C page 28) and another 45ha area in the proximity of the East Anglia Connection Node (EACN) Substation (6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] Section C page 33). Using the proposed Project corridor this would require an approximate HVDC onshore cable project length of 20 km. Therefore, any benefit from a reduced temporary construction swathe would be negated by the land take for the converter stations. 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 net present value (NPV) of losses, and 40 year NPV of maintenance costs for all technologies. Below is the calculation using the model set for Appendix D for the consideration of circa 20 km of cable undergrounding on the route which would include the Dedham Vale National Landscape. Appendix D prices 2020/21 costs • 20 km AC Cable connection (3,465 MVA per circuit 6,930 MVA for the two circuits (of 18 conductors in total) = £815.4m • 20 km HVDC Cable connection (3 x 2 GW HVDC links – 6 GW total, 3 x 2 GW convertor stations each end, 3 bi-pole pair cables – 6 cables total) = £1,788.5m. Therefore, HVDC rather than AC cables will cost more than two times the amount, with the impact of reducing cable land take but requiring six large convertor stations with their own environmental impact. When land is reinstated, following the installation of 18 AC or 6 HVDC cables, the visual impact would be identical, and land use identical so overall this would present no benefit. HVDC is more expensive than AC and would add the impact of six large convertor stations in the area.
ALT 1.6	Reasonable alternatives: IP suggestions The reasonable alternatives which informed the 2023, 2024 and 2025 preferred draft alignment are set out in	Following careful and detailed review the Applicant has not identified any: new reasonable alternative routes; route / technology combinations; sites for CSEs; or sites for the East Anglia Connection Node (EACN) from the responses indicated by the ExA from respondent IPs at the various locations. Indeed, the Applicant would note that all those alternatives indicated have been considered and reported on in

Reference	Question	Applicant's Response
	tables 3.15, 3.16 and 3.17 of ES chapter 3 [APP-127]. The applicant is asked to review whether any other reasonable alternatives in respect of specific sections of the route or location of substation or cable sealing end (CSE) infrastructure have materialised and been considered since production of the ES, after having reviewed the comments from IPs which put forward alternative suggestions which may differ from those already considered in tables 3.15, 3.16 and 3.17, including the following: - Alternative routing around Chelmsford: the North-West and South-West of Chelmsford Parishes Group [RR-2765], [REP1-260], [REP1-261], [REP2-038] and other IPs - EACN at Ardleigh: Tendring DC [RR-3608], [REP1-182], [REP2-041], Ardleigh PC and Little Bromley PC [RR-0300], [REP1-145] and other IPs - Waltham Gap (numerous IPs) - Dedham Vale: Villages Against Pylons [RR-3780], [REP1-282], [REP2-061] and other IPs	detail at various stages of the Project's development. This includes the 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356], the 2025, 2024 and 2023 Design Development Reports [APP-122, APP-359 and APP-358]. Some comprise existing reasonable alternatives, whereas others have been ruled out as not being viable for a range of reasons. IPs may disagree with the conclusions and retain a preference for an alternative but the Applicant's position is that the available evidence does not support a change. We have responded to the various representations in material to be submitted at Deadline 3. In summary and picking up the main themes the Applicant's position is that: - Alternative routeing around Chelmsford, such as raised by the North-West and South-West of Chelmsford Parishes Group: Whilst conceptually possible in certain sections there are also locations where there is no reasonable solution to secure a route for either 400 kV cable or overhead lines. Rationalisation to adopt the alignment of existing 132 kV overhead line does not resolve the constraint. Even if these were overcome the onward connection either has to reconnect to the Project alignment or continue alongside an existing connection. The former may address the perceived concern at the Waltham Gap but transfers the effects to other similar receptors and the latter encounters multiple other blocked parts of the possible corridor. ES Chapter 3 Table 3.8 and the Design Development Report (APP-122) from paragraph 9.2.2 provide further detail. - EACN at Ardleigh: The IPs favour an alternative site; however, the Applicant's position is that the alternative site may remove some effects but replaces them with others. It also presents the Applicant and connecting customers with additional construction risks, reduced future flexibility and has implications for Project programme. See the Design Development Report (APP-122) from paragraph 6.5.8. - Waltham Gap (numerous IPs): This is linked to the first point about alternative routes around Chelmsford. In addition to those mentioned in the first bullet point above a route passing to the west of the Waltham Gap and various suggestions about underground section have been raised. The Applicant's position is that all these alternatives have been considered previously. In summary, the effects arising from overhead lattice (including some low height pylons) do not engage the tests in paragraph 2.9.23 of National Policy Statement (NPS) EN-5 (2024) to

Reference	Question	Applicant's Response
		consider a change to underground cable. Alternative routes provide a different balance of effects but with additional route length and are less preferred. See the Design Development Report (APP-122) in paragraph 9.2.4 and from paragraph 9.2.5. • Dedham Vale: Villages Against Pylons and other IPs. Covering EACN siting but also alternative routeing: Routes around or through the National Landscape have been considered though must be viewed in combination with the onward route to Tilbury. With Habitats Directive designations restricting options to the south of Colchester, routeing around the National Landscape requires two connections within the same corridor which is not achievable to the north of Colchester or the onward route to impact the designations to the south. The preferred design utilises the route north of Colchester for the onward connection to Tilbury and a route through the National Landscape, that accords with policy in NPS EN-5, for the connection to the EACN. Further detail is provided in response to WQ LV 1.15 element c)
ALT 1.7	Waveney Valley alternative Reasonable alternatives considered in ES chapter 3 [APP-127] as part of the 2024 (table 3.16 p.89-90) and 2025 (table 3.17 p.106) preferred draft alignments set out the applicant's reasoning for rejection of the use of an underground cable through the Waveney Valley instead of an OHL and pylons. This includes the presence of sensitive peat habitats and paleoenvironmental remains, and hydrological impacts on Wortham Ling SSSI. • The local authorities are asked to provide comment, as these issues	Pre-application consultation responses raising concerns that contributed to the rejection of the Waveney Valley Alternative (WVA) have been identified and are listed below. For context the WVA was consulted on during the 2024 statutory consultation by the Applicant. The WVA included a section of underground cable between approximately RG84 and RG90. Details of the comments received and the Applicant's response to those comments are provided within 5.1 Consultation Report [APP-066]. Reference numbers for comments in 5.1 Consultation Report [APP-066] which raise points regarding the WVA have been identified below: • 9-2.1380, 9-2.1734, 9-2.1735, 9-3.58, 9-3.190, 9-4.96, 9-4.204, 9-4.238, 9-4.246, 9-4.309, 9-4.362, 9-4.373, 9-4.374 and 10-22.78. Due to data protection regulations the Applicant is unable to identify the respondents beyond confirming that over and above individuals and organisations responses were received from (in alphabetical order): Essex place services; Mid Suffolk District Council; South Norfolk and Broadland District Council; Suffolk County Council; Suffolk Wildlife Trust.

Reference	Question	Applicant's Response
	do not appear to have been covered in their LIRs. - Natural England is asked to comment on the applicant's ecological considerations in its reasoning for rejection of the Waveney Valley (underground) alternative as set out in ES chapter 3. This should include comment on whether potential effects on peaty soils would constitute irreplaceable habitat loss. - The applicant is asked to signpost the ExA to any pre-application consultation responses on such matters which led to its rejection of the Waveney Valley alternative.	The decision on the WVA was also informed by other survey findings and through engagement with Statutory and non-statutory bodies noting that such engagement discussions may not have featured in their respective consultation responses.
ALT 1.8	Other site specific alternatives A number of IPs in their RRs have suggested moving small sections of the pylons and OHLs to reduce effects on their individual property, land or business, as well as certain landscape features. The applicant is asked to provide a table which sets out all such specific requests, and indicate whether such relocation is possible within the limits of deviation of the order limits. If not possible within the order limits, the applicant is asked to provide within the table a response to	In summary, the Applicant has provided a table (Appendix D) which lists those suggested changes identified in RRs, as well as previous rounds of consultation, where there is scope to potentially respond within the Order Limits and proposed Limits of Deviation to reduce effects for the benefit of the particular Interested Party (IP). The caveated nature reflects the need to retain Limits of Deviation pending the completion of location specific investigations and detailed design. The Development Consent Order (DCO) Project has been developed with extensive input from feedback with stakeholders ranging from landowners, residents, non-statutory and statutory bodies. Feedback at all stages has been comprehensively reviewed with the Applicant responding to consultation feedback received covering changes ranging from wholesale route changes to individual pylons and temporary works locations. This has resulted in a substantial number of modifications being made to reduce effects on individual property, land or business, as well as on specific landscape and other environmental (including socio-economic) features. The Applicant's response to those suggested changes was set out in detail in the 5.1

Reference	Question	Applicant's Response
	each IP which explains why such a relocation is not possible.	Consultation Report [APP-066] and Design Development Reports [2025 in APP-122, 2024 in APP-359 and 2023 in APP-358]. In a number of cases, IP respondents continue to present in their relevant and written representations a preference for changes (that have previously been comprehensively considered but confirmed as less preferred) that are outside the Order Limits or Limits of Deviation relating to specified works or outwith the technical design parameters that are reflected in the DCO application (for example excessive span length). In the absence of any further evidence having been provided, the Applicant is confident that any changes suggested, that would fall outside of the Limits of Deviation, Order Limits or technical parameters, have already been considered by the Applicant through the multiple rounds of consultation and engagement and are suitably covered within the existing Consultation Reports and Design Development Reports. As an example, the landowner in the area of pylons TB175 to TB180 has raised at most consultations and in Open Floor Hearings a preference for an alignment to the west. The Applicant has stated in the Design Development Report (APP-122) at paragraph 9.3.4 their response, building on a response in a previous DDR. In keeping with typical application practice (and in line with the use of the Rochdale Envelope), the design set out in the application has been developed in a proportionate manner (i.e. a design appropriate for the application but not a full engineering design) with revision within the 3.1 Draft Development Consent Order [Revision C] Limits of Deviation providing flexibility to respond to as yet unknown physical characteristics of the particular location. As a result, there are also some smaller changes requested by respondents (within Limits of Deviation) where there remains some scope for adjustment either partly or wholly in line with the requests made. Because some of these potential changes may be close to the maximum Limits of Deviation, we have to date been cautious in the ability to make such changes when there remains uncertainty about the physical characteristics and potential that the change may not be able to be implemented due to the new build nature of the project. The actual physical characteristics that influence such decisions on micro-siting will be identified by the completion of location specific intrusive investigations and subsequent establishment of detailed design and construction methods by the Great Grid Partnership (the Applicant's delivery partner). Confirming these characteristics presents an opportunity, where no unforeseen physical characteristics are identified,

Reference	Question	Applicant's Response
		to complete further micro-siting of pylons within the scope of the Limits of Deviation and taking into account adjacent pylon adjustments. This potential for further reduction of effects will be considered through detailed design and informed by site specific discussions between the Great Grid Partnership and the relevant landowner(s). It is acknowledged that some of the potential changes are not on land under the control of the IP. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, socio-economic, environmental and constructability considerations. Only changes that remain within the Limits of Deviation sought shall be implemented. The Limits of Deviation are provided for all pylons, noting that in some locations the flexibility to change the design is limited where the Applicant has outlined prescriptive restrictions to the Limits of Deviation within commitment GG34 in Table 6.1 of 7.2 Outline Code of Construction Practice [REP2-014]. Those locations that the Applicant has recorded to date for specific consideration, as identified from representations, are noted with Appendix D Additional Detailed Design Requests Table which provides the basis for the record of engagement referred to above.

4. Air quality and emissions

Table 4.1 Air quality and emissions

Reference	Question	Applicant's Response
AQ 1.1	Air Quality - Outline Code of Construction Practice (CoCP) and Proposed Mitigation ES Chapter 7 at Section 7.6 sets out 'proposed mitigation', with paragraph 7.6.6 highlighting the outline CoCP contains relevant standard/ good practise measures relating to air quality. Under the heading 'Site Management', the ExA notes a "Record of all dust and air quality complaints, identifying cause(s), take appropriate measures to reduce emissions in a timely manner and record the measures taken" is listed as standard mitigation. The applicant is asked to: a) Signpost where in the submitted documentation it is confirmed who will be responsible for undertaking the recording of these complaints. b) Who will be responsible for checking complaints are recorded correctly and have been acted upon. c) The appropriate measures undertaken were agreed and	a) Section 1.6: Key Responsibilities of 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] confirms the Main Works Contractor(s) would be responsible for recording complaints. b) The Main Works Contractor(s) would be responsible for checking complaints are recorded correctly and have been acted upon. c) Requirement 4 of the 3.1 Draft Development Consent Order [Revision C] requires the Final Code of Construction Practice to be submitted to and agreed with the relevant Local Planning Authority prior to commencement of each stage of authorised development. The responsibility sits with the Main Works Contractor(s)'s Environmental Manager to ensure measures are carried out. Further details on this are outlined in response d) below. d) Section 2.2: Non-Compliance Procedure of 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan (Final Issue A) [APP-304] states '<i>The Environmental Manager will be responsible for undertaking site audits to check compliance with the DMP and method statements. All incidents associated with the construction of the Project, including environmental incidents and non-conformance with the DMP, will be reported and investigated as defined within Section 6 of the Outline CoCP (document reference 7.2). Further detail will be included in the Code of Construction Practice to be developed by the Main Works Contractor(s).</i>' Given the robust management and assurance processes the Applicant has in place, it would be highly unusual for repeated breaches to occur to the extent that formal enforcement action became necessary. The Applicant takes direct responsibility for managing the performance of the main works contractor to secure and maintain compliance, with issues typically identified and addressed at an early stage. This includes issuing formal instructions requiring immediate remedial action,

Reference	Question	Applicant's Response
	carried out in an acceptable manner. d) What mechanism is being proposed in relation to any enforcement action that may be required.	strengthening mitigation and site controls, enhancing supervision and monitoring, and requiring the contractor to identify and address the causes of any non-compliance. Contractor performance is kept under close review, with escalation of contractual controls where necessary. While replacement of the contractor would not be automatic, the Applicant would consider re-scoping works or replacing the main works contractor where compliance could not be reliably achieved through corrective action alone, in order to ensure continued compliance with the Development Consent Order and approved management plans. Should the relevant local planning authority consider it necessary to pursue formal enforcement action, the Applicant would comply fully with any action taken, as required by law. In all such cases, National Grid would engage constructively with the local planning authority and comply with the terms of any formal notice or direction.
AQ 1.2	Air Quality - Monitoring mechanisms ES Chapter 7 paragraph 7.6.6 refers to monitoring mechanisms to be used in relation to air quality. The ExA notes the applicant has used the term 'Where possible' in relation to the commencement of baseline monitoring at least three months before work commences on site. This term is vague and unacceptable, as it has the potential to lead to doubt as to whether baseline monitoring will actually take place. Remove the use of this term and replace with a clearer statement, such as 'Baseline monitoring will	The wording in paragraph 7.6.6 of 6.7 Environmental Statement Chapter 7 - Air Quality is consistent with IAQM construction dust guidance^{15,16} for a high dust risk site and has not been changed in the ES chapter. 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] requires the Main Works Contractor(s) to undertake further construction dust assessment as detailed design is developed. 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] will be updated and submitted after deadline 3 to remove reference to 'where possible' and will state: <i>'Baseline monitoring will commence at least three months before work commences on site, at agreed locations where monitoring is considered to be necessary.'</i> In addition, commitment AQ01 of 7.2 Outline Code of Construction Practice [Revision C] has been updated to remove reference to 'where possible' and states: <i>'Baseline monitoring will commence at least three months before work commences on site, at agreed locations where monitoring is considered to be necessary.'</i>

¹⁵ Institute of Air Quality Management (IAQM) (2024) *Guidance on the assessment of dust from demolition and construction*

¹⁶ IAQM (2018) *Guidance on Monitoring in the Vicinity of Demolition and Construction Sites*

Reference	Question	Applicant's Response
	<i>commence at least three months before work commences on site'.</i>	7.2 Outline Code of Construction Practice (Final Issue A) [APP-300] . This update has been submitted at deadline 3.
AQ 1.3	Air Quality – Outline CoCP Appendix D – Dust Management Plan (DMP) Braintree DC in its LIR [REP1-148] considers further clarification and alignment are required between the air quality assessment and the outline CoCP, particularly in relation to the siting and emissions control of non-road mobile machinery, to ensure mitigation commitments are robustly secure through clear and enforceable DCO requirements. Respond to these comments, including whether the documents mentioned above will be brought into alignment and how it is intended to ensure the mitigation commitments are secured through the DCO in a clear and enforceable way.	Section 7.6 of the air quality assessment in 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147] presents proposed mitigation. The Environmental Statement chapter cross references 7.2 Outline Code of Construction Practice [REP2-014] and 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304]. Both of these documents are aligned with the mitigation proposed in the Environmental Statement, including emissions standards for non-road mobile machinery (NRMM) and the siting of generators which are a subset of NRMM. 7.2 Outline Code of Construction Practice Appendix D - Outline Dust Management Plan [APP-304] outlines mitigation measures to minimise emissions from NRMM with commitments set out in Annex A of the document. Paragraph A.1.7 confirms that the Project will be carried out in accordance with legislation relevant to generators. Reference to being in accordance with legislation is not included within 7.2 Outline Code of Construction Practice [REP2-014] at AQ02; however, GG19 states that '<i>Plant and construction vehicles (not including construction worker private vehicles) will conform to relevant applicable standards for vehicle type which will be defined in the CoCP.</i>' It then goes on to list potential, appropriate standards, including those for NRMM. It is assumed that generators would be sited within temporary construction compounds which are shown on 6.7.F7 Environmental Statement Figure 7.7 - Air Quality Generators [APP-157]. Section 7.3 of 6.7.A3 Environmental Statement Appendix 7.3 - Air Quality Assessment Result [APP-150] and 7.2 Outline Code of Construction Practice [REP2-014] also provide site management practices for temporary construction compounds to minimise the risk of impacts on receptors within 100 m of the work boundary. NRMM, in particular heavy construction plant, is expected to move around within the Order Limits to facilitate construction of the Project. The use of construction NRMM with suitable controls and site management is unlikely to result in significant effects on

Reference	Question	Applicant's Response
		local air quality according to the guidance from Local Air Quality Management – Technical Guidance (TG22)¹⁷ paragraph 7.30. Additionally, commitment AQ01 of 7.2 Outline Code of Construction Practice [REP2-014] includes the following: '<i>Plan the site layout so that machinery and dust-causing activities are located away from receptors, as far as practical or possible.</i>' It is considered that commitment GG19 governing emission standards and this response explaining siting of generators addresses the concerns expressed by the Local Planning Authority and that the Applicant's documents already reflect the outcome the Local Planning Authority is seeking through its request.

¹⁷ Department for Environment, Food and Rural Affairs (2025) *Local Air Quality Management Technical Guidance (TG22)*

5. Biodiversity ecology and natural environment

Table 5.1 Biodiversity ecology and natural environment

Reference	Question	Applicant's Response
BIO 1.1	Criteria for ascribing importance/ value to biodiversity receptors In Table 8.5 of ES Chapter 8 [AS-026] you have stated that the criteria for a “County/Regional” Chartered Institute of Ecology and Environmental Management (CIEEM) level of importance that has a “Medium” value includes species or habitats listed in accordance with the requirements of the Natural Environment and Rural Communities (NERC) Act 2006. However, in the criteria for “Local” CIEEM importance and a “Low” value you also refer to s41 of the NERC Act, and to Red or Amber listed Birds of Conservation Concern and Red Data Book species as examples that a receptor “... is relatively common and widespread”. Explain your reasoning for this methodology, and justify why you consider impacts on, for example, Red and Amber listed bird species are considered to be of a low value and only of local importance.	The assessment methodology presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] is in line with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment (2024). The value of the site for a species or habitat is determined by its importance at a defined geographical scale (e.g. local or county). In line with guidance, professional judgement has been applied, considering the distribution and abundance, the quality and extent, the role the site plays in supporting the species population, and whether the site contributes to the local or wider conservation objectives. Species listed on Section 41 of the Natural Environment and Rural Communities Act 2006 (S41) may therefore be valued at different levels of geographical importance within an ecological assessment. Ecological receptors listed on S41 have been included as examples at both local and county geographical levels within Table 8.5 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. This assessment methodology was agreed with stakeholders through the Scoping Report 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297]. The Birds of Conservation Concern (BoCC) list is a tool used for identifying bird species that should be a conservation priority. It is based on wide-ranging information and many birds listed remain relatively common and widespread in the UK although their populations are in decline. It is therefore considered alongside other information when assessing the level of importance. While BoCC has been used as an example of local level importance within Table 8.5, this is a guide only and professional judgement has been applied to each individual and group of bird species throughout the assessment process.

Reference	Question	Applicant's Response
BIO 1.3	Meadow Wood nature reserve Norfolk Wildlife Trust in [RR-2756] and Norfolk CC in [REP1-173] have both raised particular concerns about the proposed pylon route between pylons 48 and 49 and the impact on the ancient wood pasture at Meadow Wood Nature Reserve (a candidate CWS). Comment on how the impacts on this site have been evaluated and what mitigation has been considered, for example alternative alignments that have been assessed that would be further away from Meadow Wood.	Firstly, the Applicant can confirm that other alignments and design variants have been considered in this location. Western and eastern corridor alternatives, diverting over a few km, transferred effects to other receptors and were less preferred by being longer and less direct (western discussed at 5.5.20 in 7.20 2023 - Design Development Report for the Project [APP-358] and eastern corridor alternatives at 5.5.27). The same report also considered a more localised eastern route around Cargate Common, but this was less preferred because of increased effects on a Grade I listed church and a route with additional and sharp changes of direction. Finally, localised pylon routeing and siting has responded to the accumulating survey data. This led to limited movement east, which has subsequently been partly revised back to the west towards the previous position in light of further information, most notably the position of various veteran trees as explained in paragraph 4.4.5 and Figure 4.4 of 5.15 Design Development Report [APP-122] (2025). It is understood from Norfolk County Council and Norfolk Wildlife Trust that a parcel of land between RG48-RG49 has recently been designated as Meadow Wood Nature Reserve County Wildlife Site (CWS), having been nominated as a candidate CWS part way through the Project development process. While not considered as a CWS in the ecological assessment due to the designation of the site in March 2026, after submission of the development consent application, this area of woodland and grassland habitat has been included under the Habitats of Principal Importance (Section 41 of the Natural Environment and Rural Communities Act 2006) ecological receptor and has been fully assessed within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Detailed habitat surveys of the area have been undertaken and are presented within 6.8.A1 ES Appendix 8.1 - Habitat Report [AS-028]. The designation of this site as a CWS does not materially alter the conclusions of the assessment, that there will be no significant residual effects on CWSs or woodland habitat. As a Habitat of Principal Importance this area has been given significant weighting in routeing design decisions, with impacts minimised where practicable. No pylons or construction haul roads have been located within the CWS. Although the 400 kV overhead line would oversail the southern corner of the CWS, this meadow habitat would not be affected. A small area of tree loss/management within 28 m of the overhead line for electrical clearance reasons will be required within the CWS (0.06

Reference	Question	Applicant's Response
		ha). The trees in this area are native broad-leaved species that would re-grow from coppice stools or pollards that would be created within the electrical clearance zone. The route selected avoids removal of the veteran trees within the CWS. The existing UK Power Networks 11 kV overhead line that currently passes through the CWS would be removed, and replaced underground outside the CWS boundary, providing an ecological benefit. Mitigation proposals for Meadow Wood Nature Reserve CWS would relate to the small impact on woodland habitat and this mitigation is already clearly set out in Section 9 of 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. For completeness, Meadow Wood Nature Reserve CWS will be added to the next iteration of the Outline Landscape and Ecological Management Plan submitted at Deadline 3. There will be no significant residual effects on Meadow Wood Nature Reserve CWS.
BIO 1.4	Assessment of effects on species Table 8.23 of ES Chapter 8 [AS-026] provides an assessment of effects on ecology and biodiversity receptors during construction. For all species (both protected and notable) you conclude that “there would be an overall negligible magnitude of impact with no significant residual effects”. Table 8.23 specifically refers to these effects during construction. It is the ExA's understanding that measures such as replacement planting and habitat creation would not generally take place until after construction had finished. Therefore, justify how you have arrived at your conclusion of an overall negligible impact for all species during the construction stage.	Replacement planting and habitat creation would be undertaken at the earliest opportunity and no later than the first planting season following completion of construction activities on that stage. For the assessment, replacement planting has therefore been considered as part of the construction phase activities. Replacement planting and habitat creation is identified as embedded / standard mitigation within the 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. With these mitigation measures in place there would be no long-term significant residual effects on any ecological receptors and no ‘biodiversity deficit’. As identified in Section 8.7 of the 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], most of the construction phase impacts are temporary and would not occur in all areas throughout the construction period at the same time. Impacts to key habitats such as trees, hedgerows and watercourses have been minimised as far as practicable to ensure that at any one location, there are limited impacts to protected species resulting from habitat loss or fragmentation during construction and until replacement planting reaches maturity. Most of the habitat that would be temporarily removed is arable land or modified grassland of limited value to biodiversity, replacement planting of which would take up to one year to reach the required habitat condition. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] has taken into consideration any short-term temporary effects on ecological receptors

Reference	Question	Applicant's Response
	Furthermore, explain how your assessment has taken account of any biodiversity deficit on species that might arise, for example on bat foraging and commuting, from the time taken between habitat removal and when any replacement planting would become fully established and therefore able to provide an equivalent biodiversity benefit.	(biodiversity deficit). Some mitigation measures would remain in place past the end of construction, while habitat reinstatement is undertaken and habitats mature. For example, the provision of bat, bird and dormouse boxes would provide alternative safe places for fauna to nest/roost whilst replacement planting matures. The temporary bat flyways (installed during the construction phase) would be removed at the end of construction phase, but the new planting would fill the gaps created and this planting does not need to be mature to fulfil the function of maintaining the foraging route or commuting corridor.
BIO 1.5	Bat tree roost surveys A number of LIRs from local authorities, for example Braintree DC in [REP1-148], Chelmsford City Council in [REP1-153], Essex CC in [REP1-161] and the joint LIR from Suffolk CC, Mid-Suffolk and Babergh DCs [REP1-178] have maintained significant concerns regarding the assessment methodology and the current level of survey effort for bat tree roosts. Set out your process and timeline for conducting further bat tree roost surveys, including an explanation for your focus on barbastelle when all bat species are protected. If further survey work is not going to be submitted during the course of this examination, explain how the ExA can be confident that the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) have been met.	No further bat roosting surveys are being undertaken. The approach to bat surveys was agreed in advance with Natural England, as evidenced within 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034], as the primary statutory advisor and competent authority on roosting bats. Targeted bat roosting surveys undertaken included all bat species, but with a focus on areas likely to be more suitable for barbastelle following feedback from Natural England. Barbastelle are listed as 'vulnerable' and are a very rare species in England, restricted mainly to southern and central England and Wales. Other bat species recorded within the survey area are not as rare and are more widespread across the country. While all roosts are afforded the same protection, the potential for impacts on a barbastelle roost, if one were present, is of greater importance due to the rarity and geographical restriction of the species. Barbastelle are also listed as Annex II species under the EU Habitats Directive meaning that they are of community interest and require special conservation measures, demonstrating further the importance of this species. The Applicant disagrees with comments from local planning authorities that insufficient bat surveys have been undertaken. Ground level tree assessments to identify potential bat roosting features have been undertaken on 97% of the land within the Order Limits, giving a detailed understanding of the natural potential roost resource. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] includes a reasonable worst-case assessment of impacts on these potential bat roost features.

Reference	Question	Applicant's Response
		In line with the requirements of The Conservation of Habitats and Species Regulations 2017, bat roosting surveys have been undertaken and further pre-commencement surveys will be completed post-consent. Given the transient nature of bat roosts within trees¹⁸, pre-commencement surveys will ensure all bat roosts are identified prior to construction and are the best means of protecting the bats themselves and providing any compensatory roost mitigation that may be required. Where the presence of a roost is confirmed, mitigation measures to be agreed with Natural England would be delivered under licence to ensure no impact on the favourable conservation of bats. The Examining Authority can therefore be reassured that the requirements of The Conservation of Habitats and Species Regulations 2017 for roosting bats have been met.
BIO 1.7	Badger setts and construction Table A8.15.2 of the updated Badger Report - Confidential [AS-042] indicates that a total of 231 badger setts are present in the survey area (order limits plus a 30m buffer), and this figure includes 48 main setts. As noted in Table A8.15.1 of [AS-042] if a main sett requires closure, mitigation must be provided usually involving the construction of an artificial sett along with proof of uptake by badgers. Notwithstanding paragraph 6.1.44 of the outline Landscape and Ecological Management Plan (outline LEMP) [AS-046], set out in more detail the process you would undertake, what is the timeline for this would be and	The Applicant can confirm that only one main badger sett (S376) will require full closure, necessitating the construction of one artificial sett as mitigation. All other main setts have either been completely avoided or impacts minimised to the extent that no artificial sett is required as mitigation. In proximity to S376, located west of Holton St Mary, year one of construction would only involve the construction of the haul road, which would not require sett closure. The installation of the underground cables would take place further into the programme (i.e. year two onwards). The Main Works Contractor(s) would therefore have sufficient time (at least a full year) in which to create an artificial sett, produce evidence of occupation by the badger clan (up to six months) and undertake closure of the main sett (21 days) within the appropriate time of year (July-August), to meet both the requirements of the Natural England licence and ensure badger welfare is safeguarded. Given this is an isolated requirement at only one location across the Project, consideration of timings at this location will be factored into all construction programming. A draft main badger licence has been produced, which includes full details of closure of S376 and the proposed artificial sett, and was submitted to Natural England for agreement and a Letter of No Impediment has been received from Natural England. This draft licence also includes a provisional programme of works, which considers

¹⁸ Zeale, M. R. K., Davidson-Watts, I. & Jones, G. (2012) *Home range use and habitat selection by barbastelle bats (Barbastella barbastellus): implications for conservation*. Journal of Mammalogy, 93, 1110-1118.

Reference	Question	Applicant's Response
	explain how the ExA can be confident that, in any locations where main setts may require closure, sufficient time has been allowed for so that any necessary works would be fully completed and replacement setts occupied before construction commences.	the lead-in time needed. Construction of an artificial sett can take place at any time of year; however, the closure of the main sett must only take place between July and November, outside of the badger breeding season.
BIO 1.8	Badger sett near Roydon In [RR-3209] Mr Matthews contends that the proposed temporary haul road near the village of Roydon would go through a hedgerow that contains an active badger sett. This sett does not appear to have been identified in the updated Badger Report - Confidential [AS-042]. Comment on this and, if applicable provide an amendment to the Badger Report – Confidential that identifies this sett.	The Applicant has identified badger setts within the fields adjacent to Mr Matthews property boundary, which are presented on page 5 of Figure 2 within 6.8.A15 ES Appendix 8.15 - Badger Report Confidential [AS-042]. The description of the sett and location provided by Mr Matthews matches that of the identified badger sett S8. As the sett has already been identified within the submitted documentation, no update to 6.8.A15 ES Appendix 8.15 - Badger Report Confidential [AS-042] is required.
BIO 1.9	Invasive Non-Native species Suffolk CC in its RR [RR-3520] makes reference to the need for a commitment to eradicating invasive non-native species (INNS) within the Order limits (instead of only preventing any spread of INNS). Comment on the practicality of this and whether, if successfully achieved, this could count as a potential compensation measure.	Invasive plant species in England are identified 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 [REP2-018]. It would not be viable to consider eradication of invasive species across the Order Limits as an enhancement/compensation opportunity, due to the significant timeframes (many years) and substantial cost which would be involved in complete eradication.

Reference	Question	Applicant's Response
BIO 1.10	Post-consent monitoring and assessment of effects Babergh DC in [RR-0314] and Mid Suffolk DC in [RR-2540] have questioned the assumption that post consent licences would ensure neutral or beneficial outcomes for protected species and consider that there would be limited post-mitigation monitoring to enable this to be assessed. - To the applicant: Notwithstanding your response in [REP1-132], please respond to the concerns raised by Babergh DC and Mid Suffolk DC and explain how you have reached your assessment on this. - To Babergh DC and Mid Suffolk DC: Explain why you consider that additional post-consent monitoring is needed beyond anything that might be specified in the protected species licensing process.	Proposed mitigation as set out within 7.4 Outline Landscape and Ecological Management Plan [REP2-018], has followed best practice guidelines, including for European Protected Species (EPS) and badgers. Where post-mitigation monitoring has been identified as necessary for EPS or badger, this has been included within the draft EPS licence applications and agreed with Natural England. The Applicant has worked closely with Natural England towards obtaining Letters of No Impediment (LONIs) for these species. LONIs for water vole, badger and dormouse have been obtained. 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 for activity which would harm an EPS (or in this case issue a LONI). The third derogation test is that the favourable conservation status of the species must be maintained. Badger is not an EPS and therefore this is not a requirement for badger. The receipt of LONI's from Natural England confirms their support in our assessment that following the implementation of mitigation, including any agreed post-mitigation monitoring, a neutral or beneficial outcome for EPS species will be achieved. The Project as currently proposed has not identified any impacts to bat roosts which would likely constitute an offence under the legislation, with no bat roosts identified that would be lost/disturbed and therefore no current requirement for a bat licence. Should a bat roost be identified during pre-commencement surveys a licence would be obtained from Natural England, the same tests will therefore apply as above, and the favourable conservation status of bats will be maintained.
BIO 1.11	Electrocution risk to birds Paragraph 2.10.4 of NPS EN-5 (2023) states that electrocution risk to birds can be reduced through the design of lattice steel tower crossarms, insulators and the construction of other parts of high voltage power lines. Explain how you have taken account of this in	Paragraph 2.10.4 of NPS EN-5 (2023) states that electrocution risk to birds can be reduced through the design of lattice steel tower crossarms, insulators and other components of high voltage power lines. The Applicant confirms that electrocution risk to birds has been considered through the application of established high voltage transmission line design principles. At transmission voltages of 400 kV, electrocution risk to birds is inherently low due to the large electrical clearances and crossarm spacings between live conductors and earthed steelwork. Avian electrocution can only occur if a bird completes an electrical circuit, either by simultaneously contacting two live phase conductors or by contacting

Reference	Question	Applicant's Response
	designing the proposed development, and whether these are preferable to T-Pylons in reducing incidences of bird strike.	a live conductor and earthed steelwork. At 400 kV, the separation distances and crossarm geometry are such that this scenario is extremely unlikely for bird species in the UK, allowing for wingspan size, the release of conductive streamers (such as liquid faecal streams) and flashover distances (400-1,500 mm in 400 kV lines). Phase conductors are typically spaced a minimum of 8.1 m apart on 400 kV lines while minimum distance between a live conductor and earthed steelwork is 4.7 m. Therefore, for the chance of electrocution by means of a flashover, a bird would have to be perched on a crossarm and bridge a gap of more than 3.2 m for electrocution to occur. Eagles and swans have the largest wingspans in the UK, reaching 2.5 m, which is below this threshold, and as such are not of a size to complete an electrical circuit at a 400kV line causing electrocution. Based on the above factors, electrocution was not identified as a plausible or significant impact pathway for the Norwich to Tilbury project as presented in 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026], which appropriately focuses on collision risk as the relevant mechanism for potential effects on birds. The proposed overhead line has been designed in accordance with standard modern transmission specifications, which inherently minimise electrocution risk through conductor spacing, insulation design and crossarm configuration. As a result, electrocution risk at transmission level is governed by voltage and physical clearances rather than by the specific form of support structure. Regarding support structure type, there is no evidence to indicate that lattice steel towers or T Pylons differ materially in terms of bird electrocution risk at the proposed voltage. Electrocution risk is determined by conductor spacing and line geometry, which are equivalent for both structure types. Accordingly, neither lattice towers nor T Pylons are considered inherently preferable in reducing bird electrocution risk. Similarly, there is no expected difference in bird strike risk between lattice towers and T Pylons, as both carry the same conductor and earth wire arrangement (triple Araucaria configuration). Bird collision risk is primarily influenced by factors such as span length, conductor visibility and the presence of constrained flight corridors, rather than the form of the support structure itself. These factors have been addressed through the collision risk assessment presented in 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [AS-026]

Reference	Question	Applicant's Response
		and 6.8.A8 Environmental Statement Appendix 8.8 – Wintering and Passage Bird Report [APP-167 to APP-170], with precautionary bird diverters proposed at two selected locations where the risk to large waterbirds is higher. In summary, electrocution risk to birds has been addressed through modern high voltage transmission line design, which inherently minimises such risk. Electrocution was not identified as a significant impact pathway for the Project, and there is no evidence to suggest that the use of lattice steel towers or T Pylons would materially alter either electrocution or collision risk conclusions.
BIO 1.12	Assessment of bird mortalities In paragraph 8.5.57 of ES Chapter 8 [AS-026] you state that no specific surveys for wintering farmland birds have been undertaken as they are not considered to be at risk of collision. A number of IPs, including Pylons East Anglia Ltd in its attachments to [RR-2973] and Suzanne Bolwell-Davies in [REP1-480], have raised concerns about the survey effort for, and impacts on farmland birds, and on birds overall due to collisions with OHLs and electrocution risk. Respond to these concerns and expand on the reasons why you consider surveys for farmland birds are not required and, in the absence of such surveys, explain in more detail how you have assessed the potential impacts on bird mortalities for all species due to electrocution risks and collisions for areas/ species that have not been surveyed. Justify your conclusion in Table 8.24 of ES Chapter 8 [AS-026]	The Applicant would like to provide clarification on the statement in paragraph 8.5.57 of 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [APP-158]. The wording ‘no specific surveys for wintering farmland birds have been undertaken as they are not considered to be at risk of collision’ is an imprecise summary of the intended meaning, consistent with the technical assessments and cited guidance that ‘wintering farmland passerine species are not considered to be at significant risk of collision with overhead lines’. This is taken from industry best practice guidance, namely <i>Recommended bird survey methods to inform impact assessment of onshore windfarms</i> (NatureScot, 2017, updated 2025), which is also used to inform impact assessments of overhead transmission lines. This is set out within the Target Species section of 6.8.A8 Environmental Statement Appendix 8.8 – Wintering and Passage Bird Report [APP-167 to APP-170], which states that passerine species are not significantly impacted by wind farms or overhead cables. The concerns raised by a number of IPs, including Pylons East Anglia Ltd in its attachments [RR-2973] and Suzanne Bolwell Davies in [REP1-480], relate primarily to the absence of bespoke wintering farmland bird collision surveys. The Applicant considers that such surveys were not required and that the approach adopted is proportionate and consistent with good practice for the following reasons: • The habitat across the Order Limits and surrounding land is predominantly arable farmland, where the most common species present are expected to be farmland passerines. This is supported by desk study data with waterfowl and wader species (of higher collision concern due to their larger size, wing-loading and lower manoeuvrability in flight) concentrated around wetlands and river corridors where survey effort was focussed

Reference	Question	Applicant's Response
	that: "...collision risk and potential mortality in the absence of mitigation is considered to be a negligible effect in the medium term which is not significant", and that therefore there would be no residual operational effect?	• Farmland passerines are small and generally highly manoeuvrable in flight, capable of avoiding obstacles. Therefore, they are not highlighted as species of concern in relation to collision risk as outlined in best practice guidance outlined above • Passerines 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. Industry good practice guidance was followed in determining Target and Secondary Species for collision risk analysis, including NatureScot guidance on assessing the effects of power lines on birds (NatureScot, 2016), which recommends the same selection criteria as the guidance on bird survey methods to inform impact assessment of onshore wind farms (NatureScot, 2017, updated 2025). This guidance states that passerine species are not generally considered to be significantly impacted by wind farms and overhead cables. This approach is consistent with the Guidelines for Ecological Impact Assessment (CIEEM, 2018; updated 2023) and follows established good practice for assessing bird collision and electrocution risk associated with overhead lines. Engagement with Natural England on ornithological survey methodology appropriately focused on matters within its statutory remit, including wintering and passage bird surveys required to inform the Habitats Regulations Assessment (HRA) and internationally designated sites, for which the scope was discussed and agreed. For bird species and locations outside the HRA context, the scope of surveys and the collision risk assessment methodology were developed in accordance with published guidance and standing advice and informed by professional judgement. The approach has been subject to consultation with all relevant local planning authorities and, as evidenced by the Local Impact Reports submitted to the Examining Authority, no local authority has raised concerns regarding the adequacy of the bird survey methodology, collision risk assessment approach, or the need for further bird-specific survey work. The Applicant therefore considers the approach adopted to be proportionate and robust for the purposes of assessing potential bird mortalities. Although bespoke wintering farmland bird collision surveys were not undertaken, collision risk for all species groups for which such risk could realistically arise has

Reference	Question	Applicant's Response
		been assessed using a combination of desk study, targeted surveys and precautionary mitigation. A comprehensive desk study was undertaken drawing on over 26,000 bird records obtained from the British Trust for Ornithology, the Royal Society for the Protection of Birds and local records centres covering Essex, Suffolk and Norfolk. Records covered a ten-year period and included breeding, wintering and passage data. Relevant data were mapped to identify hotspots, potential movement corridors and proximity to designated sites. Collision risk assessment is detailed in 6.8.A8 Environmental Statement Appendix 8.8 – Wintering and Passage Bird Report [APP-167 to APP-170]. Target and Secondary Species were identified following NatureScot (2017, updated 2025) guidance, and the following groups were assessed: • Divers and grebes • Raptors and owls • Wildfowl • Waders • Bittern, heron, storks, spoonbills and egrets • Seabirds • Gulls and terns. Surveys focused on locations where birds are most likely to move at height between coastal / estuarine habitat to inland habitat such as river corridors such as rivers and connective wetlands. The assessment did not identify any locations posing a notable collision risk along the proposed overhead line alignment. This considered the numbers and flight height of birds, flight manoeuvrability, natural avoidance behaviour (of infrastructure), their conservation status, and whether mortality could have an impact on local and / or national bird populations (particularly those integral to the bird assemblages at designated sites). In addition to collision risk, the potential for bird electrocution was considered as part of the overall assessment of bird mortality. Electrocution can only occur if a bird completes an electrical circuit, either by contacting two live phase conductors simultaneously or by contacting a live conductor and earthed steelwork. At 400 kV

Reference	Question	Applicant's Response
		lines, conductor clearances and crossarm spacings are such that this scenario is extremely unlikely for bird species in the UK, allowing for wingspan size, the release of conductive streamers and flashover distances. On this basis, electrocution was not identified as a plausible or significant impact pathway for the Norwich to Tilbury project (see full response on electrocution in the BIO 1.11 applicant response). Although no significant collision risk locations were identified, the Applicant has adopted a precautionary approach. Mitigation measures in the form of bird diverters and orange spacers fitted to the earth wire are proposed at two sensitive crossings, these are the River Waveney and Ardleigh Reservoir, as set out in 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. These measures further reduce an already low baseline risk. Taking account of the species assemblage present within the Order Limits, the typical flight behaviour and collision susceptibility of those species, the extensive desk based evidence base, the survey results, the inherent design characteristics of modern high voltage overhead lines that minimise electrocution risk, and the targeted application of precautionary mitigation, the conclusion presented in Table 8.24 of 6.8 Environmental Statement Chapter 8 [APP-158] that collision risk and potential mortality in the absence of mitigation would be a negligible effect in the medium term and not significant is considered robust and justified. With the inclusion of embedded design measures and additional mitigation, including the installation of bird diverters and spacers at sensitive crossings, no residual operational effects are anticipated in relation to bird mortality resulting from collisions or electrocution.
BIO 1.13	The use of bird diverters The ExA notes that bird diverters are proposed in two locations [APP-327]. Explain why these are not proposed in other locations where concentrations of birds may occur. What monitoring mechanism is in place in order to assess whether any other locations may need bird diverters installed in the future and how is the potential for	Bird diverters are proposed at two locations along the overhead line alignment, namely at the River Waveney crossing and at Ardleigh Reservoir, as shown on 7.4 Outline Landscape and Ecological Management Plan, Appendix F – Bird Diverter Locations [APP-327]. These locations were identified on a precautionary basis following the collision risk assessment presented in 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [APP-158] and 6.8.A8 Environmental Statement Appendix 8.8 – Wintering and Passage Bird Report [APP-167 to APP-170]. Wintering and passage bird surveys, including vantage point surveys, were undertaken to assess whether the proposed overhead line could fragment bird

Reference	Question	Applicant's Response
	such adaptive management secured in the draft DCO? Furthermore, what mechanism is in place for the monitoring of those locations where bird diverters are proposed? What adaptive management measures are proposed, such as additional mitigation or compensation, should monitoring indicate that bird diverters alone are insufficient to prevent significant impacts on local bird populations, and how is this currently secured in the draft DCO?	movement corridors or give rise to a material collision risk as birds move between coastal, estuarine and inland habitats. The assessment did not identify any locations along the overhead line alignment where bird flight behaviour, species assemblage or concentrations of birds would give rise to a significant collision risk. The two locations where bird diverters are proposed correspond to a larger waterbody (Ardleigh Reservoir) and proposed wetland corridor habitat creation/enhancement along the River Waveney, which forms part of The Waveney and Little Ouse Recovery (WaLOR) Project. These locations may be used by a wider range of bird species, and notwithstanding the assessment conclusions, a precautionary approach was considered appropriate. Bird diverters are not proposed at other locations because: • The collision risk assessment did not identify any additional areas of concern (see response to BIO 1.12) • The species present and their flight behaviour did not indicate vulnerability to overhead line collisions (see response to BIO 1.12) • the Project has deliberately been located inland and away from coastal Special Protection Areas (SPAs) and Ramsar sites, where collision risk is demonstrably higher, and • 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [APP-158] concludes that operational collision risk would be negligible and not significant. No operational monitoring programme for bird collisions is proposed, and no mechanism is included to identify additional locations for bird diverters in the future. This reflects the conclusions of 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [APP-158] and 5.3 Habitats Regulations Assessment Report [APP-082], which predict no significant adverse effects on birds during operation, either with or without mitigation. As the assessment concludes that effects would not be significant, additional monitoring or adaptive management is not considered necessary or proportionate. 3.1 Draft Development Consent Order [APP-056] secures the mitigation identified through the Environmental Statement by requiring the development to be carried out in accordance with the approved plans and documents, including 7.4 Outline Landscape and Ecological Management Plan, Appendix F Bird Diverter

Reference	Question	Applicant's Response
		Locations [APP-327]. 7.4 Outline Landscape and Ecological Management Plan Appendix F – Bird Diverter Locations [APP-327] includes the specific mitigation identified by the assessment, namely the location where bird diverters are to be installed at the River Waveney and Ardeigh Reservoir crossings. No further monitoring or adaptive mitigation is secured in the Draft DCO because 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [APP-158] concludes that, with embedded design measures and the proposed precautionary mitigation, the Project would result in no significant adverse effects on birds. The Draft DCO therefore reflects and implements these conclusions. No bespoke ornithological monitoring is proposed at the locations where bird diverters are installed. The suitability of this mitigation is supported by established evidence, including NatureScot (2016), which identifies bird diverters as an effective measure for improving wire visibility and reducing collision risk at waterbody crossings. In addition, 6.8 Environmental Statement Chapter 8 – Ecology and Biodiversity [APP-158] does not predict a significant collision effect to arise. No additional mitigation or compensation measures are proposed in relation to bird collisions during operation, as the risk of collision has been assessed to be low and not significant.
BIO 1.14	Pink-footed geese South Norfolk Council in its LIR [REP1-176] considers that a species management plan for pink-footed geese would be required due to vegetation removal and construction taking place during winter grazing periods. Comment on this and explain what mitigation measures are proposed for this species.	South Norfolk Council, in their LIR [REP1-176], suggest that a species management plan for pink-footed geese would be required due to vegetation removal and construction activity during the winter grazing period. The Applicant does not consider that a species-specific management plan is necessary. Pink-footed goose was considered as part of the wintering bird assessment presented 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 [APP-167 to APP-170]. The wintering bird survey scope included vantage point (VP) surveys. Three wintering bird VP survey locations were selected in Norfolk, each subject to 36 hours of observation time between September and March in the winter of 2022 to 2023. The focus of the surveys was potential wintering waterbird flight corridors and feeding areas associated with the River Tas (including a tributary) and the River Waveney. These locations were identified following a desk-based habitat review as

Reference	Question	Applicant's Response
		offering the greatest potential to support wintering waterbirds. Pink-footed goose was one of the species targeted by the survey coverage, however this species was not recorded during the wintering bird survey at any of these locations. This indicates that although the fields along the river floodplains appeared to be suitable for use by these geese, they were not found to support them. A comprehensive desk study covering a ten-year period (2013 to 2022) identified only three records of pink footed goose within a 2 km buffer along the entire Norwich to Tilbury route. These records suggest that land within or near the Order Limits is not regularly used by over winter grazing, roosting or commuting pink-footed geese. Based on the desk study and survey results, the Project area does not represent an important wintering resource for pink-footed geese, and the species is not predicted to be significantly affected by construction or operation of the Project. A species-specific management plan is therefore not necessary or proportionate. Temporary habitat loss associated with construction will be reinstated in accordance with 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. Habitat reinstatement will return temporarily affected land to its former agricultural use and condition as soon as practicable following construction, ensuring no long-term loss of potential winter foraging habitat for wintering bird species (including pink-footed goose). In addition, standard mitigation measures applicable to wintering birds, secured through 7.2 Outline Code of Construction Practice [REP2-014], will minimise disturbance during construction and would apply to any geese present. This includes but is not limited to, the implementation of Construction Exclusion Zones around retained habitats, and control measures for noise and vibration to reduce disturbance. In summary, the wintering bird assessment demonstrates that pink footed goose is unlikely to be affected by the Project, and no additional mitigation, monitoring or species-specific management plan is required.
BIO 1.15	Presence of white-clawed crayfish At OFH3 [EV7-001] and [EV7-002] and in [REP1-432] Mr Norman Stevens states that studies by the Norfolk Rivers Trust indicate the	Surveys for white-clawed crayfish at the River Tas were scoped out, as presented within 6.19 Scoping Report [APP-288 – 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 wider River Tas catchment, no desk study records of white-clawed crayfish have been obtained within 2 km of the Order Limits, in the 10 years preceding 2022. Records for the invasive signal crayfish in the river catchment

Reference	Question	Applicant's Response
	presence of white-clawed crayfish in the River Tas. Also, in [RR-1073] the Environment Agency notes that there are records of white-clawed crayfish on the River Tas (which is within the study area) and that they may be present where there are no recent records on the River Tas system and its tributaries. The ExA is aware that in paragraph 8.5.33 of ES Chapter 8 [AS-026] you have stated that desk studies revealed no records and field surveys revealed no presence of white-clawed crayfish in the Study Area. The ExA also notes that in N5 of [REP1-132] you have not specifically addressed the Environment Agency comments on this. Therefore please respond to Mr Stevens' and the Environment Agency's comments, explain whether a white-clawed crayfish licence from Natural England is likely to be required for any elements of the proposed development, and clarify how the potential presence of this species would affect the assessment conclusions you have reached in ES Chapter 8 [AS-026], including whether	within the Order Limits were obtained as part of the desk study. As signal crayfish predate on native crayfish and carry a plague that is fatal to white-clawed crayfish, it is unlikely that the native species are present in the study area. No ark sites¹⁹ were identified by the desk study. The overhead line would oversail the River Tas and have no effect on the banks where crayfish could reside. Proposed direct impacts to the River Tas are limited to one crossing between pylons RG49 and RG50 for a temporary construction haul road. This crossing would be a clear span bridge, which would not directly impact the riverbanks, the riverbed, the natural water flow or substrate and would therefore have no impacts to any white-clawed crayfish that may be present within the wider area. Surveys of the proposed crossing point of the River Tas indicate that water quality was poor, with high levels of silt in the water column. The Project would also cross water features that were identified as drainage ditches that are linked to the River Tas. These may be tributaries of the River Tas with banks that have been straightened. Many of these ditches appeared to dry out or hold limited amounts of water and so would be unsuitable for use by white-clawed crayfish. While signal crayfish can survive without water and can travel overland, white-clawed crayfish cannot and without water they desiccate and die. 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 [REP2-014]. 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 [REP2-018] to ensure no spread of crayfish plague, as agreed with the Environment Agency.

¹⁹ One approach to conserving the white-clawed crayfish is to establish isolated new refuge sites - known as "Ark sites" - where new populations can be established, safe from threats.

Reference	Question	Applicant's Response
	there are any ark sites nearby that might be affected. Please update Table 5.1 of the outline CoCP accordingly.	There would be no significant residual effects to the white-clawed crayfish at the River Tas or any other river within/adjacent to the Order Limits. For these reasons it is considered that the Project will not need to apply for a conservation licence with respect to white-clawed crayfish and there is no need to amend Table 5.1 within 7.2 Outline Code of Construction Practice [REP2-014].
BIO 1.17	Retention of dormouse habitat connectivity Are there any areas where trees and/or hedgerows will be removed where dormice are currently present, where it will not be possible to reinstate vegetation due to planting restrictions from the OHL or above underground cables? If this scenario exists, how would you propose to retain habitat connectivity for dormouse?	The Applicant can confirm that there are no areas across the Project, where reinstatement of dormouse suitable habitat cannot be undertaken on completion of the works. While there will be some restrictions to large tree planting beneath the overhead line and over underground cables, hedgerows, scrub and low-growing/shallow-rooted tree replacement planting will be undertaken as an alternative in these locations. Hedgerows, scrub and low-lying/shallow rooted tree habitats are all considered valuable habitat for dormouse and will ensure connectivity is maintained for dormouse to the wider area. Replacement planting will be undertaken in line with measures set out in 7.4 Outline Landscape and Ecological Management Plan [REP2-018].
BIO 1.18	European protected species and licensing: Should the Order be made, the ExA notes that the applicant proposes further survey work for European protected species once the detailed design has been formulated. However, the ExA is also aware of the results of the existing surveys for species that confirm a presence in places within the relevant study areas for species including bats, water vole and otter. To Natural England: The ExA notes the applicant's intention to obtain letters of no impediment	Mitigation for European protected species has been included within Section 6 of the 7.4 Outline Landscape and Ecological Management Plan (LEMP) [REP2-018]. The Outline LEMP includes mitigation for European protected species, including bats, badger, dormouse, water vole and great crested newt (GCN) to ensure the favourable conservation status of each is maintained. The Outline LEMP references the requirement for a Natural England licence as appropriate. The Applicant has undertaken significant consultation with Natural England over the past two years on the potential impacts and mitigation requirements for European protected species relevant to the Project. The broad approach to mitigation for badger, dormouse, water vole and GCN, has been agreed with Natural England through this consultation process. A signed Impact Assessment and Conservation Payment Certificate for Great Crested Newts (GCN) has been obtained from Natural England and signed by the Applicant. This confirms that the Applicant will apply for a GCN District Level Licensing (DLL) post consent and that Natural England agree to deliver the necessary mitigation.

Reference	Question	Applicant's Response
	(LONIs) from you. Provide an update on the current status of negotiations regarding all LONIs that are being sought and comment on whether you consider there to be any likely issues associated with, or impediments to, LONIs being issued for all relevant species. To applicant: Explain how the ExA can be assured that appropriate measures are in place at this stage in order to ensure that there would be no significant adverse effects on any European protected species.	Draft licence applications for badger, dormouse and water vole, which include further specific details of the mitigation approach, have been submitted to Natural England. A Letter of No Impediment (LONI) for each (water vole, badger and dormouse) have been obtained for the Project confirming 'Natural England sees no impediment to licences to derogate for impacts to badgers, dormouse and water vole being issued'. The Project has not identified any impacts to bats which would likely constitute an offence under the legislation, with no bat roost identified that would be lost due to the works and therefore there is no current requirement for a bat licence. This therefore prevents Natural England from issuing a Letter of No Impediment as they would typically do where licensable works have been confirmed.
BIO 1.19	Mitigation measures to protect fish In [RR-1073] the Environment Agency notes that the ES has not recorded the presence of brown trout in the River Ter even though the most recent surveys indicate its presence. The Environment Agency considers that measures should be included to ensure spawning periods and habitat are not disturbed during the construction of watercourse crossings in sections E to F. Furthermore, the Environment Agency has referenced work timing restrictions for other species as well eg for salmonid rivers. The ExA notes that you have responded to the Environment	Every effort will be undertaken to time in-channel works to avoid the fish spawning season where practicable. However, due to the scale of the Project, the number of watercourses and the overall constraints to the construction programme, this may not always be practicable. Commitment B11 of 7.2 Outline Code of Construction Practice [REP2-014] sets out in detail the mitigation measures to ensure fish are protected during these in-channel works. Should in-channel works within the fish spawning season be unavoidable at a particular main river, the other mitigation measures proposed within commitment B11 of 7.2 Outline Code of Construction Practice [REP2-014] will be implemented. This will include obtaining a licence/permit from the Environment Authority (EA) as required.

Reference	Question	Applicant's Response
	Agency's concerns in [REP1-132] and have cited Commitment B11 of the outline CoCP. However, as Commitment B11 contains the phrase "...where practicable", the ExA queries the likelihood of in-channel works still taking place during the spawning season. Explain your use of this tailpiece, consider additional wording in Commitment B11 that might provide extra reassurance to the Environment Agency on this matter and justify why your assessment of effects on fish in ES Chapter 8 [AS-026] would not need updating if this tailpiece is to remain with no additional wording provided for Commitment B11 of the outline CoCP.	
BIO 1.20	Assessment of effects on trees, hedgerows and woodland In the Hedgerows to be Removed or Managed Plans [APP-048] to [APP-055], both tree groups and hedgerows are classified as being either "removed", "affected managed", "potentially affected" or unaffected'. How and when will a decision on which trees and hedgerows will be "potentially affected" be made? In addition, how have the worst-case scenarios regarding the biodiversity impacts arising from "affected managed" and "potentially affected"	2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048] to [APP-055] and the 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] are based on the reasonable worst-case assumptions detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. Micro-siting at the detailed design stage will seek to minimise impacts on trees and hedgerows as far as possible. A plan showing the trees / groups of trees, woodlands and hedgerows to be retained and / or removed will be produced following detailed design, as secured through Requirement 8 of the Draft DCO [REP2-004]. These plans will be submitted to the relevant Local Planning Authority for approval, prior to the commencement of development for that particular stage of works. Tree and hedgerow loss calculations presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] combine the 'removed' and 'affected managed' category as a reasonable worst-case position on vegetation loss. Trees and hedgerows identified as 'Potentially Affected' are located within the Limits of Deviation for the overhead line/underground cables and based on the current design would not

Reference	Question	Applicant's Response
	measures for trees and hedgerows been assessed and accounted for in your mitigation, compensation and Biodiversity Net Gain (BNG) calculations? Also, as reported in, for example, page AB6 of the Applicant's Comments on RRs [REP1-132] it is currently envisaged (subject to detailed design) that 4 veteran trees would need to be lost. Signpost to where in table 8.23 of ES Chapter 8 [AS-026] an assessment of the residual effect on veteran trees has been made or provide this.	be removed or managed i.e., they would not be dug out, coppiced or pruned. If the overhead line/underground cable is slightly moved within the Limits of Deviation during detailed design, then tree removal/management could be required in this 'Potentially Affected' area. However trees/hedgerows identified as 'Potentially Affected' are not in addition to the 'Removed or Affected Managed' categories, but are 'instead of' the trees/hedgerows that have been identified as removed or managed. Therefore the 'Potentially Affected' trees and hedgerows have not been included within the areas/lengths of loss provided within the 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] to avoid double counting of vegetation impacts and to avoid an overestimation of potential significant ecological effects. While the Limits of Deviation allows minor changes to the alignment, the change of effect on tree and hedgerows will be limited. There is not expected to be an increase in the overall amount of tree and hedgerow loss across the Project, as a result of changes within the Limits of Deviation. In the rare occasions where a change within the Limit of Deviation could introduce a significant effect on an ecological feature, such as a ancient woodland, the limit of deviation has been pinched in and/or a commitment made in the 7.2 Outline Code of Construction Practice [REP2-014] to ensure any impact would be avoided. The assessment on biodiversity impacts presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] is therefore considered a reasonable worst-case scenario. These reasonable worst-case habitat loss calculations have been used to determine the amount of habitat mitigation, tree compensation and biodiversity net gain (BNG) units required. The full details on the Biodiversity Net Gain unit requirements is presented within 7.1 Biodiversity Net Gain Report [APP-299]. It is expected that through detailed design the impacts on trees and hedgerows and other habitats, will reduce overall and therefore the overall BNG unit requirement will also be reduced. As identified in paragraph 8.1.3 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], veteran trees are not included in the chapter. Veteran trees are identified in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236]. Impacts to the species that have been found to use these trees such as roosting bats, roosting barn owl and terrestrial invertebrates have been assessed under each individual species receptor.

Reference	Question	Applicant's Response
		While veteran trees are an irreplaceable habitat of intrinsic value, it is their value to species that has been assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] . 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] assesses the impact of veteran trees.
BIO 1.21	Assessment of tree removal at Local Wildlife Sites (LWS) Table 8.23 of ES Chapter 8 [AS-026] for some LWSs such as Great /Little Edney Woods, and Langley Deer Park states that: "some tree removal would be required to facilitate electrical clearances, but this would be minimal." Please explain why it is not possible to provide a worst-case scenario for these sites that would calculate the number of trees or area of woodland and other habitat that would be lost, since detailed figures have been provided for habitat loss for sites such as Buckingham Hill LWS. Since "some tree removal" is an unspecific term, explain how the ExA can be confident in the robustness of the impact assessment conclusions that have been drawn in Table 8.23 of ES Chapter 8 [AS-026]?	The Applicant can confirm that the impact assessment undertaken for Great/Little Edney Woods and Langley's Deer Park Local Wildlife Sites (LWS), as presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], was based on quantified areas of potential tree loss/ tree management as a combined value (referred to as habitat loss). These areas were not included in Table 8.23 due to the very small size of the areas involved. However, the Applicant notes the Examining Authority's comment in terms of providing evidence that a robust assessment has taken place and further information has been provided. For transparency and to evidence the robust impact assessment that has been undertaken, these areas of potential habitat loss at Great/Little Edney Woods LWS and Langley's Deer Park LWS are provided below and will be included within the next iteration of 8.1 Errata List. - Great/Little Edney Woods LWS: 0.17ha of broad-leaved woodland would be lost as a result of coppicing/pruning to facilitate the overhead line electrical clearance - Langley's Deer Park LWS: <0.001ha of trees to be coppiced/pruned to facilitate overhead line electrical clearance As the impact assessment for Great/Little Edney Woods LWS and Langley's Deer Park LWS was based on the areas given above, the Applicant considers that the Examining Authority can have confidence in the robustness of the impact assessment.
BIO 1.22	Trees and OHLs Provide more detail on the measures that would need to be undertaken in regard to trees within and near to an OHL. For example, would all species of tree and shrub need to be removed	Would all species of tree and shrub need to be removed within the entirety of the clearance zone that is referenced in paragraph 4.8.53 of ES Chapter 4 [APP-130]? Paragraph 4.8.53 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] confirms that for the purposes of the Environmental Statement a general approach to vegetation removal has been assumed and that for standard lattice

Reference	Question	Applicant's Response
	within the entirety of the clearance zone that is referenced in paragraph 4.8.53 of ES Chapter 4 [APP-130] or are there any species that could be acceptable for retention in certain zones, eg outside of the main 40m wide clearance zone? Also, would the construction clearance zones for OHLs be maintained at the same widths once operational or would any native species of tree or shrub be acceptable within any of these areas in terms of post-construction planting or natural regrowth due to the height they would reach when fully mature or their root depth?	pylons all vegetation (other than the agreed veteran trees) will be removed (to ground level or sufficient height to meet electrical clearances plus an allowance for growth) within the 40m clearance zone. For low height pylons a 51 m wide swathe of vegetation removal is required to allow for construction and operation of the overhead line. Are there any species that could be acceptable for retention in certain zones, eg outside of the main 40m wide clearance zone? As detailed in Section 4.8.53 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], an additional 8 m either side of the 40 m may need to be managed during construction and operation (and maintenance) to allow for electrical clearance from conductors to be maintained. Vegetation growing within the 'affected/managed' zone can be managed by, for example side pruning, pollarding or coppicing with retention generally linked to tree height restrictions rather than rooting depth. Would the construction clearance zones for OHLs be maintained at the same widths once operational? Operational clearance zones differ from Construction clearance zones as the area required for operations is generally smaller than the area required to construct the electrical infrastructure. The Applicant provides guidance documents that are publicly available, which address operational requirements and clearances: • Third-party guidance for working near National Grid Electricity Transmission equipment [Technical Guidance Note 287] • Design guidelines for development near pylons and high voltage overhead power lines. Would any native species of tree or shrub be acceptable within any of these areas in terms of post-construction planting or natural regrowth due to the height they would reach when fully mature or their root depth? With regards to acceptability of native species of trees and shrubs below overhead lines Vegetation management near electricity equipment – principles of good practice [Engineering Recommendation G136]. Table 1 provides examples of

Reference	Question	Applicant's Response
		common trees and shrubs which are generally suitable for retention or planting under or close to electricity overhead lines and includes the following text: – <i>‘While pruning or other management may be required in some circumstances these plants can usually be maintained below line clearance height.</i> – <i>Note that Oaks and Field Maple should not be planted under overhead lines, but where native Sessile or English Oaks or Field Maple already occur under overhead lines they may often be maintained by crown height reduction techniques.’</i> The suitable native trees and shrubs species in Table 1 are listed as: Hawthorn, Blackthorn, Rowan, Wild Service Tree, Holly, Hazel, Guelder Rose, Wayfaring Tree, Privet, Elder, Buckthorn, Spindle, Crab Apple, Dogwood, Gorse, Broom.
BIO 1.23	Experience of delivery of mitigation and compensation at this scaleSet out your experience of delivering/ contract letting for tree planting and other ecological mitigation and compensation works on the scale that is being proposed. How has learning from previous experience of submitting/ delivering NSIPs been incorporated into your considerations for managing the ecological mitigation and compensation for the proposed development?	The Applicant has extensive experience delivering mitigation and compensation works at scale on other large linear infrastructure projects - Hinkley Connection Project (HCP) (57 km); Yorkshire GREEN (38 km); Bramford to Twinstead (BTNO) (29 km) and Richborough Connection Project (RCP) (20 km). The Applicant always seeks to learn lessons from previous experience, but recognises the impacts and mitigation associated with one project will not always be the same for another. Each project has its own unique set of issues or circumstances. All projects should therefore be considered on their own individual merits and be based on the latest policy requirements. The Applicant is also aware of the need to consider the requirements from consultation, including views of the local authorities or other statutory bodies that may be different from one project to another. The mitigation areas for landscape planting around the new or extended permanent assets (CSE compounds and substations) as outlined in 7.4 Outline Landscape and Ecological Management Plan [REP2-018] (LEMP) are proposed to be delivered by the Great Grid Partnership (GGP) and form part of their contracted work-package. The GGP would be responsible for implementing the measures identified within the Outline LEMP and associated management plans/strategies subject to approval in detail under the Final LEMP secured under requirement 4 (Construction Management Plans) 3.1 Draft Development Consent Order [Revision C]. HCP and RCP included enhancement schemes such as the Offsite Planting and Enhancement Scheme (OSPES) and Landscape and Habitat Enhancement Scheme

Reference	Question	Applicant's Response
		(LHES), but such enhancement schemes were not required on Yorkshire GREEN or BTNO. Given the scale of HCP, the OSPES and replacement planting were delivered under a Landscape Framework for the business with contractor procured. This was delivered under the terms of the development consent obligation pursuant to Section 106 of the Town and Country Planning Act 1990, and recognising construction is still underway, has been primarily delivered on private landholdings. However, on the RCP it was delivered by the project team as part of the scope of the Main Works Contractor. It should be noted that the enhancement works for both HCP and RCP were secured and delivered under the 2011 National Policy Statement policy framework and before the commitment towards biodiversity net gain (BNG). To date we have delivered BNG under two projects, but this has been done in different ways, i.e., BTNO within the Order Limits, and Yorkshire GREEN secured via a Section 106 legal agreement. We are developing a National Grid BNG Framework given the number of projects coming forward. The Applicant has also provided details on the BNG procurement framework being established to address the post-consent stage in its response to question BIO 1.47 of Examining Authority's Written Questions 1 [PD-014]. The Applicant is currently engaging with Local Authorities and the Tree Council on tree replacement delivery, which will form part of an agreement in the future. However, other mechanisms do exist and could be explored further, such as the Landscape Framework utilised on HCP and the contract letting mechanisms available in the GGP enterprise agreement. The Applicant has explained how offsite tree planting required as a result of the 3:1 commitment will be secured via a legal agreement in section 3.12.9 to 3.12.10 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. The Applicant also confirms no further compensation is proposed – see section 3.10.21 to 3.10.31 and 3.10.33 to 3.10.36 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].
BIO 1.24	Assessment outstanding for hedgerows South Norfolk DC in [RR-3417] notes that an additional 53 hedgerows that	The Applicant can confirm that while not all hedgerows were surveyed under the Hedgerow Regulations 1997 methodology, all hedgerows were fully surveyed using the UKHab methodology and detailed hedgerow condition assessment methodology, which is required for the purpose of Biodiversity Net Gain (BNG).

Reference	Question	Applicant's Response
	were classified as being potentially important have not been surveyed. However, on AA13 of [REP1-132] you state that all hedgerows have been surveyed to inform the BNG assessment. Please comment on this in light of South Norfolk DC's comments, and if these 53 potentially important hedgerows remain unsurveyed, explain how this would affect the conclusions on significance you have reached in ES Chapter 8 [AS-026] and how this has been reflected in your mitigation, compensation and BNG considerations.	A Hedgerows Regulations 1997 assessment was undertaken at hedgerows across the Project that met the criteria outlined within 6.8.A3 Environmental Statement Appendix 8.3 - Hedgerows Regulations Report [APP-161]. 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026] has already assessed the impact on both important and the 53 potentially important hedgerows, under the Hedgerow Regulations, as a combined ecological receptor on a precautionary basis. All important and potentially important hedgerows affected by the Project for ecological and historic reasons are shown on 2.16 Trees and Hedgerows to be Removed and or Managed Plans [APP-048 to APP-055]. However, whether or not a hedgerow is 'important' under the Hedgerows Regulations does not materially affect the impact assessment undertaken nor the proposed mitigation, as all native-species hedgerows are identified as a Habitat of Principal Importance and identified as ecological receptors of high value. The proposed hedgerow mitigation and BNG considerations consider all hedgerows across the Project, irrespective of whether they are important under the Hedgerow Regulations 1997. Any loss of hedgerow will be mitigated for with replacement planting or hedgerow creation within Environmental Areas on completion of construction, as outlined within the 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. The BNG metric does not distinguish between 'important' or 'not important' hedgerows under the Hedgerow Regulations, but instead uses a more comprehensive UKHAB and hedgerow condition assessment which has been completed for all hedgerows across the Project. The BNG proposals for hedgerows are set out in 7.1 Biodiversity Net Gain Report [APP-299].
BIO 1.26	Ecological Clerk of Works (ECoW) The outline CoCP [APP-300] refers to the role of ECoW. However, in their RRs and LIRs a number of local authorities have stated that the role of the ECoW lacks key details including the number of people in that role, their minimum level of qualification and membership of a relevant professional	The Project role and responsibilities of the various clerks of works, environmental managers, work supervisors and technical specialists are set out within Table 3.1 of 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. What classifies as a suitably qualified ECoW will depend on the specific task to be undertaken and the protected species or habitat in question. Some examples of minimum standards which would be required include a minimum of 3 years relevant post-graduate experience in ecological supervision of construction works; membership (or eligibility for membership) of a relevant professional body, such as the Chartered Institute of Ecology and Environmental Management (CIEEM); and

Reference	Question	Applicant's Response
	body, their decision-making authority, reporting hierarchy and monitoring protocols. Since this would appear to be a critical role(s) in ensuring the successful implementation of any post-consent mitigation, compensation and BNG provide further details on this including an organisational reporting structure and explain how this is to be secured in the draft DCO.	holding of any species-specific licences required to supervise works affecting legally protected species, where applicable. This role will not be undertaken by one individual, but by multiple ecologists with a range of relevant experience and any protected species licences necessary for the specific task to be undertaken. Further details on the number and type of ECoWs required across the Project will be included within the Final Landscape and Ecological Management Plan. By way of example, the appointed ECoW(s) would typically operate with defined authority to advise on, and where necessary temporarily halt, construction activities that present a risk of non-compliance with the approved LEMP, relevant protected species legislation or licence conditions. The ECoW(s) would normally report through a clear site based reporting hierarchy, working with the Main Works Contractor's Environmental Manager(s) on day to day matters, and with established authority and escalation pathways where compliance risks or decision making thresholds are identified. Monitoring protocols are expected to include regular site inspections during relevant construction activities, verification of mitigation implementation, provision of toolbox talks and briefings to site personnel, and the maintenance of written records of ecological supervision and incidents. Findings would typically be reported through routine monitoring reports and site records, with confirmation of compliance submitted as part of the post consent reporting arrangements required under the final LEMP. In terms of organisational reporting structure, post consent ecological monitoring would normally be coordinated through the Applicant's project environmental management structure, with reporting lines enabling information from the ECoW(s) to inform internal governance processes and any required liaison with the relevant planning authority and statutory consultees. Chapter 11 of the 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. sets out the proposed approach to ecological monitoring that will be further detailed in the final LEMP. These examples are provided for clarity only. The appointed ECoW(s) will be suitably qualified and experienced to fulfil their role and to ensure that the Project is delivered in accordance with the approved LEMP and relevant legal and policy requirements.
BIO 1.27	Monitoring and compliance Table 6.1 of the outline CoCP [APP-300] provides details of a range of	Consistent with NPS EN-1 paragraphs 5.2.13, 5.7.11, 5.7.15 and 5.16.8, 7.2 Outline Code of Construction Practice [REP2-014] (Outline CoCP) codifies the mitigation that will be employed during the construction of the Project. The 'Compliance Date

Reference	Question	Applicant's Response
	mitigation measures/ environmental commitments. However, under the headings "Monitoring" and "Compliance Date and Details" it is stated that these are "To be confirmed by the Main Works Contractor(s) if the Project is consented." The ExA considers that this statement does not provide the necessary degree of certainty as to when and how monitoring and compliance matters would be dealt with. Consequently, the applicant is requested to provide more specific details at this stage, as far as possible. This should include, where applicable, a statement that the relevant CoCP commitments need to be in place and be undertaken subject to the authorised details before any works can commence.	and Details' column in Table 6.1 of the Outline CoCP is not fully specified at application stage because, for many commitments, the precise timing and form of compliance will depend on detailed design development (e.g., final construction methodologies, final positioning and sequencing of works, final access arrangements and final plant selection). Paragraph 1.2.1 of the Outline CoCP states that it is a 'preliminary framework' which will be <i>'fully developed based on detailed design information to be provided by the Main Works Contractor(s)'</i>, with the final version submitted for approval under Requirement 4 prior to commencement. The Applicant considers that Requirement 4 of 3.1 Draft Development Consent Order [Revision C] provides the necessary certainty in relation to when and how monitoring and compliance matters will be confirmed, approved and implemented. In particular, Requirement 4(1) provides that no stage of the authorised development may commence until, for that stage, the CoCP has been submitted to and approved by the relevant planning authority, and that the approved CoCP must be substantially in accordance with the Outline CoCP. This ensures that: • The final CoCP cannot depart materially from the mitigation measures, commitments and monitoring framework set out in the Outline CoCP • The detailed monitoring arrangements and compliance details for each relevant commitment must be provided, reviewed and approved prior to commencement of the relevant stage of development. Requirement 4(2) then requires that all construction works for each stage of the authorised development must be carried out in accordance with the approved plans, including the approved CoCP, unless otherwise agreed with the relevant discharging authority. Accordingly: • Once approved by the relevant planning authority, the monitoring and compliance arrangements set out in the final CoCP are binding and enforceable for that stage of development • There is no scope for construction to proceed other than in accordance with those approved arrangements. Requirement 4(3) further provides, for the avoidance of doubt, that all pre-commencement operations must be carried out in accordance with the Outline

Reference	Question	Applicant's Response
		CoCP (as well as the other outline management plans), unless otherwise agreed. This confirms that: • The Outline CoCP has direct effect in controlling pre-commencement operations • Where any mitigation, monitoring or compliance action is required at the pre-commencement stage, it must be undertaken in accordance with the Outline CoCP and is not dependent on the final CoCP being discharged. The references in Table 6.1 to monitoring and compliance details being 'to be confirmed by the Main Works Contractor(s)' should therefore be read in this secured context. They do not indicate an absence of control or deferral beyond commencement. Rather, they reflect the established NSIP approach whereby: • The principles for monitoring are fixed at application stage through the Outline CoCP • The detailed methodologies, frequencies, responsibilities and reporting mechanisms are confirmed through the final CoCP, submitted for approval under Requirement 4(1) and substantially in accordance with the Outline CoCP • Development cannot commence, other than in accordance with the approved CoCP (Requirements 4(1) and 4(2)). The Applicant also notes that not all Outline CoCP commitments are, by their nature, capable of being fully implemented prior to commencement. A number relate to construction-phase or activity-specific monitoring (for example noise, dust, ecology, water quality and site inspections) which must be undertaken during the carrying out of authorised works. These commitments are nonetheless clearly secured through Requirement 4 and become enforceable once the approved CoCP is in place. In response to the Examining Authority's question, the Applicant has updated Table 6.1 of the Outline CoCP to identify commitments that must be in place/must be implemented for pre-commencement activities. This update is provided in recognition that pre-commencement operations (as defined in 3.1 Draft Development Consent Order [Revision C]) may begin following consent and can occur prior to the final discharge of Requirement 4 for a subsequent stage of the authorised development.
BIO 1.28	Pre-construction surveys in 2026	Paragraph 2.2.1 of 7.2 Outline Code of Construction Practice [REP2-014] refers to archaeology surveys to be undertaken in 2026. Further details regarding the 2026

Reference	Question	Applicant's Response
	Paragraph 2.2.1 of the outline CoCP [APP-300] states that a number of pre-construction environmental surveys would be undertaken in 2026. What are these surveys, when in 2026 will they be undertaken and is it the applicant's intention that the results of these would be submitted into the Examination in sufficient time to allow for responses?	archaeological survey information have been provided within the Applicant's response to the Examining Authority's written question HE 1.43. The Applicant can confirm that no other surveys, including ecological surveys are being undertaken in 2026 with the purpose of informing the Development Consent Order application. A suite of surveys is proposed from 2026 onwards, to support the development of the detailed design and to inform the construction contractor's methods. These include: • Ecological surveys (including updated habitat walkover surveys and breeding bird surveys); • Arboricultural surveys; • General site walkovers; • Landscape condition surveys; • Archaeological surveys; and • Private water supply meetings. It is important to note that these surveys are being undertaken to support post-consent activities and are not required to inform the DCO application. Therefore, the results of the surveys are not intended to be submitted into the examination.
BIO 1.29	Residual effects on fish species: Table 5.1 of the outline CoCP [APP-300] indicates that a permit/authorisation for the translocation of fish is anticipated with the Environment Agency being the consenting agency. The ExA also notes that Table 8.11 of ES Chapter 8 [AS-026] details a number of watercourse catchments being of "Medium – County" value for certain fish species of conservation concern. However, Table 8.23 of ES Chapter 8 does not contain an assessment of residual effects on fish species, even	Table 8.23 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] includes an assessment of residual effects on fish species and concludes there would be no significant residual effect. The assessment identifies the installation of culverts and open cut trenching for cable installation as potentially having an effect on fish species, amongst other potential effects, at a local to medium level during construction. Commitments W01 to W16 within 7.2 Outline Code of Construction Practice [REP2-014] include measures to protect water quality and commitment B11 sets out in detail the mitigation measures to ensure fish are protected during these in-channel works. The mitigation measures proposed include fish rescue for certain watercourses which will be carried out under a fish translocation licence/permit from the Environment Agency (EA) as required. Short sections of watercourse will need to be temporarily dewatered, using a cofferdam and overpumping, to create a dry working area. Any rescued fish from these short dewatered sections would be released at a suitable distance downstream from the works. The Project will not be removing fish of conservation concern from

Reference	Question	Applicant's Response
	though Table 8.11 lists the relevant Water Framework Directive catchments and the fish species of conservation concern that are present. Explain why this is and justify the adequacy of the ES if residual impacts on fish species have not been included despite translocation measures being likely.	any watercourse or translocating fish to a new watercourse. With these mitigation measures in place there would be no significant residual effects on fish species as concluded within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] .
BIO 1.30	Avoidance measures and precautionary working methods Commitment Reference B01 in Table 6.1 of the outline CoCP [APP-300] states that: "reasonable avoidance measures and/or precautionary working methods may be developed under the consultation of the ECoW." However, this statement appears imprecise and open to interpretation. Consequently, the applicant is requested to provide further details about when/ how such further measures would be developed, the process for consultation with the relevant organisations on such measures and how this is to be secured, managed and monitored once approved, including the consideration of adaptive management if so required.	The Applicant acknowledges that the wording of B01 is open to interpretation. The wording of B01 within Table 6.1 of 7.2 Outline Code of Construction Practice [REP2-014] will therefore be updated in the next iteration of the document to state ' <i>...Where certain biodiversity receptors have been identified or where there is potential for them, and effects cannot be avoided during construction, Reasonable Avoidance Measures and/or Precautionary Working Methods will be included within the Final Landscape and Ecological Management Plan (LEMP) and implemented under supervision by an ECoW</i> '. The Final LEMP would be produced following pre-commencement surveys and detailed design and is secured through Requirement 4 of 3.1 Draft DCO [Revision 3] .
BIO 1.31	Reinstatement Planting Plan Commitment Reference B03 in the outline CoCP refers to a	The reinstatement planting plan referenced in commitment B03 of 7.2 Outline Code of Construction Practice [REP2-014] is a post-consent plan that will identify where trees, groups of trees, woodlands and hedgerows would be reinstated following

Reference	Question	Applicant's Response
	Reinstatement Planting Plan that is to be secured under R9 of the draft DCO. Is this the plan that would provide the finer details of the mitigation/ compensation areas and BNG proposals that are to be established? If so, then the applicant is requested to submit an indicative version of this plan, or signpost to where one has been provided, and to explain how it should/could interact with any Habitat Management and Monitoring Plan.	completion of construction. The locations for this planting will be identified following detailed design and submitted to the relevant Local Planning Authorities for approval. This post-consent reinstatement planting plan will include a schedule of trees, hedgerows or other plants to be planted, including the number, species, sizes and planting density. The Environmental Areas are located on land that is to be retained and managed by the Applicant. Indicative landscape designs have been prepared for the Environmental Areas and presented in 7.4 Outline Landscape and Ecological Management Plan Appendix D Outline Landscape Proposals [APP-325]. A final version of these landscape proposals for the Environmental Areas will be produced following detailed design and submitted as part of the Final Landscape and Ecological Management Plan to the Local Planning Authorities for approval. The reinstatement planting plan and Environmental Area's landscape proposals will not distinguish between the extent of planting for mitigation/compensation and BNG, as there is no distinction to be made. Further details on what is classified as mitigation, compensation and Biodiversity Net Gain are provided in response to Examining Authority's written question BIO 1.45. As identified in BIO 1.45 all management and monitoring to be undertaken at the Environmental Areas will be undertaken for at least 30 years, in line with requirements to be set out within the Final LEMP(s) and updated Biodiversity Net Gain assessment. It is therefore considered that an indicative version of the Reinstatement Planting Plan would not be valuable to the Examining Authority for this context and has not been produced by the Applicant at this stage in the process.
BIO 1.32	Priority habitat construction exclusion zones Commitment Reference B07 in the outline CoCP [APP-300] for construction exclusion zones states that "A minimum buffer of 10m (where practicable) will be retained around priority habitats (including watercourses) ..." The applicant is requested to either signpost to where	In reference to B07 in 7.2 Outline Code of Construction Practice [REP2-014], the term priority habitats refers to Habitat of Principal Importance, listed under Section 41 of the Natural Environment and Rural Communities Act 2006. A footnote will be added to the next iteration of the Outline Code of Construction Practice to provide clarity. Impacts to priority habitats, such as broad-leaved woodland, hedgerows and rivers, are fully assessed in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], based on an assessment of reasonable worst-case impacts. The impact assessment has assumed a 10 m construction exclusion zone (CEZ) will not be practicable for all priority habitats and instead has included all potential impacts within the assessment. Commitment B07 of 7.2 Outline Code of Construction

Reference	Question	Applicant's Response
	these “priority habitats” have been defined or explain what is meant by this term. In addition, the applicant is requested to explain what alternative measures would be undertaken if such 10 m exclusion zones are not practicable and how this has been factored into the assessment of effects in ES Chapter 8 [AS-026].	Practice [REP2-014], includes reference to this 10 m CEZ. This is a standard buffer to be applied where practicable to retained priority habitats across the Project during detailed design, in order to ensure impacts to priority habitats are minimised wherever practicable. This 10 m CEZ will be adhered to where there is sufficient flexibility in design to do so, when considering site-specific conditions. Where it is not practicable to maintain a standard 10 m CEZ mitigation measures associated with the specific priority habitat would be implemented as set out within 7.2 Outline Code of Construction Practice [REP2-014] and 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. For example, where works encroach within 10 m of a watercourse the water quality mitigation measures within commitments W1 – W16 will be implemented as appropriate to the specific location and type of works.
BIO 1.33	Culvert method statements Commitment Reference B11 of the outline CoCP [APP-300] refers to the development of method statements to ensure that any culverts within watercourses would contain suitable measures to ensure the safe passage of animals. How are these method statements to be consulted upon, authorised and secured? Should there be specific wording in the draft DCO requiring their submission and should an outline version(s) of these be submitted into the Examination in order to inform the final version and so they can be included in the certified documents in schedule 19 of the draft DCO?	Full details on the size and shape of each culvert required, at each specific watercourse crossing, will be determined following detailed design and following a series of detailed site investigations. This information will be presented to the relevant drainage authority in accordance with the agreed protective provisions for works to watercourses, which are secured through 3.1 Draft Development Consent Order [Revision C] and will be provided to xx to be discharged. This culvert design development would include measures to ensure safe passage of animals, such as the inclusion of pipes or mammal shelves and method statements to define specific timing of works. The detail of these measures would be determined once the DCO has been made and further information is available post-consent on a site-by-site basis. It is therefore not possible to provide an outline version of this method statement into the examination.

Reference	Question	Applicant's Response
BIO 1.34	Approval of tree surgery measures Explain why Commitment Reference B15 in the outline CoCP [APP-300] does not refer to any tree surgery measures needing to be approved in advance by the Arboricultural Clerk of Works, and to any measures that might affect either veteran trees or ancient woodland being subject to the prior approval of the relevant planning authority.	Commitment B15 in 7.2 Outline Code of Construction Practice [REP2-014] relates to the management of vegetation within the 'affected/managed' zone linked with the operational electrical safety clearances. In order to protect trees during the construction phase, commitment LV10 in 7.2 Outline Code of Construction Practice [REP2-014] commits to the establishment of construction exclusion zones and states that these would be detailed within an Arboricultural Method Statement (AMS). It also commits to any tree pruning requirements to be determined with the Arboricultural Clerk of Works prior to commencing all activities. The AMS is secured within 7.4 Outline Landscape and Ecological Management Plan [REP2-018] and therefore will be approved as part of the final LEMP by the local planning authorities The ancient woodland and veteran tree strategy, Appendix B of 7.4 Outline Landscape and Ecological Management Plan [REP2-018] contains information on ancient woodland and veteran trees and its final issue is to be agreed with the relevant Local Planning Authority.
BIO 1.35	Method statements for notable species Commitment Reference B16 of the outline CoCP refers to both protected and "notable" species. Confirm that in this context "notable" means that as defined in Footnote 1 of ES Chapter 8 [AS-026] and, if so, include a cross reference to that effect in the next iteration of the outline CoCP [APP-300]. What is the proposed determination, management and monitoring process for any method statements for notable species that might need to be produced? The applicant is requested to provide into the examination an	The Applicant can confirm the 'notable species' referred to in 7.2 Outline Code of Construction Practice [REP2-014] are as defined in footnote 1 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. Notable species comprise: species of conservation concern as listed under Section 41 (s41) of the Natural Environment and Rural Communities Act 2006; birds listed under s41 of the Natural Environment and Rural Communities Act 2006; birds listed under Schedule 1 of the Wildlife and Countryside Act 1981, as amended; and birds listed as red or amber in the Birds of Conservation Concern 5 (Stanbury <i>et al.</i>, 2021). The Applicant included a cross-reference to the definition of notable species in the next iteration of the Outline Code of Construction Practice submitted at Deadline 3. All reasonable avoidance method statements for protected and notable species, that are expected to occur within the Order Limits, are already outlined within Section 6 of 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. As further design detail becomes known post-consent and pre-construction surveys are completed, the reasonable avoidance method statements for notable species will be developed further (if required) and included within the Final Landscape and Ecological Management Plan. Separate standalone notable species method statements are not

Reference	Question	Applicant's Response
	example of a method statement for any such notable species.	proposed and therefore the applicant has not submitted a 'notable species method statement' to Examining Authority in response to this question.
BIO 1.36	Exclusion zones Commitment Reference B17 in Table 6.1 of the outline CoCP [APP-300] refers to the provision of a 15m minimum exclusion zone from the edge of ancient woodland. How will this zone be demarcated and monitored to ensure that it remains in place whilst any construction works in the vicinity are ongoing?	Detailed mitigation measures to protect specific ancient woodlands are set out within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP 323] . Details on demarcation and monitoring are already presented within this report. The 15 m exclusion zone from ancient woodlands will be demarcated using self-supporting Heras fencing (or similar). The Final Ancient Woodland and Veteran Tree Strategy will be updated following detailed design, which is secured under Requirement 4 of the 3.1 Draft Development Consent Order [Revision C] , and will be submitted to the Local Planning Authority for approval. Further details on the demarcation of the 15 m exclusion zones from ancient woodlands will also be included within the Arboricultural Method Statement. The demarcation and ongoing monitoring of this exclusion buffer will be supervised by the Arboricultural Clerk of Works, to ensure it remains in place throughout the construction phase.
BIO 1.37	Opportunities for joint working/ interactions with other projects The ExA notes that in O35 of the Applicant's Comments on Relevant Representations [REP1-132] in response to comments made by Essex CC you have referenced the landscape proposals for the proposed development being influenced by those for the neighbouring Five Estuaries and North Falls substation sites. Explain how your assessment of cumulative effects on biodiversity has been undertaken in this area where multiple NSIP projects could be undertaken at the same time. Set out in more detail the opportunities for joint working/ a co-ordinated approach	8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] identifies that Five Estuaries Offshore Wind Farm (EN010115) and North Falls Offshore Wind Farm (EN010119) and the Project have worked together to mitigate the effects of traffic and coordinate landscape plans. 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] assessed the effects that both Five Estuaries and North Falls and other NSIP projects would have on biodiversity, with a focus on the areas where the footprint of these schemes were close to, or overlapped with, the Order Limits. For example, many of these projects would connect into the proposed new East Anglia Connection Node (EACN) Substation. The effects that these projects would have on mobile species was also reviewed to identify whether there was the potential for cumulative effects. The other projects have identified potential for effects associated with noise and lighting, but the implementation of standard mitigation delivered through 7.2 Outline Code of Construction Practice [REP2-014] would ensure that inter-project cumulative effects would not be significant. Where residual effects were identified by the other projects, these related to ecological receptors such as farmland birds that would not be significantly affected by the Norwich to Tilbury Project and so no inter-project cumulative effects were identified.

Reference	Question	Applicant's Response
	to habitat creation, biodiversity enhancement and management that you have pursued so far with the proponents of other significant developments, and how this will develop in the future should all schemes achieve consent. Also, in [REP1-250] (and elsewhere) Lower Thames Crossing Project has raised concerns about the location of the Tilbury North substation impacting on the nitrogen deposition and ancient woodland mitigation areas that are proposed in the made LTC DCO and which are noted by the applicant in Table 6.1 of [REP1-134]. The ExA understands that the applicant is in discussions with the Lower Thames Crossing Project on this matter. However, the applicant is requested to explain how any potential effects arising from the proposed development on these mitigation areas for LTC have been assessed in its consideration of inter-project cumulative impacts in ES Chapter 17 [APP-281].	As noted in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], the Project will directly affect two areas where woodland planting is proposed as compensation for impacts arising from Lower Thames Crossing (LTC) project. As noted, the purpose of the planting is compensation for direct loss of ancient woodland and to compensate for air quality impacts to ancient woodlands (nitrogen deposition) in the wider area as a result of the LTC scheme. The Norwich to Tilbury Project has no air quality impacts that would affect ancient woodland or direct impacts that would result in the loss of ancient woodland. Suitable alternative areas for LTC's ancient woodland and nitrogen deposition compensation planting have been provided within the Norwich to Tilbury Order Limits, which will ensure LTC are compliant with their Development Consent Order. 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] shows the proposed alternative compensation planting locations within the Norwich to Tilbury Order Limits. As a suitable location for the LTC compensation planting had been identified within the Order Limits, close to its original location that would maintain connectivity, relocating this planting was not considered to give rise to cumulative effects related to ecology and biodiversity and therefore not discussed within 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281].
BIO 1.38	Local Nature Recovery Strategies Notwithstanding your comments in, for example, O34 of [REP1-132] that Local Nature Recovery Strategy areas would be considered as part of the off-site BNG selection process, explain	While Essex Local Nature Recovery Strategy (LNRS) was published in July 2025, just before the Project DCO submission, Norfolk and Suffolk LNRS were both published after in October 2025. Notwithstanding, the draft versions of these LNRSs were available prior to submission and were therefore considered by the Project. As previously stated, the Applicant will consider the Essex, Suffolk and Norfolk LNRSs as part of the off-site BNG selection process, where sites are available, and

Reference	Question	Applicant's Response
	how your proposed mitigation, compensation, enhancement and BNG measures have thus far had regard to the Local Nature Recovery Strategies that have now been produced by Essex CC, Norfolk CC and Suffolk CC.	appropriate to the Project. This off-site selection process would take into consideration the potential for wider habitat connectivity and enhancement across the three counties, as well as specific areas of importance to biodiversity. Full details of the off-site solution would be provided to the Local Planning Authorities post-consent. The Applicant is currently engaging with Suffolk Wildlife Trust on the Waveney and Little Ouse Recovery (WaLOR) project on the potential delivery of biodiversity units within the scheme. The WaLOR project aims to enhance the natural heritage of the landscape, restore habitats, improve biodiversity and deliver climate change and water management benefits. The scheme was identified by virtue of its location in relation to the Project and identification within the Suffolk LNRS as a site where creation or improvement of habitat is strongly encouraged. In addition, the seven Environmental Areas around the permanent assets (i.e. Substations and Cable Sealing End (CSE) Compounds) also offer opportunities to align with the LNRS's. The below information details how at each Environmental Area the LNRS has been applied, with reference to 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325] and 7.1 Biodiversity Net Gain Report [APP-299]: Norwich Substation Environmental Area (Norfolk LNRS): The existing woodland strip along the southern boundary has been identified by the LNRS as offering potential for Deciduous Woodland Restoration [PM02]. As part of the indicative landscape plan and BNG assessment this area has been identified as retained woodland to be enhanced, aligning with the LNRS. Woodland planting is proposed in the south east corner, to connect the woodland strip to the south of the boundary and Dunston Hills; two areas of woodland identified in the LNRS as potential areas for Deciduous Woodland Restoration [PM02]. The condition of the existing scrub habitat in the Environmental Area is also proposed to be improved. The woodlands and scrub habitats are to be linked with new planting to create an ecological network that is bigger, better and more joined up to provide benefits to biodiversity in alignment with the goals of the Norfolk LNRS. Wenham Grove CSE Compound (Suffolk LNRS): The Wenham Grove Environmental Area sits entirely within areas identified by the LNRS as a potential area for Deciduous Woodland Creation [PM01], Scrub Creation [PM07], and Other Neutral Grassland Creation [PM19], with the potential to create a mosaic of all

Reference	Question	Applicant's Response
		three habitats. As part of the indicative landscape proposal and BNG assessment, it is proposed to plant a mosaic of other neutral grassland, mixed scrub, and mixed woodland planting aligning with the LNRS. This new woodland planting would be linked to existing woodland blocks with surrounding scrub habitat, and native tree planting. Woodland and scrub planting is also proposed next to Wenham Grove woodland, providing benefits to woodland flora and fauna. Existing woodland blocks within the Environmental Area have been identified by the LNRS as offering potential for Deciduous Woodland Restoration [PM02]. As part of the indicative landscape plan and BNG assessment these areas of woodland have been identified as retained woodland to be enhanced, aligning with the LNRS. • EACN Substation (Essex LNRS): The Environmental Area is not located in any 'Strategic Opportunity Areas' identified by the LNRS. However, the Essex LNRS does identify the EACN Environmental Area as a 'Potential Opportunity Area' for woodland, grassland and scrub creation. 'Potential Opportunity Areas' for woodland within the Environmental Area range from Value Index Categories '55-65%' to '5-15%', and as part of the indicative landscape plan and BNG assessment this will include new woodland planting within all these categories. 'Potential Opportunity Areas' for grassland range from Value Index Categories '15-25%' to '0.01-0.5%', and as part of the indicative landscape plan and BNG assessment the Project will create grassland within all these categories. 'Potential Opportunity Areas' for scrub within the Environmental Area range from Value Index Categories '55-65%' to '0.01-5%', and as part of the indicative landscape plan and BNG assessment the Project will create scrub within all these categories. • Great Horkesley (EACN side) CSE Compound (Essex LNRS): The Environmental Area lies adjacent to Harrow Wood Local Wildlife Site and is located entirely within a LNRS 'Strategic Opportunity Area' for woodland and scrub creation and within a 'Strategic Opportunity Area' for woodland enhancement. As part of the indicative landscape plan and BNG assessment it is proposed to plant woodland and scrub habitats and enhance the existing plantation woodland within the Environmental Area, aligning with the LNRS. The Environmental Area is also within a 'Potential Opportunity Area' identified in the LNRS for grassland ranging from Value Index Categories '65-75%' to '25-35%', and as part of the indicative

Reference	Question	Applicant's Response
		landscape plan and BNG assessment the Project will create grassland within '65-75%' and '55-65%' areas. • Great Horkesley (Tilbury side) CSE Compound (Essex LNRS): The Environmental Area is partly within a 'Strategic Opportunity Area' identified within the LNRS for woodland and scrub creation. As part of the indicative landscape plan and BNG assessment, woodland and scrub planting is proposed in these areas aligning with the LNRS. The Environmental Area is also within 'Potential Opportunity Areas' identified in the LNRS for grassland ranging from Value Index categories '45-55%' to '15-25%', and as part of the indicative landscape plan and BNG assessment the Project will create grassland within all these categories within the Environmental Area. • Fairstead (EACN side) and Fairstead (Tilbury side) CSE Compounds (Essex LNRS): The Environmental Area is not located in any 'Strategic Opportunity Areas' identified by the LNRS. However, the Essex LNRS does identify the Environmental Area as within 'Potential Opportunity Areas' for woodland, grassland and scrub creation. Potential opportunity areas for woodland within the Environmental Area range from Value Index Categories '35-45%' to '5-15%', and as part of the indicative landscape plan and BNG assessment the Project will create woodland within all these categories. 'Potential Opportunity Areas' for grassland within the Environmental Area range from Value Index Categories '35-45%' to '0.01-0.5%', and as part of the indicative landscape plan and BNG assessment the Project will create grassland within all these categories. 'Potential Opportunity Areas' for scrub within the Environmental Area range from Value Index Categories '55-65%' to '5-15%', and as part of the indicative landscape plan and BNG assessment the Project will create scrub within all these categories. • Tilbury North substation and CSE Compounds (with LTC) (Essex LNRS): The Tilbury North substation and CSE compounds (with LTC) will include woodland and grassland planting within 'Strategic Opportunity Areas' identified by the LNRS for woodland and grassland creation.
BIO 1.39	Ecology Working Group In paragraph 9.10 of their joint LIR [REP1-178] Suffolk CC, Mid Suffolk	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 during the construction period, as set out within 7.4 Outline

Reference	Question	Applicant's Response
	SDC and Babergh DC have raised the need for an Ecology Working Group to be instigated to allow for consultation and monitoring to be undertaken for any post-consent mitigation, compensation and BNG. Is it your intention to set up such a working group and if not, justify why not? If such a group is to be formed, then suitable wording should be inserted into the next version of the outline versions of the outline LEMP and outline CoCP.	Landscape and Ecological Management Plan [REP2 -018] and 7.2 Outline Code of Construction Practice [REP2-014]. 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 and Outline Code of Construction Practice will be updated to include the requirement for a post-consent Ecology Working Group. The Ecology Working Group would be established in consultation with the above bodies following the grant of consent, including agreement of its remit and terms of reference, membership and attendance arrangements, meeting frequency, and the format of progress reporting and information sharing. The Applicant proposes that it would fund and administer the working group and, where agreed, the reasonable costs of attendance and technical input from the above bodies as part of the Project's environmental management and compliance arrangements during construction.
BIO 1.40	Application of the mitigation hierarchy Paragraph 5.4.42 of NPS EN-1 (2023) references the application of the mitigation hierarchy in regard to biodiversity and geological conservation interests. A number of IPs have referenced the need for the applicant to demonstrate that a strict adherence to the mitigation hierarchy has been followed. In paragraph 3.1.17 of its LIR [REP1-176] South Norfolk Council, in relation to the mitigation hierarchy, states that: "Further work is required to demonstrate that avoidance and minimisation measures have been fully explored. Compensation should only be	The mitigation hierarchy has been fully applied by the Project with regard to priority habitats and species listed under S41 of the Natural Environment and Rural Communities Act 2006, as presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and in accordance with National Policy Statements (NPS) EN-1 and EN-5 (2024). 6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135] sets out the hierarchy. The Applicant notes paragraph 5.4.42 of NPS EN-1 (2024) clearly expects a sequential approach to be followed when applying the mitigation hierarchy. The first pillar of the mitigation hierarchy is to 'avoid' the impact. At the outset of the Project the scoping corridor was mapped by Geographic Information System (GIS) so that known constraints could be identified within the scoping corridor and the various search areas used for designated sites, habitat and species records. Desk-study data were obtained from third parties and added to the GIS database. A fixed-wing drone was used to fly this corridor to capture aerial photographs with LiDAR data so that habitats and features could be mapped with an accuracy level to 3 cm at ground level. These data were captured in GIS. Using such data it was possible to look for a route corridor that avoided statutory designated sites (i.e., Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas, Ramsar sites and Local Nature Reserves), non-statutory designated sites (County

Reference	Question	Applicant's Response
	considered where no reasonable alternatives exist.” Therefore, respond to South Norfolk Council's comments and justify how you have fully applied the mitigation hierarchy in regard to priority habitats and species listed under section 41 of the NERC Act 2006.	Wildlife Sites, Local Wildlife Sites, Roadside Reserves), irreplaceable habitats (i.e., lowland fen and ancient woodland), Habitats of Principal Importance (HPI) (i.e., lowland meadows, coastal and floodplain grazing marsh, lowland mixed deciduous woodland, calcareous grassland, lowland dry acid grassland, ponds, rivers, reedbed, hedgerows). This route continued to be refined based on the results of the habitat and species surveys undertaken for the Project. Through careful routeing and siting and following a series of change requests, it was possible to avoid direct impacts to all statutory designated sites and most of the non-statutory designated sites, the lowland fen and most of the ancient woodlands, some of the HPI, and to avoid direct impacts to protected species by avoiding main badger setts, potential otter holts and confirmed bat roosts. The Limits of Deviation for the Project have also been reduced, as appropriate, to avoid impacts to designated sites, HPI, ancient woodlands and protected species constraints such as main badger setts and potential bat tree roosts. The Project has committed to avoid undertaking ground-breaking works within ancient woodland and within the 15 m buffer surrounding ancient woodland, where practicable. It is not possible to avoid works in ancient woodlands where impacted third-party infrastructure is already located within ancient woodland. Where total avoidance of the HPI was not possible, for instance, where the alignment crosses hedgerows and rivers or an area of dry acid grassland, the Project sought to minimise impacts, for example, by reducing the width of the haul road at each watercourse and hedgerow crossing and using existing crossing points to cross watercourses and hedgerows. The dimensions of bellmouths/visibility splays have been reduced to limit the pruning of trees and shrubs in sensitive habitats including ancient woodland sites and to avoid impacts to tree roosting bats. It is expected that the impact of the Project on ecological receptors would be reduced further at detailed design as micro-siting will be undertaken to ensure that haul roads, pylons, bell mouth/visibility splays and other construction activities are adjusted avoid impacts to habitats and habitat features such as trees. The implementation of the standard mitigation measures set out in 7.2 Outline Code of Construction Practice [REP2-014] has ensured that standard pollution control measures and appropriate fencing are in place to ensure adherence to the second pillar of the mitigation hierarchy, namely to ‘prevent’ impacts associated with changes

Reference	Question	Applicant's Response
		in air quality, changes in water quality, noise, lighting. Mitigation measures that are relevant to S41 habitats and species are identified as Standard Mitigation in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The Project will also use the third pillar of the mitigation hierarchy, 'reduce', as it will restore all temporarily impacted habitats using replacement planting or natural regeneration as set out in 7.4 Outline Landscape and Ecological Management Plan [REP2-018], which includes standard and additional mitigation for a range of protected species. Mitigation measures that are relevant to S41 habitats and species are identified as Standard Mitigation and Additional Mitigation in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]. The fourth pillar of the mitigation hierarchy is 'offset', also known as compensation. As identified in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], no off-site planting or habitat creation is required as part of the Environmental Impact Assessment to offset impacts to S41 habitats or species. Offsite biodiversity units are to be purchased to deliver a net gain in biodiversity, but this is not required as mitigation for the Project. This offsite purchase is an enhancement measure in terms of ecology and biodiversity. The Applicant has also made a commitment to provide 3:1 planting for individual trees and individual trees within small groups which will provide a combination of reinstatement planting and compensatory planting. The Applicant has reached agreement with Natural England on how the mitigation hierarchy has been applied. This was reported in the Statement of Common Ground submitted at Deadline 1 – see ID 3.3.18 in 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]. Overall, the Applicant considers the mitigation hierarchy has been correctly applied for biodiversity and has reached agreement with the appropriate Statutory Nature Conservation Body in compliance with paragraph 4.2.11 of NPS EN-1 (2024).
BIO 1.41	Proposals for mitigation, enhancement, compensation and BNG Notwithstanding your commentary in ES Chapter 5 [APP-135], at the	The 'Additional Mitigation' measures referred to within paragraphs 8.6.10 and 8.6.13 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] are all set out in detail within 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. Additional Mitigation measures are measures considered additional to the embedded and standard mitigation set out within Section 8.6 of the 6.8

Reference	Question	Applicant's Response
	moment it is unclear to the ExA precisely which measures the applicant considers to be mitigation (particularly any "Additional Mitigation" that is referenced in paragraphs 8.6.10 to 8.6.13 of ES Chapter 8 [AS-026]), and which would fall within the context of compensation, enhancement or BNG. For example, it would appear that within some of the proposed environmental areas there is a mixture of these. In order to ensure that there is no double counting of measures the applicant is requested to provide additional clarification as to which measures/ proposed habitat creation fall within each of the above categories. To ensure clarity and future ease of monitoring you are requested to provide this information in a single document that details the type and quantum of habitat types that are being lost and the type and quantum of habitats and measures for species that are being replaced/ developed, state where these new sites will be, and whether this will represent mitigation, compensation, enhancement or BNG. For linear features such as hedgerows this information should, as far as possible	Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026], and include but are not limited to the following: • Timings of habitat reinstatement within land functionally linked to the Stour and Orwell Estuaries SPA and Ramsar site • Specific demarcation and supervision requirements for protection of ecologically designated sites • Natural regeneration of certain habitats/species lists to be planted within locally designated sites • Specific ancient woodland mitigation such as construction exclusion areas, demarcation, machinery and working areas restrictions and supervision • Specific mitigation for protected species within Section 6, including (but not exclusive to) key timings to avoid, spoil mounds for terrestrial invertebrates, installation of artificial bat flyways and reasonable avoidance measures for a range of protected species. The embedded mitigation measures include the proposed habitat creation within the Environmental Areas (which is also landscape and visual mitigation). Standard mitigation measures include all in situ habitat reinstatement (where impacts are temporary) across the Project. Both habitat reinstatement across the Project and habitat creation with the Environmental Areas are considered ecological mitigation and will ensure delivery of 'no net loss to biodiversity'. There are no specific areas of habitat creation required as mitigation or compensation, specifically for any protected species. Therefore, all embedded, standard and additional mitigation, with respect to ecology and biodiversity, identified within both 7.4 Outline Landscape and Ecological Management Plan [REP2-018] and 7.2 Outline Code of Construction Practice [REP2-014] are categorised as mitigation and not compensation or enhancement. Biodiversity Net Gain (BNG) is then considered separately. The BNG methodology requires all onsite habitats post-development (i.e. on completion of all works including landscaping), to be inputted into the BNG metric. This post-development metric therefore includes all habitats to be retained, habitats to be improved, habitats to be reinstated and habitats to be created across the Project. The BNG assessment therefore includes all land within the Environmental Area. The BNG additionality

Reference	Question	Applicant's Response
	at this stage, be broken down into figures for each individual length of hedgerow that is proposed to be removed and figures for what is proposed to be re-planted at the original location or to be compensated for with planting elsewhere. Whilst the ExA appreciates that the full details might not be available until the detailed design stage, the applicant is requested to provide its best estimate prior to detailed design, based on what has been assessed in the ES.	principle allows for landscape mitigation and habitat mitigation to also be included within the BNG calculation. The Project will deliver any biodiversity deficit, in order to achieve 10% net gain, through offsite third-party habitat banks as set out within 7.1 Biodiversity Net Gain Report [APP-299]. To conclude, the full extent of each of the Environmental Areas are ecology habitat mitigation, landscape mitigation and BNG. There is no distinction to be made between these three categories. All habitats within the Environmental Areas will be managed for 30 years in line with the management and monitoring details that will be included within the final Landscape and Ecological Management Plan. In addition to the above, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] provides a 3:1 commitment in relation to replanting individual trees and individual trees within small groups which is considered to provide a combination of reinstatement planting and compensatory planting. The environmental measures contributing towards the duty to seek to further the purpose of the National Landscape detailed within 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120] comprise compensation and enhancement/ furtherance.
BIO 1.42	Measures to minimise loss of habitat South Norfolk DC in its RR [RR-3417] considers that some of the temporary work areas would appear to be “excessive in places”. Please comment on this, including the scope for these areas to be reduced in size at the detailed design stage, and explain what measures you have taken to minimise the loss of trees and hedgerows in these locations, including the Tree Preservation Order (TPO) - designated veteran tree (TPO ref SN0697) that South Norfolk DC has referred to.	6.4 Environmental Statement Chapter 4 - Project Description [APP-130] provides detail on the temporary features such as temporary construction compounds and haul roads and working swathe areas used for assessment purposes. Illustrative examples of the temporary features can be found within the Design and Layout Plans [APP-041, APP-042, APP-043]. The sizing of these features reflects the limits of deviation applied to the permanent assets and likewise provide flexibility for the contractors chosen construction methodology. 7.2 Outline Code of Construction Practice [REP2-014] contains a commitment (B02) to reduce the impacts of construction, for example, minimising land-take / habitat loss and locating access tracks / haul roads and temporary construction compounds / material storage areas outside of ecologically sensitive sites/habitats. With specific regard to Tree Preservation Order (TPO ref SN0697), this corresponds with the veteran tree reported as T65 in 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]. The buffer zone for this tree is reported as a radius of 33 m and is identified as retained with no pruning works required. A section of the tree's buffer

Reference	Question	Applicant's Response
		zone is impacted by the temporary haul road as worst-case, however there is scope to reduce the working width of the haul road in order to completely avoid the buffer zone of T65 as per commitment B14 in 7.2 Outline Code of Construction Practice [REP2-014]. Commitment GG14 in 7.2 Outline Code of Construction Practice [REP2-014] seeks to reduce tree and hedgerow removal.
BIO 1.43	Woodland planting In [RR-1138] the Forestry Commission has stated that ideally woodland planting should be in blocks of at least 5 hectares (ha) in size or to link to other existing woodland to create blocks of at least 5 ha. Provide details of the sizes of proposed woodland planting areas (or signpost to where such details are available) and explain how you have accounted for the comments of the Forestry Commission in designing your proposed woodland planting areas.	The Applicant notes the Forestry Commission feedback, that ideally new woodland planting should be in blocks of 5 ha or linked to other existing woodlands to create blocks of 5 ha. While the Forestry Commissions comment that blocks of 5 ha is ideal, the suggestion is not considered an absolute requirement. The indicative landscape plans for the Environmental Areas, as presented within 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325], have been developed to deliver landscape screening with additional ecology benefit. Indicative landscape designs have been developed aligned with the Local Nature Recovery Strategies for Norfolk, Suffolk and Essex and therefore a mosaic of habitats, including woodland, have been proposed within the Environmental Areas. Where possible the Applicant has aimed to achieve the best biodiversity value within the Environmental Area with a diversity of habitats, whilst still aiming to provide woodland of significant size, which is connected to the wider landscape. Within the indicative landscape proposals for the Environmental Areas, 7.4 Outline Landscape and Ecological Management Plan Appendix D - Outline Landscape Proposals [APP-325], woodland planting within each is located adjacent to existing areas of woodland and /or where it will provide a connection between existing areas of woodlands. In some cases, the existing areas of woodland are outside the Order Limits. All but one of the seven proposed Environmental Areas have a proposed total woodland coverage of more than 5 ha when considering both new and existing connected woodland which aligns with the suggestion from the Forestry Commission. The Environmental Area around 'Tilbury North Substation and CSE compounds (with LTC)' is the only Environmental Area with woodland totalling less than 5 ha. This is due to the limited space available in the area due to existing assets and the geographical interaction with Lower Thames Crossing including the areas of planting identified for ancient woodland and nitrogen deposition compensation.

Reference	Question	Applicant's Response
BIO 1.44	Restoration measures at CWSs In [RR-3522] Suffolk Wildlife Trust considers that restoration at Sproughton Park CWS, Fore and Busheys Grove CWS and Thrandeston Marsh CWS is of concern and that the aim should be to improve the habitat condition rather than just restore. - To Suffolk Wildlife Trust: What discussions have you had with the applicant over the restoration of these sites and what additional measures would you wish to see? - To applicant: Comment on the concerns raised by Suffolk Wildlife Trust and explain whether the enhancement of these sites is being considered as a potential BNG option?	As set out within 7.4 Outline Landscape and Ecological Management Plan [REP2-018] all temporarily affected habitats will be returned to their original type/condition and handed back to the respective landowners. The Applicant has consulted Suffolk Wildlife Trust over the proposed habitat reinstatement measures at County Wildlife Sites (CWS), which includes Sproughton Park CWS, Fore and Busheys Grove CWS and Thrandeston Marsh CWS and has agreed where natural regeneration over replacement planting is preferred. The Applicant is open to opportunities within Norfolk, Suffolk and Essex for off-site Biodiversity Net Gain (BNG) including at Sproughton Park CWS, Fore and Bushey Groves CWS and Thrandeston Marsh CWS, should they align with the BNG selection criteria as set out within 7.1 Biodiversity Net Gain Report [APP-299]. Off-site BNG sites will be selected based on a range of factors including proximity to the Project, geographical location, habitat type, habitat condition, cost and timings amongst others, including the local nature recovery strategies (LNRs). BNG delivered off-site would be delivered through expert partners and biodiversity units purchased from providers registered on the Biodiversity Gain Site Register. It is our understanding that Sproughton Park CWS and Fore and Bushey Groves CWS are currently owned by private landowners and Thrandeston Marsh CWS is owned by Thrandeston Parish Council and not Suffolk Wildlife Trust. The landowners of these CWS would need to agree to any proposed BNG provision. The Applicant has been in regular consultation with Suffolk Wildlife Trust over potential areas for off-site BNG and these particular County Wildlife Sites (Sproughton Park CWS, Fore and Bushey Groves CWS and Thrandeston Marsh CWS) have not been raised by Suffolk Wildlife Trust as options for BNG.
BIO 1.45	Long-term monitoring and management of BNG Explain how you propose to manage the process and the practical application of BNG measures over a time period of 30 years? In addition, since it would appear that the proposed environmental areas would potentially contain mitigation planting,	The Applicant can confirm that full details of the habitat creation, habitat management and monitoring for each Environmental Area, will be included within the Final Landscape and Ecological Management Plan(s) (LEMP). This will include a final version of the landscape plans for each Environmental Area following detailed design. This Final LEMP(s) will set out the specifics on how each area will be managed to deliver the habitat type and condition that has been predicted as part of the updated Biodiversity Net Gain (BNG) assessment. A monitoring programme will be included within the Final LEMP(s) which will be delivered by a competent ecologist who will

Reference	Question	Applicant's Response
	compensation habitat and BNG habitat then clarify how all those elements would be monitored and managed in practice?	determine if habitat establishment is on track or if adaptive management measures are required. The Environmental Areas are all located around the Applicant's permanent assets (substation and cable sealing end compounds) and therefore will be owned by the Applicant in perpetuity. Habitat creation will be undertaken on completion of construction, in the next suitable planting season. All long-term habitat management and monitoring will be undertaken by the Applicant's land management team and their contractors (including ecologists). All management and monitoring to be undertaken at the Environmental Areas will be undertaken for at least 30 years, in line with requirements to be set out within the Final LEMP(s) and updated BNG assessment. There is no distinction within the Environmental Areas between habitat mitigation; landscape mitigation and BNG (as set out in detail within the response to Examining Authority's written question BIO 1.41). Therefore, all habitats across the Environmental Areas will be managed as per the requirements of the BNG assessment, with the BNG requirements being the most exhaustive.
BIO 1.46	Habitat management and monitoring plan Essex CC in its RR [RR-1083] states that a 30 year management and monitoring period should be secured for all BNG. In addition, Essex CC indicates that for all mandatory BNG proposals a Habitat Management and Monitoring Plan (HMMP) must be submitted to and approved by the LPA. Whilst the ExA notes the commitment to a 30-year period for BNG, the applicant is requested to provide an outline HMMP to be submitted for its BNG proposals and to explain why a requirement for the provision of a HMMP in accordance with the outline HMMP is	The Applicant can confirm that all habitats (both proposed and existing) located within each Environmental Area, around the permanent assets (substations and cable sealing end compounds), will be managed and monitored by the Applicant for at least 30 years, in line with requirements to be set out within the Final Landscape and Environmental Management Plan(s) (LEMP(s)) and updated BNG assessment. This commitment is already set out within 7.1 Biodiversity Net Gain Report [APP-299]. The Applicant can confirm that full details of the habitat creation, habitat management and monitoring for each Environmental Area, will be included within the Final LEMP(s). This will include a final version of the landscape plans for each Environmental Area following detailed design. This Final LEMP(s) will set out the specifics on how each area will be managed to deliver the habitat type and condition that has been predicted as part of the updated Biodiversity Net Gain (BNG) assessment. A monitoring programme will be included within the Final LEMP(s) which will be delivered by a competent ecologist who will determine if habitat establishment is on track or if adaptive management measures are required. This will broadly follow the content of the Defra Habitat Management and Monitoring Plan (HMMP) template for Town and Country Planning Applications, although this will be adapted as required for a Nationally Significant Infrastructure Project (NSIP), in the current absence of any

Reference	Question	Applicant's Response
	not currently secured within the draft DCO.	formal NSIP Biodiversity Net Gain guidelines. The Final LEMP(s) will be submitted to the relevant Local Planning Authority for review and to be discharged under Requirement 4 of 3.1 Draft Development Consent Order [REP2-004] . Given the habitat management and monitoring measures will be included within the Final LEMP(s) there is no requirement for a separate HMMP.
BIO 1.47	Approach to the provision of BNG, including off-site BNG As set out in Table 7.1 of its BNG Report [APP-299] the applicant proposes 1165.95 Off-site Biodiversity Units to achieve 10% BNG in terms of Area habitat Units. The ExA understands that off-site BNG requirements would be calculated following detailed design and the biodiversity metric being re-calculated. Consequently, no specific sites have been proposed as yet, although the ExA notes that paragraphs 6.1.6 and 6.1.7 of [APP-299] refer to the Waveney and Little Ouse Landscape Recovery Project (WaLOR) scheme and Market Weston Fen in Suffolk and that Essex Wildlife Trust has confirmed its intent to assist with the requirement for approximately 400 units in Essex. Provide an update on progress on the securing of off-site BNG, including confirmation that sufficient land would be available from commercially registered providers.	Update on progress on the securing of offsite BNG, including confirmation that sufficient land would be available from commercially registered providers. The engagement with potential providers of off-site Biodiversity Net Gain (BNG) is continuing. In particular, the Applicant remains in detailed discussions with Suffolk Wildlife Trust regarding the Waveney and Little Ouse Recovery (WaLOR) project on the potential delivery of biodiversity units within the scheme. The WaLOR project is a landscape recovery scheme funded by the Department for Environment, Food and Rural Affairs (Defra) that focuses on the restoration and enhancement of the Waveney and Little Ouse river catchments on the Norfolk/Suffolk border. The WaLOR project is located in the same geographic area as the Project and has the potential to offer the habitat types required. The project is identified within the Norfolk and Suffolk Local Nature Recovery Strategies, which encourages BNG delivery in this area and offers a significant number of ecologically valuable units and wider environmental benefits. The Applicant will provide a further update subsequent to securing any agreement. In addition to the proactive work the Project is undertaking to secure biodiversity units upfront, work is also taking place more centrally within National Grid to address the post-consent stage. The organisation is developing a procurement exercise that will include identifying suppliers of off-site biodiversity gains (including BNG and marine net gain) and carbon compensation to support the portfolio of projects, including the major infrastructure projects. This will be procured through a Qualifying Utilities Dynamic Market (QUDM), under the Procurement Act 2023. The QUDM is a pre-vetted pool of capable suppliers and works as a dynamic framework where a utility company publishes a notice, suppliers register and qualify (proving their technical capability). Suppliers will need to demonstrate that biodiversity gain schemes will contribute to wider environmental and societal benefits, including environmental education, learning and skills.

Reference	Question	Applicant's Response
	Furthermore, in an attachment to [RR-2973] Pylons East Anglia Ltd raises concerns about the applicant's approach to BNG, including what it contends to be a lack of detailed plans and quantification to support the applicant's approach to BNG provision, and the absence of any meaningful assessment of ecosystem services. The applicant is requested to respond to the concerns raised by Pylons East Anglia Ltd.	National Grid will then be able to invite the qualified members to bid for opportunities, through either spot tenders for individual projects, spot tenders for combined project requirements, or through an overarching framework. Applications to enter the QUDM are anticipated to open in April/May 2026 and will be advertised on the Government Find a Tender Service. Proactive engagement is therefore occurring on both a Project level and at a higher level centrally within National Grid. Through the engagement undertaken so far, the future availability of off-site biodiversity units has not been raised as a concern. The Applicant is looking to potentially reserve up to 600 biodiversity units pre-consent, which is a significant proportion of the biodiversity units estimated to be required t. It is not, however, possible to secure all the off-site units up-front as the expectation is that the quantity of units required would reduce through detailed design, therefore the final exact requirement is not known at this time. Whilst future availability of off-site units cannot be guaranteed, engagement with stakeholders has not identified this as unachievable. In fact, although it is the Applicant's ambition to provide legacy BNG sites in each of the counties, it should be noted that the WaLOR project's website is promoting the potential future availability of 5,346 units. The Project and procurement work being undertaken with suppliers provides an early indication to the market and an opportunity for large-scale BNG sites to come forward. The Applicant is therefore confident that the 10% BNG commitment with wider environmental and societal benefits can be met for this Project. Response to comments made by Pylons East Anglia Limited 7.1 Biodiversity Net Gain Report [APP-299] clearly 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 Nationally Significant Infrastructure Projects. 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 [REP2-018]. The Applicant supports the delivery of Environmental Net Gain (ENG) of which BNG is an essential component, and will continue to explore a range of options to deliver

Reference	Question	Applicant's Response
		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 <i>'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'</i>. Whilst the Applicant seeks to deliver ENG 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.
BIO 1.48	Failure rate for replacement planting Babergh DC in [RR-0314] and Mid Suffolk DC in [RR-2540] have stated that a failure rate should be factored in to compensation planting. The ExA notes that, as stated on page AB7 of [REP1-132], you have proposed a 3 to 1 ratio for replacement planting "for individual trees and individual trees within small groups". However, in [RR-0391] Brentwood BC states "replacement planting on a 3:1 basis is reinstatement, not compensation." Please comment on this and also	The Applicant considers that the 3:1 replacement planting strategy for individual trees and individual trees within small groups extends beyond what would be required solely for reinstatement planting, i.e. in-situ reinstatement. The strategy comprises both reinstatement and compensatory measures. The Applicant has followed the mitigation hierarchy during the development of the Project to avoid and reduce tree loss and will continue to do this through the detailed design stages. Standard mitigation measures include all in-situ reinstatement (where impacts are temporary) across the Project. This standard mitigation has fed into the Environmental Statement and particularly for trees, 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026] and 6.13 Environmental Statement Chapter 13: Landscape and Visual [APP-226]. The compensatory element of the 3:1 commitment has been provided in consideration of the final stage of the mitigation hierarchy, as part of a package of compensation and enhancement measures. Any off-site tree planting required as a result of the 3:1 replanting commitment will

Reference	Question	Applicant's Response
	explain what would constitute “small groups” of trees.	comprise compensation. The off-site planting has not been taken into consideration in relation to the outputs of the Environmental Statement as in accordance with NPS EN-1 (2026) paragraph 4.2.25, <i>‘Compensation, by definition, does not reduce an adverse effect resulting from a development’</i>. ‘Individual trees within small groups’ are individual trees that do not form part of a broader habitat type, such as a woodland, as defined by UKHab methodology. This distinction has been made to remove any double counting of replacement tree planting and Biodiversity Net Gain requirements.

6. Compulsory acquisition temporary possession and land rights

Table 6.1 Compulsory acquisition temporary possession and land rights

Reference	Question	Applicant's Response																																																																																																																																																												
CA 1.1	Extent of land and persons affected by compulsory acquisition temporary possession and land rights To provide an overview of the extent of land subject to compulsory acquisition (CA) and temporary possession (TP) provide the details in the attached table. This should be regularly reviewed and updated at each deadline or confirmation provided that there are no changes.	The Applicant has acknowledged the request and provided a tabulated overview of the land and interests subject to compulsory acquisition and temporary possession, including the number of affected plots and Persons with an Interest in Land (PILs). This table will be reviewed and updated at each Examination deadline, or confirmation will be provided where no changes have occurred. Category 3 PILs are shown as 'N/A' in this table because they represent precautionary or indirect interests from which no land or rights are sought and therefore cannot be meaningfully attributed to individual land acquisition categories.																																																																																																																																																												
	<table><tr><th rowspan="2"></th><th rowspan="2">Total area (ha)</th><th rowspan="2">Total No of plots</th><th colspan="4">Total No of APs</th></tr><tr><th>Cat 1</th><th>Cat 2</th><th>Cat 3</th><th>Total</th></tr><tr><td>CA of land</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>CA of Rights</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>TP</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Crown Land</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Stat Undertaker land</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Open space</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Common land</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Open Access land</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>White land</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Order lands</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Order limits</td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>		Total area (ha)	Total No of plots	Total No of APs				Cat 1	Cat 2	Cat 3	Total	CA of land							CA of Rights							TP							Crown Land							Stat Undertaker land							Open space							Common land							Open Access land							White land							Order lands							Order limits							<table><tr><th rowspan="2"></th><th rowspan="2">Total Area (m2)</th><th rowspan="2">Total Area (ha)</th><th rowspan="2">Total No of Plots</th><th colspan="4">Total Number of Named AP's</th></tr><tr><th>Cat 1</th><th>Cat 2</th><th>Cat 3</th><th>Total</th></tr><tr><td>CA of Land</td><td>2628433.37</td><td>262.84</td><td>391</td><td>166</td><td>61</td><td>N/A</td><td>227</td></tr><tr><td>CA of Rights</td><td>28671615.37</td><td>2867.16</td><td>4905</td><td>1161</td><td>780</td><td>N/A</td><td>1941</td></tr><tr><td>Temporary possession</td><td>6173936.75</td><td>617.39</td><td>2521</td><td>1019</td><td>547</td><td>N/A</td><td>1566</td></tr><tr><td>Crown Land</td><td>696017</td><td>69.60</td><td>61</td><td>48</td><td>25</td><td>N/A</td><td>73</td></tr><tr><td>Stat Undertaker Land</td><td>747381.28</td><td>74.74</td><td>218</td><td>105</td><td>16</td><td>N/A</td><td>121</td></tr><tr><td>Open Space</td><td>398541.7</td><td>39.85</td><td>44</td><td>37</td><td>25</td><td>N/A</td><td>62</td></tr><tr><td>Common Land</td><td>312545.31</td><td>31.25</td><td>105</td><td>71</td><td>68</td><td>N/A</td><td>139</td></tr></table>		Total Area (m2)	Total Area (ha)	Total No of Plots	Total Number of Named AP's				Cat 1	Cat 2	Cat 3	Total	CA of Land	2628433.37	262.84	391	166	61	N/A	227	CA of Rights	28671615.37	2867.16	4905	1161	780	N/A	1941	Temporary possession	6173936.75	617.39	2521	1019	547	N/A	1566	Crown Land	696017	69.60	61	48	25	N/A	73	Stat Undertaker Land	747381.28	74.74	218	105	16	N/A	121	Open Space	398541.7	39.85	44	37	25	N/A	62	Common Land	312545.31	31.25	105	71	68	N/A	139
	Total area (ha)				Total No of plots	Total No of APs																																																																																																																																																								
		Cat 1	Cat 2	Cat 3		Total																																																																																																																																																								
CA of land																																																																																																																																																														
CA of Rights																																																																																																																																																														
TP																																																																																																																																																														
Crown Land																																																																																																																																																														
Stat Undertaker land																																																																																																																																																														
Open space																																																																																																																																																														
Common land																																																																																																																																																														
Open Access land																																																																																																																																																														
White land																																																																																																																																																														
Order lands																																																																																																																																																														
Order limits																																																																																																																																																														
	Total Area (m2)	Total Area (ha)	Total No of Plots	Total Number of Named AP's																																																																																																																																																										
				Cat 1	Cat 2	Cat 3	Total																																																																																																																																																							
CA of Land	2628433.37	262.84	391	166	61	N/A	227																																																																																																																																																							
CA of Rights	28671615.37	2867.16	4905	1161	780	N/A	1941																																																																																																																																																							
Temporary possession	6173936.75	617.39	2521	1019	547	N/A	1566																																																																																																																																																							
Crown Land	696017	69.60	61	48	25	N/A	73																																																																																																																																																							
Stat Undertaker Land	747381.28	74.74	218	105	16	N/A	121																																																																																																																																																							
Open Space	398541.7	39.85	44	37	25	N/A	62																																																																																																																																																							
Common Land	312545.31	31.25	105	71	68	N/A	139																																																																																																																																																							

Reference	Question	Applicant's Response							
		Open Access Land	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		White Land	79504.93	7.95	286	349	173	N/A	522
		Order Lands	37473985.49	3747.40	7817	1411	842	N/A	2253
		Order Limits	37553490.42	3755.35	8103	1438	869	N/A	2307
CA 1.2	Extent of order limits order lands and 'white land' Confirm that all of the land within the Order Limits is needed for the construction, operation or maintenance of the proposed development and that the Order Lands only relates to the land or interests required to be Compulsorily Acquired or Temporarily possessed to implement the development. Such that the 'white land' is land required for the proposed development but over which no interests are required as these have already either been acquired or separate agreements have been concluded such that no CA or TP is required to facilitate the proposed development. Thus, ensuring the Order Limits are tightly drawn and do not include more land than is necessary or if such land is identified that is not required consider whether this should be removed from the Order Limits.	As outlined in the Applicant's response to Action No. 2 in Table 3.1 of 8.5.2 Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138], it is not unusual for a Development Consent Order (DCO) to be made whilst containing land in respect of which no powers of compulsory acquisition or temporary possession are sought. Indeed, it is noteworthy that the 3.1 Draft Development Consent Order [Revision C] includes, at Article 2(1), a definition of 'Order land' (meaning '<i>the land shown on the land plans and described in the book of reference</i>') which is separate to the definition of 'Order Limits' (meaning '<i>the limits shown on the works plans within which the authorised development may be carried out</i>'). Taking this point further, the 3.1 Draft Development Consent Order [Revision C] only empowers the compulsory acquisition of land or rights 'described' in the Book of Reference. Part 1 of the 4.3 Book of Reference [AS-018] contains a 'description' of the land or right to be acquired in respect of each plot. In respect of Class 8 plots, the description is that the land in question is not subject to powers of acquisition or temporary use. The Applicant is of the view that the Order Limits can remain unchanged without undermining the legal position, as the application of Class 8 'white land' to land plots expressly reinforces the position that the Applicant is not seeking any powers over that land. Furthermore, based on the Applicant's own recent experience, it is not unusual for additional changes made during an Examination to lead to an increase in the adoption of 'white land'. The Applicant does not consider the alternative (i.e. the removal of Class 8 'white land' plots via an amendment to the Order Limits) to be proportionate, necessary or appropriate. There is arguably insufficient time remaining in the Examination for a formal change application to be examined, and particularly to the extent that any							

Reference	Question	Applicant's Response
		such amendment to the Order Limits was to trigger the procedural requirements under the Infrastructure Planning (Compulsory Acquisition) Regulations 2010. Noting the scale of the Project, the Applicant proposes to prioritise opportunities and/or requests to potentially accommodate further commitments to avoiding recourse to reliance upon compulsory acquisition or temporary possession powers that may arise throughout the Examination, by applying a Class 8 'white land' designation to the affected plot(s). Examples of potential future application of Class 8 'white land' designation to the affected plot(s) may include the Applicant addressing concerns raised by affected persons, regarding land and/or rights on land to be compulsorily acquired permanently and/or temporarily, where possible. The Applicant is also exploring amendments to the Detailed Land Rights Tracker (and/or other interim submissions) to potentially accommodate further commitments to avoiding recourse to reliance upon compulsory acquisition or temporary possession powers that may arise throughout the Examination, by applying a Class 8 'white land' designation to the affected plot(s), and identifying these within the Detailed Land Rights Tracker at each deadline, where appropriate. It is currently anticipated that a full suite of formal updated Land Plans and an updated Book of Reference will be submitted at an appropriate interim deadline, and again at Deadline 7 (21 July).
CA 1.3	Schedule of affected persons objecting to CA or TP of their lands or rights Provide a schedule, in the form of a tracker, listing those APs who have objected to the CA or TP of their land or interests; similar in approach to the statutory undertakers tracker. This is proposed to extract those persons from the detailed Land Rights Tracker (LRT) on which the ExA will need to report to the Secretary of State and provide a schedule which can be used to track the	The Applicant has prepared a detailed Objections Schedule (8.14 Schedule of affected persons objecting to CA or TP) in response to the Examining Authority's question, which will be updated and submitted at all future Deadlines. Source data included within the Objections Schedule has been extracted from the Detailed Land Rights Tracker (DLRT), as updated for Deadline 3. Indeed, the Applicant wishes to reiterate the fact that it is crucial that the Objections Tracker is read alongside the DLRT. More specifically, the Applicant notes the Examining Authority's request that the Objections Schedule include details relating only to those APs <i>"who have objected to the CA or TP of their land"</i>. Therefore, and in order to respond as comprehensively as possible to this request, the Applicant has reviewed all relevant sources of information within the

Reference	Question	Applicant's Response
	progress of on-going discussions on those objections. The schedule should be in tabular form providing columns with Name of AP, The plots (separated into those subject to CA, CA of Rights and TP) in which they have an interest, the nature of their interest, a summary of the reasons for their objection (reference to RR, Written Representation (WR), etc.), the applicant's response to the issues raised, a column to state the latest position and a final column providing a Red/ Amber/ Green (RAG) rating to give a visual indication of how likely the issues with the APs are to being resolved and whether objections would be withdrawn by the close of the examination. For certainty red means not likely to be resolved during examination; Amber means on-going discussion with potential to conclude; and Green means matters have been resolved and objection has been withdrawn. This schedule is to be updated at each subsequent deadline.	Examination Library (as it stands immediately prior to Deadline 3 (10 April)), noting that those sources principally comprise: Relevant Representations (RRs), Written Representations (WRs), Written Submissions at Deadlines 1 and/or 2, and recordings and transcripts from previous Open Floor Hearings. In that context, it merits noting that the categorisation of a written or oral submission made by an AP as an "objection" to the use of CA or TP powers is, in a number of cases, an inherently subjective exercise. Where there is any ambiguity as to the nature or content of an AP's submission, the Applicant has sought to include that AP within the Objections Schedule on a precautionary basis. Similarly, a number of submissions include redacted data which can, in certain instances, increase the potential for error in correctly assigning those submissions to APs recorded in the schedule. Where the Applicant has been unable to ascertain the land interest to which a submission relates, the submission has been recorded in the Objections Schedule in any case, and the Applicant will continue to seek to identify data required to populate any remaining column entries. It may be necessary for the Planning Inspectorate to make unredacted versions of those submissions available to the Applicant in order to assist with that exercise. Taking account of the limitations noted above, the Applicant has included the following APs within the Objections Schedule: • APs who have submitted a RR objecting to the CA or TP of their land, where the Applicant has been able to establish a link to landownership or a qualifying land interest. This includes RRs submitted by land agents on behalf of individual APs. • APs who have submitted a RR objecting to the CA or TP of their land, where the Applicant has not yet been able to establish a link to landownership or a qualifying land interest. This includes RRs submitted by land agents on behalf of individual APs. • APs who have submitted a WR to the Examination objecting to the CA or TP of their land. This includes WRs submitted by land agents on behalf of individual APs.

Reference	Question	Applicant's Response
		APs who have attended previous Open Floor Hearings and made submissions (including any subsequent written submissions) objecting to the CA or TP of their land. Whilst the Objections Schedule includes reference to all identified submissions made by each of these categories of AP, the Applicant has been unable to populate Column N ("Summary of Objection") at Deadline 3. The Applicant intends that Column N will be fully updated at Deadline 4, alongside a series of enhanced entries in Column O ("Applicant's Response to Issues Raised").
CA 1.4	Crown land schedule The update on progress on crown land was helpful, but this would be usefully reformatted into a schedule table identifying the contact points and crown interest and identifying the plots (separated into those subject to CA, CA of Rights and TP) for each and noting on-going discussions and progress towards resolution. To be updated at each subsequent deadline.	The Applicant acknowledges the request for a Crown Land Schedule and has submitted this as the 4.7 Crown Land Schedule Tracker. This tracker will be updated in line with all future deadlines, with further narrative provided where required.
CA 1.5	Land rights tracker, statement of reasons, schedule of negotiations The ExA notes the update of and explanation of changes to the LRT submitted at Deadline 2 [REP2-011] and that this is a work in progress which we are still in the process of reviewing. However, and notwithstanding the question above in relation to the 'Schedule of Affected Persons objecting to CA or TP of their Lands or Rights': please ensure that at Deadline 3 particular attention is given to	Q: Land rights tracker, statement of reasons, schedule of negotiations. The ExA notes the update of and explanation of changes to the LRT submitted at Deadline 2 [REP2-011] and that this is a work in progress which we are still in the process of reviewing. However, and notwithstanding the question above in relation to the 'Schedule of Affected Persons objecting to CA or TP of their Lands or Rights': Please ensure that at Deadline 3 particular attention is given to ensuring that column AC (Objection Status) is updated. A: The Applicant has applied the recommended RAG status (as requested within the ExA's question No. CA 1.3) to individual landowners within column AC of the LRT. Upon re-issuing of the V2 set of HoTs the Applicant will actively seek to negotiate and understand any outstanding concerns from the landowners and their agents. This will in turn provide an accurate, informative and up to date picture summarising the 'Objection status' of Persons with an Interest in Land (PILs).

Reference	Question	Applicant's Response
	ensuring that column AC (Objection Status) is updated. - Can the applicant confirm that the new second tab 'Engagement History' supplements but does not replace and is independent of the Statement of Reasons - Appendix B - Schedule of Negotiations, last submitted as an additional submission [AS-016]. Appendix B should remain as a separate schedule as an updated document through the examination, please ensure an update is provided at Deadline 3. (Also check the land interests are correctly named eg Arelion UK Limited is referred to as Arenlion UK Limited in schedule B which makes searching APs difficult). - With respect to column E on tab 2 explain what each of the categories represents. In that it would appear that some 1339 parties have not been issued with Heads of Terms (HoTs) and this includes 556 category 1 persons. Explain the reason why HoTs have not been issued to these persons. Also given the engagement history (column c) it would appear they were provided with a HoTs early engagement letter and therefore the issue of HoTs is assumed to be in relation to	The Applicant has undertaken various meetings with the land agents who are advising landowners impacted by the Project. The purpose of these meetings has been to review and amend the terms and clauses within the HoTs following their comments where necessary and possible. As a result, the revised sets of HoTs have been prepared and sent out to landowners in the following timescales (ahead of Deadline 3): 25 July 2025 – V1 Set of HoTs (Blank Template) sent to list of landowners as a hard copy via post 27 February 2026 – V2 Set of HoTs (Blank Template) sent to the group of agents advising landowners via email 26 March 2026 – V2 HoTs (Detailed Template) sent to Section C and D landowners (and agents) via post 02 April 2026 – V2 HoTs (Detailed Template) sent to Section E and F landowners (and agents) via post 09 April 2026 – V2 HoTs (Detailed Template) sent to Section A, B, G and H landowners (and agents) via post. The Applicant proposes the following: - By Deadline 3 – All landowners to have received the revised V2 Detailed HoTs - By Deadline 4 – Column AC (Objection Status) – The Applicant to update the 'Objection Status' of landowners once landowners and agents have had sufficient time to digest the revised documents - Further information can be found within the Land Rights Tracker (LRT) Q: Can the applicant confirm that the new second tab 'Engagement History' supplements but does not replace and is independent of the Statement of Reasons - Appendix B - Schedule of Negotiations, last submitted as an additional submission [AS-016]. Appendix B should remain as a separate schedule as an updated document through the examination, please ensure an update is provided at Deadline 3. A: Confirmed this is supplementary and not a replacement document. The Applicant can also confirm that the Appendix B will be updated for Deadline 3.

Reference	Question	Applicant's Response
	populated HoTs? Given the assurances around resources following Compulsory Acquisition Hearing 1, confirm this is not a resource issue and explain in greater clarity the nature of the categories and the inter-relationship and potential movement between them.	Q: (Also check the land interests are correctly named eg Arelion UK Limited is referred to as Arenlion UK Limited in schedule B which makes searching APs difficult). A: Noted and confirm this will be continually reviewed and corrected. Q: With respect to column E on tab 2 explain what each of the categories represents. In that it would appear that some 1339 parties have not been issued with Heads of Terms (HoTs) and this includes 556 category 1 persons. Explain the reason why HoTs have not been issued to these persons. A: The Applicant believes every Category 1 landowner, who is a freehold landowner impacted by the Order Limits has been sent the V1 set of HoTs and will have been sent the revised V2 set of HoTs prior to Deadline 3. A DLRT preface report is being created to explain and clarify this position. Q: Also given the engagement history (column c) it would appear they were provided with a HoTs early engagement letter and therefore the issue of HoTs is assumed to be in relation to populated HoTs? A: Early Heads of Terms engagement letters were issued to all Category 1 PILs identified in the Book of Reference, including freeholders, lessees, tenants and occupiers. This cohort aligns with the approximately 1,339 parties referenced by the Examining Authority. The purpose of these letters was to notify affected parties of the Project, explain why their interests had been identified, and invite early engagement in voluntary discussions. These letters were not offers to acquire land or rights and did not contain populated commercial terms. In many instances, the early engagement letters were followed by the issue of template Heads of Terms, which set out the Applicant's standard commercial and legal framework in an unpopulated and illustrative form, to promote transparency and consistency. Populated Heads of Terms were issued only where subsequent land referencing, design development and engagement confirmed that a bespoke voluntary land agreement was both necessary and capable of securing the land or rights required for the Project. These populated HoTs were tailored to the relevant plot and interest and formed the basis for detailed voluntary negotiations. They were issued

Reference	Question	Applicant's Response
		iteratively (including Version 1 and Version 2), with later versions incorporating clarifications but remaining expressly non-binding. Progression through these stages was not automatic. Accordingly, there are Category 1 PILs who received early HoTs engagement letters (and, where appropriate, template HoTs) but were not subsequently issued with populated Heads of Terms. This reflects circumstances where, following further project development: - the acquisition of land or land rights was no longer required; - potential effects were mitigated or avoided through design changes; or - the necessary land rights could be secured through engagement with a superior interest holder, without the need for a separate bespoke voluntary agreement with all subordinate interests. In those circumstances, there was no justification for issuing populated Heads of Terms, as no voluntary land transaction was required. References to "HoTs" within the engagement history should therefore be understood as referring to early engagement letters and/or template HoTs, unless expressly stated otherwise, and should not be taken to imply that populated Heads of Terms were issued in every case. Q: Given the assurances around resources following Compulsory Acquisition Hearing 1, confirm this is not a resource issue and explain in greater clarity the nature of the categories and the inter relationship and potential movement between them. A: Please see explanatory note detailed with the DLRT preface report which covers the position on Cat 1 occupiers, Cat 2 PILs and Cat 3 persons.
CA 1.6	Special category land schedule Provide a schedule, in the form of a tracker, to identify any special category land interests to which objections have been received this should identify the special category (open space, common land etc) and include the plot numbers (separated into those subject to CA, CA	A tracker has been produced (8.12 Special Category Land Schedule [Revision A]), as requested to identify the special category land interests over which new rights are to be acquired and which identifies the special category (open space, common land etc), includes the relevant plot numbers, the nature of the interest, the APs and any representations received. However, we would draw to the Examining Authority's attention the following points in relation to the schedule which has been produced:

Reference	Question	Applicant's Response
	of Rights and TP), the nature of the interest, the APs, any representations received in relation to its CA/TP, the applicant's response to comments and an on-going position status. To be updated at each subsequent deadline.	1. As explained in section 2 of the Special Category Land Report, the only special categories of land over which new rights are sought for the Project is land forming part of a Common and Open space. The column for "special category" therefore identifies whether the plot relates to common land or open space – no other categories of land are listed. 2. The land ownership (PIL) information currently listed relates to the plot as a whole, rather than being limited to the extent of Special Category Land (SCL) within the Order Limits. 3. Only powers of compulsory acquisition of new rights are being sought over areas of Order land which are identified as special category land. There is no compulsory acquisition of the special category land itself proposed and application of temporary possession powers is not relevant to the application of the special parliamentary procedure ("SPP") and exemptions pursuant to s132 of the Planning Act 2008 and hence under the column on "class of rights and type of acquisition" the tracker lists only those new rights which are to be compulsory acquired. 4. As can be seen in the status column, no objections have been received from APs which objects to impact on any special category land interest or makes reference to "special category land" or the application of s132 Planning Act 2008. However, s132 of the Planning Act 2008 relates to a SPP requirement in respect of development consent orders that authorise the compulsory acquisition of rights over protected categories of land and the various exemptions that apply in order to dispense with the need for SPP and is therefore a separate process to negotiations with APs relating to compulsory acquisition of new rights over land. The land rights tracker is the appropriate tracker to review for an update on the status of negotiations with the various APs. An explanation of why SPP is not required for this Project is set out in the Special Category Land Report [APP – 062]." It should be noted that, in line with 4.1 Statement of Reasons - Appendix C - Special Category Land Report [APP-062], there is no compulsory acquisition of Class 1 land proposed in relation to Special Category Land. The legislation (s132 of the Planning Act 2008) does not apply in relation to Temporary Possession of Land

Reference	Question	Applicant's Response
		(4.1 Statement of Reasons - Appendix C - Special Category Land Report [APP-062] paragraph 2.1.6).
CA 1.7	Statutory undertakers schedule Include in the statutory undertakers tracker, provided at deadline 1 [REP1-142], a column to list the plots affected (separated into those subject to CA, CA of Rights and TP). The tracker should be kept up to date and updated at each subsequent deadline.	8.7 Statutory Undertaker Tracker (Revision B) has been submitted at Deadline 3 and includes the additional columns requested by the Examining Authority in order to identify plots where CA (land or rights) or TP powers are sought by the Applicant. However, given the scale of the Project and the consequent number of plot-specific interactions with land and rights held by statutory undertakers, it has not been possible to populate these additional columns for Deadline 3. The Applicant considers there would have been a risk to the overall accuracy and quality of that information had it attempted to do so within the limited time available. The Applicant will, however, ensure that all additional columns are fully populated at Deadline 4. The Statutory Undertakers Tracker will then be updated and submitted at all subsequent deadlines. A further column, which shows the updates since last submission in track changes, has also been included within the Tracker.
CA 1.8	Minerals rights and quarries There are a number of SoCGs with parties who have interests in quarries and mineral extraction and approximately 40 IPs shown in the LRT with quarry land listed. A number of these parties state that mineral extraction will be sterilised and alternative routing of pylons is required to avoid this. For the avoidance of doubt, - list the IPs who have rights for existing, working quarries - list the IPs who have rights for proposed mineral extraction - why some SoCG show negotiations not being held for a number of	Q: Minerals rights and quarries: There are a number of SoCGs with parties who have interests in quarries and mineral extraction and approximately 40 IPs shown in the LRT with quarry land listed. A: The Applicant is aware of six sites, three of which are working quarries and three of which are within the 'call for sites', which interact with the Project's Order Limits. All these sites form part of the SoCG workstream. Within the DLRT (Detailed Land Rights Tracker), the Applicant is aware of 28 instances of quarries or mineral sites being named. This categorisation has been derived from the land referencing process, whereby mineral rights (including historic mines and minerals beneath 200 feet) may be listed on the Land Registry. A historic reference to mines and minerals does not necessarily create a legitimate minerals extraction site. The Applicant welcomes clarification from the Examining Authority to understand how the total of 40 has been derived. Q: A number of these parties state that mineral extraction will be sterilised and alternative routing of pylons is required to avoid this.

Reference	Question	Applicant's Response
	months and how the applicant proposes to conclude these negotiations and reduce the impact on these sites.	A: The Applicant is in discussions with a number of parties to mitigate impacts on such cases by route alignment and pylon siting. Individual sites vary in the degree of interaction but no sites would be wholly sterilised. We have carefully considered each circumstance where the site has a status in planning and identified adjustments to mitigate as far as possible. Q: For the avoidance of doubt, list the IPs who have rights for existing, working quarries A: The parties we are actively engaging with through the SoCG process are those who we know to have rights for existing working quarries. These are set out below. <u>1 – SRC Group: Crown Quarry A79 – In operation</u> Parcel: 116689 • PIL (Person with an Interest in Land): The Secretary National Highways Limited – 10201 • PIL: The Secretary SRC Group Holdings Limited – 13639. Parcel: 4412 • PIL: James Robert Samuel Blyth – 7890 • PIL: The Secretary Sewells Reservoir Construction Limited – 10356. Parcel: 4382 • PIL: The Secretary SRC Group Holdings Limited – 13639 • PIL: The Secretary Sewells Reservoir Construction Limited – 10356. Parcel: 4514 • PIL: James Hector Blyth – 7776. <u>2 – SRC Group: Sheepcotes Quarry – In operation</u> Parcel: 2578 • PIL: Alexander David Robert Micklem – 6898. Parcel: 2580 • PIL: The Secretary Sarah Micklem 2010 Trust – 25173. Parcel: 12152A

Reference	Question	Applicant's Response
		- PIL: Personal Representative to the Estate of Sarah Caroline Georgiana Micklem – 14503. Parcel: 12581 - PIL: The Secretary Sarah Micklem 2010 Trust – 25173. <u>3 – Ingrebourne Valley Limited: Ingrebourne Valley – In operation</u> Parcel: 607 - PIL: The Secretary Ingrebourne Valley Limited – 10209. Q: List the IPs who have rights for proposed mineral extraction A: The Applicant understands 'proposed' mineral extraction sites are locations where the landowner currently has planning permission to extract, but has not yet committed to that extraction. There are a number of sites which do not currently have planning permission, however, they are within the 'call for sites' list, and currently do not have permission to extract anything from the site. These include the following: <u>1 – SRC Group Martell A85 / A86</u> Parcel: 5596 - Pil: Anthony Robert Wooldridge – 5294. Parcel: 5592 - Pil: Anthony Robert Wooldridge – 5294. <u>2 – Blackwater Aggregates – Bradwell Monks – in operation but Order Limits interact with Phase 2 that is in 'call for sites'</u> Parcel: 3092 - Pil: The Secretary Gent Fairhead Aggregates Limited – 10384 - Pil: The Secretary London Diocesan Fund – 10467. Parcel: 3086 - Pil: The Secretary Parkers Of Leicester Limited – 10218. <u>3 – Lions Hall Wood – 'Call for sites' – Lowleys Mineral Farm (Tritton Farming Partnership and Brett Aggregates)</u> Parcel: 11224

Reference	Question	Applicant's Response
		- Pil: The Secretary Tritton Farming Partnership LLP – 14063. Parcel: 1224a - Pil: The Secretary Tritton Farming Partnership LLP – 14063. In addition, there may be landowners who own land which does not have planning permission for minerals extraction and are not within the 'call for sites'. Q: Why some SoCG show negotiations not being held for a number of months and how the applicant proposes to conclude these negotiations and reduce the impact on these sites. A: The Applicant has been actively engaging on a number of SoCGs as detailed above. The Applicant appreciates the schedule of negotiations may show a gap in engagement with the SRC Group, who have three sites impacted by the Order Limits. The pause between initial issue of the SoCG in July 2025 and September 2025 was due to SRC requiring further information on mitigation measures and detailed design to minimise the interactions with the Crown Quarry asphalt plant. Now that a full picture has been provided across all three sites, the Applicant is actively engaging with the land interest to provide detailed design to mitigate the impacts.
CA 1.9	Compulsory Acquisition of the Linford Household Waste and Recycling Centre In its LIR [REP1-187] Thurrock Council raise concerns in relation to the CA of the Linford Household Waste and Recycling Centre, see paragraph 6.17.1 for a summary of its position in this regard. Address the issues set out in section 6.17 of Thurrock's LIR and detail the applicant's position in relation to the issues raised and what further engagement and actions are to be undertaken.	The Applicant does not agree with the Council's position that the statutory tests for compulsory acquisition under section 122 of the Planning Act 2008 have not been met in relation to land at Linford Household Waste and Recycling Centre (HWRC). The Application seeks temporary and permanent rights only, rather than acquisition of the freehold, and these rights are limited in extent and purpose. They are required to facilitate the construction, operation and maintenance of the overhead electricity line between pylons TB256 and TB259 and associated access and therefore fall within section 122(2)(a) and (b) of the 2008 Act. The rights sought are necessary to ensure the safe construction and long-term operation of nationally significant electricity infrastructure and cannot reasonably be omitted without compromising deliverability of the scheme. In accordance with section 122(3), the Applicant considers there to be a compelling case in the public interest for the acquisition of these rights. The Scheme forms part of strategic national electricity transmission infrastructure required to maintain security of supply and enable the connection of low-carbon generation.

Reference	Question	Applicant's Response
		The rights sought at Linford HWRC are proportionate, limited to what is required, and subject to compensation in accordance with the statutory compensation code. The Applicant does not accept that it has failed to pursue acquisition by agreement. Engagement with the Council commenced in late 2024 in respect of land and access at Linford HWRC, and the Applicant remains willing to continue discussions with the Council to seek voluntary agreement. The inclusion of land within the Order Limits reflects the need to ensure the Scheme can be delivered should voluntary agreement not be reached, consistent with established DCO practice and the Guidance. The Applicant proposes to arrange a site meeting involving representatives from both the Council and Linford Household Waste and Recycling Centre (HWRC). The purpose of this meeting is to facilitate further discussion of the issues that have been raised regarding the proposed Scheme. By convening at the site, all parties will have the opportunity to look at the affected areas in detail and to consider appropriate mitigation measures tailored to the specific circumstances of Linford HWRC. This collaborative approach aims to ensure that concerns are addressed directly and that solutions are developed through joint engagement. The Applicant is committed to working with all relevant stakeholders to identify and implement site-specific mitigation, thereby promoting the effective delivery of the Scheme while minimising disruption and ensuring continued operation of the HWRC.
CA 1.11	The scope and purpose of the CA Powers sought Please detail what would happen to rights acquired if and when the project, or elements of the project, were to be decommissioned and how is this secured in the draft DCO?	Decommissioning has been scoped out for the Environmental Statement and the 3.1 Draft Development Consent Order [Revision C] reflects this (in that the definition of 'maintain' in Article 2(1) allows for the removal of part, but not all, of the authorised development). The Applicant's position normally in relation to promotion of Development Consent Orders is that decommissioning is not anticipated given the design life of the development and the continuing need for the transmission network to operate. However, all appropriate consents would be sought at the relevant time if decommissioning was in fact subsequently required in future. From a Class of Rights perspective, all of the permanent classes of rights include the right to remove. In the event of future decommissioning of the Project, the Applicant would, following the removal of all apparatus, surrender or extinguish their land rights if required by the affected landowners at that stage. At the point of

Reference	Question	Applicant's Response
		decommissioning, and if removal is required, the Applicant would engage further with the affected landowners to agree timings and requirements.
CA 1.12	The scope and purpose of the CA Powers sought Please confirm that all matters ancillary to the development contained within schedule 5 of the PA2008 are included within the scope for the CA powers sought if relevant.	S120 of the Planning Act 2008 (PA2008) prescribes those matters which may be provided for in a Development Consent Order. In particular, an Order may impose requirements in connection with the development for which consent is granted. S120(3) and s120(4) go on to provide that an Order may make provision relating to, or to matters ancillary to, the development for which consent is granted. The matters in respect of which provision may be made include (but are not expressly limited to) the matters listed in Schedule 5 to the PA2008, for example: • The acquisition of land, compulsorily or by agreement • The creation, suspension or extinguishment of, or interference with, interests in or rights over land (including rights of navigation over water), compulsorily or by agreement • The payment of compensation. The Applicant confirms that all relevant matters ancillary to the proposed development contained within Schedule 5 of the PA2008 are included within the scope of the compulsory acquisition (CA) powers sought.
CA 1.13	Whether there is a compelling case in the public interest for the CA of the land, rights and powers that are sought by the draft DCO. For the avoidance of doubt, what are all the factors that are regarded as constituting evidence of a compelling case in the public interest for the CA powers sought for this NSIP and where, giving specific paragraph references, are these set out in the submitted documentation?	Introduction: There is a compelling case in the public interest for the CA of the land, rights and powers sought by the draft DCO. The Applicant has set out that compelling case in the public interest in its Statement of Reasons, the latest version of which is [REP2-009]. Further summary justification of that compelling case was provided in Table 2.1 of the Applicant's Written Summary of Oral Submission and Response to Action Points for Compulsory Acquisition Hearing 1 [REP1-138]. The Statement of Reasons should be read alongside other core DCO documents (or subsequent variations thereto) that relate to CA powers including: • 1.3 Guide to the Application [REP2-002] • 2.2 Land Plans [AS-005 to AS-012] • 2.3 Works Plans [APP-017 – APP-024] • 2.14 Special Category and Crown Land Plans [AS-013]

Reference	Question	Applicant's Response
		• 3.1 Draft Development Consent Order [REP2-004] • 3.2 Explanatory Memorandum [REP2-006] • 4.2 Funding Statement [REP1-004] • 4.3 Book of Reference [AS-018] • 5.6 Planning Statement [APP-085] • 7.14 Equality Impact Assessment [APP-352] and [REP1-067] In addition to the Statement of Reasons, the Need Case is addressed in Section 5.6 of the Planning Statement [APP-085] and in 7.17 Strategic Options Backcheck Report [APP-355]. More specifically, factors relevant to the compelling case in the public interest for the CA of the land, rights and powers sought by the draft DCO are set out below, alongside references to the relevant paragraph of the Statement of Reasons: Need for the Project: In addition to the fact that the Project constitutes Critical National Infrastructure, the need for which is identified, defined and explained in NPS EN-1, the need case for the Project is set out in detail in Paragraphs 2.2.1 to 2.2.12 and Paragraphs 6.3.1 to 6.3.6 of the Statement of Reasons. In summary, the compelling need case is underpinned by the fact that there is a pressing requirement for reinforcement of the inadequate East Anglia and South East transmission system in order to: • Serve the needs of offshore windfarms which presently exist and are expected to grow substantially; • Assist in meeting the higher requirements for non-fossil fuel based generation; • Help secure reliable and safe sources of UK based offshore energy; • Help secure reductions in cost of energy for all consumers as part of sustainable economic growth; • Help secure the clean power goals; and • Avoid taxpayers paying annual substantial constraint payments in the event that this critical part of the clean energy programme is delayed beyond 2030. Without reinforcement, the capacity of the existing transmission network in East Anglia and the South East existing network would be insufficient to accommodate

Reference	Question	Applicant's Response
		the connection of the proposed new power sources. The Thermal Boundary Export Limit would be exceeded, preventing export of power to demand centres beyond East Anglia, and predicted constraint costs are likely to significantly exceed those of reinforcement. That need is best met having regard to NPS EN-5 by a substantially new overhead line project in conjunction with new underground cables where supported by policy such as in the Dedham Vale National Landscape, to which see Paragraphs 2.11 and 2.12 of the Statement of Reasons. Environmental Mitigation Measures: Embedded, standard and additional mitigation measures are intended to be put in place in order to reduce the residual impact of the proposals in line with the mitigation hierarchy. As set out in Paragraph 3.1.5 of the Statement of Reasons, these mitigation measures require CA powers so that they may be secured in the event that agreement cannot be reached with relevant landowners. Approach to CA: As part of the compelling case, the acquisition of rights has been limited to those which are necessary and proportionate and are set out in Paragraphs 4.3.1 to 4.3.13 of the Statement of Reasons. Further, and as explained in Paragraph 6.4.7 of the Statement of Reasons, it is in the public interest to obtain the appropriate security for the electricity supply network through the grant of permanent land rights. For major infrastructure projects undertaken by the Applicant, longevity and security of rights is essential. It is essential to secure the grant of permanent easements rather than wayleaves whether by negotiation or through powers of compulsion. It is noted that any practicable alternative location for the Project would similarly require the acquisition and/or use of third-party land. Human Rights & Equalities: Paragraphs 8.1.1 to 8.1.13 of the Statement of Reasons explain that, whilst the Project has the potential to infringe the human rights of persons who hold interests in the Order Land, such infringement can be authorised by law provided the appropriate statutory procedures for making the DCO are followed and a compelling case in the public interest is made for the compulsory acquisition, and

Reference	Question	Applicant's Response
		the interference with the convention right is proportionate. On the basis of decisions of the courts, the test of proportionality is satisfied if the DCO strikes a fair balance between the public benefit sought and the interference with the rights in question. The Applicant reiterates the conclusion articulated in the Statement of Reasons that the significant public benefits outweigh the effects of the draft DCO upon persons who own property in the Order Limits such that there would not be a disproportionate interference with their Article 8 and Article 1 First Protocol rights. The Applicant also considers that the inclusion of powers of compulsory acquisition in the draft DCO would not constitute any unlawful interference with Convention Rights and further that it would be appropriate and proportionate to make the DCO, including the grant of powers of compulsory acquisition. Summary: The Examining Authority and, in turn, the Secretary of State can conclude having regard to these factors that: • The powers sought in the dDCO are legitimate, reasonable, proportionate and necessary to deliver and thereafter maintain the Proposed Project, including there being a clear idea of how the land proposed for acquisition is intended to be used (Chapter 5 and Paragraph 6.5 of the Statement of Reasons [REP2-009]). • Having identified the tests set out in s122 of the PA2008 that govern the grant of powers of CA, the Applicant has explained how those tests have been satisfied in its Statement of Reasons [REP2-009] whereby there is a compelling case in the public interest for the inclusion of CA powers based on the need to ensure the timely delivery of the Project, for which there is a national need (Paragraphs 2.1 to 2.6 of the Statement of Reasons [REP2-009], the Planning Statement [APP-085] and the Strategic Options Backcheck Report [APP-355]). • All reasonable alternatives to the use of CA have been explored. • The Funding Statement demonstrates that there is a reasonable prospect of the requisite funds being available to fund all aspects of the Project (Paragraph 6.6

Reference	Question	Applicant's Response
		of the Statement of Reasons [REP2-009] and the Funding Statement [REP1-004]. • In compliance with s132 of the PA2008, the acquisition of permanent rights over special category land, in this instance open space and common land, would fall within statutory exemptions and hence a certificate should be issued which confirms that special parliamentary procedure is not triggered 7.2 Statement of Reasons [REP2-009]. • Protective Provisions (PPs) included in the dDCO will ensure that Statutory Undertakers' statutory operations are not detrimentally affected by the Project. • There are no known impediments to the Project progressing (Paragraph 6.1.10 of the Statement of Reasons [REP2-009]). • The Project's significant public benefits would outweigh the effects of the dDCO on the private loss of persons who own property in the Order Limits, such that there would not be a disproportionate interference with rights under the Human Rights Act 1998 and the ECHR (Paragraph 8.1 of the Statement of Reasons [REP2-009]).
CA 1.14	Funding statement - 1 In the funding statement [REP1-004] a number of funding sources are detailed. • Detail the amount from each funding source that is contributing to the total project cost. • In paragraph 3.2.6 you explain that the £60 billion 2024-2029 financial framework investment plan includes £7 billion underwritten rights issue, can you explain the funding stream for the remaining £53billion	• Funding sources. The funding sources for a project change across the lifetime of a project. It is a little like securing the deposit, a mortgage, and then earning rental income on a leasehold property: – The initial capital is secured initially by the Rights Issue as described in paragraph 3.2.6 of the Funding Statement [REP1-004]. – The Rights Issue enables the company to raise capital investments in the National Electricity Transmission System (NETS) to be made through a combination of debt, equity and revenue. – The revenue earned by a completed project enables the capital investments and debt to be repaid over time. • Funding stream. The financial framework investment plan, and the forthcoming rights issues was described for investors in the 2023/24 Full Year Results Statement.²⁰ This sets out further details of the £60bn investment programme

²⁰ National Grid (2024) 2023/24 Full Year Results Statement. <https://www.nationalgrid.com/document/152011/download>

Reference	Question	Applicant's Response
	Will funding will be required in the post-2029 framework and if so, how the ExA can be certain that funding will be available.	that is backed by a balanced, comprehensive financing plan that includes the £7bn underwritten rights issue. In effect, the rights issues unlocks further investment which is then able to earn revenue which supports dividends and repayment of the investments made. Further details of the five-year financial framework, and the forward guidance related to those investments and the return on investment that they will generate can be found on pages 18-28. Certainty of funding. - There is no doubt that the project will be funded. As set out in the response on CA 1.15 there is an obligation on the company to deliver the project, and the expenditure is recovered later. - There is confirmation of the certainty of funding on page 28 of the 2023/24 Full Year Results Statement set out the Board's plans to investors. It confirms that the company is committed to delivering the portfolio of ASTI projects, and has been confident about the financial case to achieve this: <i>'The Board has considered the Group's ability to finance normal operations as well as funding a significant capital programme. This includes stress testing of the Group's finances under a 'reasonable worst-case' scenario, assessing the timing of the sale of businesses held for sale and the further levers at the Board's discretion to ensure our businesses are adequately financed. As a result, the Board has concluded that the Group will have adequate resources to do so.'</i> (Emphasis added).
CA 1.15	Funding statement - 2 Paragraph 3.2.14 of the funding statement [REP1-004] states that the project assessment needs to be submitted to OfGEM for a decision which will be following the conformation of the DCO, if given. Can you explain what the decision relates to, what makes up the project assessment and how the ExA can be assured that funding for CA will be available and when.	Project Assessment - A Project Assessment begins with NGET's application to Ofgem for the setting of an efficient allowance for the delivery of a project. A completed Project Assessment allows National Grid to recover the costs incurred through payments within the 'Revenue = Incentives + Innovation + Outputs' (RIIO) mechanisms, typically over 45 years. - The Project Assessment process enables Ofgem to: <u>assess</u> National Grid's submitted costs <u>consult</u> on proposed allowances to meet the economic and efficient expenditure

Reference	Question	Applicant's Response
		iii. <u>analyse</u> the responses received to the consultation iv. <u>document</u> its' decision in the published Project Assessment. Assurance of funding • Funding in place - The company has made financial provision to ensure funding for the construction of the Project will be available. The Project Assessment, and the RIIO mechanisms are part of the process for NGET's subsequent cost recovery. • Delivery is a licence obligation - The ExA can be assured that funding will be available for the construction of Norwich to Tilbury because: – The delivery of the Project is now a licence obligation, as confirmed in paragraph 3.2.12 of the 4.2 Funding Statement [REP1-004] – Ofgem has the power to make sure the licence obligation is delivered. It could take enforcement action if NGET failed to deliver Norwich to Tilbury, and has the ability to impose substantial financial penalties amongst other measures.
CA 1.16	Funding statement - 3 At Deadline 1 an updated cost estimate based on a 2025/26 cost base has been provided in the Funding Statement [REP1-004]. Provide a detailed breakdown of the cost estimate which should include inflation allowance as a value and a percentage of the project cost.	Breakdown of the cost estimate The detail requested would involve the disclosure of commercial sensitive information. The information can be shared with the Examining Authority if arrangements to ensure its continued confidentiality are put in place. In the meantime, it may be of assistance to know that the current cost estimate is derived from detailed bottom-up estimating, which includes commercially sensitive information such as unit rates, supplier and contractor pricing assumptions, labour and productivity factors, and risk allowances. This level of detail is managed as confidential commercial information, even when shared with the Regulator, and is not placed in the public domain. Inflation The cost estimate is presented in a 2025/26 price base. This reflects price base equivalence only, where earlier estimates are converted to a common price base using published indices and forecasts.

Reference	Question	Applicant's Response
CA 1.17	Funding statement - 4 The funding statement [REP1-004] states that the £184.9 million estimate for CA and compensation is benchmarked and has a 10% contingency. A number of the RRs state they have been offered very low compensation or CA valuation. • How can the ExA be certain that the applicant has included the full likely costs of CA and compensation, include mineral rights. • Taking these matters into account, how can the ExA be certain that the overall cost estimate is accurate, how does it compare with the expectations of the Treasury Green Book for	A cost base does not include inflation up to a future price base. The estimate does not, therefore, include an explicit allowance for inflation beyond the 2025/26 price base through the construction period. Accordingly, there is no separate inflation value or percentage that can be quoted for inflation to end of construction. The commitment to fund the Project in the 4.2 Funding Statement [REP1-004] is not tied to the figure derived from any particular cost base. The Licence Obligation to deliver the Project is also independent of any particular cost base. As stated in paragraph 3.2.17 of the 4.2 Funding Statement [REP1-004]: <i>'National Grid is satisfied that the funding required to meet the estimated implementation costs (in accordance with the appropriate cost base at the time) will be made available for the Project within the relevant time period to meet National Grid's Licence Obligation'.</i> Further details of the funding National Grid already has in place are set out in CA 1.14. Further details of the Licence Obligation requiring the delivery of the Project are set out in CA 1.15. Q: The funding statement [REP1-004] states that the £184.9 million estimate for CA and compensation is benchmarked and has a 10% contingency. A number of the RRs state they have been offered very low compensation or CA valuation. A: While the 4.2 Funding Statement [REP1004] includes a benchmarked estimate of £184.9 million for compulsory acquisition and compensation with a 10% contingency, it is important to distinguish this from the voluntary engagement currently underway. To date, the figures shared with landowners relate to nonbinding Heads of Terms issued on a voluntary basis in accordance with the National Grid Land Rights Strategy, which are intended to facilitate early engagement and do not represent compensation under the statutory compensation code. References in Written Representations to 'low compensation' therefore reflect the offer put forward as part of the voluntary negotiations for Heads of Terms, rather than compulsory acquisition entitlements. Any compensation payable following the exercise of compulsory acquisition powers would be assessed at the relevant time in accordance with the statutory compensation code, and the cost estimate in the 4.2 Funding Statement [REP1-004] is derived from a Project-wide,

Reference	Question	Applicant's Response
	estimates at this stage of design development and therefore overall, how can the ExA be certain that the total cost of the project can be met within the available funding. • The Funding Statement submitted at DL1 revised the project cost estimate to a 2025/26 baseline. The estimated cost of CA was also updated. • Please explain the basis of the updated CA costs. It is notable that the increase in costs is minimal and the ExA needs to be reassured that the cost of all CA matters are adequately considered and can be met, please provide this reassurance.	benchmark-based assessment of likely liabilities, inclusive of contingency, rather than from individual voluntary offers. Q: How can the ExA be certain that the applicant has included the full likely costs of CA and compensation, include mineral rights. A: The Route development process has aimed to reduce effects initially through a combination of route alignment and pylon positioning adjustments. This inherently reduces the overall potential for compensation to be payable. This has included considering how relatively higher value resources, features and factors can be avoided or the interface reduced as far as possible. This has included considering future plans for development and encompassed emerging housing plan allocations. Mineral reserves are extensive and the Applicant's position is that avoidance is not possible. Where the Project interacts with known mineral allocations or potentially allocated sites for other uses or other potential claims of higher value, we have sought to modify designs to minimise the impact (whether loss of resource, effect on housing delivery, loss of crops) and thus reduce potential claims. Wherever possible, the Applicant is in active discussions with landowners to seek to agree measures to reduce effects and record in Statements of Common Ground. The Applicant has requested evidence to support any landowner's claims regarding mineral reserves and is willing to review these on a case-by-case basis but noting that current allocated sites in the area are assumed to provide a long-term supply, suggesting any claim for losses is likely to be a number of years away. Where there are potential future mineral reserves along the route, which are not currently allocated in any development plan, no assessment of loss has been calculated. Additionally, it is challenging to make any assessment of potential mineral loss until infrastructure is installed and impacts are known. Nothing precludes landowners making claims under the mining code at some future date either under voluntary agreements or compulsory purchase orders (CPO). That said, the Property Cost Estimate (PCE) has allowed in full for all the known likely costs of compulsory acquisition (CA) and compensation including mineral rights based on the current known information; the assessment includes an assessment of all costs listed below: • Rights sought

Reference	Question	Applicant's Response
		• Advance compensation • Crop loss • Future loss • Disturbance • Severance • Third party fees • Injurious affection • Land purchase • Development losses. Q: Please explain the basis of the updated CA costs. It is notable that the increase in costs is minimal and the ExA needs to be reassured that the cost of all CA matters are adequately considered and can be met, please provide this reassurance. A: The reason for the minimal uplift is that the increase in the payment for Land rights is in large part offset by the reduction on landowners impacted using landowner groupings on affected land parcels, whereas on the original PCE it was assumed that all landowners were unique. The Applicant is comfortable that the cost of CA matters is accounted for in the PCE assessment. This will be kept under review as the Project progresses and if further, as yet unknown, information comes to light.
CA 1.18	Funding statement – 5 What is the applicant's approach to blight claims and how can the ExA be assured that the allowance for blight is sufficient in the cost estimate and the costs can be met.	The Applicant's approach to blight is governed by the statutory framework set out in the Planning Act 2008, the Land Compensation Act 1973 and the established Compensation Code. Statutory blight provisions apply only where the relevant legislative tests are met. Outside those circumstances, perceived blight or general diminution in value does not give rise to an entitlement to compensation. Prior to the making of a Development Consent Order or the exercise of compulsory purchase powers, compensation is not payable unless and until the statutory tests are satisfied. For statutory blight to arise, all the following tests must be met:

Reference	Question	Applicant's Response
		• Qualifying interest: The claimant must hold a qualifying interest in the land (typically an owner-occupier or long leaseholder) • Land must be 'blighted land': The land must fall within the categories defined by the legislation (for example, land affected by proposals for compulsory acquisition) • Inability to sell except at a substantially reduced value: The claimant must demonstrate that the land cannot be sold or could only be sold at a price substantially lower than would reasonably be expected, because of blight • Reasonable endeavours to sell: The claimant must show that they have made reasonable endeavours to sell the property (unless statutory deeming provisions apply) • Service of a valid blight notice: A blight notice must be properly served in accordance with the statutory requirements. Only where these tests are satisfied does statutory blight arise and compensation become payable; perceived blight or general diminution in value does not meet the statutory threshold. The Applicant does not operate a discretionary blight or hardship scheme. For a statutory blight notice to be accepted, and compensation to become payable, the claimant must demonstrate that they have made reasonable endeavours to sell the land and have been unable to do so, or could only do so at a price substantially lower than that reasonably expected. Based on engagement to date, the Applicant is not aware of any landowners having attempted to sell land at a substantially reduced value, and has been made aware of any intention to serve blight notices as a result of the Norwich to Tilbury Project. On that basis, the Applicant does not anticipate statutory blight claims arising. The Applicant confirms that its cost estimates and funding arrangements are aligned with the statutory position on blight. Should statutory blight compensation arise, it would be met in full in accordance with the established legal framework.
CA 1.19	Funding statement – 6 At ISH1, the ExA questioned the scheme cost estimate following the display of a	• Introduction. There is no doubt that the project will be funded. As set out in the response to CA 1.14 the funding required to deliver the project is in place. As set out in the response to CA 1.15 there is a Licence Obligation on the company

Reference	Question	Applicant's Response																																																																																													
	slide in the applicants presentation titled 'Approach to Alternative Methods of Electricity Transmission – Capital Cost Overview 2020/21'. The ExA's request for further explanation of the estimate was provided in the applicant's Written Summary of Oral Submissions and Response to Action Points for ISH1 [REP1-139]. Table 7.19 on page 39, being an extract from the 2023 Strategic Options Backcheck and Review [APP-357], shows that the project cost estimate was derived from EAN4, being the preferred option from Norwich to Bramford all OHL, at an estimated cost of £355.3 million, plus EAS2, being the preferred option from Bramford to Tilbury with majority OHL and partial AC cable, at an estimated cost of £1,275.1 million. Together these two elements total £1.630.3 million. The ExA is unclear how this estimated cost then translated into the application Funding Statement [APP-063] as a project estimated cost of £895m, being shown in the above mentioned slide at ISH1 as the estimated cost of a wholly OHL for the total of options EAN4 and EAS2; the response at Deadline 1 does not sufficiently clarify such matters. The ExA notes that the updated Funding Statement at Deadline 1 [REP1-004]	to deliver the Project. As set out in the response to CA 1.16 the commitment to deliver the Project is independent of any cost base. 7.19 2023 Strategic Options Backcheck and Review [APP-357] includes Table 15.4 page 122 in 2020/21 Cost Base <table><tr><th>Boundary or Group</th><th colspan="4">2020/21 Onshore Options</th><th>Offshore</th></tr><tr><th>EC5N</th><th>EAN 1 Necton to Pelham</th><th>EAN 2 Necton to Twinstead</th><th>EAN 3 Necton to Bramford</th><th>EAN 4 Norwich Main to Bramford</th><th>Offshore 1 Norwich Main to Tilbury</th></tr><tr><td>Economic Technology (Capacity)</td><td>OHL 115km (6930 MW)</td><td>OHL 90km (6930 MW)</td><td>OHL 85km (6930 MW)</td><td>OHL 80km (6930 MW)</td><td></td></tr><tr><td>Capital Cost including non-circuit works</td><td>£494.5m</td><td>£494.2m</td><td>£375.1m</td><td>£355.2m</td><td></td></tr><tr><td>Circuit 40yr Lifetime NPV Cost</td><td>£787m</td><td>£616m</td><td>£582m</td><td>£548m</td><td></td></tr><tr><th>EC5 & LE1</th><th>EAS 1* Twinstead to Tilbury</th><th>EAS 2 Bramford via new substation to Tilbury</th><th>EAS 3 Bramford via Bradwell to Tilbury</th><th colspan="2">EAS 2 Cable Section (after detailed appraisal and consultation outside SOR assessment) Bramford via new substation to Tilbury</th></tr><tr><td>Economic Technology (Capacity)</td><td>OHL 80km (6930 MW)</td><td>OHL 100km (6930 MW)</td><td>OHL 130km (6930 MW)</td><td>HVDC 220km (6000 MW) [4000 MW]</td><td></td></tr><tr><td>Capital Cost including non-circuit works</td><td>£454.4m</td><td>£539.3m</td><td>£658.7m</td><td>£4,096.5m [£2,882.4m]</td><td></td></tr><tr><td>Circuit 40yr Lifetime NPV Cost</td><td>£548m</td><td>£684m</td><td>£890m</td><td>£4,661m [£3,232m]</td><td></td></tr><tr><th>SC2, EC5 & Sizewell</th><th colspan="4">Sea Link Sizewell area to Richborough area</th><th></th></tr><tr><td>Economic Technology (Capacity)</td><td colspan="4">HVDC 145km 2000 MW</td><td></td></tr><tr><td>Capital Cost including non-circuit works</td><td colspan="4">£1,420.8m</td><td></td></tr><tr><td>Circuit 40yr Lifetime NPV Cost</td><td colspan="4">£1,197m</td><td></td></tr></table> 2020/21 Cost Base Post Consultation inclusion of OHL and AC Cable section of 20kms added to EAS 2 <table><tr><th colspan="3">EAS 2 Cable Section (after detailed appraisal and consultation outside SOR assessment) Bramford via new substation to Tilbury</th></tr><tr><th>OHL 80km</th><th>Cable 20km</th><th>Total 100km</th></tr><tr><td></td><td></td><td>(6930 MW)</td></tr><tr><td>£459.7m</td><td>£815.4m</td><td>£1,275.1m</td></tr><tr><td>£547m</td><td>£845m</td><td>£1,392m</td></tr></table> As referred to within the question, Table 7.19 on page 39 of 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139] is an extract from the 7.19 2023 - Strategic Options Backcheck and Review [APP-357] and is replicated here. The table provides the costs in 2020/21 prices showing the original Project cost:	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	EAS 2 Cable Section (after detailed appraisal and consultation outside SOR assessment) Bramford via new substation 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					EAS 2 Cable Section (after detailed appraisal and consultation outside SOR assessment) Bramford via new substation to Tilbury			OHL 80km	Cable 20km	Total 100km			(6930 MW)	£459.7m	£815.4m	£1,275.1m	£547m	£845m	£1,392m
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	EAS 2 Cable Section (after detailed appraisal and consultation outside SOR assessment) Bramford via new substation 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																																																																																														
EAS 2 Cable Section (after detailed appraisal and consultation outside SOR assessment) Bramford via new substation to Tilbury																																																																																															
OHL 80km	Cable 20km	Total 100km																																																																																													
		(6930 MW)																																																																																													
£459.7m	£815.4m	£1,275.1m																																																																																													
£547m	£845m	£1,392m																																																																																													

Reference	Question	Applicant's Response
	updates the estimate with a 2025/26 price base which is now approximately £1,200 million. Please clarify again, clearly, why the estimated cost that is calculated in the backcheck review and updated at Deadline 1 appears to be for the wholly OHL option. If this is an error, confirm what the updated cost including the underground element is and if that the higher cost is able to be met to ensure that CA funds will be available.	2020/21 Wholly overhead line (OHL) cost = (EAN4, £355.2m + EAS2, £539.3m) = £894.5m 2020/21 Mostly OHL (with 20 km cable) cost = (EAN4, £355.2m + EAS2, £1,275.1m) = £1,630.3m. The latest 4.2 Funding Statement [Revision C] raised the costs into our new 2025/26 cost base which becomes effective at the start of the Applicant's Price Control period, as set out in our Costing Paper submission: 2025/26 Wholly OHL cost = (EAN4, £479.1m + EAS2, £721.0m) = £1,200.1m 2025/26 Mostly OHL (with 20 km cable) cost = (EAN4, £479.1m + EAS2, £1,824.0m) = £2,223.9m. To be clear the analogue to our Project in 2020/21 costs is £1,630.2m and 2025/26 costs is £2,223.9m. The revised funding paper accidentally only provided the revised uplift of the Wholly OHL cost of £1,200.1m. The funding paper will be adjusted for the next deadline to correct the reference to the wholly overhead line cost and instead refer to the 2025/26 Mostly OHL cost (with 20 km of cable) of £2,223.9m. For noting in the same exercise set out in detail in our to be submitted costing paper the costs evaluated for Offshore 1 connection as shown in the table above have changed as follows between 2020/21 cost base and 2025/26 cost base: 2020/21 Offshore 1 – 6 GW HVDC link directly Norwich to Tilbury, less flexible solution without ability to connect Essex generation = £4,097m 2025/26 Offshore 1 – 6 GW HVDC link directly Norwich to Tilbury, less flexible solution without ability to connect Essex generation = £7,190m.
CA 1.20	General, detailed or other matters - 1 A number of RRs state that they have been sent paperwork with incorrect details, plans and plots. The applicant is asked to explain how the ExA and Aps can be reassured that the applicant will correct these issues quickly and eliminate them going forward.	The Applicant acknowledges the concerns raised by Relevant Representations regarding instances where correspondence or land plans contained incorrect details. The Applicant readily updates its internal records and the underlying database that drives the 4.3 Book of Reference [AS-018] and 2.2 Land Plans [AS-005 to AS-012] when new information arises, e.g. new land interests arising / existing land interests changing. However, not all information arising will necessitate a change to the 4.3 Book of Reference [AS-018] (or wider Lands submission documents).

Reference	Question	Applicant's Response
		Where points have been raised directly by landowners (e.g. REP1-409), the Applicant has re-visited internal records in respect of historic documents sent to the Affected Parties and has updated any internal land referencing records on a case-by-case basis. Should any further feedback be received, and in the event the Applicant identifies information suggesting a change in land ownership/ land interests, the Applicant will communicate with the relevant parties, as required. The Applicant remains committed to providing clear, accurate and timely information to all Affected Persons throughout the Development Consent Order process. The Applicant can reassure the ExA and Affected Persons that: - Any errors or inconsistencies within the land referencing database used to generate outgoing correspondence have been fully validated and corrected. The 4.3 Book of Reference [AS-018] (or wider Lands submission documents) are iterative documents representative of the Applicant's understanding of land ownership and land interest at a given moment in time and are regularly updated. - Updated and corrected documents will be issued where necessary, which has been the case historically throughout the project. Where any Affected Person has notified the Applicant of an error, the Applicant has issued corrected versions and confirmed accuracy directly with the individual. - Ongoing communication channels are in place. The Applicant has encouraged all Affected Parties to contact the Applicant via the existing contact details on file (email and phone line or through appointed land agent where applicable) as well as the Written Responses, should any further anomalies be identified.
CA 1.21	General, detailed or other matters - 2 A number of RRs state that with localised design changes, the impact on their land could be significantly reduced. What approach is the applicant taking to these suggestions and how can the ExA be assured that these alternative suggestions are being adequately considered and will be within the order	This is a variation of the response at ALT 1.8 In summary the Applicant has provided a table (Appendix D) which lists those suggested changes identified in Relevant Representations where there is scope to potentially respond within the Order Limits and proposed Limits if Deviation to reduce effects for the benefit of the particular Interested Party (IP). The caveated nature reflects the fact that Order Limits are not easily amended on an application of this linear scale and the need to retain sufficient Limits of Deviation (LoD) pending the completion of location specific investigations and design.

Reference	Question	Applicant's Response
	limits and LoD.	In keeping with typical application practice (and in line with the use of the Rochdale Envelope), the design set out in the application has been developed in a proportionate manner (i.e. a design appropriate for the application but not a full engineering design) with revision within the 3.1 Draft Development Consent Order [Revision C] LoD providing flexibility to respond to as yet unknown physical characteristics of the particular location. As a result there are also some smaller changes requested by respondents (within LoD) where there remains some scope for adjustment either partly or wholly in line with the requests made. Because some of these potential changes may be close to the maximum LoD, we have to date been cautious in the ability to make such changes when there remains uncertainty about the physical characteristics and potential that the change may not be able to be implemented due to the new build nature. The actual physical characteristics that influence such decisions on micro-siting will be identified by the completion of location specific intrusive investigations and subsequent establishment of detailed design and construction methods by the Great Grid Partnership (the Applicant's delivery partner). Confirming these characteristics presents an opportunity, where no unforeseen physical characteristics are identified, to complete further micro-siting of pylons within the scope of the LoD and taking into account adjacent pylon adjustments. This potential for further reduction of effects will be considered through detailed design and informed by site specific discussions between the Great Grid Partnership and the relevant landowner(s). It is acknowledged that some of the potential changes are not on land under the control of the IP. Records of engagement are maintained, and any aspirational commitments are documented for detailed design purposes, subject to technical, environmental and constructability considerations. Only changes that remain within the LoD sought shall be implemented. The LoD are provided for all pylons, noting that in some locations the flexibility to change the design is limited where the Applicant has outlined prescriptive restrictions to the LoD within commitment GG34 in Table 6.1 of 7.2 Outline Code of Construction Practice [REP2-014]. Those locations that the Applicant has recorded to date for specific consideration, as identified from representations, are noted in an Additional Detailed Design Requests Table which provides the basis for the record of engagement referred to above.

7. Draft Development Consent Order

Table 7.1 Draft Development Consent Order

Reference	Question	Applicant's Response
DCO 1.G1	Development Consent Order – general 1. A number of LIRs refer to many of the comments made by local authorities in previous responses with regard to the draft DCO [APP-056] not being taken into account, with no explanation offered. Respond accordingly.	The Applicant provided a response to this comment in the 8.4.1 Applicant's Comments on Relevant Representations [REP1-132] see, for example, pages E20 and H37. As noted in those responses, the Applicant is grateful for the feedback received on the 3.1 Draft Development Consent Order and had regard to all feedback prior to submission of the application. The justification for the provisions in the 3.1 Draft Development Consent Order is included in the Explanatory Memorandum that accompanies the draft order. The Applicant shared the 3.1 Draft Development Consent Order with all host authorities and received, from a number of these, different and sometimes overlapping comments. The Applicant had regard to all comments and took on board those comments that it considered appropriate prior to submission. The Applicant notes that the host authorities have included comments in their Relevant Representations and Local Impact Reports and the Applicant has responded to these in the course of the Examination.
DCO 1.G2	Development Consent Order – general 2 A number of local authorities in their RRs and LIRs note commitments in the outline CoCP include notification 'as appropriate'. For example GH10, which as part of unexpected contamination protocols and post-consent ground investigations, includes such a notification. The ExA is concerned in regard to the vagueness of the term 'as	The words 'as appropriate' were used to indicate that notifications or engagement would occur with those parties who are affected by the matter at hand, rather than to give the Applicant a discretion as to when or how it considered it appropriate to notify or engage with relevant parties. The Applicant acknowledges that this could be more precise and will update the 7.2 Outline Code of Construction Practice (CoCP) [REP2-014] to specify that such notification or engagement will be carried out with the relevant authority. Notifications are secured through Requirement 4 of the 3.1 Draft Development Consent Order [Revision C], which requires the submission, approval and implementation of a final CoCP prior to the commencement of relevant works.

Reference	Question	Applicant's Response
	appropriate' and whether this would meet the tests of preciseness and enforceability. It would also ask for clarification as to how such notifications will be secured through the draft DCO, how the notification procedure will operate in practice, what post-consent documentation the Applicant will submit in compliance with the procedures outlined in the outline CoCP?	Accordingly: • The clarified notification commitments will be embedded within the approved CoCP • Compliance with those commitments will be enforceable through the Requirement, in the same manner as other CoCP controls. This provides a legally binding mechanism to secure notification and engagement obligations. Commitment GH10 states that sites which are identified as requiring individual investigation will be individually investigated and assessed in accordance with guidance described within Land Contamination Risk Management²¹ (LCRM) prior to construction. LCRM is the Environment Agency's statutory guidance for the assessment, management and remediation of land contamination in England and is the accepted regulatory framework used by: • Local Planning Authorities • The Environment Agency • Applicants discharging Development Consent Order requirements relating to land contamination. LCRM provides a structured, risk-based and proportionate approach to identifying contamination risks, assessing their significance and agreeing appropriate remediation. The Applicant will submit the following documents post-consent, where triggered in accordance with LCRM: • A contamination risk assessment and remediation/mitigation strategy report for approval • A verification report confirming completion of the approved works. As such, the procedure is familiar to regulators, proportionate, and capable of effective enforcement.

²¹ Environment Agency (2023) *Land contamination risk management (LCRM)*

Reference	Question	Applicant's Response
DCO 1.G3	Development Consent Order – control documents Explain why the outline CoCP, outline CTMP, outline LEMP, outline materials and waste management plan; outline Public Rights of Way (PRoW) management plan and outline WSI Are not listed as control documents, similar to the made Bramford to Twinstead DCO. Additionally, explain why Norwich to Tilbury DCO has not included a Construction Environment Management Plan, Materials Management Plan or a Waste Management Plan.	Requirement 4 of Schedule 3 to the 3.1 Draft Development Consent Order [Revision C] secures compliance with the management plans and, in the case of pre-commencement operations, the outline management plans. Requirement 4 refers to the Code of Construction Practice, the Construction Traffic Management Plan, the Landscape and Ecological Management Plan and the Public Rights of Way Management Plan, together with the outline versions of these management plans. Requirement 5 secures compliance with the 7.5 Outline Archaeological Mitigation Strategy and Written Scheme of Investigation [APP-328] and the Detailed Written Schemes of Investigation. Outline management plans provide the preliminary framework for the principles and procedures that the Main Works Contractor(s) must implement to minimise, manage and mitigate the potential environmental impacts of construction works associated with the Project. The outline management plans will be fully developed based on detailed design information to be provided by the Main Works Contractor(s). The final version will be submitted for approval in accordance with Requirement 4 (construction management plans) of the 3.1 Draft Development Consent Order [Revision C] prior to commencement of development. This process ensures that detailed design is developed with clear alignment to the principles and procedures within the outline plans. Article 2 (interpretation) of the 3.1 Draft Development Consent Order [Revision C] defines each of these management plans as including their appendices. By virtue of it being an appendix to the 7.2 Outline Code of Construction Practice [REP2-014], the 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016] is also secured by Requirement 4. These documents are control documents because they are referred to in those provisions of the Development Consent Order that control the authorised development. They do not become control documents by being listed as a certified document in Schedule 19 (certified documents). The purpose of Schedule 19 (certified documents) and the process of certifying documents is to ensure there is clarity as to which is the approved version of any particular document that sits alongside the Development Consent Order at the point at which it is made. 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste

Reference	Question	Applicant's Response
		Management Plan [REP2-016] details measures that will be undertaken in relation to material management (Section 4). The Applicant and its Main Works Contractor(s) will adopt the control measures when undertaking the construction of the Project. As noted in the 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] (for example, page 158) and the 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] page 151, 7.2 Outline Code of Construction Practice [REP2-014] includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP is not required.
DCO 1.G4	Unilateral undertaking Explain how the ExA can be satisfied that the longer-term ongoing monitoring and management measures (including adaptive management measures if required) will be accounted for in terms of any proposed off-site BNG that is to be determined following detailed design of the proposed development? A number of local authorities, for example Norfolk CC in [REP1-173] do not agree that a unilateral undertaking would be the appropriate mechanism for securing BNG commitments, due to concerns over monitoring, scrutiny and enforceability. Justify why you consider a unilateral undertaking would be appropriate.	The Applicant has proposed a s106 unilateral undertaking to secure its commitment to delivering at least 10% Biodiversity Net Gain (BNG). This BNG will be provided through a mix of on-site and off-site habitat enhancement. The off-site BNG (including its long-term monitoring and maintenance) will be secured through legal agreements (either s106 agreements or conservation covenant agreements) between the appropriate landowner and the relevant Local Planning Authority or responsible body (as applicable). The Applicant shall then acquire biodiversity units from these landowners. The s106 unilateral undertaking intended to be given by the Applicant to the Local Planning Authorities will not itself secure the management and maintenance of any off-site BNG. A unilateral undertaking is seen as a more pragmatic approach to securing the Applicant's BNG commitment, due to the high volume of Local Planning Authorities who would otherwise be required to agree and enter into a bilateral agreement. As BNG is being provided as a voluntary commitment, there is no need to place any obligations on the Local Planning Authorities. The Local Planning Authorities still have the same level of enforcement methods under s106 of the Town and Country Planning Act 1990, as they would with a bilateral s106 agreement, in the event that the Applicant does not deliver a 10% BNG or does not comply with the requirements of the unilateral undertaking. Therefore, the proposed s106 unilateral undertaking is in no way deficient or inferior to a bilateral s106 agreement.

7.1 Articles

Table 7.2 Articles

Reference	Question	Applicant's Response
DCO 1.A1	Articles (general) - 1 There are several articles included within the draft DCO [APP-056] where deemed consent is granted in the event of a determining authority failing to notify the undertaker of its decision within a defined number of days. However, the same articles also set out consent must not be unreasonably withheld or delayed. The ExA question the need for both provisions within the relevant articles. The applicant is asked to review all instances where this occurs and amend as necessary. Should the applicant not consider amendments appropriate, the applicant should provide a full written justification as to why those amendments have not been undertaken.	As noted on page 407 of the 8.4.1 Applicant's Response to Relevant Representations [REP2-023], the words 'not to be unreasonably withheld or delayed' are intended to ensure proportionate and timely decision making, accounting for instances where smaller or less contentious applications for consent have been submitted to the relevant authority to avoid delays where decisions could reasonably be made within a shorter time period. The Applicant therefore has not amended the 3.1 Draft Development Consent Order [Revision C].
DCO 1.A2	Articles (general) - 2 Throughout the articles contained in the draft DCO [APP-056] the applicant has specified time periods within which a response is required from a determining body. That time period tends to be 28 days. A number of the local authorities have raised concerns in regard to the time period specified, but there does not appear to be a consensus as to an	The Applicant selected 28 days for the decision-making and deemed consent time periods following detailed consideration of the programme for delivery of the Project. In selecting 28 days, the Applicant took into account: • Its commitment to continued proactive and proportionate engagement with host Local Authorities and statutory consultees to support the efficient and timely determination of post-consent submissions • That the discharge of Development Consent Order (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

Reference	Question	Applicant's Response
	appropriate alternative time period. The ExA is also concerned as to such a short period being imposed, especially where a deemed consent is triggered where a determining body has failed to respond in the period specified. Applicant: Explain how you have reached the time period chosen (generally 28 days), including an explanation of your understanding of any processes the relevant determining bodies have to/ or are required go through. For example, your understanding of: any application validation period; any minimum consultation periods required with statutory or other bodies; any report writing periods; any committee or delegated cycles; and any decision issuing periods that may apply. All local authorities, relevant statutory undertaker and or other relevant determining body: provide a summary of any processes you are required to go through, including any time period in the number of days required to undertake that process. For example, any application validation process; any minimum consultation periods required with statutory or other bodies; any report writing periods; any committee or delegated cycles relevant; and any decision issuing periods that may apply.	intent of 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 • That the post-consent submissions will focus on the detailed implementation of agreed measures, rather than introducing new concepts or untested mitigation. The Applicant will continue to engage with authorities on draft submissions where appropriate, helping to clarify expectations and reduce the likelihood of iterative amendments • Recent precedent timescales for deemed consents in articles of the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the Applicant's preference for 28 days in its application for the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant notes the Examining Authority's request for details of its consideration of validation periods, consultation periods, report writing periods, committee cycles and decision issuing periods that may apply. Whilst there are prescribed periods for applications made under the Town and Country Planning Act 1990, in the context of a Nationally Significant Infrastructure Project of critical national priority such as this, and where the details of the application and the foundations for submission of applications for post-consent approvals have been considered in great detail as part of the Examination process, the Applicant's position is that adopting similar validation, consultation, report writing, committee and decision periods would undermine the delivery of urgent and critical nationally significant infrastructure. The Applicant has had regard to the concerns of the Examining Authority and the host authorities and proposes to extend the 28-day period to 25 business days. The Applicant considers that this provides sufficient additional time to the relevant decision-making authorities and brings this in line with the 35 days that the Secretary of State considered to be appropriate for the National Grid (Bramford to Twinstead Reinforcement) Order 2024. Furthermore, the use of business days instead of days will ensure that the relevant authorities are not disadvantaged by weekend and Bank Holiday periods. As noted in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] and 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], there is scope within paragraph 1(1)(c) of

Reference	Question	Applicant's Response
		Schedule 4 (Discharge of Requirements) (3.1 Draft Development Consent Order [Revision C]) and within each article that makes provision for deemed consent to extend the decision period by agreement in writing between the undertaker and the relevant authority. Paragraph 2 of Schedule 4 (Discharge of Requirements) also allows the relevant authority to seek further information from the Applicant and to consult with those required by the terms of the Requirement in question. The Applicant notes that some authorities have requested decision periods far in excess of what is acceptable to the Applicant as it seeks to deliver the Project by 2030 and which is of critical importance to the UK government's Clean Power Target of 2030. The Applicant's position remains that extending the decision-making period beyond what the Applicant proposes would not be proportionate or appropriate given the programme constraints faced by the Applicant, the nature of the applications proposed to be made, and in the context that Annex 2 of the NESO Clean Power 2030 Report²² 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. With the exception of Schedule 16 (Protective Provisions) the details of which remain under discussion with the relevant stakeholders, the Applicant has updated the 3.1 Draft Development Consent Order (Revision C) to reflect these newly proposed timescales.
DCO 1.A3	Articles and Schedules (general) - 3 A number of RRs raise the issue of consistency in regard to the term 'day(s)' and 'business day(s)'. In the interests of consistency justify the two different terms or amend the draft DCO, as necessary.	With the exception of Schedule 16 (Protective Provisions) the details of which remain under discussion with the relevant stakeholders, the Applicant has updated references to "days" to become references to "business days" throughout 3.1 draft Development Consent Order [Revision C]. It is not appropriate to do a straight swap in all instances, hence some of the numbers have also been adjusted to provide a comparative number of business days.
DCO 1.A4	Article 2 (Interpretation) (general)	The 3.1 Draft Development Consent Order [REP2-004] defines the Outline Code of Code of Construction Practice in Article 2 (Interpretation) as <i>'the</i>

²² National Energy System Operator (NESO) (2024) *Clean Power 2030. Annex 2: Networks, connections and network access analysis*

Reference	Question	Applicant's Response
	Braintree DC in its RR [RR-0383] and LIR [REP1-148], considers a number of central documents, submitted as part of the application, are missing from the interpretations list and should be defined. These including, but are not limited to the CoCP, the Minerals and Waste Management Plan; and the Noise and Vibration Management Plan. Signpost your responses to these concerns or provide a response.	<i>document of that description (together with its appendices) (document 7.2)...’.</i> This definition therefore captures 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306] as an appendix to the Outline Code of Construction Practice. The other terms referred to in the Examining Authority's Question is not used within the draft Development Consent Order and therefore it is not necessary to define these terms.
DCO 1.A5	Article 2 (Interpretation) (design and layout Plans (elevations)) The ExA notes the definition of design and layout plans (elevations), as set out in article 2(1). However, it is concerned the definition has the potential to add a layer of confusion. Justify why there is a need for the interpretation of design and layout plans (elevations), as opposed to just defining the term ‘design and layout plans – subs & cables’.	Reference to the elevations within the Design and Layout Plans - Subs & Cables is to ensure that the authorised development is carried out in general accordance with the elevations of proposed equipment and proposed overhead line works under Requirement 6 of the 3.1 Draft Development Consent Order [REP2-004]. There are other sections within the wider suite of Design and Layout Plans - Subs & Cables that show other elements of the design and that are illustrative only, hence it is not appropriate to refer in this Requirement to the suite of plans as a whole.
DCO 1.A6	Article 2 (Interpretation) (maintain) Braintree DC in its RR [RR-0383] and LIR [REP1-148], along with a number of other local authorities and statutory undertakers, considers the definition of “Maintain” needs to be clear with regard to who decides whether the maintenance	Please refer to the Applicant's responses to these comments on page 158 of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] and page 130 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. The Applicant notes the concern raised, 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

Reference	Question	Applicant's Response
	would give rise to any materially new or materially different environmental effects. Signpost your responses to this matter or provide a considered response.	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 development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.
DCO 1.A7	Article 2 (Interpretation) (order land) The definition of 'Order land' is not sufficiently clear to ensure that land not required/ intended to be subject to CA or TP is appropriately excluded from articles pursuant to CA (articles 24 and 25) and TP (articles 27, 28 and 29). The consequence of the definition being unclear could result in allowing for the acquisition or temporary use of such land unintentionally. Should 'Class 8' (Uncoloured (White) Land), as set out in the SoR [APP-059] at Table 5.1 (Powers related to land acquisition and use being sought by the Project) be specifically defined and excluded in these articles or through the definition of 'Order land'?	The definition of 'Order land' is 'the land shown on the land plans and described in the book of reference'. The definition of Order land, therefore, must be understood as what is shown on those plans but also what is described in the Book of Reference. Table 2.1 of 4.3 Book of Reference [AS-018] describes: • The land use power sought • The colour of the land on the 2.2 Land Plans [AS-005 to AS-012] that is associated with the power sought • The principal relevant article in the 3.1 Draft Development Consent Order [Revision C] • A description of the powers afforded by each Class • A list of any subordinate powers, which can also be exercised on land to which the primary power relates. For example, Class 1 authorises the compulsory acquisition of land. The undertaker can only exercise powers to compulsorily acquire land on the land shown brown on the 2.2 Land Plans [AS-005 to AS-012]. The powers that the undertaker can exercise on the brown land are those set out in Article 24 (compulsory acquisition of land). The fourth column of the table sets out the description of the Class (i.e. the purpose for which the land can be acquired). The final column lists any subordinate powers so, in the case of the brown land, the undertaker can also exercise Class 2 powers (compulsory acquisition of rights – overhead lines), Class 3 powers (compulsory acquisition of rights – underground cable system), Class 4 powers (compulsory acquisition of rights – overhead line and underground cabling system), Class 5 powers (compulsory acquisition of

Reference	Question	Applicant's Response
		rights – access), Class 6 (compulsory acquisition of rights – drainage) and Class 7 (temporary use). Thus land over which a class of rights can be exercised is shaded a particular colour on the Land Plans. The entry for Class 8 is clear that the white land is 'Land that is not subject to powers of acquisition nor temporary use'. The columns relating to the relevant article of the 3.1 Draft Development Consent Order [Revision C], the description of the Class and the subordinate classes are also blank or marked as 'N/A' to make it clear that no powers of compulsory acquisition of land, rights or temporary possession of land can be exercised over the white land. The Applicant does not consider there to be any reading of the 3.1 Draft Development Consent Order [Revision C] that would allow compulsory acquisition powers or temporary possession powers to be exercised over the Class 8 (white) land. The Applicant therefore does not propose to amend the definition of Order land in the 3.1 Draft Development Consent Order [Revision C]. It would not be appropriate, or necessary, to start introducing or excluding details from the 4.1 Book of Reference [AS-018] into that definition and doing so in part could create unnecessary uncertainty. This approach has precedence and the definition of the Order land is consistent with the definition contained in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
DCO 1.A8	Article 2 (Interpretation) (pre-commencement operations) - 1 Braintree DC in its RR [RR-0383] and LIR [REP1-148] considers this definition should be brought in line with the same definition in National Grid's (Bramford to Twinstead Reinforcement) DCO 2024, but should also exclude those operations which the relevant planning authority considers give rise to a materially new or different environmental effect. Signpost your responses to this matter or provide a considered response.	The Applicant has carefully considered the definition of 'pre-commencement operations' to ensure it is suitable for the specific circumstances of the Norwich to Tilbury Project. The ability to undertake the 'pre-commencement operations' listed in Article 2(1) of the 3.1 Draft Development Consent Order (Revision C) is of critical importance in the context of the anticipated construction programme for the Project. An inability to undertake any of those operations before all pre-commencement Requirements listed in Schedule 3 to the 3.1 Draft Development Consent Order have been discharged would ultimately require a number of additional activities to be carried out as part of an already constrained construction programme. The net effect would be an unacceptable delay to delivery of this Project of critical national priority.

Reference	Question	Applicant's Response
		The additional items contained in the definition beyond those in the National Grid (Bramford to Twinstead Reinforcement) Order 2024 are: - Listed building surveys – these have been included at the request of Essex County Council in paragraph 5.2.8 of its Local Impact Report [REP1-161] - Protection works comprising utilities protection works or fencing and protection slabs – these works are included to account for any such works that may be necessary to enable either pre-commencement or commencement works to be carried out safely and without damaging existing utilities apparatus. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 - Set up works associated with the establishment of temporary laydown areas – this simply extends the ability to carry out set up works to temporary laydown areas in addition to construction compounds. The Applicant does not consider its inclusion to be materially beyond the scope already set out - Receipt and erection of construction plant and equipment – this is required to enable construction materials to be brought to site and construction plant and equipment to be erected ahead of commencement of development. This is necessary to enable construction works to begin as soon as the relevant pre-commencement Requirements have been discharged which, in turn, will put the Applicant in a favourable position to deliver the Project by the target date. There is precedent for this inclusion in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The Applicant has had regard to the government's guidance on the content of a Development Consent Order required for Nationally Significant Infrastructure Projects²³ which, at paragraph 005, states that <i>'The definition of commencement must not provide for preliminary works which are so extensive that they would be likely to have significant environmental effects themselves, and would normally need consideration and approval by the discharging authority prior to such works starting. Typical examples of matters which are not acceptable preliminary works</i>

²³ Ministry of Housing, Communities and Local Government (2024) *Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects*

Reference	Question	Applicant's Response
		<i>include major earthworks, clearance of trees and ground clearing, activities affecting protected species or archaeological remains, unless appropriate controls are secured in another manner.'</i> The pre-commencement operations have been assessed in the Environmental Statement and are controlled by Requirement 4(3) of Schedule 3 to the 3.1 Draft Development Consent Order [Revision C] which requires all pre-commencement operations to be carried out in accordance with the outline management plans. The scope of pre-commencement operations does not offer flexibility beyond what has been assessed in the Environmental Statement and the onus for compliance rests with the Applicant at all times. Failure to comply with a term of the DCO would be an offence. Therefore, it is not necessary for the additional controls proposed by Braintree to be included in the 3.1 Draft Development Consent Order [Revision C]. Indeed, doing so would add further administrative burden on the relevant planning authorities. There is extensive precedent for pre-commencement operations to be carried out without this further level of control from the relevant planning authorities relating to materially new or materially different environmental effects and the Applicant does not consider it appropriate for Braintree's proposed tailpiece to be added to the definition of 'pre-commencement operations'.
DCO 1.A9	Article 2 (Interpretation) (pre-commencement operations) - 2 The ExA is concerned in regard to the range of works excluded from the meaning of 'Commence', by virtue of the definition of 'Pre-commencement operations'. This matter has been raised by a number of local authorities in their LIRs. The scope of the 'pre-commencement operations' is extensive and includes multiple additional elements not included in other made DCOs (for example the Bramford to Twinstead DCO). The effect of this has the	Please refer to the Applicant's response to limb (a) of the Examining Authority's question DCO 1.A8 above. In relation to limb (b), in referring to the temporary display of advertisements, the Applicant means displays relating to considerate contractor schemes and contractor branding, which would fall within the definition of advertisement set out in section 336(1) of the Town and Country Planning Act 1990. The inclusion of the temporary display of site notices or advertisements is well preceded in Development Consent Orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.

Reference	Question	Applicant's Response
	potential to be wide ranging and not insignificant. a) Provide justification as to why the definition of 'pre-commencement operations' is so wide ranging and why additional elements have been incorporated over and above other made DCOs in terms of 'pre-commencement operations', especially the Bramford to Twinstead DCO. b) Clarify why the temporary display of advertisements would be required as part of pre-commencement operations. Please be clear in your reply in regard to what your meaning of advertisement is. For example do you mean an advertisement falling within the definition of an 'advertisement' as set out in Section 336(1) of the Town and Country Planning Act 1990 (as amended) or do you have an alternative meaning of the term.	
DCO 1.A10	Article 2 (Interpretation) (Relevant Planning Authority) Norfolk CC in its RR [RR-2753] and its LIR [REP1-173], as well as a number of other local authorities have raised concern over the definition of 'Relevant Planning Authority'. As the proposed development is a long linear scheme there will be multiple authorities involved. A number of requirements proposed use the phrase 'No	(a) The Applicant confirms that a 'stage' of the authorised development for the purposes of Requirement 3 is typically defined by how the Project is programmed and delivered in practice. Image 4.1 of 6.4 Environmental Statement Chapter 4 - Project Description [APP130] presents an indicative construction programme and helps illustrate how different elements of the Project may be sequenced; this is illustrative only and does not prescribe or fix the formal 'stages' of delivery. The same applies to the broad phases of construction, operation and (where relevant) decommissioning, which describe lifecycle phases rather than delivery stages. Rather than a division of the Project or division by Works Nos., a 'stage' for the purposes of the authorised development is more likely to be linked to a particular

Reference	Question	Applicant's Response
	stage of the authorised development may be commenced until... has been submitted to and approved by the relevant planning authority'. The ExA seeks greater clarity from both the applicant and all local authorities on the following: a) What constitutes a 'stage' of the authorised development. The ExA in asking this question notes the 'Works' are defined in schedule 1 and the proposed development has been divided into Sections A to H, covering a geographical split. It also notes image 4.1 of [APP-130] provides an indicative construction programme for the various sub-elements and there are different stages of the proposed development (the definition of have construction, operation and (potentially) decommissioning). Would these adequately cover the definition of a 'stage'? b) Which local authorities would be the relevant planning authorities for a particular stage, bearing in mind the length and size of the proposed development at that stage? For example what happens if more than one authority (such as a County Council and a Local Authority) is involved in discharging a requirement/ plan/ scheme for a particular stage and they disagree that the submission is adequate to allow for the development to commence?	package of works that will be carried out. For example, enabling works could comprise a single overarching stage with sub-stages reflecting either geographic spread of works to minimise the complexities associated with where a stage may otherwise cross local authority boundaries, or sub-stages could reflect the planned year of construction and as such the sequenced availability of detailed design information. The Applicant confirms that it is currently working with the Great Grid Partnership, as the Applicant's delivery partner, to define the detailed construction stages for the Project. These stages will be finalised as the delivery programme is developed in further detail. Once available, the Applicant intends to share a draft stage plan with the host authorities to support ongoing engagement, and to inform discussions around matters such as ways of working around requirement discharge. In summary, while the authorised development is clearly defined by the 3.1 Draft Development Consent Order [Revision C] and supporting documents, 'stages' are a delivery-led concept, defined by the contractor's construction programme, rather than being fixed by the Development Consent Order, the Section A–H structure, or high-level lifecycle phases alone. (b) The Applicant acknowledges feedback from the host authorities on the definition of 'relevant planning authority' and has updated the 3.1 Draft Development Consent Order [Revision C] to clarify the position. As stages are linked to particular packages of works, there could be more than one relevant planning authority for a stage. As noted in (a) above, sub-stages may be included where stages cross local authority boundaries to seek to minimise the complexities associated with cross-border approvals. In the event that more than one authority is involved in discharging a requirement / plan / scheme for a particular stage and they are in disagreement as to the adequacy of the submission, the Applicant could appeal a refusal or any failure to notify of a decision, using the procedure set out in Schedule 4 (Discharge of Requirements) of the 3.1 Draft Development Consent Order [Revision C]. (c) As set out in paragraph 3.18.8 (page 116) and page 163 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], Requirement 3(2) states that <i>'the authorised development may not commence until a written scheme setting</i>

Reference	Question	Applicant's Response
	c) Consider a requirement for a 'stages plan' to be submitted in writing prior to commencement, for the written approval of the relevant determining body (similar to the provisions set out on the Brechfa Forest Connection Project DCO, the Brechfa Forest West Wind Farm DCO and the Richborough connection Project DCO), to approve the staging plan prior to commencement of works. The ExA invites suggestions as to any alternative wording and/ or solutions that would address the ExA's concerns in regard to the above-mentioned matters.	<i>out all stages of the authorised development has been submitted to the relevant planning authority</i>'. The Applicant is content to submit the written scheme to the authorities for their information, as set out in 3.1 Draft Development Consent Order [Revision C]. However, given the scale of the Project, the large number of local authorities within the Order Limits and the complexities of delivering such a large project within a limited timeframe, it is not appropriate or proportionate for the Applicant to seek each authority's consent to the written scheme setting out the stages of the authorised development. Additionally, there are specialist technical considerations involved, and the Applicant and the Main Works Contractor(s) have the necessary expertise to determine the appropriate stages and programming of the authorised development. Submitting these for approval could severely delay the Applicant's ability to begin construction of the development and to achieve energisation by 2030.
DCO 1.A11	Article 2 (Interpretation) (temporary construction works) No such term is used in schedule 1 (Authorised Development). Review and amend as necessary.	The term 'temporary construction works' is used in Article 8 (Application of the 1990 Act) of 3.1 Draft Development Consent Order [REP2-004] to provide that any works of a temporary nature described in Schedule 1 (Authorised Development) are to be treated as though the development consent for those works are akin to a 'planning permission' granted for a limited period.
DCO 1.A12	Article 2 (Interpretation) (UKPN works) The ExA asks why it is necessary to reference Works Nos. 25 to 36 specifically.	The Applicant has included reference to Work Nos. 25 to 36 to ensure clarity that the extent of the powers afforded to UKPN as undertaker under the 3.1 Draft Development Consent Order [REP2-004] (which include land acquisition powers) are limited to that particular suite of works and any associated development that is required to facilitate those works. This approach follows the approach taken on the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
DCO 1.A13	Article 2 (Interpretation) – (Article 2(3)) The ExA notes article 2(3), especially the final sentence which reads “Unless otherwise specified in article 5 (LoD) and schedule 1 (Authorised	The Applicant commissioned Bluesky International to conduct an Aerial Survey and capture LiDAR of the ground along the Norwich to Tilbury Project route. The data captured the existing ground elevation above ordnance datum (AOD) in mid-late 2023. The existing ground profile is presented in the 2.7 DCO Elevation Drawings [APP-044] [APP-045] and is explained on the Explanatory Sheet of those documents. For the overhead line elements, a pylon has a foundation at the

Reference	Question	Applicant's Response
	Development), heights and depths in this Order or on the Work Plans are measured from the proposed final ground level". In the interests of certainty, how is the 'proposed final ground level' known and where within the submitted application documentation is that term is specifically defined.	base of each leg that is typically made of concrete and a protruding steel (stub), which connects to the above ground steel lattice pylon. The foundation at each leg is expected to extend above the existing ground level between 0.0 m and 0.6 m; at this point there is a connection with the above ground steel pylon, above which the pylon height is measured. Based on industry practice, and for the purposes of comparison and assessment, the final ground level is expected to be restored to a similar level as the existing ground level – generally within 0.0 m to 0.6 m of the existing ground level. There may be exceptional circumstances where, after detailed site-specific ground assessment, civil landscaping (cut and/or fill of ground) may be required for structural stability or improved water drainage or flood mitigation; none of which are anticipated based on the geotechnical assessment undertaken to inform the engineering design. The Cable Sealing End compounds and Substations require permanent earthworks for construction of the platforms; typically, the platform's height is based on a cut and fill balance. There may be circumstances where, after detailed site-specific ground assessments, further earthworks are required for structural stability or improved water drainage or flood mitigation. Including considerations detailed in 7.9 Flood Risk Assessment [APP-331], specifically the Wenham Grove CSE Compound and Tilbury North Substation. Indicative site finish levels are indicated in 2.6.1 Errata Design and Layout Plans - Subs and Cables [REP1-003], based on the available LiDAR data, ground information and the respective site arrangements.
DCO 1.A14	Article 4 (Maintenance of authorised development) Braintree DC in its RR [RR-0383] and LIR [REP1-148] seeks a mandatory obligation on the Undertaker: i) to maintain (ie 'shall'); ii) for decommissioning and iii) for removal of parts of the authorised development that become obsolete.	The powers contained within Article 4 (maintenance of the authorised development) of the 3.1 Draft Development Consent Order [Revision C] give the Applicant the ability to maintain the authorised development, which includes the power to decommission and remove part, but not all, of the authorised development. Decommissioning of the whole of the authorised development would need to be dealt with under Requirement 13 (decommissioning) as this is outside of the scope of the Environmental Statement. It is entirely appropriate that these powers are not mandatory obligations. As noted on page 158 of the 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] and page 153 of 8.8.2 Applicant's Comments on

Reference	Question	Applicant's Response
	Respond whether the above matters should be included within the article. Should these matters be provided for elsewhere within the draft DCO, the ExA would ask you to signpost where within the draft DCO they are located.	Relevant Representations [REP2-030], the Applicant is a transmission licence holder, meaning that it already has statutory duties to maintain its apparatus in order to ensure a safe, effective and efficient electricity transmission system. Adding an additional layer of control increases the likelihood of confusion and uncertainty surrounding enforceability of two statutory regimes. The powers contained within Article 4 (maintenance of the authorised development) are consistent with those powers on previous National Grid development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024, the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, the National Grid (Richborough Connection Project) Development Consent Order 2017 and the National Grid (Hinkley Point C Connection Project) Order 2016.
DCO 1.A15	Article 5 (Limits of deviation) - 1 The limits of vertical deviation within the National Grid (Bramford to Twinstead Reinforcement) DCO 2024 is 4 metres. Please explain why the limits of vertical deviation differ between your draft DCO and those contained within the above mentioned Order. Justify as to why an additional 2 metres (resulting in a total limit of deviation vertically of 6 metres) is considered to be required in this instance.	As stated in the Applicant's 8.5.3 Written Summary of Oral Submission and Responses to Action Points for Issue Specific Hearing 1 [REP1-139], the vertical Limits of Deviation (LoD) would not exceed 6 m upwards to allow for variation in pylon positions whilst maintaining electrical clearance requirements. The 6 m vertical LoD allows for two standard pylon extensions to be added, which is not possible with a 4 m vertical LoD. This is due to lattice pylon extensions typically increasing by increments of 3 m. A 6 m vertical LoD was sought and consented on the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the A122 (Lower Thames Crossing) Development Consent Order 2025. The Applicant's position is that the additional 2 m vertical LoD is proportionate to the scale of the Project and, therefore, the extent of any unknowns, the varying landforms and use across the circa 160 km overhead line route, and ongoing design coordination with a range of third-party developments that could lead to minor design changes at detailed design and construction stages.
DCO 1.A16	Article 5 (Limits of deviation) - 2 Provide an update with regards to the potential for pylons TB140 to TB142 (inclusive) and TB238 to TB243 (inclusive) and whether an 18 metre vertical limit of deviation will be required, should a change	With regards pylons TB140 to TB142 (inclusive), as highlighted on page 25 of the 8.6.1 Deadline 1 Cover Letter [REP1-141] the decision has been made to proceed with Scenario B, with standard height pylons to the south of the River Chelmer. Therefore the 18 m vertical Limits of Deviation (LoD) is required to enable the change from low height to standard pylons. It should also be noted that this change also enables the removal of one pylon between TB140 and

Reference	Question	Applicant's Response
	from low height pylons to standard height pylons be required. The explanatory memorandum (EM) [APP-057] suggests the change will be known following consultation feedback and engagement with statutory stakeholders. Please provide an indication of when that consultation and engagement concludes and when a decision on these pylons being low height or standard height pylons will be finalised. In addition, the following wording has been used multiple times in this article "... to such extent the undertaker considers necessary or convenient", with two of those instances also including the word 'downwards'. In terms of precision and enforceability, the ExA raises concerns with the applicant in regard to the wording used and ask it be reviewed and amended, as may be necessary. In regard to the above concerns, the local authorities are invited to submit their views on this matter and request they submit alternative wording for consideration, should they wish.	TB143. The Applicant is committed to proceeding with Scenario B and proposes no changes to the LoD contained within the Table of Parameters at the back of 2.3 Works Plans - Section H [APP-024]. Each scenario has been assessed in the Environmental Statement. The increased vertical LoD of 18 m at pylons TB238 to TB243 (inclusive) is to be retained, as highlighted on page 21 of the 8.6.1 Deadline 1 Cover Letter [REP1-141]. Low height pylons have been proposed in the vicinity of Thurrock Airfield as aviation impacts mitigation. However, should a housing development gain planning consent at Thurrock Airfield and/or the airfield be closed, the low height pylons would not be required and standard pylons would be installed instead. Whilst there is a possibility of this housing development progressing the Applicant seeks to retain the flexibility in this location. As set out in paragraphs 13.9.51 to 13.9.53 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual APP-226] there would be no change to the significance of effects on landscape character or visual receptors should the Project use standard lattice pylons between TB238 and TB243 instead of low height pylons. The Applicant proposes no changes to the LoD contained within the Table of Parameters at the back of 2.3 Works Plans - Section F [APP-022]. Each scenario has been assessed in the Environmental Statement. References to 'such extent as the undertaker considers necessary or convenient' in the context of overhead electric conductors and fibre-optic earth wires is critical because the height of the conductors and fibre-optic earth wires are a function of the position and height of the pylons. If, for example, a pylon height changes, or the pylons are placed closer together or further apart, the height of the conductors will also change. The upwards LoD for the overhead electric line conductors will be limited by the LoD for the pylons. The downwards LoD for the overhead electric line conductors will be regulated by the Electricity Safety, Quality and Continuity Regulations 2002 which ensure that a strict safety clearance is maintained. Flexibility downwards 'to such extent as the undertaker considers necessary or convenient' is also essential for the underground cables, as it allows for localised changes in landform, geology or agricultural practices to be taken into account during construction. It also allows the Applicant to ensure that a safe distance can

Reference	Question	Applicant's Response
		be maintained relative to any existing buried utility apparatus. Likewise, this form of flexibility is required for other permanent above ground structures, erections and apparatus, including substations and sealing end compounds. As for the underground cables, this is required so that construction can reflect extant ground conditions when the works are carried out. The flexibility afforded here is well precedented in made electricity transmission Development Consent Orders (DCOs), including the National Grid (Bramford to Twinstead Reinforcement) Order 2024, the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, and, in respect of underground works, in pipeline and tunnel DCOs including the HyNet Carbon Dioxide Pipeline Order 2024 and the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014.
DCO 1.A17	Article 5 (Limits of deviation) - 3 The ExA notes article 5(4) and the explanation provided in the EM [APP-057] (paragraph 3.9.10). However, the ExA is concerned that such provision removes certainty from the proposed development in terms of the final height of the proposed pylons and would seek further justification, including reasoning and necessity, from the applicant in this regard. For example in what instance and in what location is it envisage article 5(4) would be utilised.	The Applicant has given careful consideration to the selection of the vertical Limits of Deviation (LoD) set out in Article 5(1)(b), 5(1)(d) and 5(3) of the 3.1 Draft Development Consent Order [Revision C]. However, and as paragraph 3.9.10 of the 3.2 Explanatory Memorandum [Revision C] explains, there may be limited and localised instances where unexpected ground conditions are encountered during construction and which may render it dangerous or impracticable to install certain aspects of the authorised development within the vertical LoD specified in Article 5(1)(b), 5(1)(d) and 5(3). Article 5(4) (which does not disapply the LoD but gives a discretion to the Secretary of State) would be engaged in these circumstances in order to avoid a scenario whereby a minor departure from the stated vertical LoD would otherwise lead to a disproportionate and/or onerous delay. The adverse consequences of such a delay would be particularly acute in the context of the Project given its status as a project of critical national priority, including the additional constraints costs identified in Annex 2 of the NESO Clean Power 2030 Report²⁴ as being £2.5 billion should the Applicant deliver the Project by the end of 2031 instead of by the end of 2030 (equating to £7 million for every day that the energisation of the Project is delayed into 2031). In all instances, the Secretary of State would first need to be satisfied

²⁴ National Energy System Operator (NESO) (2024) *Clean Power 2030. Annex 2: Networks, connections and network access analysis*

Reference	Question	Applicant's Response
		that such a departure would not give rise to any materially new or materially different environmental effects to those reported in the Environmental Statement.
DCO 1.A18	Article 10 (Planning Permission and Other Consents) The ExA notes the applicant's position, as set out in the EM [APP-057] (Section 3.14) in regard to article 10, but seeks further justification for the necessity of including articles 10(2) and (3) in relation to this particular project. Additionally, in what instances would article 10(2)(b) apply, especially in terms of preventing enforcement action under the 1990 Act or the 2008 Act in relation to development carried out or used pursuant to the relevant planning permission or development consent outside the Order limits?	Given the size of the Project, it is inevitable that there will be planning permissions that are granted, or have already been granted, within the Order limits. Likewise, there are close interactions between some existing and proposed development consent orders, including North Falls, Five Estuaries and Lower Thames Crossing. As more particularly explained in paragraph 3.14 of the 3.2 Explanatory Memorandum [Revision C], the purpose of article 10(2) is to ensure that where a planning permission or development consent order is granted and implemented lawfully but is inconsistent with the powers contained in the Order (if made), that inconsistency is not taken to trigger the principles of <i>Hillside Parks Ltd v Snowdonia National Park Authority</i> [2022] UKSC 30, which could render that planning permission or development consent order incapable of physical implementation and could potentially sterilise the land. It therefore follows that in relation to that particular inconsistency, no enforcement action should be permitted for breach of the terms of the development consent order or for continuation of a planning permission that is inconsistent with the development authorised by the DCO (if made) (as provided for in article 10(2)(b). Article 10(3) ensures that any inconsistency would not prevent the Applicant from exercising its powers under the DCO (if made).
DCO 1.A20	Article 11 (Street Works) Norfolk CC in its RR [RR-2753] seeks a Highways Side Agreement or Protective Provisions. Alternatively, it suggests article 11(1) Should be subject to Street Authority Consent, with articles 11(2) to 11(7) needing amending accordingly. Provide a response to these concerns.	As noted on page 406 of the 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] and in Table 3.24 (beginning on page 171) of the 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], the Applicant has incorporated draft protective provisions into 3.1 Draft Development Consent Order [Revision C] and has sought engagement with the relevant authorities on these provisions. It is the Applicant's understanding that the highway authorities are seeking a joint highways framework agreement in lieu of protective provisions, which the Applicant will seek to negotiate with the highway authorities provided it can be concluded before the end of the Examination.

Reference	Question	Applicant's Response
DCO 1.A21	Article 12 (Application of the permit schemes)	The Applicant will continue to engage with the relevant authorities throughout the Examination process and, therefore, at this stage, it does not consider it necessary or appropriate to make amendments to the articles.
	The ExA notes article 12(8) but asks whether this is a duplication of appeal process? Additionally, what happens in the instance more than one appeal mechanism is used, in relation to the same matter being appealed, at the same time and whether there is a need to include something that prevents this occurring?	Article 12(8) clarifies that the procedure for appeals in Schedule 4 of the 3.1 Draft Development Consent Order [Revision C] is capable of applying to any refusal to grant a permit, or to any decision to grant a permit subject to conditions, but not so as to limit any other appeal mechanism available to the undertaker under the permit schemes or otherwise. The Applicant would not want to remove scope for using any appeal mechanisms set out in the permit schemes or otherwise, in case it were appropriate in all circumstances to use them. However, in the context of this Project of critical national priority, it is prudent to make provision for circumstances in which it would be more appropriate for the Applicant to use the bespoke and significantly preceded mechanism set out in Schedule 4. The Applicant notes the Examining Authority's comments on the potential for an appeal to be run concurrently on different regimes. This is not likely to occur in practice but the Applicant agrees it would be sensible to make provision preventing this occurring, and has therefore updated the 3.1 Draft Development Consent Order [Revision C] to add the following underlined wording to Article 12(8) (Application of the permit schemes): <i><u>'(8) Without restricting the undertaker's recourse to any alternative review, adjudication or appeal mechanism which may be available under the permit schemes or otherwise, the undertaker may appeal any decision to refuse to grant a permit or to grant a permit subject to conditions pursuant to the permit schemes in accordance with the mechanism set out in Schedule 4 (Discharge of Requirements) of this Order except that upon the undertaker submitting an appeal to the Secretary of State pursuant to that Schedule in respect of such a decision, neither the undertaker nor any other party may use, or continue to use, the alternative review, adjudication or appeal mechanism in relation to that decision and any such alternative review, adjudication or appeal commenced must cease and neither its process nor its determination will have any effect.'</u></i>

Reference	Question	Applicant's Response
DCO 1.A22	Article 14 (Power to alter layout, etc. of streets), Article 15 (Permanent stopping up of streets and public rights of way) and Article 16 (Temporary closure of streets and public rights of way) Norfolk CC in its RR [RR-2753] seeks a Highways Side Agreement or Protective Provisions. Alternatively, it suggests articles 14(1), 15(1) and 16(1) should be subject to Street Authority Consent. Provide a response to these concerns.	Please refer to the Applicant's response to DCO 1.A20 above, which deals with the same principles.
DCO 1.A23	Article 14 (Power to alter layout, etc. of streets) and Article 17 (Access to works) Braintree DC in its RR [RR-0383] and LIR [REP1-148], along with a number of other County and Local Authorities, seeks notification, as a relevant Local Authority in relation articles 14(1) and 17(1). Provide a response to these concerns.	As noted on page 158 of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] , notification of any works to alter the layout, etc. of streets (Article 14(1)) or works to accesses (Article 17(1)(a)) would become disproportionately onerous on the Applicant along the entire route of the Project. It would also add to the administrative load for each relevant street authority. For these reasons, the Applicant does not consider this to be appropriate or practical in the circumstances of this Project.
DCO 1.A24	Article 16 (Temporary closure of streets and public rights of way) In article 16(1) you use the term 'reasonable time'. In the interests of precision, define this term. In addition to the above, Norfolk CC in its RR [RR-2753] considers other provisions which provide for consents should also explicitly state that reasonable conditions may be applied and this article should provide that any temporary diversion specified in column (4) of Part 1 or Part 3	Please refer to page 407 of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] where the Applicant responds to these points.

Reference	Question	Applicant's Response
	of schedule 8 must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way is temporarily stopped up, altered or diverted. Provide a response to these concerns.	
DCO 1.A25	Article 18 (Construction, alteration and maintenance of streets and other structures), Article 30 (Use of subsoil under or airspace over streets) and Article 39 (Power to override easements and other rights) No explanation has been provided in the EM [APP-057] in regard to articles 18(6), 30(5) or 39(6).	The Applicant has updated the 3.2 Explanatory Memorandum [Revision C] accordingly.
DCO 1.A26	Article 21 (Protective works) Braintree DC in its RR [RR-0383] and LIR [REP1-148] considers relevant local authorities should be consulted where such works fall outside the Order limits to establish whether planning permission is required for those works. Provide a response to these concerns.	Under Article 21 (protective works) of the 3.1 Draft Development Consent Order [Revision C], protective works are only authorised to be carried out to land, buildings, structures, apparatus or equipment either within the Order Limits or which may be affected by the authorised development. The scope of these protective works is limited to those works described in paragraph (13) of Article 21. The powers in the article are designed to enable the undertaker to help people whose property has been affected by the authorised development. As noted on page 159 of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023], 3.1 Draft Development Consent Order [Revision C], once granted, would provide the relevant planning consent for these protective works under Article 3. The Applicant would notify owners and occupiers of the land prior to exercising certain rights under Article 21 (Protective Provisions), except in the case of emergency. Given these works are solely for the protection of property or remediation of damage caused by the authorised development, the Applicant does not consider it necessary or proportionate to consult with the Local Planning Authorities,

Reference	Question	Applicant's Response
		particularly in an emergency, nor does it consider it necessary to depart from precedent here.
DCO 1.A27	Article 22 (Authority to survey and investigate the land) This article would give power to enter onto “any land either shown within the Order limits or land which may be affected by the authorised development” and only requires 14 days prior notice to be given. The need for such a broad power and the short duration of any notification period needs to be clearly explained in the EM. Provide a clear explanation and for any precedent and/ or legal justification to be clearly set out.	The Applicant has updated the 3.2 Explanatory Memorandum [Revision C] to provide further justification.
DCO 1.A28	Article 23 (Removal of Human Remains) Whilst noting your commentary in the EM [APP-057] in relation to DCOs that have included articles enabling the removal of human remains, as well as the justification for such an article in paragraph 3.27.6, the ExA, having reviewed the submitted application documents has not found any direct reference to human remains or potential sites of human remains. As such the ExA would request you signpost it to where such matters are referenced in the submitted application documentation. Additionally, whilst the ExA is aware of similar articles related to the removal of human remains in other DCOs, it is equally aware that other similar articles	Article 23 (removal of human remains) of 3.1 Draft Development Consent Order [Revision C] is a precautionary mechanism and it is consistent with that precautionary mechanism that the application documents identify only one specific known cremation burial site at this stage. This is recorded as non-designated heritage asset 3293 in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The purpose of this precautionary is to provide a consolidated, efficient and legally certain process in the event that further human remains are unexpectedly discovered during works. The authorised development includes sections of underground cabling, the excavation works for which carry an inherent (if low) risk of disturbing previously unidentified remains across a substantial linear route. Though low risk, discovery of human remains is a high impact event for the purposes of construction and, thus, a delivery risk. In the absence of Article 23, if a body is discovered, the undertaker would be required to navigate a series of separate and potentially slow statutory regimes (including the Burial Act 1857, the Town and Country Planning (Churches, Places of Religious Worship and Burial Ground) Regulations 1950

Reference	Question	Applicant's Response
	have been removed from DCOs in recent decisions made by the Secretary of State, where limited or no reasoned justification has been provided during the examination of those submissions to substantiate their inclusion. (For example: the HyNet CO2 Pipeline Order 2024; The Sunnica Energy Farm Order 2024; The Gate Burton Energy Park Order 2024; and The Mallard Pass Solar Farm Order 2024). Clarify paragraph 3.27.6 of the EM [APP-057], as to why this article is considered to be necessary/ relevant to the development being sought and whether the article would be reasonable in all other respects.	(the 1950 Regulations) and sections 238 and 239 of the Town and Country Planning Act 1990), each of which has its own procedural requirements. Article 23 disapplies section 25 of the Burial Act 1857 and the 1950 Regulations and applies sections 238 and 239 of the Town and Country Planning Act 1990. In doing so, it gives effect to the consolidated process set out in Article 23 in their place. Without Article 23, those regimes would apply in their uncoordinated, piecemeal form and compliance with those regimes could delay the delivery of this Project. Given its status as a project of critical national priority, the consequences of delay would be particularly acute, including the additional constraints costs identified in Annex 2 of the NESO Clean Power 2030 Report²⁵ as being £2.5 billion should the Applicant deliver the Project by the end of 2031 instead of by the end of 2030 – equating to £7 million for every day that the energisation of the Project is delayed into 2031. Any mechanism which reduces the risk of construction delay, however low the probability of the trigger event occurring may be, is of particular importance in the context of this Project. Like many provisions in Development Consent Orders (DCOs), the inclusion of a precautionary article such as this is intended to guard against unnecessary delay, difficulty and obstruction to construction in the event that something that is an unexpected but realistic possibility occurs. There is therefore potentially significant public interest benefit from including Article 23 and no public interest harm. This question was raised by the Examining Authority during the examination of the Associated British Ports (Immingham Green Energy Terminal) Order 2025, who considered this point carefully at paragraphs 7.4.12–7.4.19 of its recommendation report. The Examining Authority in that case accepted that: • The likelihood of encountering human remains may be low based on the evidence before the examination, but could not be entirely eliminated given the nature and scale of the works • Whilst other legislative procedures exist for the removal of remains, their limitations (including the risk of delay arising from having to navigate multiple

²⁵ National Energy System Operator (NESO) (2024) *Clean Power 2030. Annex 2: Networks, connections and network access analysis*

Reference	Question	Applicant's Response
		disparate regimes) could negatively affect delivery of the authorised development • The DCO article provides a consolidated process that mitigates that delivery risk and is only engaged if remains are actually encountered • On that basis, the article was proportionate and reasonable and should be retained. Article 23 does not allow the Applicant to act unilaterally. It is subject to appropriate procedural protections, public notification and oversight by the relevant county court and the Secretary of State and provides for formal reporting obligations. The article is consistent with established DCO drafting practice and the Applicant's position is that it should remain. The Applicant notes that Suffolk County Council also made comments in its Local Impact Report [REP1-178-179] on Article 23 (human remains). In its Local Impact report, Suffolk County Council states that <i>"SCCAS understands there are no records of any historic human remains or burial sites within the Order Limits in Suffolk. However, it is not uncommon for human remains to be encountered during archaeological fieldwork, and a project of this scale should anticipate the potential discovery of such remains during ongoing evaluation and mitigation."</i> However, they go on to state that <i>"SCCAS considers article 23 conflicts with archaeological best practice for dealing with human remains in archaeological contexts as it would lead to burial features being exposed for an extended period, constituting a risk of damage or harm. For remains over 100 years old, it is usually standard archaeological practice that the terms of the Burial Act 1857 are followed; however, by article 23(17), section 25 of the Burial Act 1857 is disapplied in respect of a removal carried out in accordance with article 23. SCCAS considers article 23 should be amended so that the removal of remains considered to be over 100 years old should be carried out in line with the Burial Act 1857, any issued burial license, the relevant detailed written scheme of investigation, and best practice documents. SCCAS therefore recommends that article 23 is amended as follows—</i>

Reference	Question	Applicant's Response
		<i>“(17) Subject to subject to paragraph (17)A, section 25 of the Burial Act 1857 (offence of removal of body from burial grounds) does not apply to a removal carried out in accordance with this article.</i> <i>(17A) Subject to paragraph (17B), the disapplication mentioned in paragraph (17) does not apply to the removal of human remains where the undertaker is satisfied that the remains were interred more than 100 years ago.</i> <i>(17B) A removal to which paragraph (17A) applies must also be carried out in accordance with any issued burial license, any relevant detailed written scheme of investigation approved in accordance with requirement 5 (archaeology), and best practice documents”.</i> The Applicant's position is that the proposed amendment introduces uncertainty due to imprecise drafting (for example, it is unclear what is meant by “best practice documents”). Furthermore, the Applicant would question why a burial licence would be necessary given the procedure set out in Article 23 of 3.1 Draft Development Consent Order [Revision C] provides that the Applicant must apply to the Secretary of State for direction as to the subsequent treatment of the remains and must comply with the terms of the DCO and the Secretary of State's direction. Failure to comply would be a breach of a term of the DCO and would be an offence. However, the Applicant's appreciates Suffolk County Council's concern about compliance with the relevant written scheme of investigation and, should the Examining Authority consider it necessary and appropriate, the Applicant would be willing to include the following wording in paragraph (13): <i>“(13) In the case of remains in relation to which paragraph (12) applies, the undertaker—</i> <i>(a) may remove the remains;</i> <i>(b) must apply for direction from the Secretary of State under paragraph (15) as to their subsequent treatment; and</i> <i>(c) must deal with the remains in such manner, and subject to such conditions, as the Secretary of State directs,</i>

Reference	Question	Applicant's Response
		<u>in each case in accordance with any applicable terms of a relevant written scheme of investigation approved under paragraph 5 (archaeology) of Schedule 3 (requirements), unless the Secretary of State directs otherwise.</u> In question DCO 1.S8, the Examining Authority notes that Norfolk County Council sought in its Local Impact Report an amendment to the party to be notified under Article 23. The Applicant has updated the definition of relevant planning authority in Article 2(1) of 3.1 Draft Development Consent Order [Revision C] which addresses the point raised by Norfolk County Council.
DCO 1.A29	Article 27 (Temporary use of land by National Grid) Article 27(5)(c) refers to schedule 10 of the draft DCO. Check the correct schedule is being reference and amend if required.	The Applicant has updated Article 27(5)(c) (Temporary use of land by National Grid) in the 3.1 Draft Development Consent Order [Revision C] to refer to Schedule 11 (Land of which temporary possession may be taken).
DCO 1.A30	Article 29 (Temporary use of land for maintaining the authorised development) and Article 49 (Traffic regulations) Article 29(12) and article 49(7) refers to replacement or landscape planting where 'the maintenance period' means the period of five years. Like many of the local authorities, the ExA is concerned that 5 years for maintenance of replacement or landscape planting would be inadequate, especially for a development of this scale. Provide full justification as to the use of a 5 year period or review to maintenance period and amend as appropriate, providing a justification for that alternative period.	The Applicant has provided a response to the points raised by the Local Planning Authorities on the five-year aftercare period within 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], please see paragraph 3.12.21. 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 [REP2-018] 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 [REP2-018]. For example, Section 11.2 of BS 8545:2014+A1:2026 states '<i>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.</i>' The Applicant's commitment to a five-year aftercare period adheres to the recommendation set out in the British Standard. The Applicant is committed to ensuring a good planting regime (i.e. stock quality, planting technique and site preparation) which can be more determinative than the length of aftercare alone. 7.4 Outline Landscape and Ecological and

Reference	Question	Applicant's Response
		Management Plan [REP2-018] has highlighted some good practice principles, and these will be expanded upon with full details provided within the final Landscape and Ecological Management Plan to be discharged in accordance with Requirement 4 of 3.1 Draft Development Consent Order [Revision C]. 7.4 Outline Landscape and Ecological Management Plan [REP2-018] also further commits to the aftercare being adaptive, allowing adaptations to be made in light of monitoring results. 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. Planting sizes and species will be selected based on those which would naturalise more easily than larger trees stock, for example smaller whips and transplants. The five-year aftercare commitment is in line with other previously consented National Grid Nationally Significant Infrastructure Projects such as The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The Environmental Areas are located on land to be acquired by National Grid and any habitats included within the Biodiversity Net Gain on-site mitigation will be monitored and managed by National Grid for 30 years.
DCO 1.A31	Article 31 (Disregard of certain interests and improvements) and Article 32 (Set-off for enhancement in value of retained land) No definition of the term 'tribunal' has been provided. Please define this term.	The term 'the tribunal' is defined in Article 2 (Interpretation) of the 3.1 Draft Development Consent Order [Revision C] as meaning the Lands Chamber of the Upper Tribunal.
DCO 1.A32	Article 34 (Time limit for exercise of authority to acquire land and rights compulsorily) Justify the necessity of including article 34(3) given that in the event of a legal challenge, this may give rise to uncertainty as to when CA powers will be exercised. The ExA also seeks clarification as to how	Should the Secretary of State grant development consent and a legal challenge is made, the Applicant could progress the development of the Project, but it would be doing so at risk, therefore the scope of any works to be carried out or powers exercised would need to be carefully considered in line with the Applicant's statutory duty to maintain an economic and efficient transmission network. It is, therefore, essential that the period for exercising compulsory acquisition powers extends to account for a pause or slowing down of the processes and development of the Project that occur as a result of any legal challenge.

Reference	Question	Applicant's Response
	this is consistent with the Human Rights Act 1998.	The inclusion of Article 34(4)(b) makes clear that the extension of time for the exercise of compulsory acquisition powers will be for a maximum of one year to provide certainty to affected landowners. The Applicant concluded in 4.1 Statement of Reasons [REP2-009] , that the Project's significant public benefits would outweigh its effects on the private loss of persons who own property in the Order Limits such that there would not be a disproportionate interference with their Article 8 and Article 1 First Protocol rights under the Human Rights Act 1998. Please refer to the Applicant's response to question CA 1.13 in which the Applicant sets out further detail on the compelling case in the public interest.
DCO 1.A33	Article 44 (Statutory Undertakers) The ExA queries whether reference to other articles relevant to protective provisions (articles 46 and 54) should also be referenced in article 44(1). Review and amend as necessary. In addition to the above, and as relevant to article 44(1)(b), how is repositioning outside the order limits achievable? Are other rights, such as permitted development, or separate consent(s) required for such repositioning?	The Applicant does not consider it necessary for Article 46 (recovery of costs of new connections) and 54 (protection of interests) to be referred to in Article 44(1) (statutory undertakers) of 3.1 Draft Development Consent Order [Revision C] . Article 44(1) consolidates the powers afforded to the undertaker which are subject to the protective provisions. Conversely, Article 46 relates to the ability for others to recover costs from the undertaker, whilst Article 54 gives effect to Schedule 16 (protective provisions). No repositioning outside of the Order Limits is currently contemplated in the context of the Project but, in the event that it becomes necessary to do so, the nature and extent of any required consents and land rights would be considered on a case-by-case basis. The Applicant would comply with the terms of the Protective Provisions (with the relevant Statutory Undertaker) in the event that additional land rights for apparatus diversions were required.
DCO 1.A34	Article 45 (Apparatus and rights of statutory undertakers in stopped-up streets) The definition of 'statutory undertaker' in article 45(8) differs from the definition of 'statutory undertaker' set out in article 2(1). Review the definition in article 45(8) and amend as necessary.	The definition of "statutory undertaker" as it applies to Article 45 (apparatus and rights of statutory undertakers in stopped-up streets) is narrower and applies only to those statutory undertakers who are likely to have rights or apparatus in a street. It is appropriate for this narrower definition to be used as article 45 affords these statutory undertakers the same rights as though the street had not been permanently stopped up and also allows the Applicant to request the removal, repositioning or substitution of apparatus. The definition of "statutory undertaker" for the purposes of Article 2(1) of 3.1 Draft Development Consent Order [Revision C] includes a broader list of statutory

Reference	Question	Applicant's Response
		undertaker, which is appropriate for the purposes of the 3.1 Draft Development Consent Order [Revision C] taken as a whole. The Applicant does not consider it appropriate to amend the definitions. The Applicant would also note that these definitions and their usage are consistent with other made orders including the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
DCO 1.A35	Article 48 (Defence to proceedings in respect of statutory nuisance) The DASSI [APP-354] is noted, however, the ExA is concerned with regard to this article in the absence of any finalised design of the proposed substations, especially in the light of ES chapter 14 (noise and vibration). The ExA seeks certainty that the resultant noise impacts arising from the substations will be adequately mitigated within the design of those substations. Explain how that certainty can be provided in the absence of any finalised design of the substations. All local authorities are also invited to provide their views in relation to article 48.	7.2 Outline Code of Construction Practice [REP2-014] contains commitment NV21 that states '<i>The proposed new substations will include any required noise mitigation measures by design. This may include plant selection, siting, screening and enclosures, as appropriate.</i>' 7.2 Outline Code of Construction Practice [REP2-014] also includes as an appendix 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306], which includes embedded, standard (good practice) and additional mitigation measures to avoid or reduce effects including noise and vibration and is secured by Requirement 4 of Schedule 3 to the 3.1 Draft Development Consent Order [Revision C]. 5.4 Statement of Statutory Nuisance [APP-083] concludes that with mitigation measures in place, no breach of section 79(1) of the Environmental Protection Act 1990 is expected as a result of the Project.
DCO 1.A36	Article 49 (Traffic regulations) The references to Parts 1 and 4 of schedule 13, columns (1), (2) and (3), in this article appeared to be incorrect. Review these column numbers and amend as appropriate.	The Applicant has updated Article 49 (Traffic regulation) in the 3.1 Draft Development Consent Order [Revision C] to correct the cross-references to the columns of Schedule 13. Article 49(8) is intended to ensure that the Applicant consults with the chief of police in relation to permanent traffic regulation measures. This is additional to the notification measures in Article 49(4)(a), which apply to both temporary and permanent traffic regulation measures.

Reference	Question	Applicant's Response
	In addition to the above, do the provisions of article 49(8) duplicate the requirements of article 49(4)(a)?	
DCO 1.A37	Article 50 (Felling or lopping) Braintree DC in its RR [RR-0383] and LIR [REP1-148] seeks advanced notice in regard to proposed works where trees are outside the order limits in regard to this article. Provide a response. In addition to the above, the ExA notes article 50(7) refers to paragraph (6) twice and questions whether the second reference to paragraph (6) is correct. Review and amend as necessary.	Please refer to page 159 of 8.4.1 Applicant's Response to Relevant Representations [REP2-023] where the Applicant addresses Braintree's request. The Applicant has corrected the article 50(7) cross-reference in 3.1 Draft Development Consent Order [Revision C].
DCO 1.A38	Article 51 (Trees subject to TPOs) Braintree DC in its RR [RR-0383] and LIR [REP1-148] seeks a definition of the term 'near' and requests advanced notice of proposed works to the relevant local authority, so it can seek to impose reasonable conditions. Provide a response.	Please refer to page 159 of 8.4.1 Applicant's Response to Relevant Representations [REP2-023] where the Applicant addresses Braintree's request. The Applicant has further responded to these comments in 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 as follows: The Applicant's justification for the approach taken in respect of Article 50 is set out in paragraph 3.54 of the 3.2 Explanatory Memorandum (Revision C). Whilst there is no definition of 'near' in the 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.

Reference	Question	Applicant's Response
		Other recent development consent orders 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 included a definition of 'near'.
DCO 1.A39	Article 54 (Protection of interests) Explain why this is titled protection of interests and not protective provisions. Review and amend as necessary.	It is common for article titles and corresponding schedule titles not to match exactly. The Applicant's position is that using "protection of interests" as the title of Article 54 is most appropriate because it gives the reader an indication that it relates to the protection of the interests of third parties, whereas the title "protective provisions" is appropriate for the corresponding schedule as it indicates that this is where the provisions that set out those protections are found. The titles of Article 54 (Protection of interests) and has been adopted from precedent DCOs, 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.
DCO 1.A40	Article 56 (Safeguarding) - 1 The ExA notes article 56, especially the provisions in 56(4). The applicant should explain: a) What happens in the event of an application being withdrawn or refused by the relevant planning authority, statutory undertaker or other determining body? b) The use of the term 'all the final part of it' in article 56(7), as this appears imprecise. c) Why the term 'relevant planning authority' is required when it is already defined in article 2(1).	(a) The purpose of Article 56 (safeguarding) is simply to ensure that the Applicant is consulted on planning applications (that are not exempt applications), has an opportunity to provide representations and that the relevant planning authority has regard to any such representations before the application is determined. Whether or not they are withdrawn or ultimately refused does not affect the utility or purpose of the article. (b) The term "the final part of it" is used to cover off a scenario whereby the authorised development is decommissioned in part, rather than as a whole. The consultation provision would apply until such a time as the authorised development has been decommissioned in its entirety. (c) The term "relevant planning authority" is defined for specific use in this article to clarify that the relevant planning authority responsible for complying with the safeguarding provisions is the one that is in receipt of an application to which the article applies.

Reference	Question	Applicant's Response
DCO 1.A43	Article 59 (Amendment to local legislation) What happens after article 59(4), in the event a 'person' is not satisfied with your response?	In the event that a person is not satisfied with the Applicant's response pursuant to Article 59(4), then it could be argued that the Applicant is in breach of the local legislation in question and it would be for the 'person' to seek recourse under that local legislation as necessary.

7.2 Schedules

Table 7.3 Schedules

Reference	Question	Applicant's Response
DCO 1.S1	Schedule 1 (Authorised Development) - 1 Should associated development, listed on page 72 to 73, be placed under a separate heading, being 'Part 2 (Associated Development)'? In addition to the above, Braintree DC in its RR [RR-0383] have stated the final part of this definition should be brought in line with the definition of 'maintain' in article 2(1) and that schedules 3(1) and 3(4) should also be amended accordingly. Furthermore, it considers County and Local Authorities should be notified of works carried out for the avoidance of doubt. Provide a response in respect of these comments.	The Applicant does not consider it necessary or appropriate to place the associated development listed on page 72–73 under a separate Part of Schedule 1 to 3.1 Draft Development Consent Order [Revision C]. The Works Nos. in the earlier part of Schedule 1 necessarily include some associated development as it is incidental to the carrying out of those parts of the authorised development that comprise the nationally significant infrastructure. Including the list of associated development as a new Part of Schedule 1 could introduce confusion as to whether the associated development that is necessarily included in the Works Nos. is NSIP or associated development. This same approach has been taken on the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the Applicant does not consider it necessary to deviate from that precedent. 5.14 Details of Associated Development, with references to documents [APP-121] explains both the distinction and the relationship between the NSIP and associated development elements of the Project in further detail. Please refer to the Applicant's response to Braintree's comments on page 159 of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. Producing reports for consideration by the relevant authority in each instance any works fall within the final paragraph of 'associated development' and seeking the relevant planning authority's opinion on whether an element of associated development may result in a materially new or materially different environmental effect would be a disproportionate administrative and financial burden on both the Applicant and the relevant authority and could frustrate the delivery of this Project

Reference	Question	Applicant's Response
		of critical national priority. In turn, this could contribute to the accumulation of additional constraints costs that would ultimately fall to the consumer. The Applicant's position is that the assessment as to whether an element of currently unspecified associated development (some of which may be very inconsequential in nature) results in a new or materially different environmental effect should remain with the Applicant, noting that a failure of the Applicant to comply with a term of the DCO would be an offence.
DCO 1.S2	Schedule 1 (Authorised Development) - 2 A number of local authorities have commented on the wide drafting of the description of 'authorised development', including range of 'associated development' that affords significant latitude to the undertaker. They consider it is unclear who would be the arbiter of whether such works would be 'materially new' should a dispute arise. Comment on whether additional control over associated works, but currently unspecified works, should be included within the DCO. For example should additional wording, such as "...in the opinion of the relevant planning authority" to the final paragraph of the definition of 'associated development' on page 73 before the words ...'give rise to materially new....' be added and would such wording bring the text in line with schedule 3, paragraph 1(4)? In addition, how will relevant planning authorities be able to monitor works being carried out as 'associated development'. Is a mechanism being proposed for notifying	Please refer to the Applicant's response to DCO 1.S1 above.

Reference	Question	Applicant's Response
	the relevant planning authorities of such works?.	
DCO 1.S3	Schedule 3 (Requirements) – General The EM lacks detail ON requirements, particularly as regard to the appropriateness and relevance of the requirements listed to the proposed development which is significantly different to many previous DCOs. Prior precedents (although only described as “similar wording” rather than identical wording) have been cited, although their similarity to this scheme is not explained. Explain in detail why changes have been made to the requirements or provide a justification for the inclusion of the requirement. In the majority of cases, there does not appear to be any element within the requirements for what is secured to be maintain as approved thereafter for the duration of the lifetime of the Authorised Development or whatever alternative period of time. Review and amend, or provide explanation if not amended. Furthermore, there are several instances in requirement 4 where the use of the word ‘substantially’ occurs. Consider whether the use of this word would be precise, in the interests of clarity. Review and amend, or provide explanation if not amended.	The Applicant has reviewed and updated the Requirements section in 3.2 Explanatory Memorandum [Revision C] to provide further explanation and justification for their inclusion. The Applicant notes the Examining Authority's comment for maintenance as approved for the duration of the lifetime of the authorised development or such other alternative period of time. The Applicant has considered whether it is necessary or appropriate for each of its requirements to include an obligation for plans or measures to be ‘maintained as approved for the lifetime of the development’. The Applicant notes that a number of the Requirements relate to when and how construction is carried out, meaning that for these Requirements, there would be no need for wording to secure any future retention or maintenance of plans or measures. Requirement 10 relates to the reinstatement of land post-construction and Requirement 13 relates to the potential future occurrence of decommissioning, so again there is no need to secure retention or maintenance in either case. Requirement 9 (reinstatement planting plan) includes a maintenance provision for a specified period. Requirement 12 (design of permanent buildings) and Requirement 14 (control of noise during operational stage) are already cast as ongoing obligations without need for any further provision securing retention or maintenance of measures for the lifetime of the authorised development. The Applicant accepts that Requirement 11 (approval of details having regard to the design approach for site specific infrastructure) which relates to the external colour of the works comprised in Work No.18(b), could be re-cast to provide an obligation to maintain the external colour of the building in accordance with the details in the 7.16 Design Approach for Site Specific Infrastructure (DASSI) [APP-354] and has revised the 3.1 Draft Development Consent Order [Revision C] accordingly. The Applicant's position is that the proposed wording of the Requirements appropriately secures implementation of approved details, while allowing

Reference	Question	Applicant's Response
		amendments to be agreed with the relevant authority where justified, which is consistent with established drafting practice. To provide further certainty that mitigation measures contained within the management plans are adequately secured, the Applicant has adjusted the drafting of Requirement 4(2) to remove reference to “construction works”, so that the Requirement now reads: “(2) Each stage of the authorised development must be carried out in accordance with the approved plans referred to in paragraph (1), unless otherwise agreed with the relevant planning authority.” In relation to the Examining Authority's comment on the use of the word ‘substantially’ in Requirement 4, the Applicant notes that the purpose of using ‘substantially in accordance with’ is to ensure certainty for the relevant planning authorities that the final management plans are closely based on the principles that the relevant planning authorities are already familiar with from their consideration of the outline management plans and that these agreed principles are not matters for debate at the discharge of Requirements stage. This terminology is consistent with that contained in Requirement 4 of the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
DCO 1.S4	Schedule 3 (Requirements) – General Anglian Water in its RR and D1 submission have indicated “...if non-domestic water supply is not agreed within the examination period... [it] would request the draft DCO includes a requirement for a water resources assessment to be submitted to the... [relevant] Planning Authority in consultation with the Environment Agency and relevant water company before construction progresses. The ExA requests i) the applicant provided its considered response to Anglian Waters request; and ii) the applicant, Anglian Water, the Environment Agency and any	• The Applicant notes Anglian Water’s position that, if agreement on non-domestic water supply is not reached during the examination period, a requirement for a Water Resources Assessment (WRA) could be included in a future revision of the 3.1 Draft Development Consent Order. The Applicant considers that a bespoke Development Consent Order (DCO) requirement is not necessary for the following reasons: • The provision of non-domestic water supply is regulated through separate statutory regimes and consenting processes, including Water Connections Agreements, which would be required prior to the supply of mains water • 5.5 Consents and Licences Required Under Other Legislation [APP-084] already makes clear that applications for Water Connections Agreements required by the Water Industry Act 1991 would be submitted by the appointed Main Works Contractor(s) to Anglian Water, should development consent be granted and prior to relevant works

Reference	Question	Applicant's Response
	other relevant water company provides a form of wording for such a requirement, should the ExA consider the inclusion of such a requirement is necessary in the draft DCO.	Anglian Water's published Non-Domestic Water Requests Policy²⁶ applies independently of the DCO and, where requests exceed 20 m³/day for Nationally Significant Infrastructure Projects, requires a WRA to be completed as part of the water supply approval process. The Applicant has submitted a draft Water Resource Assessment (WRA) to Anglian Water for feedback prior to the submission of all WRA's requested by Anglian Water for each temporary and permanent connection to proposed infrastructure where the WRA threshold is met. The Applicant intends to further define the connection requirement and complete submission of all required WRAs by Deadline 6. The Applicant has already acknowledged, in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023], that commitment W16 in 7.2 Outline Code of Construction Practice [REP2-014] is limited to the monitoring and efficient use of water during construction, and does not extend to resource assessment or water supply approvals, which sit outside the planning regime. ii) Taken together, the Applicant considers that the existing commitments in the 7.2 Outline Code of Construction Practice [REP2-014] and the requirement to secure Water Connections Agreements under other legislation provide sufficient and appropriate control. The inclusion of a DCO requirement would duplicate existing regulatory processes and is not considered necessary or proportionate. The Applicant's view is that, given the nature of the issue raised, it is not possible to draft a requirement that would clearly meet the tests for applying a DCO requirement. This is because the need for, scope and timing of any Water Resources Assessment are determined by the policies and approval processes of the relevant water undertaker, operating under a separate statutory regime. Any requirement would therefore need to be contingent on decisions taken by a third party outside the control of the Applicant or the discharging authority, resulting in uncertainty as to when the requirement would be engaged and how compliance would be demonstrated. As a result, any requirement is likely either to duplicate controls that already apply under other legislation, or to function as a signposting provision rather than a genuine planning control. For these reasons, it

²⁶ Anglian Water (2024) *Non-Domestic Water Requests Policy*

Reference	Question	Applicant's Response
		remains the Applicant's position that a requirement capable of clearly meeting the tests of necessity, precision, enforceability and reasonableness cannot be satisfactorily framed in this case.
DCO 1.S5	Schedule 3 – Requirement 1 (Interpretation) – Terms “discharging authority” and “start-up and close down activities” a) “discharging authority”: There are multiple examples throughout the draft DCO where terms such as ‘discharging authority’; ‘relevant planning authority’ and ‘relevant highways authority’ appear to be used interchangeably. This could lead to confusion and would ask the applicant and relevant local authorities for their views on this matter, including any suggestions, alternative wording or definitions within the interpretations section, that would prevent any such confusion. b) “start-up and close down activities”: Reference is made to the safety checking of plant and machinery, under (g), whilst reference to ‘safety checks’ is listed in (c). Are they not the same thing? Clarify and amend as necessary.	Discharging authority The Applicant has considered the feedback received from the host authorities, including the detailed comments of Norfolk County Council in its Local Impact Report (LIR) [REP1-173], on the approach to defining the ‘relevant planning authority’ in 3.1 Draft Development Consent Order (the ‘dDCO’). The definition in the dDCO as submitted is common across a number of made development consent orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. However, the Applicant recognises that the circumstances of each made DCO may differ and, in this case, to limit any scope for ambiguity proposes to replace the existing definition of ‘relevant planning authority’ with a new two-limb definition as follows in Article 2 (Interpretation) of 3.1 Draft Development Consent Order [Revision C]: <i>“relevant planning authority” means, in any given provision of this Order—</i> <i>(a) for an area to which the provision relates in respect of which there is both a district planning authority and a county planning authority for the purposes of Part I (Planning Authorities) of the 1990 Act, the district planning authority; and</i> <i>(b) for an area to which the provision relates in respect of which there is only one local planning authority for the purposes of that Part, that one local planning authority,</i> <i>or any successor exercising its functions as local planning authority for the purposes of that Part;’</i> The Applicant also proposes to insert a new definition of ‘relevant county planning authority’ as follows: <i>“relevant county planning authority” means, in any given provision of this Order, the county planning authority (which has the meaning given in Part I (Planning Authorities) of the 1990 Act) for the area to which the provision relates or any</i>

Reference	Question	Applicant's Response
		<i>successor exercising its functions as local planning authority for the purposes of that Part;</i> This approach: (i) removes any ambiguity Norfolk County Council has identified, by making clear that in a two-tier area the district planning authority is the primary discharging body; (ii) retains a separate 'relevant county planning authority' definition, enabling requirements to specify county-level consultees expressly; and (iii) avoids complications for any other authorities within the Order Limits that are, or may become, unitary or metropolitan district authorities, for whom Norfolk County Council's proposed 'relevant district planning authority' definition would not be appropriate. Limb (b) of the Applicant's definition captures those single-authority scenarios without requiring an exhaustive schedule of which councils are unitary, which would be unusual and unwieldy on the face of the DCO. The general principle the Applicant would apply is that: (i) the 'relevant planning authority' (per the new two-limb definition) would be the primary discharging body throughout the Requirements; and (ii) 'relevant county planning authority' will be named expressly as a consultee where county-level expertise is relevant (e.g. archaeology, flood risk, construction surface water drainage), with Requirements amended to read <i>'following consultation with the relevant county planning authority'</i>. Specific other consequential points identified at Table 4-A: Proposed substantive changes to articles and requirements of Norfolk County Council's LIR [REP1-173] relevant to the question of appropriate planning authority are addressed as follows: Article 5(4) (now 5(5)) (Limits of deviation): As per the new definition of relevant planning authority, i.e. the district planning authority in two-tier areas, the Secretary of State would consult the district planning authority and so the intention of the proposed amendment is met. Article 7(5) (Consent to transfer benefit of order): It would be unduly onerous and unusual for any notification of any transfer/grant of the benefit of the Order to extend to the relevant county planning authority as well as the district planning authority in two-tier areas, given that the relevant county planning authority in such circumstances is a consultee on approvals under the dDCO related to their function and not primary discharging authority.

Reference	Question	Applicant's Response
		Article 23(4) and 23(11)(b) (Removal of human remains): As per the new definition of relevant planning authority, i.e. the district planning authority in two-tier areas, the copies of the notices/certificates would go to the district planning authority and so the intention of the proposed amendment is met. Article 48(3) (Defence to proceedings in respect of statutory nuisance): As per the new definition of relevant planning authority, i.e. the district planning authority in two-tier areas, the references to powers under the Control of Pollution Act 1974 would be allocated as per Norfolk County Council's proposed amendment. Article 55(1) (Procedure regarding certain approvals etc.): As per Applicant comments above, in a two-tier area the district planning authority is the primary discharging body and the relevant county planning authority a consultee where appropriate. The relevant application or request would thus not be sent to the relevant county planning authority and it need not be included. Paragraph 1 (Interpretation) of Schedule 3 (requirements): As per Applicant comments above, in a two-tier area the district planning authority is the primary discharging body and the relevant county planning authority a consultee where appropriate, so the intention of the various proposed amendments is achieved without needing to make them. Requirement 3 (Stages of authorised development) of Schedule 3 (requirements): References should remain to the relevant planning authority for the reasons set out above. Requirement 4(1), (3) and (4) (Construction Management Plans) of Schedule 3 (requirements): Whilst such references were appropriate in the made DCOs in which they have appeared, in this dDCO references within Requirements to any 'other discharging authority as may be appropriate' have been removed in favour of specifying the 'relevant planning authority' as discharging body to reduce scope for ambiguity. Reference should remain to the relevant planning authority for the reasons set out above. Requirement 5 (Archaeology) of Schedule 3 (requirements): References should remain to the relevant planning authority for the reasons set out above but

Reference	Question	Applicant's Response
		scope has been included for consultation with the relevant county planning authority as well as, where relevant, Historic England. Requirements 8 to 13 of Schedule 3 (requirements): References should remain to the relevant planning authority for the reasons set out above. Turning to the definition of 'discharging authority', whilst such references were appropriate in the made DCOs in which they have appeared, in the 3.1 Draft Development Consent Order [Revision C] references within Requirements to any 'other discharging authority as may be appropriate' have been removed in favour of specifying the 'relevant planning authority' as discharging body to reduce scope for ambiguity in this case (per the new two-limb definition of 'relevant planning authority' above). The use of 'street authority' and 'highway authority' is to account for the distinct roles as defined under the New Roads and Street Works Act 1991 and the Highways Act 1980. Start up and close down activities The safety checks referred to in paragraph (c) of the definition of 'start up and close down activities' relates to general site inspections and safety checks, whereas the safety checks referred to in paragraph (g) are associated with low key maintenance of plant and machinery. The Applicant proposes to retain the two items as drafted. The drafting has precedent in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
DCO 1.S6	Schedule 3 – Requirement 2 (Time Limits) a) Provide further justification for the necessity of including requirement 2, sub-paragraphs (2) to (4), given, in the event of a legal challenge, this is likely to give rise to uncertainty as to when CA powers will be exercised. Clarify how this is consistent with the Human Rights Act 1998.	(a) Please refer to the Applicant's response at DCO 1.A32 above. (b) The Applicant seeks five years for the commencement of the authorised development to ensure that there is sufficient flexibility to account for any changes in circumstances outside of the Applicant's control, which may include wider global affairs or changes in government policy. There is wide-spread precedent for a five year time limit to commence the authorised development, including the Gatwick Airport (Northern Runway Project) Development Consent Order 2025, the A122 (Lower Thames Crossing) Development Consent Order 2025, the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the National Grid (Bramford to Twinstead Reinforcement) Order 2024. The Applicant is also aware of projects whose time

Reference	Question	Applicant's Response
	b) The proposed development is required to be operational by 2031, therefore justify why 5 years is proposed for the commencement of development, with that time period beginning with the date on which the Order comes into force, as set out in requirement 2(1)?	limit for commencement of the authorised development allows much longer time limits for commencement, for example the National Grid (Hinkley Point C Connection Project) Order 2016 allowed eight years. Given the urgency of the Project, the Applicant has not sought a longer period than is standard for projects of this nature, however, because the Project is a crucial element in the drive to achieve clean power, the Applicant's position remains that a contingency for matters outside of its control is essential and that the five year period is justified and proportionate.
DCO 1.S7	Schedule 3 – Requirement 3 (stages of the authorised development) requirement 3(1) specifies "...written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out..." The ExA would ask all local authorities, as well as any relevant discharging authorities whether seven days is an adequate period for such written notice and whether such written notice should be approved in writing by the relevant planning authority/ discharging authority? In addition to the above, should requirement 3(5) refer to sub-paragraph (2) and/ or (3)?	The Applicant cannot accept submissions under Requirement 3(1) of 3.1 Draft Development Consent Order [REP2-004] being for approval by the relevant planning authority. Given the scale of the Project, the large number of local authorities and discharging authorities within the Order Limits and the complexities of delivering such a large project within a limited timeframe, it is not appropriate or proportionate for the Applicant to seek each authority's approval in writing of such written notices. There are, amongst other things, specialist technical considerations and tight programme constraints that factor into the proposed stages and programming of the authorised development. Submitting these for approval risks severely delaying the Applicant's ability to begin construction of the development and to achieve energisation by 2030. The Applicant considers that the proposed notice period is appropriate, given that there is no requirement for the relevant authority to take any further action or other positive step(s) within that period. The Applicant has adjusted this proposed notice period to a 'business day' equivalent of 'five business days' for consistency of terminology throughout 3.1 Draft Development Consent Order (Revision C). Requirement 3(5) of 3.1 Draft Development Consent Order (Revision C) appropriately secures that the authorised development must be carried out in accordance with the original written scheme submitted under sub-paragraph (2) and any subsequent revisions secured under sub-paragraph (3), including those made prior to or following the commencement of that stage.

Reference	Question	Applicant's Response
		Aside from the adjustment from 'days' to a 'business day' equivalent period referred to above, the Applicant considers that no further amendment to this Requirement is necessary.
DCO 1.S8	Schedule 3 – Requirement 5 (archaeology) Braintree DC in its LIR [REP1-148] (section 10.9) has recommended changes to requirement 5, whilst Chelmsford City Council, Colchester City Council, and Essex CC in their LIR (LIRs [REP1-153]; LIR [REP1-156] and [REP1-161] respectively) all recommended amendments to the wording of requirement 5 and the inclusion of a new sub-paragraph. Additionally, Norfolk CC in its LIR [REP1-173] recommends amending the wording of requirement 5(1) and (4) and article 23 (Removal of human remains) so notification is required to be made to the relevant County/ Local Authority. In their joint LIR [REP1-178] Suffolk CC, Mid Suffolk DC and Babergh DC have recommended amendments to article 23 and to requirement 5 of the draft DCO. Historic England in its WR [REP1-191] has proposed an amendment to requirement 5 of the draft DCO and H04 of the outline CoCP to refer to consultation with Historic England. All local authorities, as well as the applicant, are invited to comment on all of these proposed changes (amendment to	The Applicant has prepared a discussion draft of Requirement 5 (Archaeology) as it would look if all of the proposed amendments of the host authorities and Historic England were accepted. This discussion draft is set out in tabular format, with the Applicant's comments on each proposed change set out alongside the proposed revisions. The Applicant is particularly concerned about the proposed restriction on 'intrusive site preparation works' and considers that this has real potential to significantly impact the delivery programme by restricting what would ordinarily be standard pre-commencement works until such a time as the relevant planning authority agrees an archaeological or geoarchaeological written scheme of investigation. Whilst such a restriction may be appropriate and proportionate for a single site project, the Applicant's position is that it would be wholly disproportionate for a project that spans a route of approximately 180 km and passes through 13 host authorities. The pre-commencement works have already been assessed in the Environmental Statement and the Applicant had proposed a suitable, and preceded, control by requiring all pre-commencement works to be carried out in accordance with the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] (OAMS and OWSI). Evaluation trial trenching has been agreed directly with the archaeological advisors to the host authorities. For the priority/first phase of work, this comprised an overarching WSI (which set out scope and methodology), supported by site specific WSIs (which contained the relevant archaeological background, site specific methodology and trench plans). For the Phase 2 element of the evaluation archaeological trial trenching, the Applicant is seeking to agree the details and the overarching scope will be contained in a future revision of 7.5 Outline AMS-OWSI and again supported by site specific WSIs. The approach to agreement for the Phase 2 element has been discussed and agreed with the stakeholders in regular meetings. The Applicant further explains its position in the table below and does not repeat that here.

Reference	Question	Applicant's Response
	article 23 and schedule 3, requirement 5 of the draft DCO and to H04 of the outline CoCP). In addition, the applicant is requested to provide, for discussion purposes, a new draft of requirement 5 that, as far as possible, takes into account all of these requested changes and also is requested to provide a commentary on whether any of these proposed amendments sought by the various organisations would be incompatible with each other.	Commitment H04 in 7.2 Outline Code of Construction Practice [REP2-014], issued at Deadline 2 was updated to address the comments provided in Local Impact Reports and Historic England's Written Representation (updated text in red): <i>'Where a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and Historic England and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements. The Main Works Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This will include toolbox talks within site inductions.'</i> Please refer to the Applicant's response to question DCO 1.A28 in relation to any proposed amendments to Article 23 (removal of human remains).
DCO 1.S9	Schedule 3 - Schedules and requirements, especially requirement 6 (design and layout plans) It is questioned whether the term '...in general accordance with...' meets the relevant tests of precision and enforceability. Review the draft DCO and amend where this term has been used, or otherwise justify your reasoning. Additionally, requirement 6(2) specifies "The authorised development will not be in general accordance with the design and layout plans (elevations) to the extent that any departure from the design and layout plans (elevations) gives rise to any materially new or materially different environmental effects from those identified in the environmental statement."	The Applicant has considered its use of the phrase 'in general accordance with' throughout Schedule 3 (Requirements) and considers that its use is appropriate in each circumstance as it specifically proposed as a direct response to the precise nature of the project and the DCO application. In each instance (Requirement 6 (design and layout plans (elevations)), Requirement 9 (reinstatement planting plan), Requirement 11 (approval of details having regard to the design approach for site specific infrastructure) and Requirement 12 (design of permanent buildings)), the wording proposed reflects the scale of the Project, the level of detailed design at both the time of the DCO application and at the present point of time in the examination, and hence to ensure sufficient flexibility in design necessary to respond to such final design proposals as will be agreed with the relevant authority as prescribed in 3.1 Draft Development Consent Order [Revision C]. The level of detailed design available is not expected to materially change by the time the examination ends (or after that prior to the DCO decision) so the approach to these requirements will continue to remain valid and justified. As part of the process, the authority will be able to form a view as to whether any proposals submitted for approval will give rise to any materially new or different environmental effects beyond those identified in the Environmental Statement and

Reference	Question	Applicant's Response
	Requirement 1(4) already deals with this matter in that where an approval or agreement is required under the terms of any requirement... such approval or agreement may only be given where it has been demonstrated... that the subject matter of the approval or agreement... will not give rise to any materially new or materially different environmental effects from those identified in the ES. Clarify and amend, if required.	the extent to which any effects are acceptable within the terms of 3.1 Draft Development Consent Order [Revision C]. The government's guidance on the content of a Development Consent Order required for a Nationally Significant Infrastructure Project²⁷ anticipates the use of the phrase 'in general accordance with' at paragraph 017 and there is precedent for the use of this phrase in the Gatwick Airport (Northern Runway Project) Development Consent Order 2025, the National Grid (Bramford to Twinstead Reinforcement) Order 2024, the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the Sizewell C (Nuclear Generating Station) Order 2022. Turning specifically to the Examining Authority's comment on Requirement 6 (design and layout plans (elevations)), the purpose of paragraph (2) is to further clarify that if any proposed deviation from what is shown on the design and layout plans (elevations) gives rise to any materially new or materially different environmental effects, then this would not satisfy the control in Requirement 6(1). The Applicant notes the Examining Authority's comment regarding duplication of Requirement 1(4); however, Requirement 1(4) applies where an approval is sought under the terms of a Requirement. In the case of Requirement 6, there is no provision for a submission or approval, simply a control on development to be in general accordance with an existing suite of plans. The Applicant therefore considers it appropriate for Requirement 6(2) to remain.
DCO 1.S10	Schedule 3 - Requirement 7 (construction hours) A number of local authorities, along with a significant number of IPs, have raised concerns in regard to proposed construction, piling and heavy goods vehicle (HGV) delivery hours, which they consider excessive especially in the context of the rural locations affected by	a) <u>Justification for the proposed construction hours</u> <u>The core construction hours</u> The construction programme has been developed under the assumption that works can be carried out using the core construction working hours requested in Schedule 3, paragraph 7 (Construction hours) of 3.1 Draft Development Consent Order [Revision C]. To ensure the construction programme remains on schedule, certain activities will require a seven-day work week and longer working hours. This approach is necessary to maintain programme certainty, take

²⁷ Ministry of Housing, Communities and Local Government (2024) *Planning Act 2008: Content of a Development Consent Order required for Nationally Significant Infrastructure Projects*

Reference	Question	Applicant's Response
	the proposed development. The ExA shares such concerns, especially bearing in mind: i) the proposed construction/ percussive piling/ HGV delivery hours, are currently set out as 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays, Sundays, bank holidays and other public holidays ii) the proposed start-up and close-down provisions iii) the activities permitted outside core working hours iv) the duration of the construction programme The applicant should clarify/ provide further justification for: a) the proposed construction hours/ piling hours/ HGV delivery hours, including in relation to proposed start-up and close-down provisions b) the extensive list of activities that would be permitted outside core working hours c) an explanation of the implications in regard to the proposed construction timeline should it recommend to the Secretary of State reducing these hours (construction/ piling/ HGV delivery) to Monday to Friday 07:00–19:00 and Saturday 08:00- 13:00, with no working on Sundays, bank holidays	advantage of favourable weather conditions, minimise disruptions to local businesses and residents, and to align with access and possession constraints over highways and rail. The construction working hours set out in 3.1 Draft Development Consent Order [Revision C] define the maximum permissible envelope within which works may take place and do not imply that construction would occur continuously or routinely throughout those hours. It is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. The inclusion of these hours, including Sundays and Bank Holidays, provides flexibility to manage construction sequencing, including accommodating weather-related disruption, land access constraints, ground conditions and outage requirements associated with electricity transmission projects, while ensuring that works can be completed or secured safely. This flexibility is critical to maintaining programme resilience and avoiding a prolonged overall construction period, which would itself result in longer-term exposure to construction impacts. The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather, there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews means that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or Bank Holiday. The assessment within Volume 6: Environmental Statement [APP-123 to APP-298] is based on a set of parameters, including the core working hours for the construction phase of the Project. The assessment provides details of mitigation and controls which will protect the amenity of local communities and avoid unacceptable disturbance. In particular, these include commitments on nuisance generating activities (GG17), traffic impacts (GG33), dust (AQ01), lighting (GG26), monitoring and compliance (GG09, GG01), applications for prior consent under Section 61 of the Control of Pollution Act 1974 (NV03) and advance community notification (GG30) within Table 6.1 of 7.2 Outline Code of Construction Practice [REP2-014]. The mitigation measures set out within 7.2

Reference	Question	Applicant's Response
	and/ or other public holidays, or any variation of removing such days (ie just removing Sundays; just removing bank holidays and other public holidays and so on) d) the measures included in the draft DCO, or other management plans, that prevents the use of other forms of piling e) which restrictions apply to abnormal indivisible loads (AIL), as these would be excluded from the definition of 'HGV' as set out in requirement 1(1) and the fact they are potentially an operation excluded by requirement 7(4)(m) f) the complaints procedure in the event of a breach occurring	Outline Code of Construction Practice [REP2-014] are secured via Requirement 4(a) (Construction Management Plans) of 3.1 Draft Development Consent Order [Revision C]. The Applicant considers that the proposed approach therefore represents a balanced and proportionate control, providing flexibility to maintain programme resilience while retaining safeguards through other Development Consent Order (DCO) controls to manage impacts. <u>Piling hours and HGV deliveries</u> As set out in Requirement 7(2) and (3) of 3.1 Draft Development Consent Order [Revision C], percussive piling and HGV deliveries are subject to more restrictive hours than the core working hours. These activities are limited to the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant planning authority. No percussive piling works or HGV deliveries are permitted on Sundays, bank holidays or other public holidays. Accordingly, the Applicant would respectfully refer the ExA's to consider the more restrictive controls on percussive piling and HGV deliveries through Requirement 7. The Applicant considers that these restrictions are proportionate, reflecting the higher potential for disturbance associated with these activities while ensuring that appropriate controls are in place to protect local amenity. <u>Start-up and close-down provisions</u> Requirement 7(5) of 3.1 Draft Development Consent Order [Revision C] permits start-up and close down activities up to 1 hour either side of the core working hours. The start-up and close down activities are defined in Schedule 3, Part 1 (Interpretation) as: (a) <i>'arrival and departure of workforce and staff at site and movement to and from places of work;</i> (b) <i>general refuelling of plant;</i> (c) <i>site inspections and safety checks;</i> (d) <i>site meetings inspections and walkovers;</i> (e) <i>site clean-up (site housekeeping that does not require the use of plant);</i>

Reference	Question	Applicant's Response
		(f) <i>general site maintenance; and</i> (g) <i>low key maintenance and safety checking of plant and machinery.'</i> These activities do not typically involve the operation of heavy machinery, require HGV deliveries, or generate significant noise, dust, or vibration, and therefore are not nuisance generating activities. All activities taking place on-site remain subject to the application of best practicable means and appropriate mitigation to manage noise and other environmental effects as set out in 7.2 Outline Code of Construction Practice [REP2-014]. The Applicant notes in particular commitments GG17, GG26, GG09, and GG01. In respect of noise impacts, works during any period would be subject to assessment against the applicable construction noise threshold for potential significant effects for that period, as per the 'ABC' method described in Annex E.3.2 of BS 5228-1:2009+A1:2014 – Part 1: Noise²⁸, and as detailed in Section 14.4 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The Main Works Contractor(s) will identify and implement specific mitigation measures for all construction works, including start-up and close-down activities, in consideration of these thresholds to avoid significant adverse effects and reduce adverse effects as per commitment NV05 within Table 6.1 of 7.2 Outline Code of Construction Practice [REP2-014]. The Applicant therefore considers the provision for start-up and close-down activities 1 hour either side of the core working hours to be proportionate, justified, and consistent with established practice for Nationally Significant Infrastructure Projects, noting that all such activities remain subject to the application of best practicable means and appropriate mitigation to manage noise and other environmental effects as set out within 7.2 Outline Code of Construction Practice [REP2-014]. The measures are secured via Requirement 4(a) (Construction Management Plans) of 3.1 Draft Development Consent Order [Revision C]. b) <u>Activities permitted outside of core construction hours</u>

²⁸ British Standards Institution (2014) *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise*

Reference	Question	Applicant's Response
		Requirement 7(4) of 3.1 Draft Development Consent Order [Revision C] permits a limited range of activities to take place outside the core working hours where this is necessary to ensure public safety, engineering integrity, network reliability, or compliance with third-party requirements, and to minimise overall disruption. The activities identified are not routine construction works but are those that are time-critical, continuous once commenced, or externally constrained, such that restricting them to core hours would increase risk or prolong impacts. Trenchless crossings, underground cable jointing, oil processing of transformers, and certain commissioning activities may need to proceed without interruption to avoid safety, environmental, or asset integrity risks. Works affecting highways, railways and watercourses, including conductor installation and the delivery of Abnormal Indivisible Loads (AILs), are often governed by requirements of highway authorities, asset owners or the police, and are therefore routinely scheduled at nights or weekends to maintain safety and reduce disruption. Provision is also made for the continuation of works to a safe stopping point, the completion of works delayed by severe weather, emergency activities, security monitoring, and necessary survey works. Mechanical and electrical installation works undertaken within completed and enclosed buildings are expected to result in minimal external effects and can proceed outside core hours without significant effects on nearby receptors. The inclusion of activities that may take place outside core construction hours is not an indication that construction would routinely occur throughout the day and night. It is not typical construction practice for work to continue on an extended or overnight basis as standard. Core construction activity is expected to take place within the defined working hours in the normal course of construction. Importantly, any activities undertaken outside core construction hours remain subject to the controls and mitigation measures set out in 7.2 Outline Code of Construction Practice [REP2-014]. These controls include provisions relating to noise management, lighting, environmental protection and monitoring, ensuring that any out-of-hours activity is appropriately managed and minimised. The measures set out within 7.2 Outline Code of Construction Practice [REP2-014] are secured via Requirement 4(1)(a) (Construction Management Plans) of

Reference	Question	Applicant's Response
		3.1 Draft Development Consent Order [Revision C]. The identification of activities outside core hours therefore reflects a pragmatic construction envelope, providing flexibility to manage safety and technical requirements, while maintaining clear control through the Code of Construction Practice. c) <u>Implications in regard to the proposed construction timeline</u> The Applicant has considered the scenario suggested by the ExA, being the loss of the flexibility to work after 13:00 on a Saturday and the loss working hours on a Sunday and Bank Holidays. The baseline construction schedule shown on Image 4.1 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] shows an energisation date in December 2030. The Applicant has undertaken a high-level modelling exercise, the result of which indicated that under the above scenario, the energisation date would be delayed by 14 weeks. This does not take into account unforeseen delays or the potential for the altered working hours to impact on critical path activities. Given the forecast of constraint costs outlined in Annex 2 of the National Energy System Operator's Clean Power 2030 Report published in November 2024²⁹, any restriction of working hours that results in a delay to the energisation date would lead to additional costs being borne by British energy bill payers, at a rate of approximately £7 million per day. The Applicant would also like to note that reducing working hours on a Saturday to 8:00–13:00 would not be practical as it would significantly limit the available time to carry out construction activities. The process of mobilising the workforce, setting up equipment and preparing the site for work can take a considerable amount of time at the start of each shift, likewise with demobilisation which requires adequate time to safely secure equipment and materials to ensure the site is left in a safe condition. A substantial portion of the morning would be taken up by these activities, leaving insufficient time for productive construction works. The Applicant has considered the request to consider variations of the scenarios such as just removing Sundays or just removing Bank Holidays and other public holidays. Should these scenarios be modelled, it is anticipated that the energisation date on the baseline construction programme would remain largely

²⁹ National Energy System Operator (NESO) (2024) *Clean Power 2030. Annex 2: Networks, connections and network access analysis*

Reference	Question	Applicant's Response
		unchanged. This is consistent with the Applicant's position that it is not typical for construction activities to take place across the full duration of the permitted working day, nor on every day within the defined hours. Whilst scenario-modelling may indicate that the energisation date on a baseline programme could appear broadly similar, this would mask a material loss of programme resilience. In practice, the availability of additional working hours and days provides essential flexibility to accommodate inefficiencies, unforeseen delays and the inherent constraints associated with mobilisation and demobilisation. Certain elements of the construction programme require the flexibility to be undertaken across a seven-day working week, including Sundays and Bank Holidays, where necessary. For instance, earthworks (often delayed due to wet weather) benefit from a flexible schedule to maintain programme certainty and take advantage of favourable weather conditions. Overhead line works may necessitate activity throughout the week to uphold project continuity, minimise outage durations, and coordinate effectively with access and possession constraints related to highway and railway infrastructure. Additionally, highway mitigation works may require seven-day flexibility to reduce weekday disruption to the business community and to enhance safety when working in areas adjacent to live roads. This approach ensures that such activities can be efficiently managed while remaining sensitive to the needs of the community and the operational requirements of the Project. Importantly, the core working hours permit, but do not require, working on Sundays and Bank Holidays. The flexibility to operate across seven days, including Sundays and Bank Holidays, is essential to maintain programme certainty and continuity for certain construction activities as described above and minimise disruption to local communities and businesses. Limiting the working week would inevitably prolong the overall construction period, leading to extended exposure to construction impacts. For these reasons, the Applicant considers that maintaining a seven-day schedule is both appropriate and necessary for the delivery of the Project. The removal of Sundays and/or Bank Holidays and public holidays from the core working hours would not represent a neutral change; rather, it would reduce flexibility and introduce unnecessary risk on the timely delivery of the Project.

Reference	Question	Applicant's Response
		d) <u>Measures to prevent the use of other forms of piling</u> 3.1 Draft Development Consent Order [Revision C] and supporting management plans provide flexibility in the selection of piling methods used for construction, while ensuring that potential noise and vibration impacts are appropriately controlled through secured mitigation. Percussive piling is subject to more restrictive hours than the core construction hours and the use of other forms of piling is currently restricted to the core working hours within Requirement 7 of 3.1 Draft Development Consent Order [Revision C]. The assessments of construction noise and vibration presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] assume percussive piling to be a reasonable worst-case scenario to identify potential noise and vibration 'hot-spots' and any likely significant adverse effects in the absence of mitigation. At the time of the assessment, detailed geotechnical information across the entire route is not yet available, and it would therefore not be appropriate to assume the use of quieter plant prior to the geotechnical investigations being completed. The final, specific construction methodologies, including the selection of other piling methods, would be determined by the Main Works Contractor(s) following their detailed site-specific assessments, including a Foundation Works Risk Assessment (FWRA). The FWRA will consider ground conditions, structural requirements, and environmental constraints to identify the most appropriate piling methodology. This process is secured through commitment GH02 within Table 6.1 of 7.2 Outline Code of Construction Practice [REP2-014]. The Main Works Contractor(s) are also committed to employing best practicable means by commitment NV01 within 7.2 Outline Code of Construction Practice [REP2-014]. This would include selection of an appropriate pylon foundation construction methodology to minimise noise and vibration effects so far as reasonably practicable. The Applicant has considered the request from Local Authorities in their Local Impact Reports to amend Requirement 7(2) to remove the word 'percussive' and thereby restrict all forms of piling to the hours of 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, unless otherwise approved by the relevant planning authority.

Reference	Question	Applicant's Response
		In light of the worst-case assessment presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256], together with the controls secured through the DCO and the commitment to employ best practicable means, the Applicant considers that the proposed approach is appropriate and proportionate for managing noise and vibration effects. The assessment demonstrates that, even for percussive piling, the application of embedded mitigation and controls ensures that no significant adverse effects arise. The distinction between percussive and non-percussive piling reflects the potential for their differing levels of impact, while allowing flexibility for the use of alternative, lower-impact methods outside of the core working hours. e) <u>Restrictions to Abnormal Indivisible Loads (AILs)</u> The restrictions that apply to AILs are set out in Section 5.3 of 7.3 Outline Construction Traffic Management Plan [APP-309] and in Section 6 of 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]. The movement of AILs will be outside of the restrictions contained within Requirement 7 of 3.1 Draft Development Consent Order [Revision C] and will be subject to separate agreement with the relevant highway authorities and police through the Electronic Service Delivery for Abnormal Loads (ESDAL) system. This includes notifications to stakeholders (relevant highway authorities, police and Network Rail) and advising of timings, routes and any asset protection measures appropriate to the type of road. Where blue light services have a local embargo on AIL movements, these hours will be adhered to for AIL movements associated with the Project, unless agreed otherwise. Should delivery of AILs be required outside of the core working hours, prior notice for AIL movements will be given to the relevant highway authority 72 hours in advance before such traffic movements commence. The Main Works Contractor(s) will be responsible for developing the AIL access strategy, including continuation of the structural checks process, confirming preferred routes where appropriate and progressing towards formal movement applications (including securing necessary permits), pursuant to established procedures, which will need to be submitted closer to the time of movements. Commitment T12 within Table 6.1 of 7.2 Outline Code of Construction

Reference	Question	Applicant's Response
		Practice [REP2-014] ensures that all AIL measures will be discussed and agreed with the Local Highway Authorities and National Highways and presented in the final Construction Traffic Management Plan. Mitigation measures within 7.2 Outline Code of Construction Practice [REP2-014] and 7.3 Outline Construction Traffic Management Plan [APP-309] are secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 Draft Development Consent Order [Revision C]. f) <u>Complaints procedure in the event of a breach</u> The complaints procedure is set out in Section 6.7 of the 7.3 Outline Construction Traffic Management Plan [APP-309]. All complaints associated with the construction of the Project, including non-conformance with management plans, will be reported and investigated using a detailed complaints procedure developed by the Main Works Contractor(s). The detailed complaints procedure (including but not limited to complaints relating to noise, dust, vibration, pollution and construction traffic) will set out: • How and to whom complaints can be made • A reasonable timeframe for responding to complaints • The potential remedies available to address complaints • Whom to contact in the event that the complainant is not satisfied with the outcome. Primarily, any minor issues or complaints relating to site incidents will be dealt with by the Main Works Contractor(s). For the escalation of these issues or for more serious issues, these will be dealt with by the National Grid Project Team. Any complaints regarding environmental issues will be discussed with the Construction Manager and the Environmental Manager, appropriate action will be taken and the conclusion recorded. A record will be made of the incident for audit purposes. In addition to the Project telephone helpline and the Project website, complaints from an external party may also be received via a number of other sources, for example via written correspondence or incidental contact with construction workers.

Reference	Question	Applicant's Response
		Where a member of the public makes a complaint, it will be passed initially to the Community Relations Team, who will liaise with the other members of the Project Team to investigate the complaint. Appropriate action will be taken by the Project construction team. Commitment GG30 within Table 6.1 of 7.2 Outline Code of Construction Practice [REP2-014] commits the Main Works Contractor(s) to this procedure. Mitigation measures in 7.2 Outline Code of Construction Practice [REP2-014] and 7.3 Outline Construction Traffic Management Plan [APP-309] are secured via Requirement 4(1)(a) (Construction Management Plans) of 3.1 Draft Development Consent Order [Revision C].
DCO 1.S12	Schedule 3 – Requirement 8 (Retention and removal of trees, woodland and hedgerows) The ExA asks why arboricultural protection measures, such as arboricultural method statements, tree protection plans and root protection areas are not clearly defined and being secured prior to construction as part of this requirement? Braintree DC along with other County/ Local Authorities consider that in the absence of such additional details, there is a risk that the scale of tree and hedgerow loss could exceed that currently assessed. As such they consider the acceptability of the arboricultural impacts of the scheme is dependent on the provision of further information, including delivery of tree retention, protection, and replacement planting, and the inclusion of such measures should be incorporated as a	Requirement 8 of Schedule 3 in 3.1 Draft Development Consent Order [Revision C] requires plans showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage to be submitted to and approved by the relevant planning authority, prior to that stage commencing, unless otherwise agreed with the relevant planning authority. These plans can be contained as an appendix to an Arboricultural Method Statement (AMS) which details the works and confirms what protection measures are to be implemented, for example tree protection fencing, tree pruning operations, ground protection and works to be undertaken under arboricultural supervision. The submission of an AMS is secured through the 7.4 Outline Landscape and Ecological Management Plan [REP2-014] and Requirement 4 of the 3.1 Draft Development Consent Order [Revision C]. Paragraph 7.1.2 of 7.4 Outline Landscape and Ecological Management Plan (LEMP) [REP2-014] states that <i>‘All construction elements likely to impact on retained trees will be addressed within an Arboricultural Method Statement (AMS) to be produced following detailed design and agreed with the relevant LPAs prior to construction activity commencing. The AMS will include protection measures including tree protection fencing as discussed in Section 7.3. and illustrated in a Tree Protection Plan’</i>. Therefore, whilst the AMS is not secured through Requirement 8, it is secured through Requirement 4 and full details will be provided within the Final LEMP(s) prior to the stage of works commencing.

Reference	Question	Applicant's Response
	requirement and would be fundamental to delivery of acceptable mitigation.	In terms of the root protection areas these are clearly shown on the plans 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]. Through the combination of Requirement 4 and Requirement 8 of the 3.1 Draft Development Consent Order [Revision C], the relevant local authorities will be required to approve the plans showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed and also the AMS through the final LEMP which will include the protection measures. Under Requirement 1(4), the Applicant would need to satisfy the relevant local authorities that the proposed plan would not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement.
DCO 1.S13	Schedule 3 – Requirement 9 (Reinstatement Planting Plan) - replacement planting period and on-site BNG aftercare period A number of IPs have commented that your proposed 5-year replacement period for any trees or hedgerows planted as part of the reinstatement planting plan under R9(7) would be an insufficient time period due to the nature of the environment and erratic weather patterns in the locality, and a ten year aftercare period is recommended by, for example, Suffolk CC. Notwithstanding your response in [REP1-132] provide evidence to justify how a 5-year period provides sufficient certainty that the replacement planting will be successful and that therefore the mitigation/compensation effects you have assessed would be realised in practice.	Five-year aftercare period The five-year monitoring period for replacement planting (outside the Environmental Areas) is considered sufficient to ensure successful plant establishment. Most planting failures happen within the first few years, and the five-year period captures this initial establishment risk and by year 5 provides a realistic picture of long-term success. It is considered that the early establishment can be a key determinant to later success. 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 '<i>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.</i>' The Applicant's commitment to a five-year aftercare period adheres to the recommendation set out in the British Standard. The Applicant is committed to ensuring a good planting regime (i.e. stock quality, planting technique and site preparation) which can be more determinative than the length of aftercare alone. 7.4 Outline Landscape and Ecological and

Reference	Question	Applicant's Response
	Also, a number of organisations such as Colchester City Council in [REP1-156], Braintree DC in [REP1-148] and Essex CC in [REP1-161] have argued that in cases where this 5 year period cannot be extended due to landowner agreements then an evidence-based planting failure rate should be factored in to any planned mitigation in order to ensure that the predicted outcomes in the ES can be achieved. Respond to this. Furthermore, the ExA understands that, as stated in paragraph 3.5.9 of the BNG Report [APP-299] and as referenced in [REP1-132] there would be a 30-year aftercare period for BNG on-site habitat for the Environmental Areas. Clarify the position in terms of the aftercare period for any other on-site BNG outside of the proposed Environmental Areas, for example reinstated hedgerows and priority watercourses that would be upgraded to one condition higher.	Management Plan [Revision D] has highlighted some best practice principles, and these will be expanded upon with full details provided within the final Landscape and Ecological Management Plan. 7.4 Outline Landscape and Ecological Management Plan [Revision D] also further commits to the aftercare being adaptive, allowing adaptations to be made in light of monitoring results. 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. Planting sizes and species will be selected based on those which would naturalise more easily than larger trees stock, for example smaller whips and transplants. The five-year aftercare commitment aligns with other previously consented National Grid Nationally Significant Infrastructure Projects (NSIPs) such as The National Grid (Bramford to Twinstead Reinforcement) Order 2024 and The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. The commitment is also in accordance with a number of other non-National Grid schemes including The East Anglia One Offshore Wind Farm Order 2014, The East Anglia Three Offshore Wind Farm Order 2017, The Norfolk Vanguard Offshore Wind Farm Order 2022 and The Norfolk Boreas Offshore Wind Farm Order 2021, where the default position has primarily been five years with the exception of around the substation/converter station sites. Planting failure rate Requirement 9(7) (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. It is therefore not considered that an additional failure rate should be required. Aftercare period for on-site Biodiversity Net Gain (BNG) On completion of the Project construction, land would be returned to the landowners across the majority of the length of the alignment and the expectation would be for it to return to previous long-term management. A commitment to a five-year monitoring/management of all trees, hedgerows and enhanced

Reference	Question	Applicant's Response
		watercourses on-site has been included within the 3.1 Draft Development Consent Order [Revision C] in accordance with the 7.4 Outline Landscape and Ecological Management Plan [Revision D]. Reinstated hedgerows and watercourses which have been enhanced to one condition higher than their baseline, but sit outside the Environmental Areas, will be subject to this five-year monitoring and management period. Further information to clarify this point has been added to the next iteration of the Outline Landscape and Ecological Management Plan submitted at Deadline 3. It is recognised that the Statutory Biodiversity Metric User Guide³⁰ (for Town and Country Planning Act (TCPA) projects) states that any habitat that cannot be managed for the 30-year period cannot be included within the BNG metric. For NSIPs this does not accurately reflect the real-world situation, where under the requirements of the Development Consent Order, the Applicant is obliged to reinstate habitats that are temporarily lost to the Project to their previous type and condition. Excluding all reinstated habitat along the full length of the Project from the metric does not accurately reflect the biodiversity value on completion of the Project. The Applicant has provided detailed justification why it is not considered that the TCPA User Guide on replacement habitats is suitable for NSIPs within paragraphs 3.5.3 to 3.5.7 of 7.1 Biodiversity Net Gain Report [APP-299]. Essentially, an NSIP cannot seek to interfere with landowners' rights to manage their own land beyond the extent needed to deliver the development. It would be disproportionate to compulsorily acquire rights to control a landowner's land management activities for 30 years purely to control small sections of reinstated habitats. The inclusion of secured funding for 30 years of habitat management for small areas of habitat/small sections of hedgerows or watercourses temporarily affected by the Project would also create an administrative burden for landowners. Through consultation, Natural England has confirmed that the approach used which includes all replacement planting within the BNG metric where the area habitat type and condition would be returned to baseline type and hedgerows and

³⁰ Department for Environment, Food and Rural Affairs (2025) *Statutory biodiversity metric: user guide*

Reference	Question	Applicant's Response
		watercourses would be enhanced by one condition level, is acceptable prior to mandatory BNG for NSIPs.
DCO 1.S14	Schedule 3 - Requirement 9 (Reinstatement Planting Plan) – monitoring The outline LEMP, Appendix B at Table 5.1 of [APP-323] explains the outline mitigation hierarchy for veteran trees and under compensation states there will be commitments to maintain and monitor “compensation areas” for a minimum of 30 years. Whilst it is acknowledged that this figure is within the outline LEMP, it is not reflected in the draft DCO under requirement 9. This refers to reinstatement planting plans and sub-section (7) refers to monitoring and replacing for a period of five years. The ExA would ask what exactly you mean by the term 'compensation areas'; how they have been defined in the plans submitted as part of the application documentation; and how are they to be secured in the draft DCO. requirement 9 of the draft DCO should be updated to reflect the status of compensation that is proposed for impacts on veteran trees.	The Applicant considers that the reference to ‘compensation areas’ in the context of veteran trees within Table 7.1 Mitigation Hierarchy for Veteran Trees of 7.4 Outline Landscape and Ecological Management Plan (LEMP) [REP2-018] could be misconstrued as referring solely to a defined physical area. In practice, compensation associated with veteran trees may comprise a range of measures, which could include management, protection, monitoring, soil improvement, or other bespoke actions. Any compensation required in relation to veteran trees, including the nature and location of compensation measures where relevant, would be developed and agreed prior to the removal of any veteran tree and secured through the final Landscape and Ecological Management Plan to be submitted for approval pursuant to Requirement 4 of 3.1 Draft Development Consent Order [Revision C]. To avoid ambiguity, the Applicant will update the wording in the next version of the Outline LEMP to state that ‘<i>the Applicant commits to maintain and monitor compensation measures for 30 years</i>’. This clarification better reflects the nature of the compensation options proposed and ensures that the commitment relates to the effectiveness and longevity of the measures. The Applicant confirms that the commitment to maintaining and monitoring compensation measures, including those associated with veteran tree impacts, is secured through the combination of Requirement 4 and should the measure involve replacement planting, Requirement 9, and in particular Requirement 9(7) of 3.1 Draft Development Consent Order [Revision C]. Under Requirement 4(1)(c), no stage of the authorised development may commence until a LEMP is submitted to and approved by the relevant planning authority, and that plan must be substantially in accordance with the Outline LEMP. This ensures that the compensation measures and their long-term management commitments identified in the Outline LEMP must be carried forward into the approved final LEMP.

Reference	Question	Applicant's Response
		Requirement 9(6) requires that all reinstatement planting works are implemented, monitored and maintained in accordance with the 'Aftercare' section of the final LEMP approved under Requirement 4. Requirement 9(7) then secures the ongoing replacement, monitoring and maintenance of planting where failures occur, for a minimum period of five years or such other period as is specified in the final LEMP approved pursuant to Requirement 4. The Applicant confirms that, where the final LEMP specifies a longer management and monitoring period for habitat-based compensation (such as the 30-year period identified for veteran tree compensation measures), this longer period will apply by virtue of Requirement 9(7) as stated in the wording 'or such other period as is specified in the final LEMP...'. The five-year period operates as a default minimum for standard replacement planting, not as a cap.
DCO 1.S15	Schedule 3 - BNG commitments The ExA notes that BNG is not defined in the draft DCO, and none of the requirements in schedule 3 of the draft DCO make specific reference to the BNG baseline and measures that are contained in the BNG Report [APP-299] and which are referenced in other documents you have submitted. Whilst the ExA is aware that the BNG Report [APP-299] is intended to present an initial calculation of how BNG could be achieved, it is not a certified document in schedule 19 of the DCO. Justify why a specific reference to securing BNG is not contained in the draft DCO as either a requirement or within a separate schedule. Furthermore, explain how the ExA can rely upon the BNG measures that are set out in [APP-299] actually	Justify why a specific reference to securing BNG is not contained in the draft DCO as either a requirement or within a separate schedule. The Applicant has prepared Heads of Terms regarding a unilateral undertaking to be given by National Grid to the Local Planning Authorities along the Project route under s106 of the Town and Country Planning Act 1990 ('s106 UU'), relating to obligations designed to secure at least a 10% Biodiversity Net Gain (BNG) as part of the Project. As it will not be achievable to secure a 10% net gain entirely through on-site habitat enhancement and creation measures alone, the Applicant will seek to acquire biodiversity units from third party biodiversity gain providers, to make up the shortfall from on-site habitat creation and enhancement. A s106 UU is seen as the most appropriate option to legally secure the Applicant's commitment to delivering a 10% BNG as it allows greater flexibility to draft detailed obligations and secures sufficient enforcements for the benefit of the Local Planning Authorities receiving the s106 UU. As the Applicant intends to secure the BNG commitment via a s106 UU it is not considered a further commitment within the 3.1 Draft Development Consent Order [Revision C] is necessary. BNG is not yet mandatory in relation to Nationally Significant Infrastructure Projects; there is therefore a concern that the

Reference	Question	Applicant's Response
	being undertaken if they are not adequately defined and secured in the draft DCO.	imposition of a requirement in relation to the provision of BNG may not meet the legal tests for obligations in terms of necessity. Explain how the ExA can rely upon the BNG measures that are set out in [APP-299] actually being undertaken if they are not adequately defined and secured in the draft DCO As stated above, although 7.1 Biodiversity Net Gain Report [APP-299] is not secured within the 3.1 Draft Development Consent Order [Revision C], the legal agreement secures the delivery of the on-site and off-site BNG commitment. The stages of the delivery process have been outlined below. The intention is to submit the s106 UU into the Examination by Deadline 7, or earlier if possible. The assessment provided within 7.1 Biodiversity Net Gain Report [APP-299] represents an initial calculation based on the current stage of the Project and will be updated. The legal agreement will secure the provision of an updated BNG assessment which will provide an updated assessment following detailed design based on Project refinement and construction information. The assessment will be undertaken using the methodology outlined in 7.1 Biodiversity Net Gain Report [APP-299] and will calculate the predicted biodiversity units at completion of the development compared to its pre-development baseline. Any BNG delivered on-site will be subject to the final Landscape and Ecological Management Plan which will be submitted to and approved by the relevant Local Planning Authorities. This document will contain details of habitat management and monitoring for the Environmental Areas/on-site BNG. Within a set period of the end of the construction period (likely to be six months), the Applicant will submit to the Local Planning Authorities a final BNG assessment which calculates the units upon completion and identifies the on-site deficit and therefore off-site biodiversity unit requirement. This assessment will include details of where the off-site BNG is to be delivered. Following delivery of the off-site BNG, the Applicant will provide a completion report to the Local Planning Authorities confirming how the off-site BNG has been delivered.
DCO 1.S16	Schedule 3 – Requirement 9 (Reinstatement Planting Plan)	Any replacement planting provided under Requirement 9(7) will be subject to the same five-year monitoring period/replacement procedure as the original failed

Reference	Question	Applicant's Response
	requirement 9(7) addresses what happens in the event of any trees or hedgerows planted, as part of an approved reinstatement planting plan, being removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased. However, what monitoring period/ replacement procedure applies in regard to any trees or hedgerows replaced under requirement 9(7)?	planting; the period will not re-commence. 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. Such a rolling commitment would create a potentially open-ended obligation that would be disproportionate, especially taking into consideration that the majority of land is temporarily impacted by the Project and will be returned to landowners. Resetting the period would also be very complicated to track and enforce, potentially creating ambiguity around compliance. The wording of Requirement 9 is considered appropriate and reasonable and reflects the standard approach across a number of Nationally Significant Infrastructure Projects.
DCO 1.S17	Schedule 3 – Requirement 10 (Reinstatement schemes) Braintree DC in its LIR [REP1-148], along with other County and Local Authorities have raised concerns related the strength/ enforceability of some of the requirements. For example, Braintree's LIR [REP1-148] (paragraph 12.5.10) requests requirement 10 (Reinstatement Schemes) be strengthened to ensure temporary haul routes are required to be removed following completion of construction and for full reinstatement of the land to take place. The ExA seeks the applicant's response to these matters and would ask for it to generally review all requirements as to the standard tests, especially the tests of precision and enforceability.	Article 10 (Planning Permission) provides that temporary works are treated as having only temporary planning permission and, therefore, must be removed save where expressly stated to the contrary. Articles 27 (temporary use of land by National Grid) and 28 (temporary use of land by UKPN) do not authorise the retention of temporary accesses and expressly state that land must be restored to the reasonable satisfaction of the owners of the land. Furthermore, Requirement 10 (reinstatement schemes) requires (subject to Article 27 and 28) '<i>any land within the Order limits which is used temporarily for construction to be reinstated to a condition suitable for its former use, or such condition as the relevant planning authority may approve</i>'. The removal of the temporary haul road and its reinstatement are sufficiently controlled and no further amendments are required to Requirement 10. The Applicant will review the Requirements against the standard tests generally and will update the next revision of the 3.1 Draft Development Consent Order as necessary.
DCO 1.S18	Schedule 3 – Requirement 14 (Control of Development under Work Nos. 19 and 21 to 24)	The Applicant has now committed to one of the two scenarios dealt with by this Requirement and, as such, this Requirement has now been deleted from Schedule 3 (Requirements) of 3.1 Draft Development Consent Order [Revision

Reference	Question	Applicant's Response
	The clarity and reasonableness of this requirement is questioned, given it allows the applicant to construct either the works specified in column (2) or (3) in the table set out below the requirement. Please provide further justification for the inclusion of this requirement and explain how you consider it is consistent with and meets the relevant tests for the imposition of such a requirement.	C] and the description of the relevant works in Schedule 1 (Authorised Development) has been updated accordingly.
DCO 1.S19	Schedule 4 – (Discharge of requirements) - 1 The government published its response to the Nuclear Regulatory Review 2025 on 13 March 2025, in its document 'Building our nuclear nation: government response to the Nuclear Regulatory Review 2025'. The ExA draws attention to: i) it is seeking to accelerate "...efforts to ensure the planning system more effectively enables both low-carbon energy projects and infrastructure as a whole..."; and ii) its response to Recommendation 30, where it indicates this includes "...establishing a new unit within DESNZ to coordinate post-consent discharge functions for nuclear power and electricity network projects."	A) The Applicant notes the government's response to the Nuclear Regulatory Review 2025, published on 13 March 2026³¹, including the clear policy intent to accelerate the delivery of low-carbon energy and electricity network infrastructure through more effective post-consent processes. In particular, the Applicant recognises the government's intention, as set out in its response to Recommendation 30, to establish a new unit within the Department for Energy Security and Net Zero (DESNZ) to coordinate post-consent discharge functions for nuclear power and electricity network projects. The Applicant understands that this proposal is aimed at improving efficiency, consistency and timeliness in the discharge of requirements for nationally significant energy infrastructure. The Applicant is supportive of the overarching objectives of this approach and is keen to understand further details as they emerge from DESNZ as this proposal develops, including to understand how such a unit might operate in practice, the scope of requirements it may discharge, and how it would interface with Local Planning Authorities and other statutory bodies. The Applicant also considers it important to understand the views of local authorities/discharging authorities on this emerging approach and feels there is

³¹ Department for Energy Security and Net Zero (2026) *Building our nuclear nation: government response to the Nuclear Regulatory Review 2025*

Reference	Question	Applicant's Response
	In the light of the above document and a clear statements from the government regarding its intention in related to post-consent discharge, the applicant and discharging authorities are asked to: a) Provide comments on the above publication in respect of post-consent discharge functions. b) Consider if the current drafting of schedule 4 in the draft DCO [APP-056] is an appropriate approach to the post-consent discharge of requirements, or whether schedule 4 of the draft DCO [APP-056] should take a similar approach to that set out in schedule 2, Part 2 of The A122 (Lower Thames Crossing) Development Consent Order 2025?	time remaining in the Examination period for those views to be considered. The Applicant intends to discuss the recommendations of the review recently published with the local authorities as it seeks to maintain effective working relationships at the local level. B) The Applicant considers that the current drafting of Schedule 4 of the 3.1 Draft Development Consent Order [Revision C] represents an appropriate and proportionate mechanism for the post-consent discharge of requirements at this stage of the Project based on the current approach adopted by other NSIPs. The proposed approach reflects established practice across Nationally Significant Infrastructure Project regimes and aligns with the engagement undertaken with host Local Planning Authorities to date whose expectation that discharge of DCO requirements will primarily fall to them given the largely local issue they address. The Applicant recognises that alternative approaches to post-consent discharge have been adopted in other made Development Consent Orders, including Schedule 2, Part 2 of The A122 (Lower Thames Crossing) Development Consent Order 2025, and accepts that this represents a potential model for schemes where a centralised discharge function is established. Given the evolving nature of the government's proposals, the Applicant remains open to further consideration of this issue as the Examination progresses, government's approach develops and through engagement with the local authorities. Should it become appropriate and beneficial to do so, the Applicant may wish to explore the submission of alternative drafting options, including the potential for two versions of Schedule 4 of the Development Consent Order to be considered. Any such approach would need to ensure continuity of engagement, protect programme delivery, and provide clarity and certainty for all parties involved.
DCO 1.S20	Schedule 4 – (Discharge of requirements) - 2 Fees referenced at schedule 4 sub-paragraph 3(1)(b) must be updated to ensure any fee payable remains in line with latest planning fee guidance at the	The drafting in paragraph 3(1)(a) of Schedule 4 (discharge of requirements) to the 3.1 Draft Development Consent Order (Revision C) already provides for the application fee for the discharge of conditions to be such fee as is prescribed under the relevant regulations. The drafting in paragraph 3(1)(b) provides an alternative figure or arrangement that would apply in the absence of there being a prescribed fee. As such, the

Reference	Question	Applicant's Response
	time the discharge of requirement submission is made and should reflect the fact the fees increase on the 1 April each year. The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023 permits planning fees in England to increase automatically by the rate of inflation, capped at 10%, every 1 April. Additionally, clarify what is meant by the term 'per request'. For example does it mean that all discharge of requirement requests applied for/ made in one letter/ application, or does it apply to each individual discharge of requirement request/ submission contained in such a letter/ application?	Applicant does not consider it necessary to link this figure to the annual increases permitted in the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023. The Applicant notes that other made Orders, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, also do not provide for this 'fall back' figure to be linked to annual fee increases. The term "per request" will have the same meaning as in the Town and Country Planning regime, meaning that the fee would be per application for consent (i.e. more than one consent could be sought in one application) and not for each individual discharge of Requirement or consent contained in an application for approval.
DCO 1.S21	Schedule 7 (Streets or Public Rights of Way to be Permanently Stopped Up) The ExA notes Little Bromley 7 and Little Bromley 15 have no substitute or diversions to be provided. The table states 'PRoW is truncated by widened highway'. Please clarify whether these PRoW (Little Bromley 7 and Little Bromley 15) will remain open and in use or does the truncation result in the whole of these PRoW (Little Bromley 7 and Little Bromley 15) being stopped up?	Little Bromley 7 and Little Bromley 15 both terminate at existing highways, these being Bentley Road and Ardleigh Road respectively, each of which will be widened as part of the Project. These Public Rights of Way (PRoWs) are included in Schedule 7 because they will be shortened slightly by the road-widening works, which render the existing termination points redundant. The short end sections of each PRoW will therefore be permanently stopped up where the widened highway extends over their current alignments, and new termination points will be created. In both cases, the widening works only stop up the short length of PRoW that becomes redundant. The Applicant can therefore confirm that access will be maintained on both Little Bromley 7 and Little Bromley 15 during construction and operation of the Project. During construction, the affected lengths of the PRoWs will be managed on their existing alignment in the vicinity of the widening works and will remain open and available for use. During operation, the short stopped-up lengths will have been removed, as they relate solely to redundant stubs created by the widened

Reference	Question	Applicant's Response
		highway, but the functional PRoW routes will remain connected to their respective highways and available for public use.
DCO 1.S22	Schedule 9A - works for the Protection of United Kingdom Oil Pipeline (UKOP) apparatus The ExA questions the use of the numbering of this schedule (schedule 9A). It is the only instance a suffix has been used, rather than maintaining a purely numerical approach to the schedule numbering. In addition to the above, this article appears to be incomplete. The ExA requests the full text for this article be provided and the draft DCO is updated accordingly.	Schedule 9A has been deleted from 3.1 Draft Development Consent Order [Revision C] following acceptance by the Examining Authority of the Applicant's Change Application 1 – Bulphan.
DCO 1.S23	Schedule 12 (Not Used) Why is schedule 12 (Not Used) not being used? There is no explanation given in the EM [APP-057]. If there is no good reason as to why this schedule is not in use all subsequent schedules should be renumbered accordingly to avoid a schedule not being used. The ExA asks the applicant to provide further justification as to why schedule 12 is not in use in the draft DCO.	Schedule 12 had been identified for use, however, shortly before submission of the application, the position changed and the drafting of the associated article was adjusted accordingly, however, to avoid extensive re-working of other application documents that include references to schedules to the 3.1 Draft Development Consent Order, the schedules were not re-numbered at that stage. The Applicant anticipates incorporating Schedule 12, which will relate to Article 41 (Extinguishment of private rights and restrictive covenants relating to apparatus belonging to National Grid or UKPN removed from land subject to temporary possession) at Deadline 4.
DCO 1.S24	Schedule 16 – protective provisions – general A number of statutory undertakers are seeking specific protective provisions within the DCO and that negotiations in	(a) The Applicant will include those bespoke Protective Provisions for the benefit of specific Statutory Undertakers that it has been possible to reach agreement on in the 3.1 Draft Development Consent Order at Deadline 4. To the extent that it is possible to agree further Protective Provisions thereafter with additional Statutory Undertakers, further bespoke Protective Provisions for

Reference	Question	Applicant's Response
	relation to these protective provisions are ongoing with those statutory undertakers. The applicant is asked to: a) Enter the draft protected provisions into the draft DCO. b) Provide a list of all IPs and APs the applicant is negotiating protective provisions with. This should include an update on the status of the negotiations and an indication when those protective provisions will be included within the draft DCO.	those additional parties benefit will be included in the 3.1 Draft Development Consent Order at Deadline 5 and thereafter, as and when they are finalised and agreed. (b) The 8.7 Statutory Undertaker Tracker [Revision B] is being submitted at Deadline 3; this will include details of all 127/138 Parties and indicate where the Applicant is negotiating Protective Provisions with these parties, along with the deadline at which these will be added to the 3.1 Draft Development Consent Order [Revision C], where this date is ascertainable at this stage. The Applicant will also add another table into this tracker to identify any other IPs/APs (who are not s127/138 parties) but with whom the Applicant is currently negotiating Protective Provisions. The Applicant will also indicate in relation to those entities the deadline at which these will be added to the 3.1 Draft Development Consent Order [Revision C] where this date is ascertainable at this stage.
DCO 1.S25	Schedule 19 – certified documents - 1 Braintree DC in its RR [RR-0383] and LIR [REP1-148], considers the supplemental environmental statements submitted should be added to the list of certified documents. Provide a response to this request.	As noted on Page 158 of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023], the definition of Environmental Statement in Article 2 (Interpretation) of 3.1 Draft Development Consent Order [Revision C] includes any supplemental or additional information and any environmental statement submitted for the purposes of complying with and/or discharging the Requirements, therefore the Applicant's position is that the proposed change is not necessary.
DCO 1.S26	Schedule 19 – certified documents - 2 Article 2(1) refers to Design and Layout Plans (Elevations), but there is no reference to these plans in this schedule related to certified documents. The ExA is concerned the reference to Design and Layout Plans – Subs & Cables in this schedule could lead to confusion. Justify why there is no reference to the design and layout plans (elevations), as detailed	Design and layout plans (elevations) are defined in article 2(1) (interpretation), immediately below the definition of "commence" (see 3.1 Draft Development Consent Order [Revision C]). [The Applicant has updated Schedule 19 (certified documents) of the 3.1 Draft Development Consent Order [Revision C] to replace reference to "Design and Layout Plans - Subs & Cables" with "Design and Layout Plans (Elevations)"]

Reference	Question	Applicant's Response
	in article 2(1) in this schedule, or amend the schedule as necessary.	
DCO 1.S27	Schedule 19 – certified documents - 3 In schedule 19 of the draft DCO [APP-056] the outline CoCP [APP-300] is included as a certified document but the Appendices (Appendices A to H [APP-301] to [APP-308]) have not been listed as certified document. The ExA notes that in Part 1, 2 Interpretation of the draft DCO the definitions for the outline CoCP and outline LEMP do include “(together with its appendices)” in the definition. However, to aid clarity and avoid the potential for any future confusion, should references be included to “and all appendices” for all certified documents that contain appendices?	The Applicant respectfully does not consider it necessary to add the words "and all appendices" to the relevant documents listed in Schedule 19 (Certified Documents) of 3.1 Draft Development Consent Order [Revision C] because, as the Examining Authority has identified, the definitions of those documents in Article 2 (Interpretation) include the appendices. It would be unusual for a defined term to be embellished elsewhere in a statutory instrument and risks causing confusion where the term is used elsewhere in the draft order without the additional text.

8. Historic environment

Table 8.1 Historic environment

Reference	Question	Applicant's Response
HE 1.1	NPS EN-1 (2023) and CNP Paragraphs 11.2.8-11.2.11 of ES Chapter 11, Historic Environment [APP-208] sets out and quotes government policy on energy infrastructure and CNP. The applicant is asked to set out: a) How such policy is applicable in this case to a proposal which would cause acknowledged harm to numerous heritage assets. b) How the mitigation hierarchy has been met and complied with in the case of harm to heritage assets.	The Project as CNP Infrastructure Section 2.4 of the Applicant's Comments on Local Impact Reports (EN020027) sets out the application of CNP policy to the Application and we have summarised the position below. Section 3 of NPS EN-1 (2024) confirms the urgent need for significant amounts of new large scale low carbon energy infrastructure to meet the government's energy objectives and paragraph 3.2.6 of EN-1 confirms that this need is urgent. Paragraphs 3.3.65-66 of NPS EN-1 (2024) reiterate that the need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives is urgent in order to enable the new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. Paragraph 3.3.62 of NPS EN-1 (2024) explains that the '<i>Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure</i>'. NPS EN-5 (2024), at paragraph 1.1.5 confirms that CNP infrastructure includes: <i>'for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System'.</i> The paragraph goes on to confirm that: '<i>These are viewed by the government as being CNP infrastructure and should be progressed as quickly as possible</i>'.

Reference	Question	Applicant's Response
		As set out within 5.6 Planning Statement [APP-085], the Project is CNP Infrastructure. Implications of CNP policy for Heritage With regard to determining applications for such infrastructure, NPS EN-1 (2024) paragraph 3.3.63 states that the urgent need for CNP infrastructure will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy, and confirms that the government strongly supports the delivery of CNP infrastructure, and that it should be progressed as quickly as possible. Similarly, paragraph 4.1.3 of NPS EN-1 (2024) confirms that, <i>'Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.'</i> This position is reinforced by NPS EN-1 (2024) paragraph 4.1.7 which confirms that, for CNP infrastructure, where there would still be residual adverse effects after the implementation of mitigation measures, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. Whilst that presumption does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero, or to residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk, none of those exceptions are relevant in the case of the Project. Paragraphs 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) sets out 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 specifically that this even includes the test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. The Project has been carefully designed to avoid, reduce or mitigate potentially significant effects on cultural heritage and archaeology assets where possible. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and

Reference	Question	Applicant's Response
		non-designated heritage assets. The 6.11.A7 Assessment of Harm to Designated Assets [APP-215] demonstrates that the Project will not result in substantial harm to designated heritage assets, although 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. Noting the reference to 'harm to numerous heritage assets', it is important to note that cumulative effects have been assessed and reported; neither EN-1 or the National Planning Policy Framework supports the mathematical aggregation of harm across assets. However, this loss of significance is necessary to achieve the substantial public benefit of delivering CNP infrastructure and this clearly outweighs the heritage impact. This is supported by paragraph 4.2.16 and 4.2.17 of NPS EN-1 (DESNZ, 2024) which provides that the SoS will take as the starting point for decision-making that CNP infrastructure is to be treated as if it has met 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 specifically that this includes the test where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional. National policy is therefore clear that in general, the need for CNP infrastructure is urgent and the further CNP presumption strongly supports development consent being granted for those projects. This can include justifying the causing of substantial harm to the significance of designated heritage assets. In the circumstances of this case there are no such substantial harms with any harms to designated assets identified being in the less than substantial harm category. The Project team has applied the mitigation hierarchy to minimise residual impacts and the need for the Project strongly outweighs those impacts including residual adverse heritage effects. How the mitigation hierarchy has been met and complied with in the case of harm to heritage assets Section 2.5 of the Applicant's Comments on Local Impact Reports (EN020027) sets out the application of the mitigation hierarchy to the Project and we have summarised the position below in relation to heritage assets. The Applicant has applied the mitigation hierarchy to the Project as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135], 5.6

Reference	Question	Applicant's Response
		Planning Statement [APP-085], and through consultation with heritage stakeholders, including Local Planning Authority historic environment advisors and Historic England. The process has been as follows (7.2 Outline Code of Construction Practice [REP2-014]): 1. Avoidance (Embedded Mitigation): From the earliest stages, the routeing and design of the Project have sought to avoid direct impacts on heritage assets wherever possible. Embedded mitigation measures are intrinsic to the Project's design. This includes, for example, alignment of the route to avoid the most sensitive heritage receptors, as documented in the 5.15 Design Development Report [APP-122]. Where avoidance was not possible due to other constraints, the design sought to minimise impacts by sensitive siting and alignment. 2. Reduction (Standard Mitigation): Where complete avoidance was not achievable, the Project has incorporated standard mitigation measures to reduce effects. These include the retention and reinstatement of landscape features such as hedgerows, earthworks, and boundaries, and the use of established good practice during construction (e.g., pollution control, soil handling), as set out in 7.2 Outline Code of Construction Practice [REP2-014] and 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. 3. Additional Measures: Where residual impacts remain targeted archaeological investigation and recording as set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] will be implemented to enhance knowledge of the specific assets and improve understanding of the Historic Environment. Where avoidance and reduction measures do not full remove the risk of harm, appropriate archaeological mitigation of preservation in situ will be applied where justified. Elsewhere, archaeological fieldwork such as preservation by record will be implemented in line with best practice and in consultation with relevant authorities. Throughout this process, the mitigation strategy has been informed by ongoing consultation, and each step of the hierarchy has been followed before moving to the next level of intervention. Decisions not to pursue further embedded mitigation have

Reference	Question	Applicant's Response
		been made on balance, taking into account environmental, technical, and socio-economic factors, and are consistent with the mitigation hierarchy and national policy. This stepwise approach demonstrates that the mitigation hierarchy has been systematically and proportionately applied, ensuring that any potential harm to heritage assets is avoided, reduced, or appropriately mitigated. The Applicant is confident that the resulting strategy is robust, justified, and has been developed in collaboration with relevant heritage stakeholders. Whilst compensation is part of the mitigation hierarchy, NPS EN-1 and EN-5 (both 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. It is particularly noteworthy that none of the policies on heritage in EN-1 and EN-5 expressly mention compensation. This is in contrast to other NPS policy sections, e.g. biodiversity, where the provision of compensation is expressly referred to. Furthermore, the National Planning Policy Framework³² (2025) does not make reference to a requirement for compensation for any harm to heritage assets. The issue of compensation is considered further in response to question HE1.37.
HE 1.2	ES Chapter 11, Historic Environment – methodology Table 11.3 of ES Chapter 11 [APP-208] contains the heritage values assessment criteria. Provide further information over how Conservation Areas are split between 'High' and 'Medium' value/sensitivity.	The valuation of a conservation area from a historic environment perspective is largely a reflection of the dominant value of the listed buildings as well as other designated and non-designated assets within. For example, a conservation area where a majority of heritage assets were assessed as medium value would likely be assessed as medium value; and a conservation area where a majority of heritage assets were assessed as high value would likely be assessed as high value. However, the value is also affected by the cohesion of the conservation area and the interaction of the settings of the designated and non-designated assets within. Although not necessarily heritage assets in their own right, value can also be influenced positively or negatively by sympathetic, or not, highway signage and street furniture, shop frontages, the use of metal shuttering, traffic management, the arboreal land/streetscape, bin storage, billboards and advertising, open spaces and greens. The Applicant is confident that the assessment of the value of conservation areas within the Project study area reported in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline

³² Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework*

Reference	Question	Applicant's Response
		Report [APP-209] is proportionate and appropriate and in accordance with professional advice. ^{33,34}
HE 1.3	ES Chapter 11, Historic Environment – historic landscape characterisations (HLC) Provide further information and justification for the categorisation of HLCs, including: a) Why the HLC subtypes of ancient woodland and former medieval deer parks are defined as ‘low value’. b) What value is assigned to areas of ‘informal parkland’ (“designed ornamental landscapes laid out around a ‘great’ or ‘grand’ house in the post medieval period”) in the study area? c) What value is assigned to ‘pre 18th century unenclosed common arable’ HLC subtype? d) Are all HLC types low or negligible value aside from ‘formal style parliamentary enclosure’?	Justification for the categorisation of Historic Landscape Characterisations (HLCs) is based on the characterisations developed and published by Norfolk Landscape Archaeology and English Heritage³⁵; Archaeological Service of Suffolk County Council and English Heritage³⁶; and Essex County Council and English Heritage³⁷. These documents do not, however, provide a valuation of the Historic Landscape Characterisation (HLC) types as required by the EIA process and instead grade the HLC types on their rarity within the respective county. Within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] a scale of negligible/low/medium/high value was used to reflect the rarity of the HLC types with high value representing very rare HLC types. However, in EIA terms, the HLC types recorded within the Order Limits are of either negligible or low value as defined in Table A11.1.1 ‘Heritage value assessment criteria’ of 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]. High and medium value HLC types, therefore, equate to low value in EIA terms; and low and negligible value HLC type equate to negligible value in EIA terms. The Applicant acknowledges that the discrepancy between the values for the HLC types presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and those in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068] is not adequately explained in either submitted document and apologises for this omission. (a). Ancient woodland identified in the HLC data has been attributed low value as such assets are very rarely of regional importance and/or contain physical archaeological remains such as wood banks and internal sub-divisions (see Table A11.1.1 Heritage

³³ Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*

³⁴ Historic England (2019) *Conservation Area Appraisal, Designation and Management Historic England Advice Note 1 (Second Edition)*

³⁵ Norfolk Landscape Archaeology and English Heritage (2009) *Norfolk's Historic Landscape Character: A Report On The Norfolk Historic Landscape Characterisation Project*

³⁶ Archaeological Service of Suffolk County Council and English Heritage (2012) *The Suffolk Historic Landscape Characterisation Map, Version 3*

³⁷ Essex County Council and English Heritage (2011) *The Historic Landscape Characterisation Report for Essex, Volumes 2 and 3*

Reference	Question	Applicant's Response
		value assessment criteria in 6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]). The medieval deer parks within the Project study area have been attributed low value as they are poorly defined; they are only occasionally defined by their former boundaries being fossilised in an extant field system. Furthermore, all have lost their function, being replaced by arable land and no physical features survive such as tree cover, and defining banks or pales. (b). Areas of informal parkland within the study area have been assigned low value in EIA terms as they have generally lost their function and are poorly defined. One parcel of informal parkland is, however, within the larger medium value Essex HER monument designed landscape garden (5036) associated with the Grade II* listed Rivenhall Place (1122598). (c). 'Pre 18th century unenclosed common arable' is an Essex HLC subtype of HLC type Pre-18th century enclosure. This HLC type is not represented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], however, based on a rapid review of the HLC data, one parcel of this HLC type (HEX11336) has been located within the Order Limits. This would and should have been attributed high value in the Baseline with the caveat of the discrepancy between the Baseline HLC values and those in the Environmental Statement (ES) chapter noted above. (d). In EIA terms yes, however, with the caveat of the discrepancy between the Baseline HLC values and those in the ES chapter noted above: • Medium value HLC types include parcels of enclosed meadow, parliamentary fen enclosure, carr woodland, pre-18th century enclosure, pre-18th century fen enclosure, anciently enclosed grazing marsh, and enclosed common land in Norfolk • High value HLC types include Formal style Parliamentary Enclosure, and Co-axial Enclosure, and medium value HLC types Boundary Loss – with relict elements, Enclosed Meadow, Irregular Sinuous Enclosure, Ancient Woodland, and Piecemeal Enclosure by Agreement in Essex.
HE 1.4	ES Chapter 11, Historic Environment – embedded mitigation Paragraph 11.6.4 of Chapter 11 [APP-208] states that lower height	The Applicant's response to various aspects is as follows: On the matter of technical difference and cost differential between standard and low height lattice pylons

Reference	Question	Applicant's Response
	pylons are proposed for the section of OHL that passes between Great Waltham and Little Waltham conservation areas to reduce visibility of the alignment from various heritage assets. To the applicant: • What is the cost or technical difference between the lower height and 'standard' height pylons? • Why are the lower height pylons not chosen for a more extensive part of the route, or indeed all of it? • Has undergrounding or T-pylons been considered for the same stretch of route – and if not, then why not? Various relevant representations raise concerns over the use of the lower height pylons considering that their more squat nature would have more • of an impact locally. Respond to such concerns. The detail in table 3.16 and 3.17 of ES Chapter 3 [APP-127] is noted in respect to the above queries. To Historic England Provide your views on the effectiveness (or otherwise) of the	The technical difference between standard and low height lattice pylons is that the low height design has only two cross arms, one fewer than the standard lattice, but has a wider lower cross arm. This allows the lower cross arm to carry two conductor bundles whilst ensuring safety clearances are met. This reduces the vertical height of the pylons by around 10 m. The low height lattice does need to be strengthened to respond to the different forces leading to a short squat structure made of thickened steel. Individual pylons vary in cost depending on whether angle pylons or suspension pylons are required, plus their height and foundation type, but low height lattice pylons are within the same cost range as standard lattice pylons. Why not low heights more extensively? Whilst the benefits of low height design may be to reduce the apparent height of structures dropping below sky lines, the shorter squat design (with strengthened steelwork) can increase visual effects for close receptors and the wider cross arm may lead to greater tree loss at hedgerow crossings. On balance therefore, they are typically used where a reduction in height is the critical characteristic. On the Project they are used at two locations: north of the River Chelmer to the north-east of Little Waltham to respond to heritage effects and to the east of Thurrock airfield to maintain aviation safety with this decision taken in light of the points raised in the fourth part of the response below about localised impacts of their squat appearance. Undergrounding or T-pylon The Applicant has set out elsewhere (at ISH 1 and in other responses) the strong starting presumption for new connections to use overhead lines, with consideration of tests under paragraph 2.9.23 of NPS EN-5 and progressing the use of the mitigation hierarchy leading to the proposed design. At Great Waltham and Little Waltham there is no automatic reversal of the strong starting presumption for overhead line as the area is not a nationally designated landscape. The application of the mitigation hierarchy identified that effects were reduced to a level considered acceptable by the introduction of low height pylons. Whilst not required, the Applicant did consider what an underground solution would comprise (5.15 Design Development Report [APP-122] from paragraph 9.2.17) but concluded this further progression up the mitigation hierarchy could not be justified by the level of effects, and location outside a nationally designated landscape. Local impacts from squat appearance

Reference	Question	Applicant's Response
	lower height pylons for this area and any other comments you may wish to make on • this matter.	On this last point the Applicant believes this particularly relates to a section of the route south of the River Chelmer where we had consulted on an arrangement with three low height pylons (from Table 3.17 in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]) continuing southwards from the four low height pylons to the north of the river. This sought to respond to concerns about a pylon between the Chelmsford road and river but necessitated a low height pylon being positioned to the side of a residential property. We confirmed at Deadline ? in document ref ????? that, subject to ExA approval, we were responding to further feedback and reverting to standard lattice pylons south of the River Chelmer. With a slight adjustment to positioning we were also able to confirm a reduction from three pylons to two pylons. For the other section of low height pylons to the east of Thurrock airfield (from Table 3.16 in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127]), maintaining aviation safety provides a compelling basis for low height pylons. In response to the concerns regarding the 'more squat' nature of the low height pylons, reference can be made to 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229] of the Landscape and Visual Impact Assessment. This document reports on the assessment of visual effects on Visual Receptor Area (VRA) F3 Great Waltham (para 13.9.31) and VRA F4 Little Waltham (para 13.9.44) where low height pylons are proposed. The assessment notes that low height pylons are proposed in the shallow valley area between Little Waltham and Great Waltham, to the east of Langleys Registered Park and Garden to mitigate effects on the views from heritage assets. The assessment acknowledges that the use of these pylons has some benefits for more distant visual receptors within the VRA, whose views are already partially screened by intervening vegetation and landform, since the lower height would further reduce the likely visibility of the proposed overhead line in these views. The assessment also acknowledges that in views from the closest visual receptors where there is limited or no intervening screening or landform, low height lattice pylons are likely to be more noticeable. This is due to their wider stature, use of thicker steel lattice sections and therefore bulkier appearance. In addition, the assessment notes that the width requirement for removal of existing vegetation beneath the proposed overhead line is slightly greater for low height pylons than for standard lattice pylons. This has been taken into account when judging the level of effects.

Reference	Question	Applicant's Response
		The visualisation for Viewpoint HE16 at Great Waltham can be found within 7.12 Visualisations - Part 9 of 9 [APP-351] , pdf page 99 to 104. This photomontage demonstrates the appearance of low height pylons.
HE 1.5	Historic Environment Baseline Report [APP-209] - Appendix A - Kings Farmhouse (1266530) doesn't appear or is significantly obscured on page 25 of the document. Consider and amend if necessary. - The listed building Bragg (1267411) does not appear to be on page 28 of the document. Consider and amend if necessary.	The Applicant acknowledges that the symbol label for listed building Kings Farmhouse (1266530) on Figure A11.1.1 - Historic Environment - Designated Heritage Assets Page 25 of 44 as included in Annex A of 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is partially obscured by the label for pylon TB40. The Applicant has included an updated sheet 25 of the figure - submitted separately, which shows the label for pylon TB40 moved away from the symbol label for Kings Farmhouse and will also include this update in the next iteration of 8.1 Errata List, which will be submitted at Deadline 4. The Applicant acknowledges that the symbol label for listed building Bragg (1267411) on Figure A11.1.1 - Historic Environment - Designated Heritage Assets Page 28 of 44 as included in Annex A of 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is entirely obscured by the label for pylon TB70. The Applicant has included an updated sheet 28 of the figure - submitted separately, which shows the label for pylon TB70 moved away from the symbol label for Bragg and will also include this update in the next iteration of 8.1 Errata List.
HE 1.6	Harm to heritage assets The proposed development is assessed to cause 'negligible' harm to various heritage assets along the route. Confirm if this equates to less than substantial harm in line with NPS EN-1 (2023) paragraph 5.9.30.	The term 'negligible' has not been used to describe 'harm' to a heritage asset within the Applicant's assessment of the historic environment. Rather, the term as used in the EIA process describes: - The value (significance) of a heritage asset within the scale of very high, high, medium, low, or negligible - The magnitude of impact on an asset caused by the Project within the scale of high, medium, low, negligible and no change - The significance of effect the Project has on an asset within the scale of major, moderate, minor, negligible and neutral. There is no direct correlation between this EIA terminology and NPS EN-1 which expresses the assessment of harm on a three-point scale: no harm, less than substantial harm and substantial harm. Therefore, the Applicant has provided 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated

Reference	Question	Applicant's Response
HE 1.7	Level of harm to heritage assets Provide further information over how the ES considers whether the proposed development would cause a mid or a lower less than substantial harm including: a) What differentiates between the two levels of harm assigned? b) What would an upper, or a high level, of less than substantial harm look like?	Heritage Assets [APP-215], which presents the assessment in terms of harm. It can be stated, therefore, that where the assessment has concluded the Project would result in negligible significance of effect on a heritage asset, this would be less than substantial harm in terms of NPS EN-1 paragraphs 5.9.27, 5.9.32 and 5.9.34. The Applicant notes that NPS EN-1 paragraph 5.9.30 refers only to substantial harm. The methodology for determining the level of harm a heritage asset would experience due to the Project, is set out in Section 2 of 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]. The concepts of substantial harm and less than substantial harm are only in play in relation to designated heritage assets. There is no direct impact of the Project on any designated heritage asset. All relevant impacts are indirect impacts – in other words impacts on setting. The level of harm would therefore depend upon the impact of the proposal on the setting and the importance of that setting to the significance of the asset. These are both matters of expert judgment undertaken by relevant professionals having regard to the pre and post application consultation responses of Heritage England and other. Lower less than substantial harm is assessed where there are slight or small changes within the setting of the designated asset (or elements of its setting that contribute to the asset's value) but these changes would be largely screened from the asset; or where these changes would occur at the limit of the setting of the asset. Mid less than substantial harm is assessed where the changes within the setting of the designated asset (or elements of its setting that contribute to the asset's value) would be noticeable with little or no screening. Upper less than substantial harm is assessed where the changes would significantly alter a large proportion of the asset's setting (or elements of the setting that contribute to the asset's value). The Courts have made clear in the Holocaust case that the issue of where on the spectrum of harm an impact lies is a matter of judgment and that it is very fact and case dependant so it is impossible to say in abstract what a high level of less than substantial harm would look like. In a setting case, the most important factor would be if an asset's significance lay predominantly or largely in its setting alone.

Reference	Question	Applicant's Response
HE 1.8	Weighting to be given to harm to multiple assets It is acknowledged in the ES that harm would be caused to a considerable number of heritage assets by the proposed development. Does this lead to a cumulative level of harm, and if so how might this be considered in the scope of the project? Justify your answer.	The number of heritage assets affected by the Project does not in itself lead to cumulative harm in the conventional sense of one historic receptor being affected by more than one element of the proposal. But of course each separate incidence of harm to a specific asset identified will form part of the overall harm occasioned by the project and must be accumulated accurately to identify the extent of the heritage harm as a whole. Each asset however should be identified and assessed for the Project's impact on it and that impact must be assessed as being within one of three categories: no harm, less than substantial harm or substantial harm. (In this case there has been no identification of substantial harm). It is neither appropriate nor lawful to add up the less than substantial harms to produce a notional new "substantial" harm category because the assessment calls for an asset by asset consideration but the number of less than substantial harms would be a material consideration to weigh in the balance. The methodology for the assessment of cumulative effects for the Project is detailed in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]. The assessment identifies two cumulative effects categories comprising intra-project cumulative effects and inter-project cumulative effects as defined by the Institute of Environmental Management and Assessment³⁸. Intra-project cumulative effects for heritage assets are reported in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. Inter-project cumulative effects are reported in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. The cumulative effects assessment methodology agreed through 6.19 Scoping Report [APP-288 to APP-296], 6.20 Scoping Opinion [APP-297] and relevant national policy and guidance does not require a cumulative assessment purely based on the number of heritage assets affected by a development. This is because the significance of the majority of assets does not depend on the presence/absence of other unrelated assets within the study area for the Project and therefore the harm to individual assets does not alter dependent on harm caused to other assets. For example, harm to a medieval settlement site is not greater or lesser because of the partial loss of a prehistoric

³⁸ Institute of Environmental Management and Assessment (2011) *Special Report – The State of Environmental Impact Assessment Practice in the UK*

Reference	Question	Applicant's Response
		archaeological site elsewhere on the route. Therefore, a cumulative assessment based on the number of assets affected would be a false equivalence and not in accordance with the agreed methodology. The historic environment assessment has considered the potential harm to the significance of heritage assets from the Project, and where the significance of individual assets is informed by its relationship with other assets this has been taken into account both in the assessment of value and the likely effects. For example the Roydon Hall complex (which comprises The Grade II* listed Roydon Hall (1033215), the Grade II* listed Barn 30 Metres North West of Roydon Hall (1284584), the Garden Wall Enclosing Garden to South Side of Roydon Hall (1352074), and the non-designated remains of a medieval moat (2241) and the Roydon Hall Farmstead (2422)) was assessed and the interrelationships between the assets were deemed to be a prominent factor in determining that the shared setting of the assets made a considerable contribution to the individual values of the assets as well the assets as a group. The conclusion of the assessment was not, however, given greater weight because of the group dynamic as the Applicant, in line with legislation, policy and guidance, considers cumulative impacts to be derived from separate developments. The guidance provided by Historic England³⁹ does not define cumulative effects in terms of number of assets affected, but in terms of effects resulting from multiple developments affecting the same asset. The same approach is also set out in the Historic Environment Planning Practice Guidance⁴⁰.
HE 1.10	Limits of deviation Numerous councils in their Local Impact Reports (LIRs) raise concerns over the LoD and the effect that any subsequent movement in proposed pylons may have on the significance of nearby heritage assets. The contents of	The assessment presented within Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 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] has been undertaken on the design shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. 'Sensitivity testing' has been undertaken to

³⁹ Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3* (Second Edition)

⁴⁰ Ministry of Housing, Communities and Local Government (2019) *Guidance: Historic Environment*

Reference	Question	Applicant's Response
	Commitment GG34 in the outline CoCP is noted in this respect [APP-300] but this appears primarily to address archaeological and other concerns (with the odd exception). Set out: a) Whether changes to the LoD were considered in the overall heritage harm assessment. b) In relation to those heritage assets that, through your assessments in [APP-215], would be subject to a mid-less than substantial level of harm during both construction and operation, explain the options available to you to reduce the vertical and horizontal LoD in the vicinity of those assets. If you consider there to be none, provide evidence of the constraints to support this position. c) The potential changes in levels of harm that could occur to heritage assets along the route were pylons and OHLs to be sited closer, and/or be taller. d) Any subsequent changes in the level of heritage harm which may occur as a result of such movement. e) Whether GG34 should and will be expanded in the light of the above.	determine if changes to the design within the Limits of Deviation (LoD) would affect the assessment, as set out in Section 11.9 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Theoretically, alternative locations could change the assessment for the historic environment in relation to physical impacts and impacts through change to setting that affect the value of a heritage asset. While alternative locations within the LoD have been considered, the Environmental Statement (ES) assessment comprehensively accounts for the reasonable worst-case physical and setting impacts on heritage assets. Therefore, no significant effects beyond those reported in the ES residual effects section are anticipated due to alternative pylon locations or adjustments within the LoD. The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for the LoD. The LoD was reviewed and in particularly sensitive locations for heritage assets specific commitments are set out in 7.2 Outline Code of Construction Practice [REP2-014] to restrict the longitudinal LoD. The assessment in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and its appendices has considered the reasonable worst-case potential effects of locating pylons or conductors anywhere within the LoD and has considered the potential effects of a vertical increase in height of up to 6 m from the pylon design heights presented within 2.3 Works Plans [APP-017 – APP-024]. The Project has been through extensive design iterations to remove or reduce effects on heritage assets. However, given the density of designated heritage assets within this region it has not been possible to avoid impacts to all designated heritage assets. The response to part a) sets out the steps taken to consider whether change within the LoD would alter the conclusions of the historic environment assessment. As the assessment considered the reasonable worst-case scenario and has concluded either less than substantial harm or no harm to designated heritage assets following sensitivity testing regarding the LoD, there is no requirement to further reduce the LoD. Therefore, options have already been considered, and where relevant taken, to reduce the LoD to the required level. Relevant national planning policy requires the Project to give considerable importance and weight to the desirability of preserving heritage assets and any harm or loss of significance of a designated heritage asset should require clear and convincing justification. The policy also states that substantial harm or loss of

Reference	Question	Applicant's Response
	f) Whether more certainty should and can be given to the location of pylons in the vicinity of heritage assets.	significance to designated heritage assets should be exceptional (in the case of Grade II Listed Buildings) or wholly exceptional (in the case of assets of the highest significance). (NPS EN-1 paragraphs 5.9.29 – 5.9.32). The assessment demonstrates the Project would not result in substantial harm. Having applied the mitigation hierarchy, the Application is satisfied there is no requirement to further reduce the LoD. • Please see the response to part a) above. • Please see the response to part a) above. • The Applicant reviewed the submitted design prior to submission of the DCO application in order to determine the locations in which restriction of the LoD was considered necessary to avoid an increase in impacts to heritage assets. No changes to the design have been proposed that change the prior conclusions of this review, or the locations identified in GG34. • Please see the response to part b) above. The Applicant must deliver the scheme in line with stringent technical design requirements including Regulatory and Other Constraints (Such as Operational, Safety and Security Requirements); please see 7.15 Design and Access Statement [REP2-020] paras 5.3.50 to 5.3.58 for further information. Combined, these Regulatory and Other Constraints ensure the design meets certain standards and provide adequate controls across the LoD. Where circumstances may lead to a longitudinal or lateral change in position, the Project has a robust internal governance and assurance process to ensure compliance with the DCO, to ensure the change does not give rise to any materially new or materially different environmental effects, and to secure mitigation where relevant.
HE 1.11	Vibration effects on listed buildings In your comments on RRs [REP1-132] inadequate detailed information was provided in response to the RRs that specifically mentioned vibration effects likely to be experienced at specific addresses, due in general to the lack of foundations at these properties.	The responses to parts a) and c) of this question are presented in the table below. The table shows all of the listed buildings within the 100 m vibration study area that are associated with a location identified as experiencing a negligible, small, medium or large effect as a result of construction vibration, as shown on 6.14.F3 Environmental Statement Figure 14.3 - Construction Vibration Assessment Outputs [APP-264]. In order to produce this table the Applicant has assumed that where the recorded location of a listed building is within 10 m of a point recording an impact from construction vibration, the listed building would experience that effect. Locations of listed buildings over 10 m from a recorded point of construction vibration impact have

Reference	Question	Applicant's Response																																																																																	
	ES Chapter 14 – Noise and Vibration [APP-256] notes at paragraph 14.2.27 five structures of buildings where there is the potential for damage due to construction vibration. However, whether these are listed buildings is not noted, neither is there a separate table that deals with potential vibration effects on historic buildings that are unlikely to have standard (or any) foundations. The applicant is asked to: a) Cross reference the list of listed buildings with the initial vibration study and indicate whether there are any listed buildings (whether scoped in or out of the listed buildings assessment) that fall within any of the categories shown to be at risk (negligible to significant) without mitigation. b) Provide additional information in order to more fully understand the potential impacts on these properties c) Cross reference this information with any RRs that specifically mention this as an issue.	been checked on an individual basis to confirm if the listed building is potentially affected. Those listed buildings that were scoped into the historic environment assessment are noted, as are the buildings which were mentioned in Relevant Representations. With regard to the buildings identified through the Relevant Representations, the Applicant made every attempt to identify the relevant building although this was at times hindered due to the redaction of personal details and in some cases non-specific descriptions. The Applicant is, therefore, confident that the buildings with an entry in the final column of the table are the assets referred to the Relevant Representation. <table><tr><th>List Entry Number</th><th>Name</th><th>Grade</th><th>Easting</th><th>Northing</th><th>Distance to nearest magnitude of impact without mitigation point (m)</th><th>Magnitude of impact without mitigation</th><th>Scoped in to historic environment assessment</th><th>Mentioned in Relevant Representations</th></tr><tr><td>1152699</td><td>Barn Adjoining Corner Farmhouse on South-West</td><td>II</td><td>614882</td><td>293463</td><td>37.947332</td><td>Negligible</td><td>YES</td><td>-</td></tr><tr><td>1111558</td><td>Walls at Saffron Garden</td><td>II</td><td>566671</td><td>182262</td><td>27.856777</td><td>Negligible</td><td>YES</td><td>-</td></tr><tr><td>1222893</td><td>Barn to North Of Barn Aligned East West At Oldhouse Farm</td><td>II</td><td>597388</td><td>229968</td><td>23.086793</td><td>Negligible</td><td>YES</td><td>-</td></tr><tr><td>1239876</td><td>Barn To East Of Rams Farmhouse</td><td>II</td><td>593479</td><td>228866</td><td>22.238725</td><td>Negligible</td><td>YES</td><td>-</td></tr><tr><td>1241179</td><td>Highways</td><td>II</td><td>604231</td><td>274416</td><td>21.863451</td><td>Medium</td><td>YES</td><td>-</td></tr><tr><td>1251587</td><td>Rose Cottage Farmhouse</td><td>II</td><td>605360</td><td>249520</td><td>21.385977</td><td>Negligible</td><td>YES</td><td>-</td></tr><tr><td>1121459</td><td>Wayletts</td><td>II</td><td>565644</td><td>190009</td><td>21.192638</td><td>Small</td><td>YES</td><td>-</td></tr><tr><td>1337818</td><td>Barn Approximately</td><td>II</td><td>576203</td><td>218086</td><td>21.095023</td><td>Negligible</td><td>YES</td><td>-</td></tr></table>	List Entry Number	Name	Grade	Easting	Northing	Distance to nearest magnitude of impact without mitigation point (m)	Magnitude of impact without mitigation	Scoped in to historic environment assessment	Mentioned in Relevant Representations	1152699	Barn Adjoining Corner Farmhouse on South-West	II	614882	293463	37.947332	Negligible	YES	-	1111558	Walls at Saffron Garden	II	566671	182262	27.856777	Negligible	YES	-	1222893	Barn to North Of Barn Aligned East West At Oldhouse Farm	II	597388	229968	23.086793	Negligible	YES	-	1239876	Barn To East Of Rams Farmhouse	II	593479	228866	22.238725	Negligible	YES	-	1241179	Highways	II	604231	274416	21.863451	Medium	YES	-	1251587	Rose Cottage Farmhouse	II	605360	249520	21.385977	Negligible	YES	-	1121459	Wayletts	II	565644	190009	21.192638	Small	YES	-	1337818	Barn Approximately	II	576203	218086	21.095023	Negligible	YES	-
List Entry Number	Name	Grade	Easting	Northing	Distance to nearest magnitude of impact without mitigation point (m)	Magnitude of impact without mitigation	Scoped in to historic environment assessment	Mentioned in Relevant Representations																																																																											
1152699	Barn Adjoining Corner Farmhouse on South-West	II	614882	293463	37.947332	Negligible	YES	-																																																																											
1111558	Walls at Saffron Garden	II	566671	182262	27.856777	Negligible	YES	-																																																																											
1222893	Barn to North Of Barn Aligned East West At Oldhouse Farm	II	597388	229968	23.086793	Negligible	YES	-																																																																											
1239876	Barn To East Of Rams Farmhouse	II	593479	228866	22.238725	Negligible	YES	-																																																																											
1241179	Highways	II	604231	274416	21.863451	Medium	YES	-																																																																											
1251587	Rose Cottage Farmhouse	II	605360	249520	21.385977	Negligible	YES	-																																																																											
1121459	Wayletts	II	565644	190009	21.192638	Small	YES	-																																																																											
1337818	Barn Approximately	II	576203	218086	21.095023	Negligible	YES	-																																																																											

Reference	Question	Applicant's Response							
	40 Metres South-West Of Great Warley Hall								
1238756	Weatherboarded Barn at Oldhouse Farm	II	600182	230711	20.615528	Negligible	YES	-	
1308478	Barn Approximately 30 Metres East of Sparrows Farmhouse	II	575451	214506	19.646883	Negligible	YES	-	
1251588	Barn, 10 Metres West of Poplar Farmhouse	II	605118	249523	19.257466	Negligible	YES	-	
1267268	Barn West of The Hall	II	603136	233634	19.209373	Negligible	YES	-	
1267339	Cart Lodge To West Of Upp Hall	II	588529	223725	19.121195	Negligible	YES	-	
1032787	Park House	II	609879	277567	18.686915	Negligible	YES	-	
1352504	Lodge Cottage	II	608980	266107	18.031977	Negligible	YES	-	
1223514	The Old House	II	602675	233255	17.804494	Negligible	YES	-	
1322651	Barn Approximately 70 Metres North West of Badliss Hall And North of Barn Qv 6/28	II	606635	229822	17.464249	Negligible	YES	-	
1239819	72, Church Road	II	592785	228113	16.124515	Negligible	YES	-	
1350319	Barn 60 Metres North West of Feering Place	II	586942	220640	15.901279	Negligible	YES	-	

Reference	Question	Applicant's Response								
		1110885	Threshers	II*	592038	226983	14.866069	Negligible	YES	-
		1152659	The Horse Shoes	II	614408	293663	13.928388	Negligible	YES	-
		1123831	Feering Place	II	586985	220606	13	Negligible	YES	-
		1351621	Cartshed at Chattisham Place	II	609232	242071	12.653893	Negligible	YES	-
		1251603	Thornbush Hall	II	611777	245797	12.620004	Negligible	YES	-
		1170238	Rattees	II	615814	296725	12.0949	Negligible	YES	-
		1122198	Barn With Gable Dovecote to the North of Brickbarns Farm	II	568354	208943	11.981874	Negligible	YES	-
		1267422	Barn to Rear of Stables At Teybrook Farm	II	589179	224846	11.822623	Negligible	YES	-
		1170044	Garden Wall to North of Riverdale Cottage	II	592004	227056	11.7047	Negligible	YES	-
		1305802	The Clock House	II	584628	219547	11.7047	Negligible	YES	-
		1222853	Barn at Oldhouse Farmyard, Aligned North South	II	597421	229958	11.401754	Negligible	YES	-
		1194480	The Grange	II	611244	242920	10.867865	Negligible	YES	-
		1112056	New Hall	II	605424	229214	10.799517	Negligible	YES	-
		1231088	The Dower House	II	607810	256101	10.401923	Negligible	YES	-
		1373245	Hill Farmhouse	II	613989	293498	10.29563	Negligible	YES	-

Reference	Question	Applicant's Response								
		1197225	Hutton Village School	II	563560	194746	10.220306	Negligible	YES	-
		1169367	Scrip's Cottage (At Rear Of Scrip's House)	II	585009	221043	10.198039	Negligible	YES	-
		1222667	Messrs Peatling And Cawdron	II	597744	230672	10.049876	Negligible	YES	RR-1314
		1237421	Barn At Southwoods Farm	II	567110	203942	10.049876	Negligible	YES	-
		1222862	Church Of England School	II	597652	230646	10	Negligible	YES	RR-1314
		1123458	Pump Approximately 1.50 Metres West Of Fairstead Lodge	II	574982	216574	9.899495	Negligible	YES	-
		1308636	Pump at Rear, Approximately 3 Metres West of Jennings Farmhouse	II	608799	228556	9.848858	Negligible	YES	-
		1033409	Wenham Grange	II	607830	240308	9.36376	Negligible	YES	-
		1180651	Chart House and Adjoining Former Post Office and Shop	II	607502	271512	9.321373	Negligible	NO	-
		1170403	Barn at Hall Farm With Attached Cattle Shelters	II	621513	302946	9.303526	Negligible	YES	-

Reference	Question	Applicant's Response								
		1169966	Numbers 1, 2 And 3 Brick Cottages	II	591707	225141	9.189784	Small	YES	-
		1123867	The Granary at Cressing Temple	II*	579914	218637	9.166584	Negligible	YES	-
		1223469	Langford Hall	II	602948	232013	9.145862	Negligible	YES	-
		1366100	Barhams Manor	II	603480	235634	9.037621	Negligible	YES	-
		1223750	Forge Cottage	II	603004	233400	8.944272	Negligible	YES	-
		1247678	K6 Telephone Kiosk (Opposite Number 108, Canonbury House)	II	570801	212992	8.821042	Negligible	NO	-
		1337826	Little Russells	II	575351	214503	8.246211	Negligible	YES	-
		1273738	Mount Pleasant	II	604466	231509	8.062258	Negligible	YES	-
		1182102	Upland House	II	608589	261102	8.047167	Negligible	YES	-
		1222850	Old House Farmhouse	II	597478	229990	8.002815	Negligible	YES	-
		1036957	Higham Hall	II	603597	235237	7.940403	Negligible	YES	-
		1337412	Bentalls Cottages	II	591813	225814	7.81025	Negligible	YES	-
		1147592	Beaumaris Witheys	II	604840	230538	7.615773	Negligible	YES	-
		1297239	Hutton Lodge	II	563534	194807	7.615773	Negligible	YES	-
		1239277	Gunhill Cottages	II	604239	233417	7.211103	Negligible	NO	-
		1337825	Leylands Farmhouse	II	575094	214872	7.211103	Negligible	YES	-
		1032974	Fairview	II	605053	251280	7.192246	Negligible	YES	-

Reference	Question	Applicant's Response								
		1231443	Home Farmhouse	II	607106	253306	7.086614	Negligible	YES	-
		1322652	Thatched Cottage	II	605436	230928	7.071068	Negligible	YES	-
		1036986	Dewlands Farmhouse	II	604336	236726	7	Negligible	YES	-
		1181793	West End Farm II House		608171	273477	6.9857	Negligible	YES	-
		1187339	35, Hutton Village	II	563475	194941	6.962996	Negligible	YES	-
		1122598	Rivenhall Place II*		581982	219016	6.708204	Negligible	YES	-
		1373059	The Lodge	II	620182	300814	6.708204	Negligible	YES	-
		1351596	Church Of St Mary	II*	605927	236787	6.675867	Negligible	YES	-
		1180903	Barn, 40 Metres South West of Rookery Farm	II	608482	262669	6.536666	Negligible	YES	-
		1223466	Langham Hall Farmhouse	II	603098	233653	6.490008	Negligible	YES	-
		1050434	Barn 40 Metres II North West of Dairy Farmhouse		622531	302492	6.403124	Negligible	NO	-
		1111556	10, 11 and 12, Pump Street	II	567147	182653	6.403124	Negligible	YES	-
		1251241	Valley Farmhouse	II	607621	246972	6.382053	Negligible	YES	-
		1179387	Manor House	II	612198	290089	6.145909	Negligible	YES	-
		1032663	Star Orchard	II	608784	261560	6.112985	Negligible	YES	-
		1050373	Barn East Of Limetree Farmhouse	II	614875	293607	6.082763	Negligible	YES	-

Reference	Question	Applicant's Response								
		1123812	Pound Farmhouse	II	585696	220490	6.082763	Negligible	YES	-
		1351623	Waterloo House	II	604495	234306	6.081127	Negligible	NO	-
		1050518	Mangreen Lodge c.50m East Of Mangreen Hall	II	621616	303024	6	Negligible	YES	-
		1123868	Hungry Hall Farmhouse	II	580267	218059	6	Small	YES	-
		1122116	Rose And Crown Inn	II	570120	213054	5.830952	Negligible	YES	-
		1123457	Troys Hall	II*	577527	216973	5.830952	Negligible	YES	-
		1197304	Little Hyde Farmhouse	II	565597	200714	5.830952	Negligible	YES	-
		1223157	Granary North West of Teybrook Farmhouse	II	589136	224897	5.830952	Negligible	YES	-
		1237420	Granary and Cart Lodge at Southwoods Farm	II	567085	203942	5.830952	Negligible	YES	-
		1264434	Church Of St Mary	II*	566384	198622	5.830952	Negligible	YES	-
		1182611	Ampners	II	611541	276503	5.798655	Negligible	YES	-
		1251593	The Green	II	606512	249562	5.689028	Negligible	YES	-
		1182599	1-3 Abbey Farm	II	608427	268869	5.578217	Negligible	YES	-
		1263030	Church of St Mary	I	606613	249637	5.564288	Negligible	YES	-
		1032804	Glebe Farm House	II	608962	275463	5.389249	Negligible	YES	-

Reference	Question	Applicant's Response								
		1223471	Malting Farm Cottage	II	601008	230702	5.385165	Negligible	YES	-
		1111633	Kings Head Public House	II	566062	177992	5.385165	Negligible	YES	-
		1123797	Felix Hall	II	584655	219483	5.385165	Negligible	YES	-
		1302309	Barn Immediately North-West of Mary's Farmhouse	II	614929	294191	5.385165	Negligible	YES	-
		1181676	Green Farm House	II	607457	274937	5.381459	Negligible	YES	-
		1049998	Manor Farmhouse	II	612206	289973	5.303635	Negligible	YES	-
		1231442	Timberleys	II	606998	252977	5.295904	Negligible	YES	-
		1187316	47, Hutton Village	II	563481	194896	5.294244	Negligible	YES	-
		1187381	64, Hutton Village	II	563536	194839	5.27619	Negligible	YES	-
		1263017	Spar Food Store	II	612295	246541	5.2721	Negligible	NO	-
		1298775	56 and 58, Hutton Village	II	563528	194858	5.255434	Negligible	YES	-
		1237409	Outbuildings at II Bearmans Farmhouse	II	566888	202437	5.110642	Negligible	YES	-
		1122197	Brickbarns Farmhouse	II	568328	208924	5.09902	Negligible	YES	-
		1322634	Phoenix Steam II Mill and Engine House	II	605358	229116	5.09902	Negligible	NO	-
		1373217	Cart Shed And II Hay Loft South-East of	II	614876	293578	5.09902	Negligible	YES	-

Reference	Question	Applicant's Response								
		Limetree Farmhouse								
1123866	The Wheat Barn at Cressing Temple	I	579941	218761	5.05362	Negligible	YES	-		
1147645	Gods House Farmhouse	II	603952	230599	5	Negligible	YES	-		
1223465	The Hall	II*	603222	233656	5	Negligible	YES	-		
1050372	Limetree Farm Cottages	II	614769	293556	5	Negligible	YES	-		
1123456	The Old Rectory	II	576950	216797	5	Negligible	YES	-		
1224584	The Barn	II	589904	223685	5	Negligible	YES	-		
1237174	Southwoods	II	567090	204003	5	Negligible	YES	-		
1261545	Ancient House	II	605317	229456	5	Negligible	NO	-		
1267594	Cart Lodge withII Grain Store Over at Oldhouse Farm		597412	229940	5	Negligible	YES	-		
1373311	Roydon Hall	II	609338	280599	5	Negligible	YES	-		
1193318	Raydon House Nursing Home	II	605135	238228	4.990651	Negligible	YES	-		
1366150	Mangreen Hall	II*	621557	303044	4.862962	Negligible	YES	-		
1297238	43 And 45, Hutton Village	II	563479	194912	4.856798	Negligible	YES	-		
1036959	White House	II	603412	235639	4.794664	Negligible	YES	-		
1154419	22 And 23, Snow Street	II	609584	281140	4.689114	Negligible	YES	-		
1112087	Tudor Cottage and Well House	II	604784	229180	4.62118	Negligible	YES	-		

Reference	Question	Applicant's Response								
		1049737	Willows Farmhouse	II	612058	284934	4.612065	Negligible	YES	-
		1267423	Stables to South of Teybrook Farmhouse	II	589186	224850	4.606365	Negligible	YES	-
		1231757	Mullets Farmhouse	II	606517	251673	4.574582	Negligible	YES	-
		1251595	Court Farmhouse	II	605971	248694	4.574582	Small	YES	-
		1231094	Top Farmhouse	II	605843	252276	4.542914	Negligible	YES	-
		1373002	Rookery Farmhouse	II	611067	287343	4.512198	Negligible	YES	-
		1373274	Firtree Farmhouse	II	609538	281129	4.508363	Negligible	YES	-
		1050240	Snow Cottage	II	609653	281121	4.488681	Negligible	YES	-
		1239409	Hill House in Park West North West of Lamb Corner	II	604263	231727	4.472136	Negligible	YES	-
		1050515	Gowthorpe Manor House	II*	620848	302321	4.472136	Negligible	YES	-
		1123387	Complete Complex of Farm Buildings East of Sparrow's Farmhouse Excluding The Barn, Listed Separately as Item 5/152	II	575444	214529	4.472136	Negligible	YES	-
		1152026	42, The Street	II	570721	212697	4.472136	Negligible	YES	-
		1152690	Stables Immediately	II	614854	293584	4.472136	Negligible	YES	-

Reference	Question	Applicant's Response							
	South-East of Limetree Farmhouse								
1172474	Stonage Farmhouse	II	571671	214594	4.472136	Negligible	YES	-	
1247731	Milestone and Cover Plate 45 Metres South West of Ivy Cottage	II	566108	200895	4.472136	Small	YES	-	
1266779	Barn To South West of Little Tey House	II*	589289	224405	4.472136	Small	YES	-	
1197224	60 And 62, Hutton Village	II	563531	194849	4.45083	Negligible	YES	-	
1111557	Saffron Garden	II	566680	182298	4.242641	Negligible	YES	-	
1123187	Houchin's Farmhouse	II*	587084	223548	4.242641	Negligible	YES	-	
1305642	Lowleys Farmhouse	II	572517	215819	4.242641	Negligible	YES	-	
1352268	The Paddocks and Paddocks Side	II	611484	278655	4.225683	Negligible	NO	-	
1251600	Barn 20 Metres South West Of Gunn's Farmhouse	II	606608	248064	4.196475	Negligible	YES	-	
1351617	Fenn Farmhouse	II	610681	243744	4.188138	Negligible	YES	-	
1251602	Long Meadow	II	606518	250057	4.170048	Negligible	YES	-	
1231522	Fairfax House	II	607142	253186	4.160829	Negligible	YES	-	
1111418	Pair of Cottages Approximately 10 Metres	II	610160	227909	4.123106	Large	YES	REP2-023	

Reference	Question	Applicant's Response								
		South of The Fox and Hounds Public House								
1111626	Lorkins Farmhouse	II	564592	183833	4.123106	Negligible	YES	-		
1122022	The Limes	II	570664	212656	4.123106	Negligible	YES	-		
1146812	The Stores	II	574733	215958	4.123106	Negligible	YES	-		
1267424	Barn to South East of Teybrook Farmhouse	II	589238	224823	4.123106	Negligible	YES	-		
1267632	Barn to North Of Knowles Farmhouse	II	596314	230804	4.123106	Negligible	YES	-		
1322862	Botney Hill Farmhouse	II	565280	191731	4.123106	Negligible	YES	-		
1032807	Rosetree Cottage (Including Part of Rose Cottage)	II	609525	274450	4.122132	Negligible	YES	-		
1251598	Mount Pleasant II Farmhouse		606672	249521	4.111844	Negligible	YES	-		
1122023	30, The Street	II	570690	212669	4.073161	Negligible	YES	-		
1032778	Brackendale	II*	611564	278397	4.032679	Negligible	NO	-		
1050272	The Old Post Office	II	609612	280679	4	Negligible	YES	-		
1110894	Old Bouchiers Hall	II	591530	226413	4	Negligible	YES	-		
1146798	Fairstead Lodge	II	574989	216571	4	Negligible	YES	-		
1151967	Walden Cottage	II	570732	212797	4	Negligible	YES	-		

Reference	Question	Applicant's Response								
		1152069	Westeria	II	570817	212979	4	Negligible	YES	-
		1253913	Wick Farmhouse	II	603283	229545	4	Negligible	YES	-
		1181694	Gibsons Farm House	II	607576	274731	3.948329	Negligible	YES	-
		1284850	Home Farm House	II	609574	274562	3.936623	Negligible	YES	-
		1032730	Hill Farmhouse	II	608226	263294	3.808648	Negligible	YES	-
		1032776	Church Of St. Peter	I	611562	278465	3.768727	Negligible	YES	-
		1182668	Allfield Farmhouse	II	609222	268903	3.752026	Negligible	YES	-
		1352086	Red House Farmhouse	II	607453	270617	3.752026	Negligible	YES	-
		1033162	Oak Farm Cottage	II	607375	271805	3.702999	Negligible	NO	-
		1182737	The Rookery	II	609374	277144	3.699351	Negligible	YES	-
		1239672	Green Acres	II	592627	225655	3.691749	Negligible	YES	-
		1032661	Grange Farmhouse	II	608448	260894	3.667345	Negligible	YES	-
		1278294	Tye Farmhouse	II	606296	251948	3.654832	Negligible	YES	-
		1351599	The Swan Inn	II	604309	234190	3.624058	Negligible	YES	-
		1050786	White House	II	611228	287183	3.621998	Negligible	YES	-
		1032662	Firtree Farmhouse	II	608747	261342	3.620663	Negligible	YES	-
		1223498	Pungford Cottages	II	602948	231904	3.605551	Small	YES	-
		1274047	Langmoor House	II	600708	230384	3.605551	Negligible	YES	-
		1050442	Glebe Farmhouse	II	621532	301185	3.605551	Negligible	YES	-

Reference	Question	Applicant's Response								
		1122199	Former Church Of St James	II*	566952	209663	3.605551	Negligible	YES	-
		1171200	Bishops Hall	II	573849	216821	3.605551	Negligible	YES	-
		1180035	Church Of St Mary	I	610932	285713	3.605551	Negligible	YES	-
		1223158	Barn To East Of Teybrook House	II	589602	224927	3.605551	Negligible	YES	-
		1225071	Coney Byes	II	595008	229177	3.605551	Negligible	YES	-
		1337090	The Cottages	II	566055	177999	3.605551	Negligible	YES	-
		1337096	Murrells Cottages	II	564909	181055	3.605551	Negligible	YES	-
		1337803	Parish Church Of St Germanus	I	580030	216573	3.605551	Negligible	YES	-
		1373216	Chestnut View	II	614483	293614	3.605551	Negligible	YES	-
		1373550	Heywood End	II	612558	287452	3.605551	Negligible	YES	-
		1033263	Bullenhall Farmhouse	II	610284	246608	3.597805	Negligible	YES	-
		1036980	Holton Hall	II	605656	236935	3.592005	Negligible	YES	-
		1036960	Tudor House	II	603378	235629	3.579623	Negligible	YES	-
		1337060	Ongar Hall	II	564998	184498	3.541537	Negligible	YES	-
		1251590	Hill House Farmhouse	II	605061	249551	3.527676	Negligible	YES	-
		1198570	Corner House	II	604255	234329	3.510057	Negligible	YES	-
		1322635	Tudor Cottage And Cottage Adjoining To Right (North)	II	605352	229521	3.50172	Negligible	NO	-
		1293253	Fidgeons Farmhouse	II	611322	246100	3.494939	Negligible	YES	-

Reference	Question	Applicant's Response								
		1278102	Ashburnham Farmhouse	II	607628	253284	3.483002	Negligible	YES	-
		1193333	Raydon Hall	II	605290	239055	3.458092	Negligible	YES	-
		1050088	Hill Cottages	II	611310	283595	3.448948	Negligible	YES	-
		1278293	Former Stable Range 30 Metres West Of Moat Farmhouse	II	605780	251769	3.448507	Negligible	YES	-
		1307127	3 Cottages To North Of Tudor Cottage And Adjoining Cottage	II	605351	229535	3.422	Negligible	NO	-
		1036958	The Old Vicarage	II	603563	235380	3.381952	Negligible	YES	-
		1284658	Barn About 35m West Of Spring Farm House	II	610712	277219	3.377728	Negligible	YES	-
		1352266	Orme House	II	611621	278433	3.348029	Negligible	NO	-
		1036898	Birch House Farmhouse	II	608304	241051	3.337259	Negligible	YES	-
		1351957	Vauxhall	II	607208	240900	3.310081	Negligible	YES	-
		1180798	Barn About 20 Metres North Of Oak Farm Cottage	II	607366	271830	3.245489	Negligible	NO	-
		1251594	Barn 50 Metres East Of Castle Farmhouse	II	606565	249239	3.236356	Negligible	YES	-
		1351625	Church Of St Mary	II*	603563	235232	3.225678	Negligible	YES	-
		1197223	52, Hutton Village	II	563525	194869	3.223983	Negligible	YES	-

Reference	Question	Applicant's Response								
		1373309	Manor Farmhouse	II	610250	280516	3.210052	Negligible	YES	-
		1032809	The Old Forge	II	609789	274682	3.19799	Negligible	YES	-
		1352264	Priory Farm Cottages	II	611538	278380	3.180063	Negligible	NO	-
		1223518	Walnut Tree Cottage	II	602482	233145	3.162278	Small	YES	-
		1266286	Keepers Cottage	II	602617	231927	3.162278	Negligible	YES	-
		1273740	Beech Cottages	II	605137	231393	3.162278	Negligible	YES	-
		1050237	Church Of St Remigius	I	609610	280378	3.162278	Negligible	YES	-
		1050517	Cowshed C.10m North-West Of Barn At Gowthorpe Manor House	II	620768	302372	3.162278	Negligible	YES	-
		1111575	Heath Place	II	564618	180389	3.162278	Negligible	YES	-
		1111650	Timber Framed II Barn At Ongar Hall	II	565051	184479	3.162278	Negligible	YES	-
		1122028	108, The Street	II	570821	212987	3.162278	Negligible	YES	-
		1122117	Lace Cottages	II	570146	212986	3.162278	Small	YES	-
		1122128	Lyons Hall	II	573754	215631	3.162278	Negligible	YES	-
		1123421	Oak Cottages	II	579401	217321	3.162278	Negligible	YES	-
		1170063	Church Of St Margaret And St Catherine	II*	591763	225844	3.162278	Negligible	YES	-
		1172487	Evergreens And Kozi Cot	II	571725	214928	3.162278	Negligible	YES	-
		1197325	Mountnessing Hall And	II	564754	196597	3.162278	Negligible	YES	-

Reference	Question	Applicant's Response							
		Attached Walls, Railings And Gates							
1222770	Knights Farmhouse	II	596603	230277	3.162278	Negligible	YES	-	
1337058	Marshall's Cottages	II*	566063	178225	3.162278	Negligible	YES	-	
1337780	Parish Church Of St Mary The Virgin	I	576785	216689	3.162278	Negligible	YES	-	
1343675	Barn Immediately South Of Vine Farmhouse	II	612144	284506	3.162278	Negligible	YES	-	
1284584	Barn 30 Metres North West Of Roydon Hall	II*	608464	258506	3.153982	Negligible	YES	-	
1198552	Valley House	II	604308	234088	3.134996	Negligible	YES	-	
1250921	51, 53 And 55, The Street	II	612305	246519	3.070505	Negligible	NO	-	
1250929	Lovetofts Farmhouse	II	608471	247094	3.059444	Negligible	YES	-	
1169484	Cockerell's Farmhouse and Bakehouse	II	587194	222114	3.033668	Negligible	YES	-	
1194545	Manor Farmhouse	II	606883	239181	3.032952	Negligible	YES	-	
1267140	Grove Cottage	II	602986	232125	3	Negligible	YES	-	
1111624	Walnut Tree Cottage	II	566714	177611	3	Negligible	YES	-	
1122200	Cottages Immediately to The West of St James's Churchyard	II	566907	209672	3	Negligible	YES	-	

Reference	Question	Applicant's Response							
1123422	Oak Farnhouse II	579412	217358	3	Negligible	YES	-		
1152667	Chestnut Tree Farmhouse II	614534	293634	3	Negligible	YES	-		
1171147	Monk's Farm Cottages II	585196	220251	3	Small	YES	-		
1208238	Church Of St Giles I	564831	196581	3	Negligible	YES	-		
1267009	Westwood Park II* (Old Peoples Home)	596195	229988	3	Negligible	YES	-		
1337085	Weatherboarded Cartlodge At Lorkins Farm II	564559	183820	3	Negligible	YES	-		
1338380	Dunton Hall II	565354	188264	3	Small	YES	-		
1338514	Little Waltham Lodge II	570592	212478	3	Negligible	YES	-		
1373205	Dairy Farmhouse II	622544	302454	2.990341	Negligible	NO	-		
1285727	Coles Green Farmhouse II	609942	241772	2.981074	Negligible	YES	-		
1032768	Marsh Farm House II	611003	276731	2.971498	Negligible	YES	-		
1301982	Kenhurst And Fairfield II	613346	290672	2.936082	Negligible	YES	-		
1261546	Dundas Place II	605291	229461	2.931724	Negligible	NO	-		
1372456	The Grindle House II	611893	245292	2.901724	Negligible	YES	-		
1351595	Lampitts II	605975	236740	2.869233	Negligible	NO	-		
1154298	Thatch End And The Haven II	609390	281019	2.84595	Negligible	YES	-		
1351622	The Old Rectory II	609139	242198	2.839754	Negligible	YES	-		

Reference	Question	Applicant's Response								
		1231465	The Old School II House		606803	252916	2.833814	Negligible	YES	-
		1050791	School House II		610873	285584	2.828427	Negligible	YES	-
		1110883	Rose Cottage II		592074	226917	2.828427	Negligible	YES	-
		1122047	Bakery Cottage II		571536	215451	2.828427	Negligible	YES	-
		1122054	37, The Street II		570672	212689	2.828427	Negligible	YES	-
		1122130	Greystones II		573736	216912	2.828427	Negligible	YES	-
		1123448	Dines Hall II		575550	217684	2.828427	Negligible	YES	-
		1171364	Barn To The South Of Hole Farmhouse II		573236	215607	2.828427	Negligible	YES	-
		1267411	Bragg II		587768	223337	2.828427	Negligible	YES	-
		1033124	Church Farmhouse II		607671	271778	2.810552	Negligible	NO	-
		1123839	The Old Cottage II		587043	221914	2.795468	Negligible	YES	-
		1251803	Tye Farmhouse II		606037	251059	2.794651	Negligible	YES	-
		1251035	Two Tuns Cottage II		612282	246557	2.772724	Negligible	NO	-
		1147764	Outbuilding To The North East Of St Clere's Hall II		567572	181985	2.762573	Negligible	YES	-
		1284204	Thatched Cottage II		609351	278730	2.757481	Negligible	YES	-
		1385987	Black Cottage II		566541	201412	2.748171	Negligible	YES	-
		1032766	The Old Cottage II		611438	276409	2.743319	Negligible	YES	-
		1306464	1 And 2 Rivenhall Farm Cottages II		582681	218073	2.722952	Negligible	YES	-
		1193456	The Clayes II		608961	242114	2.712729	Negligible	YES	-

Reference	Question	Applicant's Response								
		1231437	The Fox Inn	II	606704	252662	2.699815	Negligible	YES	-
		1036965	White Oak Cottage And Dysart	II	603492	235670	2.695172	Negligible	YES	-
		1351620	Church Of All Saints	II*	609226	242150	2.674864	Negligible	YES	-
		1262690	Prospect House	II	607269	249350	2.648365	Negligible	YES	-
		1284686	Grange Cottage	II	608330	260704	2.64371	Negligible	YES	-
		1231756	Church Of St Mary	I	607643	253565	2.624881	Negligible	YES	-
		1032808	Barn About 20m East Of Home Farm House	II	609608	274577	2.612049	Negligible	YES	-
		1122048	9-12, Chatham Green	II	571515	215406	2.58986	Negligible	YES	-
		1032793	The Priory	II	611469	278351	2.571867	Negligible	NO	-
		1262986	The Cock Inn	II	612388	246374	2.556658	Negligible	NO	-
		1352265	North View	II	611591	278417	2.530316	Negligible	NO	-
		1198619	Hayling Cottage The Beams	II	604466	234317	2.51575	Negligible	NO	-
		1182315	Glebe House	II	608145	257662	2.513986	Negligible	YES	-
		1036966	Higham Lodge	II	603989	235931	2.499	Negligible	YES	-
		1036981	Mayfields	II	605568	237320	2.495756	Negligible	YES	-
		1251596	Maltings House	II	607480	249162	2.490961	Negligible	YES	-
		1036991	Lowe Hill House	II*	604251	235021	2.486463	Negligible	YES	-
		1253910	Cypress Cottage	II	605217	229461	2.449623	Negligible	NO	-

Reference	Question	Applicant's Response								
		1036894	The Orchards	II	610078	241608	2.443931	Negligible	YES	-
		1207659	Little Hyde Farm Cottages	II	565565	200727	2.441311	Negligible	YES	-
		1032199	Walnut Farmhouse	II	609140	268908	2.437417	Negligible	YES	-
		1337056	1 And 2 Grays Corner Cottages	II	563657	180416	2.435296	Negligible	YES	-
		1122026	Numbers 66, 68 (Romary's) And 70 (Lindens)	II	570765	212841	2.431133	Negligible	YES	-
		1182106	The Hollies	II	611414	278422	2.410498	Negligible	NO	-
		1352111	Starhouse Farmhouse	II	608480	270513	2.377772	Negligible	YES	-
		1302864	Shelfanger Lodge	II	610862	282723	2.361398	Negligible	YES	-
		1193163	Meadow View, Gable End And Adjoining Cottage	II	603551	235733	2.359401	Negligible	YES	-
		1032769	The Old Cottage	II	611226	276376	2.352616	Negligible	YES	-
		1123461	Hill Farmhouse	II	579663	217077	2.295321	Small	YES	-
		1182339	Hill Farmhouse	II	608577	257296	2.294559	Small	YES	-
		1050828	Church Place	II	610938	285773	2.276789	Negligible	YES	-
		1172578	4-7, Chatham Green	II	571507	215376	2.271729	Negligible	YES	-
		1250922	67, The Street	II	612280	246569	2.259425	Negligible	NO	-
		1170055	Green Farmhouse	II	592397	226245	2.250188	Negligible	YES	-
		1278138	Walnut Tree Cottage	II	606986	252966	2.240402	Negligible	YES	-

Reference	Question	Applicant's Response								
		1223747	Highfield Cottage	II	602966	233413	2.236068	Negligible	YES	-
		1351597	Four Sisters Farmhouse	II	606617	236474	2.236068	Medium	YES	-
		1033215	Roydon Hall	II*	608493	258483	2.236068	Negligible	YES	RR-0728
		1049610	Persehall Manor	II	613730	291507	2.236068	Negligible	YES	-
		1049736	Heywood Manor	II	611889	286990	2.236068	Negligible	YES	-
		1050235	Rose Villa	II	610288	280466	2.236068	Negligible	NO	-
		1050236	Grove Farmhouse	II	609757	280047	2.236068	Negligible	YES	-
		1050705	Monks Farmhouse	II	620247	298692	2.236068	Negligible	YES	-
		1111565	St Clere's Hall	II*	567529	181966	2.236068	Negligible	YES	-
		1119792	Linstead Farm Cottages	II	565872	182472	2.236068	Negligible	YES	-
		1122021	Ash Tree Cottage	II	570619	212658	2.236068	Negligible	YES	-
		1122043	Campen's Cottage	II	570806	212940	2.236068	Negligible	YES	-
		1122083	1 And 2, Larks Lane	II	569424	212431	2.236068	Negligible	YES	-
		1123829	Barn Of Feeringbury Farm, 60 Metres South East Of Feeringbury Manor	II	586397	221508	2.236068	Negligible	YES	-
		1123869	Barn 20 Metres North West Of Coggeshall Hall Farmhouse	II	586047	220645	2.236068	Negligible	YES	-

Reference	Question	Applicant's Response								
		1152848	Maltings Farmhouse	II	614114	293554	2.236068	Negligible	YES	-
		1154386	Gringle Cottage	II	609700	281204	2.236068	Negligible	YES	-
		1169653	Dunston Manor	II	622547	302571	2.236068	Negligible	NO	-
		1171336	Barn To The East Of Goodmans Farmhouse	II	573148	215592	2.236068	Negligible	YES	-
		1222857	Granary At Oldhouse Farm	II	597432	229936	2.236068	Negligible	YES	-
		1225475	The Grove	II	594545	230495	2.236068	Negligible	YES	-
		1235763	Hoestreet Farmhouse	II	565402	207659	2.236068	Negligible	YES	-
		1237407	Barn To South East Of Bearmans Farmhouse	II	566883	202391	2.236068	Negligible	YES	-
		1239789	Church Of All Saints	I	592750	228087	2.236068	Negligible	YES	-
		1252706	Ashdell House	II	614209	293657	2.236068	Negligible	NO	-
		1306710	Feeringbury Manor	II*	586331	221558	2.236068	Negligible	YES	-
		1337089	Manor Farmhouse	II	566103	177976	2.236068	Negligible	YES	-
		1337174	Grove Farmhouse	II	610076	227820	2.236068	Negligible	YES	RR-1282
		1337781	The Herons	II	574763	216080	2.236068	Negligible	YES	-
		1338254	Bowers Hall With Barns And Outbuildings To The South East	II	581332	219419	2.236068	Negligible	NO	-
		1338501	Yew Trees	II	570763	212906	2.236068	Negligible	YES	-

Reference	Question	Applicant's Response								
		1373243	Granville Farmhouse	II	614285	293419	2.236068	Negligible	YES	-
		1250911	Runcton House	II	612161	245789	2.226859	Negligible	YES	-
		1179474	Tibenham Farmhouse	II	612493	288167	2.222485	Negligible	YES	-
		1352142	Hascot Hill Farmhouse	II	606669	253694	2.202385	Negligible	YES	-
		1123460	Blixes Farmhouse	II	575355	217853	2.199292	Negligible	YES	-
		1036996	Kings Arms	II	604275	234344	2.184033	Negligible	YES	-
		1032767	Honeysuckle Cottage And Adjoining Dwelling	II	611382	276415	2.152324	Negligible	YES	-
		1110896	Half A Loaf Cottage	II	590824	225260	2.144175	Negligible	YES	-
		1262688	The Old Vicarage	II	606607	249605	2.128121	Negligible	YES	-
		1284392	Valley Cottage	II	605914	253759	2.113764	Negligible	YES	-
		1168171	The Lion Inn	II	605354	229505	2.079685	Negligible	NO	-
		1352084	Princes Farmhouse	II	607535	271730	2.076969	Negligible	NO	-
		1180451	Hempnalls Hall	II	608064	267554	2.071835	Negligible	YES	-
		1301645	Woodthorpe Farmhouse	II	611333	287666	2.062728	Negligible	YES	-
		1036952	Church Farmhouse	II	609302	242186	2.05139	Negligible	YES	-
		1223380	Upp Hall	II	588492	223700	2.043649	Negligible	YES	-
		1262691	Offton Place	II	607677	248919	2.029409	Negligible	YES	-
		1122042	Barn To The North West Of	II	571637	214600	2.014526	Negligible	YES	-

Reference	Question	Applicant's Response								
		Stonage Farmhouse								
1182711	The Manor House	II*	611210	276393	2.011368	Negligible	YES	-		
1304923	Ivy Terrace	II	570822	213001	2.005383	Negligible	YES	-		
1180705	Ivy House Farmhouse	II*	607684	271880	2.00442	Negligible	YES	-		
1223751	Smithy South Of And Adjoining Forge Cottage	II	603006	233392	2	Negligible	YES	-		
1049592	Kilmurray	II	612124	291018	2	Negligible	YES	-		
1049647	Jubilee Farmhouse	II	609008	281798	2	Negligible	YES	-		
1050238	Bluepump Farmhouse	II	608646	280723	2	Negligible	YES	-		
1110888	Aldham Carpentry	II	592054	226969	2	Negligible	YES	-		
1111420	The Old Rectory	II	609480	227760	2	Negligible	YES	-		
1122025	36-40, The Street	II	570712	212689	2	Negligible	YES	-		
1122135	Goodmans Farmhouse	II	573115	215594	2	Negligible	YES	-		
1146765	Homecot	II	576874	217159	2	Negligible	YES	-		
1147610	Blue Barn Cottage	II	602787	230208	2	Negligible	YES	-		
1151939	Millstone Cottage	II	570656	212687	2	Negligible	YES	-		
1152043	Little Waltham United Reformed Church	II	570793	212879	2	Negligible	YES	-		

Reference	Question	Applicant's Response								
		1168106	Westocks Farmhouse	II	576356	218061	2	Negligible	YES	-
		1207790	Ingatestone Over The River Wid (That Part In Brentwood District)	II	566451	199095	2	Small	YES	-
		1225089	Timber Framed Barn At Kinkhams Farm	II	595495	229362	2	Negligible	YES	-
		1247784	Barn Immediately North West Of Coptfoldhall Farmhouse	II	566519	202880	2	Negligible	YES	-
		-1267662	Village Hall	II	597758	230624	2	Negligible	YES	RR-1314
		1274029	Rose Cottage	II	598964	230818	2	Negligible	YES	-
		1297263	Church Of All Saints	II*	563521	194340	2	Negligible	YES	-
		1306438	Dormer Cottage	II	622575	302647	2	Negligible	NO	-
		1337177	Barn Approximately 20 Metres West Of Newhouse Farmhouse	II	609712	228543	2	Negligible	YES	-
		1373552	Hawthorn Cottage	II	612132	284624	2	Negligible	YES	-
		1223526	Glebe Farmhouse	II	603184	232881	1.994237	Small	YES	-
		1304952	Numbers 100 And 102 The Street Including 'The Alcove', Brook Hill	II	570804	212960	1.99305	Negligible	YES	-

Reference	Question	Applicant's Response								
		1168891	The Farmhouse II At Cressing Temple		579916	218723	1.986184	Negligible	YES	-
		1032780	Lime Tree Farm House	II	611613	278428	1.976487	Negligible	NO	-
		1262693	Grove Farmhouse	II	607199	248657	1.973276	Negligible	YES	-
		1033189	Upper Lonsdales Farmhouse	II	609157	258098	1.964688	Negligible	YES	RR-0728
		1032786	Hemplands With Attached Outbuildings	II	611446	278413	1.952486	Negligible	NO	-
		1250923	Royal Oak House	II	612317	246539	1.941159	Negligible	NO	-
		1277413	The Old Rectory	II	607632	253673	1.918385	Negligible	YES	-
		1373558	Elm Farmhouse II		616577	296608	1.906295	Small	YES	-
		1351626	The Old Guildhall	II	603469	235548	1.894848	Negligible	YES	-
		1033153	Clare Cottage	II	607672	271495	1.884304	Negligible	YES	-
		1231861	Browns Farmhouse	II	606565	251893	1.884304	Negligible	YES	-
		1032779	The Swan	II	611585	278392	1.878829	Negligible	NO	-
		1193444	Old Mill Cottage	II	610089	242954	1.83709	Negligible	YES	-
		1285476	Cotton Lodge	II	608072	265649	1.825842	Negligible	YES	-
		1033154	The Tudor Cottage	II	607530	271553	1.810414	Negligible	NO	-
	1180610	Coldham House	II	607654	271495	1.81011	Negligible	YES	-	
	1033159	Foundation House	II	607398	271769	1.808342	Negligible	NO	-	

Reference	Question	Applicant's Response								
		1337414	Mott's Cottage	II	591101	225251	1.807538	Negligible	YES	-
		1251072	Numbers 74, 76 And 78 And That Part Of Number 1 Raven's Lane Which Is Structurally Part Of Number 78	II	612297	246571	1.796023	Negligible	NO	-
		1262659	Gunn's Farmhouse	II	606628	248087	1.794013	Negligible	YES	-
		1182367	Willow Green Farmhouse	II	607829	258297	1.760454	Negligible	YES	-
		1146854	Hole Farmhouse	II	580268	217635	1.73211	Negligible	YES	-
		1122253	Church Of St Mary	II	565343	188324	1.700702	Small	YES	-
		1050234	Bethany	II	610126	280711	1.699891	Negligible	YES	-
		1032773	Willow Lodge	II	609148	279384	1.658011	Negligible	YES	-
		1036897	Dakons	II	611093	242856	1.645509	Negligible	YES	-
		1273789	Grove Cottage	II	604631	231683	1.623316	Negligible	YES	-
		1251597	The Mutton	II	607557	249083	1.614745	Negligible	YES	-
		1435181	Gislingham War Memorial	II	607606	271805	1.612265	Negligible	NO	-
		1123449	Great Warley Hall	II	576236	218132	1.611118	Negligible	YES	-
		1338502	84 And 86, The Street	II	570771	212882	1.611065	Negligible	YES	-
		1036983	Lark Hall	II	605037	237021	1.596621	Medium	YES	RR-3135
		1123450	Newneys Farmhouse	II*	575120	217403	1.584259	Negligible	YES	-

Reference	Question	Applicant's Response								
		1180613	West View House	II	607532	271569	1.57	Negligible	NO	-
		1250948	Valley Farmhouse	II	605487	249567	1.561858	Negligible	YES	-
		1182484	Hicks Farmhouse	II	608978	258926	1.54538	Negligible	YES	RR-0728
		1122024	The Bell Public House	II	570702	212678	1.539884	Negligible	YES	-
		1146631	Weatherboarded Barn At Lorkins Farm	II	564564	183857	1.527506	Negligible	YES	-
		1032244	Boundary Farmhouse	II	608162	266452	1.522005	Negligible	YES	-
		1154367	By The Potash	II	610543	279602	1.508742	Negligible	YES	-
		1180592	Spring Farmhouse	II	608005	271549	1.503478	Negligible	YES	RR-2155/ RR-0614/RR1397
		1231581	Bungeons Farmhouse	II	607042	253880	1.492146	Negligible	YES	-
		1352480	Willow Farmhouse	II	607849	267094	1.474924	Negligible	YES	-
		1182121	Poplar Farmhouse	II	608812	262206	1.474347	Negligible	YES	-
		1182159	Longs Farm House	II	611310	278686	1.472583	Negligible	YES	-
		1352073	Creting Hall	II*	607888	256850	1.471394	Small	YES	-
		1267621	Grove Cottage	II	597636	231608	1.450513	Negligible	YES	-
		1169962	Staceys Farmhouse	II	569699	210284	1.443662	Negligible	YES	-
		1180527	Mendlesham Hall	II	609042	265536	1.435897	Negligible	YES	-
		1239172	Boxhouse Farmhouse	II	603969	232602	1.414214	Negligible	YES	-

Reference	Question	Applicant's Response								
		1239410	The Lamb Inn	II	604515	231556	1.414214	Negligible	YES	-
		1050023	White Horse Cottage	II	617762	297246	1.414214	Negligible	YES	-
		1050829	Park Farmhouse	II	611062	286141	1.414214	Negligible	YES	-
		1111644	Thatched Cottage	II	563669	180490	1.414214	Negligible	YES	-
		1111646	Barn To North Of Wyfields Farmhouse	II	565701	184095	1.414214	Negligible	YES	-
		1111647	Cholleys Farmhouse	II	566227	182267	1.414214	Negligible	YES	-
		1122017	Post Office Shop	II	570772	212920	1.414214	Negligible	YES	-
		1122019	Knights	II	570783	213016	1.414214	Negligible	YES	-
		1122055	Oxford House	II	570689	212699	1.414214	Negligible	YES	-
		1122614	Ford Farmhouse Ford Farmhouse Barn	II	582690	218580	1.414214	Negligible	YES	-
		1123423	The Post House	II	579615	217197	1.414214	Negligible	YES	-
		1146758	Granary To North East Of Manor Farmhouse	II	566129	177996	1.414214	Negligible	YES	-
		1152104	Margaretting Hall	II	566354	200604	1.414214	Negligible	YES	-
		1171549	Poplar Cottage	II	573361	214431	1.414214	Negligible	YES	-
		1171557	Longs Farmhouse	II	572597	214337	1.414214	Negligible	YES	-

Reference	Question	Applicant's Response								
		1172583	Bailey's Farmhouse	II	571489	215267	1.414214	Negligible	YES	-
		1193985	Poplar Farmhouse	II	612630	243211	1.414214	Negligible	NO	-
		1222924	Barn To South Of New Barn House	II	597491	230602	1.414214	Negligible	YES	RR-1314
		1224023	North Lodge To Westwood Park	II	596426	230106	1.414214	Negligible	YES	-
		1237406	Bearman's Farmhouse	II	566856	202428	1.414214	Negligible	YES	-
		1237593	The Red Lion Inn	II	566536	201463	1.414214	Negligible	YES	-
		1248834	Barn Approximately 40 Metres West-South-West Of Great Warley Hall	II	576188	218103	1.414214	Negligible	YES	-
		1266736	Mott's Farm House	II	589935	223709	1.414214	Negligible	YES	-
		1266773	Knaves Farmhouse	II	589388	224021	1.414214	Negligible	YES	-
		1267412	Gull Cottage	II	587739	223105	1.414214	Negligible	YES	-
		1306410	The End House	II	622547	302442	1.414214	Negligible	NO	-
		1308803	Walnut Tree Cottage	II	576926	216896	1.414214	Negligible	YES	-
		1337176	Newhouse Farmhouse	II	609682	228562	1.414214	Negligible	YES	-
		1337627	The Orangery	II	584640	219511	1.414214	Negligible	YES	-
		1338147	Forge Cottage	II	578810	217728	1.414214	Negligible	YES	-
		1338476	Foxtons	II	570610	212692	1.414214	Negligible	YES	-
		1338512	Chatham Hall	II	570557	213721	1.414214	Negligible	YES	-

Reference	Question	Applicant's Response								
		1373204	Bottom End Farmhouse	II	622627	302809	1.414214	Negligible	NO	-
		1373310	The Gables	II	609464	281230	1.414214	Negligible	YES	-
		1373555	St Mary's Chapel	II*	616369	297447	1.414214	Negligible	YES	-
		1373606	Quakers Farmhouse	II	613686	291755	1.414214	Negligible	YES	-
		1386527	Willow Bough Farmhouse	II	611996	285695	1.414214	Negligible	YES	-
		1387251	Otters Brook Cottage	II	598328	230037	1.413165	Negligible	YES	-
		1151949	Two Gates	II	570677	212692	1.393777	Negligible	YES	-
		1050787	Thatch Cottage	II	611181	287026	1.391106	Negligible	YES	-
		1033206	The Watering	II	608848	256365	1.388272	Negligible	YES	-
		1147160	Thatched Cottage At Termination Of Old Harwich Road	II	611170	226280	1.374962	Negligible	YES	-
		1352237	Willow Cottage	II	607529	275108	1.359596	Negligible	YES	-
		1373400	Old Hall	II	612920	290688	1.314158	Negligible	YES	-
		1373273	Limetree Farmhouse	II	609400	281149	1.305952	Small	YES	-
		1032764	Styles Piece	II	611507	276564	1.287258	Negligible	YES	-
		1284692	The Cottage Near Church	II	611502	278434	1.28316	Negligible	NO	-
		1033123	Church Of St Mary	I	607634	271794	1.281444	Negligible	YES	-
		1032814	The Granary	II	609875	274516	1.281076	Negligible	YES	-
		1231093	College Grove Farmhouse	II	607301	254187	1.279587	Negligible	YES	-

Reference	Question	Applicant's Response								
		1231305	Moat Farmhouse	II	605823	251767	1.279101	Negligible	YES	-
		1050000	Dyson's Farmhouse	II	612665	287994	1.269504	Negligible	YES	-
		1182667	Old Queens Head Cottages	II	611308	276425	1.217539	Negligible	YES	-
		1261547	Ardleigh Fish And Chips	II	605233	229466	1.189073	Negligible	NO	-
		1032952	Ringshall House	II	605309	250874	1.181059	Negligible	YES	-
		1036984	Pintins	II	604798	236835	1.163873	Negligible	YES	-
		1036979	Laburnam House	II	605947	236759	1.155249	Negligible	YES	-
		1373399	Low Farmhouse	II	612037	289781	1.138705	Negligible	YES	-
		1251696	Hill Farmhouse	II	606717	248653	1.09707	Negligible	YES	-
		1182638	Chestnut Farm House	II	611388	276546	1.091788	Negligible	YES	-
		1051964	Byways	II	603517	235733	1.078238	Negligible	YES	-
		1123865	The Barley Barn At Cressing Temple	I	579892	218771	1.075438	Negligible	YES	-
		1231089	Barn, 20 Metres South East Of Doveshill Farmhouse	II	607856	256086	1.070747	Negligible	YES	-
		1033192	Spalls Farmhouse	II	608903	260104	1.070047	Negligible	YES	RR-0728
		1231488	Rectory Farmhouse	II	606833	252936	1.051903	Negligible	YES	-

Reference	Question	Applicant's Response								
		1277414	Newton Cottages	II	607222	254791	1.051903	Negligible	YES	-
		1352072	Church Of St Peter	I	608079	257693	1.040606	Negligible	YES	-
		1251669	Bleak Hall	II	607696	247875	1.015332	Small	YES	-
		1036963	Dewlands Farmhouse	II	604328	236726	1	Negligible	YES	-
		1223452	Church Of St Mary	I	603448	233700	1	Negligible	YES	-
		1223744	School Farmhouse	II	602608	231700	1	Negligible	NO	-
		1223753	Whalebone House	II	602836	233431	1	Negligible	YES	-
		1266269	The Thatched Cottage	II	604624	231582	1	Negligible	YES	-
		1267300	Broomhouse To North Of The Hall	II	603157	234642	1	Negligible	YES	-
		1273686	Faith Cottage	II	604584	231670	1	Negligible	YES	-
		1049644	Wood Farmhouse	II	612861	291842	1	Negligible	YES	-
		1049668	Walk Farmhouse	II	616312	297327	1	Negligible	YES	-
		1049738	Vine Farmhouse	II	612142	284539	1	Negligible	YES	-
		1050239	Glebe Farmhouse	II	609716	281194	1	Negligible	YES	-
		1050241	20 And 21, Snow Street	II	609638	281143	1	Negligible	YES	-
		1050271	The Hermitage	II	609395	281071	1	Negligible	YES	-
		1050435	Stable Block To II Dunston Manor		622552	302600	1	Negligible	NO	-

Reference	Question	Applicant's Response								
		1050698	Flordon Hall	II*	618674	297982	1	Negligible	YES	-
		1110886	The Queen's Head Public House	II	592049	226992	1	Negligible	YES	-
		1110887	Studio To South Of The Queen's Head Public House	II	592054	226979	1	Negligible	YES	-
		1110889	Fore Acres	II	592014	226869	1	Negligible	YES	-
		1110893	Old Hill House	II	592346	226368	1	Negligible	YES	-
		1111541	Church Of St James	II*	566136	177704	1	Negligible	YES	-
		1111574	Heath Cottage	II	564112	179923	1	Negligible	YES	-
		1111577	Mill House	II	565845	178696	1	Negligible	YES	-
		1112060	Church Of St Mary	II*	605391	229550	1	Negligible	YES	-
		1112091	Hungerdowns Farmhouse	II	607212	229727	1	Negligible	YES	-
		1122020	White Hart Inn	II	570824	213064	1	Negligible	YES	-
		1122189	Barn At Scravels House	II	569419	210009	1	Negligible	YES	-
		1123451	Elmhurst	II	576966	216865	1	Negligible	YES	-
		1152683	Limetree Farmhouse	II	614839	293601	1	Negligible	YES	-
		1154379	White House Farmhouse	II	609975	281052	1	Negligible	YES	-
		1170037	Hatches Farmhouse	II	566038	192269	1	Negligible	YES	-
		1170991	Rook Hall	II	583994	219331	1	Negligible	YES	-
		1171011	Porter's Farmhouse	II	583390	219270	1	Negligible	YES	-

Reference	Question	Applicant's Response								
		1171104	Church Of St Mary The Virgin	I	573843	215586	1	Negligible	YES	-
		1178686	St Mary's Cottage	II	614828	294233	1	Negligible	YES	-
		1222602	Fordham Place	II	593940	229225	1	Negligible	YES	-
		1222982	Yew Tree Cottage	II	597735	230512	1	Negligible	YES	RR-1314
		1223206	Broadgreen Farmhouse	II	587788	223095	1	Negligible	YES	-
		1223503	Thorpe Ley	II	602752	230246	1	Negligible	YES	-
		1223519	Langham Lodge	II	601424	229843	1	Negligible	YES	-
		1224447	The Old Rectory	II	589349	224099	1	Negligible	YES	-
		1224521	Church Of St James	I	589148	223753	1	Negligible	YES	-
		1236733	White's Tyrrells Farmhouse	II	566907	198385	1	Negligible	YES	-
		1237444	Barn At Chobbings Farm	II	568634	209442	1	Negligible	YES	-
		1237445	Granary At Chobbings Farm	II	568634	209425	1	Negligible	YES	-
		1239808	The Three Horseshoes Public House	II	592784	228129	1	Negligible	YES	-
		1247675	The Granary	II	565430	207659	1	Negligible	YES	-
		1253908	The Vicarage	II	605396	229589	1	Negligible	NO	-
		1253909	Cottage Adjacent To West Of Ancient House	II	605305	229456	1	Negligible	NO	-

Reference	Question	Applicant's Response								
		1266530	King's Farmhouse	II	594578	229512	1	Negligible	YES	-
		1267675	Danbury Cottage	II	597746	230658	1	Negligible	YES	RR-1314
		1267713	Woodlands	II	597828	230513	1	Negligible	YES	RR-1314
		1267731	Friars Farmhouse	II	591954	227418	1	Negligible	YES	-
		1306225	Crapes	II	591522	225277	1	Negligible	YES	-
		1306286	Chobbing's Farmhouse	II*	568637	209414	1	Negligible	YES	-
		1306289	Vault To The West Of Partridge Green Farm	II	569286	211919	1	Medium	YES	-
		1308981	Weatherboarded Barn At Bareham's Brooding Kennels	II	566014	180821	1	Negligible	YES	-
		1337155	Braham Hall	II	610209	228327	1	Negligible	YES	
		1337175	Church Of St Mary	II*	609175	227821	1	Negligible	YES	RR-2623
		1337411	The Old House	II*	592022	226996	1	Negligible	YES	-
		1338437	Hole Farmhouse	II	573248	215631	1	Negligible	YES	-
		1373056	Kenningham Hall	II	620573	300049	1	Small	YES	-
		1284640	Fairways	II	611492	278173	0.991817	Negligible	YES	-
		1033020	Vale Farmhouse	II	606081	254049	0.970618	Negligible	YES	-
		1337819	Barn Approximately 10 Metres South East Of	II	575128	217386	0.951893	Negligible	YES	-

Reference	Question	Applicant's Response							
		Newneys Farmhouse							
1337133	Lower Thatched Cottage	II	567025	183130	0.949407	Negligible	YES	-	
1352059	Whitehouse Farmhouse	II	609630	261930	0.94541	Negligible	YES	-	
1033217	The Elms Farmhouse	II	608951	258977	0.940213	Negligible	YES	RR-0728	
1032810	Barn About 35m East Of White House Farm House	II	609958	274711	0.917878	Negligible	YES	-	
1308840	Well House	II	566051	177921	0.839776	Negligible	YES	-	
1180771	The Old Guildhall	II*	607385	271812	0.776209	Negligible	NO	-	
1182060	Garnet House	II	611506	278582	0.756902	Negligible	NO	-	
1033214	Grove Farmhouse	II	608492	256649	0.748171	Negligible	YES	-	
1032803	Green Farm Cottage	II	607518	274902	0.745453	Negligible	YES	-	
1493299	Little Bromley War Memorial	II	609887	228146	0.743349	Large	YES	-	
1112090	Badliss Hall	II	606702	229795	0.72288	Negligible	YES	-	
1181766	White House Farm House	II	609917	274706	0.72111	Negligible	YES	-	
1032784	Church Farm House	II	611499	278495	0.695701	Negligible	NO	-	
1036964	The Old Post Office	II	603483	235650	0.682353	Negligible	YES	-	
1373215	Four Seasons	II	616124	294129	0.679487	Negligible	YES	-	
1111623	Polwicks	II	566827	177657	0.67094	Negligible	YES	-	
1182522	Yewtree Farmhouse	II	608964	259280	0.652993	Negligible	YES	RR-0728	

Reference	Question	Applicant's Response								
		1180050	Church Hill Farmhouse	II	611030	285784	0.652205	Negligible	YES	-
		1267301	Barn North West Of The Hall	II	603146	233676	0.635059	Negligible	YES	-
		1154410	The Friary And Adjoining Outbuilding To West	II	609778	281104	0.626058	Negligible	YES	-
		1194408	Church Of St Mary	II*	610953	242589	0.6	Negligible	YES	-
		1036982	Holton Place	II	605272	237167	0.579558	Negligible	YES	-
		1182167	Ivy House	II	610639	277387	0.559017	Negligible	YES	-
		1338503	104, The Street	II	570808	212969	0.533148	Negligible	YES	-
		1262946	6, 8 And 10, The Street	II	612398	246407	0.532541	Negligible	NO	-
		1122196	Barn At Staceys Farm	II	569672	210262	0.51142	Negligible	YES	-
		1222854	Barn, Aligned East West at Oldhouse Farm	II	597410	229961	0.478122	Negligible	YES	-
		1237481	Calcotts	II	567070	201716	0.462277	Negligible	NO	-
		1036949	Canes Farmhouse	II	609164	245344	0.424264	Negligible	YES	-
		1036985	Tiffins	II	604717	236868	0.412311	Negligible	YES	-
		1171652	Brook House	II	570076	213079	0.411406	Negligible	YES	-
		1456881	Little Waltham War Memorial	II	570734	212729	0.402492	Negligible	NO	-
		1231364	Lower Farmhouse	II	606118	252359	0.396883	Negligible	YES	-
		1036951	Chattisham Place	II	609203	242112	0.360555	Negligible	YES	-
		1032798	Barn About 70m South	II	607996	275564	0.325576	Negligible	YES	-

Reference	Question	Applicant's Response							
		East Of Hall Farm House							
1036955	Cottage Opposite Garden Of The Orchard	II	604398	234324	0.32319	Negligible	NO	-	
1284339	The Old Queens	II	608696	277265	0.25318	Negligible	YES	-	
1250949	Poplar Farmhouse	II	605137	249519	0.23483	Negligible	YES	-	
1172559	Liberty Hall	II	571693	215741	0.215867	Negligible	YES	-	
1231092	Badley Mill House	II	607171	256803	0.188134	Negligible	YES	-	
1032790	Ivy Cottage	II	611305	278660	0.187883	Negligible	YES	-	
1337057	Wyfields Farmhouse	II	565709	184044	0.157122	Negligible	YES	-	
1284851	Ash Tree Farm House	II	609757	274685	0.125796	Negligible	YES	-	
1352325	Doles Farmhouse	II	609201	261703	0.085277	Small	YES	-	
1112086	Thatched Cottage	II	604857	230560	0	Negligible	YES	-	
1112093	Maltings Farmhouse	II	604680	230844	0	Small	YES	-	
1223464	Church Farmhouse	II	603450	233740	0	Negligible	YES	-	
1223472	Holly Tree Cottage	II	602480	233120	0	Medium	YES	-	
1223527	Glebe House	II	603044	233008	0	Negligible	YES	-	
1239218	The Cottage	II	604627	231661	0	Negligible	YES	-	
1239265	Le Talbooth	II*	604219	233464	0	Negligible	NO	-	
1239278	The Wilderness	II	604236	233402	0	Negligible	NO	-	
1239440	Rye Farmhouse	II*	604730	231516	0	Negligible	YES	-	

Reference	Question	Applicant's Response								
		1267273	Ewens Farmhouse	II	603392	232842	0	Negligible	YES	-
		1267302	Pond Villa	II	603052	233689	0	Negligible	YES	-
		1273800	Mulberry House	II	603804	233166	0	Negligible	YES	-
		1049739	Prospect Farmhouse	II	612008	282428	0	Negligible	YES	-
		1110884	The Malting	II	592086	226879	0	Negligible	YES	-
		1110890	The Bridge House	II	591953	227060	0	Negligible	YES	-
		1110891	Riverdale Cottage	II	592008	227045	0	Negligible	YES	-
		1110892	The Bunches	II	592036	226950	0	Negligible	YES	-
		1110897	Peakes	II	591340	225819	0	Negligible	YES	-
		1111459	Jenning's Farmhouse	II	608808	228552	0	Negligible	YES	-
		1111555	The Gables	II	567107	182771	0	Negligible	YES	-
		1111567	Greygoose Farmhouse	II	562556	180686	0	Negligible	YES	-
		1111583	Lower Dunton Hall	II	565996	186990	0	Negligible	YES	-
		1112057	Mill House	II	605359	229139	0	Negligible	NO	-
		1112058	Boxley House	II	605328	229485	0	Negligible	NO	-
		1112059	Churchgate House	II	605346	229492	0	Negligible	NO	-
		1112094	Blue Barns Farmhouse	II	602855	230148	0	Negligible	YES	-
		1122018	Hillcrest	II	570774	212933	0	Negligible	YES	-
		1122027	88-94, The Street	II	570783	212905	0	Negligible	YES	-
		1122129	Brickfield	II	573861	216678	0	Negligible	YES	-
		1123455	Pond Cottage	II	576883	217095	0	Negligible	YES	-
		1146666	Doesgate Farmhouse	II	566108	186474	0	Negligible	YES	-

Reference	Question	Applicant's Response								
		1169726	Church Of St Peter	II*	621863	300970	0	Negligible	YES	-
		1170085	Church House Farmhouse	II	590670	225335	0	Negligible	YES	-
		1182111	Upland Cottage	II	608681	261380	0	Negligible	YES	-
		1222604	Altire House	II	597768	231203	0	Negligible	YES	-
		1222606	Hospytts	II	597776	231339	0	Negligible	YES	-
		1222607	Chapel Cottage	II*	597721	230967	0	Medium	YES	RR-1314
		1222665	Wisteria	II	597770	230414	0	Negligible	YES	RR-1314
		1222668	House Adjoining And To The North Of Peatling And Cawdron	II	597743	230682	0	Negligible	YES	RR-1314
		1222682	Nevards Farmhouse	II	597755	231540	0	Negligible	YES	-
		1222771	Knowles Cottage	II	596516	230971	0	Negligible	YES	-
		1222772	Knowles Farmhouse	II	596330	230865	0	Negligible	YES	-
		1222858	Little Simons	II	597284	229912	0	Negligible	YES	-
		1222861	Oak Cottage	II	597700	230590	0	Negligible	YES	RR-1314
		1222863	New Barn House	II	597483	230633	0	Negligible	YES	RR-1314
		1222923	School House	II	597654	230624	0	Negligible	YES	RR-1314
		1222977	Breewood Hall	II	597071	230875	0	Negligible	YES	-
		1222979	Cart Lodge With Granary Over To South Of Breewood Hall	II	597059	230820	0	Negligible	YES	-
		1222981	Highlands	II	597540	230665	0	Negligible	YES	RR-1314
		1223156	Teybrook Farmhouse	II	589133	224902	0	Negligible	YES	-
		1223335	Trumpingtons	II	587911	224476	0	Negligible	YES	-

Reference	Question	Applicant's Response								
		1223386	Roundhouse	II	587848	223917	0	Negligible	YES	-
		1224485	Gladwins Farmhouse	II	595739	229957	0	Negligible	YES	-
		1225575	Rookery House	II	597749	230176	0	Negligible	YES	-
		1231090	Cherry Tree Farmhouse	II	607361	256444	0	Negligible	YES	-
		1235775	Little Thatchers	II	565401	207576	0	Negligible	YES	-
		1235835	Thatcher's Farmhouse	II	565526	208183	0	Negligible	YES	-
		1237071	Sturgeons House	II	566250	206939	0	Negligible	YES	-
		1238755	Priory House	II	599768	230775	0	Negligible	YES	-
		1239708	Mantills Farmhouse	II	592751	226159	0	Negligible	YES	-
		1239790	Oak House	II	592792	228084	0	Negligible	YES	-
		1239791	The Shoulder Of Mutton Public House	II	592050	227165	0	Negligible	YES	-
		1239836	Wash Farmhouse	II*	591906	227384	0	Negligible	YES	-
		1239837	Rams Farmhouse	II	593447	228851	0	Negligible	YES	-
		1239874	Barnards Farmhouse	II*	591986	227322	0	Negligible	YES	-
		1253911	Rose Cottage	II	606777	228257	0	Negligible	YES	-
		1253915	Bloomfields Farmhouse	II	603280	230025	0	Negligible	YES	-
		1266527	Pond Farmhouse	II	595385	229491	0	Negligible	YES	-
		1266823	Little Tey House	II	589317	224489	0	Negligible	YES	-
		1267711	Idols Cottage	II	593431	228552	0	Negligible	YES	-
		1267740	Fordham Hall	II	592671	228017	0	Negligible	YES	-

Reference	Question	Applicant's Response								
		1273588	Fiddlers Farmhouse	II	593191	226614	0	Negligible	YES	-
		1273626	Chippetts Farmhouse	II	592394	225296	0	Negligible	YES	-
		1279616	Hutton House	II	564085	194835	0	Negligible	YES	-
		1280481	Hutton Hall And Attached Stable Block	II*	563430	194464	0	Negligible	YES	-
		1297247	Ellices	II	564649	194892	0	Negligible	YES	-
		1305428	Ball's Farmhouse	II	569902	212475	0	Small	YES	-
		1306223	Old Rectory	II	591276	225319	0	Negligible	YES	-
		1306270	Aldham Hall	II*	591849	224860	0	Negligible	YES	-
		1337091	High House	II	565710	179207	0	Negligible	YES	-
		1337410	Ferndale Valley House	II	592059	226946	0	Negligible	YES	-
		1338427	Priors	II	569433	209647	0	Negligible	YES	-
		1338504	Church Of St Margaret	II*	566512	200422	0	Negligible	YES	-
		1493299	Little Bromley War Memorial	II				large	YES	RR-2623
		1207790	Ingatestone Over The River Wid (That Part In Brentwood District)	II	566451	199095		small	YES	-
		1247731?	Milestone South Of Ivy Cottage	II				small	NO	-

b) Those listed buildings noted in the table as having a vibration magnitude of impact without mitigation of negligible or small, have vibration levels less than 1 mm/s. Those that are noted as medium have a vibration level between 1 mm/s and 10 mm/s. Those that are noted as large have a vibration level of at least 10 mm/s. As set out in **6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]** construction vibration levels have been calculated and assessed in accordance with the

Reference	Question	Applicant's Response
		methodologies and criteria described in British Standard BS 5228-2⁴¹ and describe construction vibration effect thresholds for humans. As stated in paragraph 14.4.26 of 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]: <i>'It is not considered appropriate to use impact magnitude values for potential damage to structures from construction vibration. Rather, a fixed threshold of 12.5 mm PPV has been adopted, at which the probability of damage tends towards zero based on the guidance of BS 5228-2. Structures or buildings where the predicted vibration level exceeds or is approaching 12.5 mm PPV, based on anticipated typical worst-case vibration-generating activities, have been highlighted such that specific mitigation measures may be considered by the Main Works Contractor(s) to reduce vibration levels at these locations on a case-by-case basis.'</i> The table above demonstrates that only one listed building (Little Bromley War Memorial NHL 1493299), as already assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], has the potential to be affected by construction vibration at a level that could potentially cause damage if mitigation measures were not implemented. Provision to apply best practicable means measures is included within 7.2 Outline Code of Construction Practice [REP2-014] with these measures applied the risk of damage is removed. As noted above, the susceptibility to damage tends to zero as vibration levels decrease down to 12.5 mm/s and foundation type does not change this. The standard which describes the assessment of vibration (BS 5228-2, section B3) states that <i>'A building of historical value should not (unless it is structurally unsound) be assumed to be more sensitive'</i>. Therefore, there is no need to adopt a lower threshold for other buildings/structures unless they are structurally unsound. Commitments NV01, NV02, NV03, NV04, NV05, and NV20 in 7.2 Outline Code of Construction Practice [REP2-014] ensure measures will be put in place first to avoid impacts from vibration. NV04 provides a means to repair damage in the highly unlikely

⁴¹ British Standards Institution (2014) *BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites - Vibration*

Reference	Question	Applicant's Response
		event it occurs. The pre-condition surveys committed to in NV04 are an important element to ensure there is a check against which any concerns regarding damage can be measured.
HE 1.13	Heritage visualisations - 2 The ExA have concerns over the following heritage visualisations [APP-350] and [APP-351]. Provide a response addressing such concerns or submit additional visualisations: HE2i Church of St Remigius. Of limited use to assess effect on setting of Church from Waveney Valley. Hedge in way and photograph almost from • underneath proposed pylons. • HE2ii Church of St Remigius. Of limited use; hedge in the way. Standing to the north of the Church would provide a more useful indication of visibility. • HE4 Coney Byes. Position of viewpoint makes full effect on setting of heritage asset difficult to ascertain. • HE7 Langleys. Viewpoint dominated by heritage asset and seemingly not very well chosen to assess effect on setting.	For the historic environment assessment, viewpoints are not heritage assets and are therefore not assessed in themselves. They are used to inform assessment of heritage assets, in combination with relevant landscape and visual viewpoints, site visits to undertake setting assessment, and information from the sources set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Viewpoint photography and visualisations are not required by the specialist setting assessment guidance⁴² but they are noted as one of the tools to assist in assessment. Viewpoint locations are microsituated on site but sometimes limitations in location or angle of view are not apparent until the visualisation is produced. New photography and photomontages will be provided at Deadline 4 for the following viewpoints: • HE22 Tacolneston. Although the current photomontage provides a representative view of the Project from the Grade I listed Church of All Saints, illustrating the potential for glimpsed views between vegetation and buildings along Norwich Road, a new photomontage will be provided from the eastern edge of the conservation area on Hurn Lane • HE35 Creeping Hall. A new photomontage will be provided from the Public Right of Way (PRoW) to the north of the listed building. A view from the immediate surroundings was requested through consultation with historic environment stakeholders but the Applicant appreciates that this provides a very restricted view. Updated photomontages are provided for the following viewpoints: • HE4 Coney Byes. This viewpoint was considered to indicate worst-case scenario as outside the edge of the garden of the property. The photomontage has been updated to include an additional 90° view showing the listed building and illustrating its location in relation to the Project • HE7 Langleys. This location illustrates the designed view along the avenue at the back of Langleys House from the central access/egress from the house and was

⁴² Historic England (2017) *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3* (Second Edition)

Reference	Question	Applicant's Response
	- HE11 Church of St James, Marks Tey. Unclear why viewpoint not from north side of Church. - HE14 White Notley. Query over whether viewpoint is the most appropriate from the Conservation Area. - HE21 Elm Farmhouse. Viewpoint does not appear to show effect on setting. VP including the heritage asset would be more useful. - HE22 Tacolneston. Query over whether viewpoint is the most appropriate from the Conservation Area. - HE24 Church of St Mary's Washbrook. Query over whether viewpoint is the most appropriate from the heritage asset. - HE25 Ardleigh. Query over whether viewpoint is the most appropriate from the Conservation Area. - HE26 Fordstreet. Query over whether viewpoint is the most appropriate from the Conservation Area. - HE33 Mellis. Query over whether viewpoint is the most appropriate from the Conservation Area.	agreed with historic environment stakeholders. The photomontage has been updated to centre on the avenue to make this clearer - HE21 Elm Farmhouse. Due to the location of the road adjacent to the property, for safety reasons the viewpoint photography had to be taken to the south of the road. It was not taken within the garden of the property as the topography and vegetation would block much of the view and prevent an understanding of the Project within its setting. The photomontage has been updated to include an additional 90° view showing the listed building and illustrating its location in relation to the Project - HE24 Church of St Mary's Washbrook. The location is appropriate as this provides views from the churchyard towards the Project but the photomontage has been updated to provide a single 90° visualisation centred on the Project - HE34 Finningham. The angle of the photomontage has been updated so that this is centred on Wickham Road, looking east. No update is proposed for the following viewpoints for the reasons listed: - HE2i Church of St Remigius. The location of this viewpoint was selected due to the gap in the hedge providing a view to the church. The hedge obscures a clear view of the church in other parts of this field. The viewpoint is taken from a PRoW, which was considered suitable as a route from which many people would be likely to view the church from the valley floor - HE2ii Church of St Remigius. This viewpoint was taken from southern edge of the churchyard to illustrate the view across the valley towards the closest pylons. No hedge obscures this view. Landscape and visual viewpoint 1.15 also provides a photomontage which includes the church and the area south of High Road. The visualisation does not include the area north of the road due to the mature trees and woodland on this side of the road. In order to inform the assessment for the Church of St Remigius, both historic environment viewpoints and landscape and visual viewpoints 1.15 and 1.22 informed assessment as these provide a variety of views towards the Project from the asset and views towards the asset across the Project - HE11 Church of St James, Marks Tey. The churchyard is enclosed by dense vegetation along its northern boundary so no view to the Project was possible. The location to the south was agreed with historic environment stakeholders to illustrate

Reference	Question	Applicant's Response
	- HE34 Finningham. Query over whether viewpoint is the most appropriate from the Conservation Area. Is there a view to the east rather than to the south east? - HE35 Creting Hall. View from inside garden with substantial screening; viewpoint from footpaths nearby could better show effect on setting.	visibility of pylons beyond the church as this is approached along the main access from the south - HE14 White Notley. This location is on the PRow that leads into/out of the conservation area past Grade II* listed White Notley Hall (1122738), one of the historical foci of the settlement. The assessment was also informed by landscape and visual viewpoint 5.04, which is beyond the edge of the conservation area closer to the Project and provides a worst-case representation - HE25 Ardleigh. This viewpoint is located at a key view identified in the conservation area appraisal and is therefore considered appropriate. The assessment of Ardleigh Conservation Area is also informed by landscape and visual viewpoint 3.11, on the northern edge of the conservation area and the location of another key view identified in the conservation area appraisal - HE26 Fordstreet. This location is considered to be appropriate as it provides the illustration of the view from the location of the southern listed buildings within the conservation area. The assessment of the conservation area is also informed by landscape and visual viewpoint 4.24, on the eastern edge of the conservation area - HE33 Mellis. This location is considered to be appropriate as it provides the illustration of the view from the location of the western listed buildings within the conservation area and provides visualisations of the Project to the north and west of the conservation area. The assessment of the conservation area is also informed by landscape and visual viewpoint 2.05, on the northern edge of the conservation area. The updated visuals for HE1.13 have been submitted separately. These include visualisations of the Project relative to the Grade II listed Elm Farmhouse (1373558), the Grade II* listed Church of Saint Mary, Washbrook (1194408), Finningham conservation area, the Grade II listed Coney Byes (1225071), and the Grade I listed Langleys (1305533).
HE 1.14	Fairstead CSE Compounds Table 3.12 of ES chapter 3 [APP-127] details the decision-making process when considering	The Fairstead Alternative Northern Route was proposed in feedback and consisted of both relocating the overhead alignment and the western Cable Sealing End (CSE) compound to the field to the north of Hallhook Row Woodland. It was the presence of the CSE compound as well as the pylon that is referred to in this section of the table and was the reason for this version of a northern alternative being discounted. We

Reference	Question	Applicant's Response
	options and alternatives for the Fairstead CSE compounds. The preferred option seems to have been chosen for a large part on the fact that it addresses conflict with "multiple game shooting". However, the ExA note that this option has adverse impacts on the Grade II listed Westocks Farm, by moving the OHL to around 300m from the heritage asset and that the Alternative Northern Route was ruled out because of a similar proximity issue to Westock's Farm. Provide further justification for this decision, explaining the rationale and decision-making process taken between the competing issues of game shooting (and providing more detail on this matter) and a heritage asset, which are defined in the NPPF as being an irreplaceable resource.	acknowledge that this could have been stated more explicitly in Table 3.12 in 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] but also note that in the 2024 Design Development Report [APP 359] which reported on the changes made following the 2023 consultation, at para 5.4.173 we do state '<i>Although the feedback suggested moving the CSE compound to the north, there was no appreciable extent of existing screening vegetation. Feedback was however addressed by moving the CSE compound further north-east immediately adjacent to the 400 kV overhead line.</i>' As there was some merit in the request we developed a modified version which moved the western CSE closer to the existing overhead line to form the design change reported as Fairstead East and West which was identified as preferred. The Applicant's position is that the decision to modify the alignment and Fairstead CSE compound positions following the second non-statutory consultation in 2023 balanced a number of factors of which land use (part of which is game shooting) was only one of those considered. The location and orientation of Westocks Farm, which sits in a shallow valley and benefits from the presence of some screening and filtering vegetation was considered along with the potential for change in assessed effects on it as a grade II listed building. The assessment presented in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] concluded a moderate adverse, significant effect on Westocks Farmhouse (1168106) during construction, due to the change to the rural setting that would be caused by the construction works, including the temporary change in use of the landscape in the temporary construction works locations. During operation the assessment concluded a negligible adverse, not significant effect which reduced from construction as the overhead line would not alter the rural character of the landscape around it, due to the presence of the existing 400 kV overhead line.
HE 1.15	Historic England written representation 1 ES Chapter 11 – Historic Environment [AS-068] provides a precis of the high-value designated heritage assets in each section of the development.	The raised issues regarding many of these assets have been addressed recently. Please refer to the Applicant's Deadline 2 response to the Written Representation from Historic England, found in 8.8.1 Applicant's Comments on Written Representations [REP2-031], responding to paragraphs between 2.17 and 2.143. The Examiners' questions regarding the four remaining assets are addressed here: Tacolneston Conservation Area (CA19)

Reference	Question	Applicant's Response
	Historic England have provided their detailed response at deadline 1 [REP1-191] and the ExA note several assets, either designated or non-designated, where Historic England has either requested further assessment of an asset, or have disagreed with your assessment. The applicant is asked to respond to the Historic England representation, in particular with regard to the following assets: Historic England disagreement with the assessment of harm: • St Regimus Church, Roydon (Grade I) • St Mary's Parish Church, Fairstead (Grade II*) • Newney's Farmhouse, Ranks Green (Grade II*) • Hylands Park (RPG Grade II*) • Hylands (Grade II*) • Historic England agree with the overall assessment of harm, but suggest additional assessment or views should be considered: • Tacolneston Conservation Area • Bush Hall (NDHA) • St Mary's Church Burgate (Grade II*)	The Applicant acknowledges the Examiners' comment and has reviewed the assessment of Tacolneston Conservation Area considering Historic England's Written Representation. The Applicant concedes that the rural landscape of the setting could have given more weight in the submitted assessment (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] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). The Applicant is, however, of the opinion that, as the Project lies over half a kilometre distant at the limits of the asset's setting, as it will only impact one external view from the asset, and that the rural landscape continues beneath and around the Project, the assessment of a direct, permanent negligible adverse significance of effect (not significant) and lower less than substantial harm on the conservation area as noted in the referenced documents noted above is both proportionate and appropriate. Church of Saint Margaret and Saint Catherine, Aldham (1170063) (Grade II*) The Applicant acknowledges the Examiners' comment and has reviewed the assessment of the Church of Saint Mary and Saint Catherine considering Historic England's Written Representation. The church is extremely well screened by the mature tree cover of its graveyard and the mature trees and residential development of the settlement of Aldham and it's likely that only partial views of the pylon top would be visible from the eastern edge of the associated graveyard. The Project would in no way diminish the understanding and appreciation of the church as a medieval ecclesiastical structure nor would it dominate the skyline due to the screening noted above. The Applicant is, therefore, satisfied that the assessment's conclusion of a direct, permanent moderate adverse significance of effect (significant) (during the operation phase) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Mid Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate. Broomfield Conservation Area (CA60) The Applicant acknowledges the Examiners' comment and has reviewed the assessment of Broomfield Conservation Area and the Church of Saint Mary

Reference	Question	Applicant's Response
	• Mellis Conservation Area • Moat Yard Plantation, Mellis • Creeting Hall (Grade II*) • Badley Church Green Conservation Area • Parish Church of St Margaret and Catherine, Aldham (Grade II*) • Feeringbury Manor (Grade II*) • Broomfield Conservation Area • Former Parish Church of St James, Chignall St James (Grade II*) • Chobbings Farmhouse (Grade II*) • Ingatestone Hall (Grade I) and associated buildings • St Clere's Hall, Stanford Le Hope (Grade II*)	considering Historic England's Written Representation. The Applicant disagrees that the assessment of the conservation area and church is contradictory in its conclusions that the setting of Broomfield conservation area does not extend to the Order Limits whilst the setting of the church, located within the conservation area, does. The church, and particularly its tower, is designed as a focal point within the landscape and thereby be visible as far as possible across its parish and in some cases from parishes beyond. The view from the church to the Project in the west is partially screened by mature tree cover in Broomfield and the intervening landscape, and so the Applicant is satisfied that the assessment's conclusion of a direct, permanent minor adverse significance of effect (not significant) (during the operation phase) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate. With regard to the conservation area, the Applicant is confident that the setting of the asset is restricted to its streetscape and the immediate agricultural land to the west, and so does not extend to the Order Limits some 1.25 km to the west. This is because the setting of a heritage asset is not defined solely by whether it is visible from or has visibility to a specific point. Therefore, despite the possibility of some visual connection, the Applicant is satisfied that the conclusion reached in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] that the setting of the conservation area does not extend to the Order Limits correct that the assessment is contradictory to that of the church. St Clere's Hall, Stanford le Hope (1111565) (Grade II*) The Applicant acknowledges the Examiners' comment and has reviewed the assessment of St Clere's Hall considering Historic England's Written Representation. The Applicant concedes that the setting of the asset has the potential to make a minor contribution to the asset's value. However, as the Applicant and Historic England are in agreement that the Project would not amount to harm to the significance of the listed building, the Applicant proposes to not edit the baseline report (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]).

Reference	Question	Applicant's Response
HE 1.16	Historic England written representation 2 In its submission [REP1-191] Historic England concluded, in relation to NPS EN-1 (2023): “We do not consider 5.9.26 has however been appropriately address in the application in particular the section that relates to the ‘the desirability of sustaining and...enhancing the significance of heritage assets...’. Whilst we appreciate mitigation other than through design changes is challenging, we consider more could be done by the applicant to consider the communities with affected heritage assets and how the applicant can foster and support community led approaches to heritage”. The concern regarding the communities affected is also raised in several RR's and WR's. The applicant is requested to respond to this conclusion, in particular to note the ways in which you can consider the communities with affected heritage assets and how you will ensure the most appropriate mitigation hierarchy.	The Applicant has considered the communities affected in the following ways. In the first instance the Applicant has sought to reduce the effect on the communities by avoiding adverse effects on heritage assets where possible. This has been achieved through embedded mitigation. Where this is not possible, the Applicant has applied the mitigation hierarchy as set out in 6.5 Environmental Statement Chapter 5 – EIA Approach and Method [APP-135] and 5.6 Planning Statement [APP-085] in order to reduce effects to heritage assets. This approach is in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297], as previously agreed with Historic England. Beyond this, measures in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] include provision for outreach and public engagement, which, where possible, will engage with the affected communities through enhancing knowledge and understanding of the significance of heritage assets. There are also the following not significant beneficial effects on heritage assets which address the desire in NPS EN-1 paragraph 5.9.25 (NB: paragraph 5.9.26 of NPS EN-1 does not contain the quoted text from HE 1.16) ‘<i>of sustaining and, where appropriate, enhancing the significance of heritage assets</i>’. Construction: • Milestone and Cover Plate 45 Metres South West of Ivy Cottage (1247731) - temporary minor beneficial. Operation (and maintenance): • Barn About 35 m West of Spring Farm House (1284658) - permanent minor beneficial • Church of St Mary (1231756) - permanent minor beneficial • Marsh Farm House (1032768) - permanent minor beneficial • Home Farmhouse (1231443) - permanent minor beneficial • Grove Farmhouse (1262693) - permanent minor beneficial • Thornbush Hall (1251603) - permanent minor beneficial • The Stores (1146812) - permanent minor beneficial

Reference	Question	Applicant's Response
		• The Herons (1337781) - permanent minor beneficial • Non-designated asset 2159, likely site of Romano-British settlement - permanent minor beneficial • Non-designated asset (2437), site of Home Farm Farmstead associated with 'Home Farmhouse' (1231443) - permanent minor beneficial • Non-designated asset (2473), site of the Grove Farm Farmstead associated with 'Grove Farmhouse' (1262693) - permanent minor beneficial • Non-designated asset (3107), site of the circular cropmark of a possible barrow - permanent minor beneficial • Non-designated asset (3115), site of the circular cropmark of a possible barrow - permanent minor beneficial. The Applicant has therefore sought to sustain and enhance the significance of heritage assets where this is possible.
HE 1.18	Pylons East Anglia written representation 2 The ExA notes the response to [REP1-267] at D2 [REP2-029] which states that the representation is the re-submission of a document prepared in response to the 2024 statutory representations which states that the use of High-Voltage Direct Current (HVDC) undergrounding should be explored further to minimise heritage harm, and provides a response with financial and costs information. Notwithstanding this, the ExA notes that the representation contains various views over the methodology used for the assessment of heritage	The Applicant has reviewed the Objection Statement (2024) produced by Fuller Long on behalf of Pylons East Anglia considering the Examiner's comments. It should be noted that the Fuller Long document comments on the Preliminary Environmental Information Report (PEIR) and an early draft of 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], both of which were based on draft Order Limits that differed from the Order Limits submitted to the Planning Inspectorate in September 2025. The updated Historic Environment Baseline Report [APP-209] was submitted with associated detailed impact assessment documentation (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [APP-210] and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) and all in support of 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208]. Updated versions of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] were submitted to the Planning Inspectorate in January 2026 incorporating supplementary environmental information detailing the results of additional archaeological fieldwork.

Reference	Question	Applicant's Response
	and archaeological assets and provides a number of case studies to highlight perceived errors within this methodology. Respond to such points and case studies.	With regard to the methodology in the Environmental Impact Assessment of the historic environment in support of the DCO application, the Applicant rejects the respondent's opinion that the assessment methodology is not fit for purpose. The assessment methodology as set out in Annex C Historic Environment Assessment Methodology of 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] was first prepared for review and discussion with relevant Statutory Environmental Bodies and Local Planning Authorities in 2022. The methodology was then reviewed following the receipt of 6.20 Scoping Opinion [APP-297] from the Planning Inspectorate, also in 2022, and updates were made before its inclusion as Annex C in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] as a result of ongoing consultation with relevant Statutory Environmental Bodies and Local Planning Authorities and to align with the approach taken in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. To address more specific points raised by the respondent: • The agreed methodology for the scoping of historic buildings is detailed in section 3.11 of Annex C: Historic Environment Assessment Methodology in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]. The scoping exercise removed heritage assets from further assessment based on their settings not extending to the Order Limits. This follows the approach set out by Historic England⁴³: '<i>Step 1: Identify which heritage assets and their settings are affected</i>'. Where the setting of an asset does not extend to a development area and there is no potential for physical impacts, it is appropriate to remove that heritage asset from further consideration as there is no potential for harm resulting from the development. Therefore, the Applicant is satisfied that this agreed methodology is both appropriate and proportionate and complies with professional guidance and relevant legislation. • The methodology included a walkover survey of the Order Limits and to undertake setting assessment of every scoped-in designated asset (see Annex D: Walkover Survey in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]). A very small number of designated

⁴³ Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition)

Reference	Question	Applicant's Response
		assets were not visited where access was not possible; however, such assets were assessed from the Order Limits and from closest public rights of way. The walkover survey achieved 97% coverage of the Project. • All non-designated heritage assets (NDHA) 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 the 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 '<i>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</i>' 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 NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets. A number of locally listed buildings assessed to be medium value were subject to detailed assessment of potential impact through change to setting, following the same approach as for designated assets of medium and high value. • Zones of Theoretical Visibility data (6.13.F8 – F19 Environmental Statement Figures 13.8 – 19 [APP-244 – APP-255]) and Project visualisations (7.12 Visualisations – Parts 1 to 9 [APP-343 to APP-351]) including 43 historic environment specific visualisations were used to inform the scoping process and the assessment of heritage assets. • The respondent repeatedly refers to 'substantial harm' to heritage assets, and the Applicant rejects this opinion. ○ The NPS (EN-1) refers to '<i>Substantial harm to or loss of significance...</i>' and this is interpreted to mean that the level of harm to a designated

Reference	Question	Applicant's Response
		heritage asset would be considerable for it to be classed as substantial harm. ○ The threshold for substantial harm can also be defined on the basis of the PPG paragraph 018: ▪ <i>'In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed.'</i> ○ Therefore, for substantial harm to be concluded as a result of change in the setting of a designated asset, there would need to be very considerable change to the setting and that setting would need to make a very considerable contribution to its value for it to be so affected that the preservation of the physical remains would not be sufficient to prevent an assessment of substantial harm ○ In EIA terms, a major (significant) effect on a designated heritage asset could be considered a guide by which to determine that the level of harm to the value of the asset would be substantial. However, as substantial harm is considered to be a high test a case-by-case assessment has been made using professional judgement. Also the assessment has not concluded any major adverse effects for historic environment. 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. 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 a Project due to this statutory duty and the

Reference	Question	Applicant's Response
		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 less than substantial 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 meets 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. Para 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. The assessment methodology was developed in accordance with relevant professional guidelines comprising: - Chartered Institute for Archaeologists' Standard and guidance for historic environment desk-based assessment⁴⁴ - Historic England's Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment⁴⁵; and The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3⁴⁶ - International Council on Monuments and Sites (ICOMOS) Guidance on Heritage Impact Assessments for Cultural World Heritage Properties⁴⁷.

⁴⁴ Chartered Institute for Archaeologists (2014) *Standard and guidance for historic environment desk-based assessment*

⁴⁵ Historic England (2008) *Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment*

⁴⁶ Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3*

⁴⁷ ICOMOS (2011) *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*

Reference	Question	Applicant's Response
		The assessment methodology was discussed and agreed with the relevant statutory environmental bodies and local authorities and the Applicant is satisfied that it complies with the relevant legislation. Regarding the respondent's comments regarding relevant legislation, Nationally Significant Infrastructure Projects (NSIPs) of this nature are guided by national planning policy (for this Project, NPS EN-1 and EN-5, 2024 versions). However, national planning policy in the form of the National Planning Policy Framework⁴⁸ (NPPF) and local planning policy was also considered in developing the design of the Project where possible. 5.6 Planning Statement [APP-085] presents an appraisal of the Project's compliance with national policy including EN-1, EN-5, EN-3, the NPPF and relevant local plan policies. The Planning Statement should be read in conjunction with 5.7 Policy Compliance Document [APP-086] which sets out an analysis of the compliance of the Project with the specific relevant policies. Paragraph 5 of the NPPF makes it clear that the Framework does not contain specific policies for developments requiring development consent and that applications for development consent are to be determined in accordance with the decision-making framework set out in the Planning Act 2008: <i>'The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework).'</i> While the NPSs remain the primary decision-making documents, regard has been had to any other matters of importance and relevance, which include relevant policies in the NPPF. 5.6 Planning Statement [APP-085] explains that the Project is Critical National Priority Infrastructure as defined in NPS EN-1, wherein, paragraph 4.2.16 sets out that where a project is CNP Infrastructure, the Secretary of State will take as a starting point for decision making that that such infrastructure is to be treated as if it has met any tests set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. NPS EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way. To meet the duty to build efficient and economic networks, an

⁴⁸ Ministry of Housing, Communities and Local Government (2024) *National Planning Policy Framework*

Reference	Question	Applicant's Response
		overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, 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. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding. Regarding the respondent's comments on mitigation measures, following the application of the mitigation hierarchy the Project would result in either no harm or less than substantial harm to designated heritage assets as set out in the ES for each designated asset assessed. Embedded and standard mitigation proposals for designated heritage assets are set out in 7.2 Outline Code of Construction Practice [REP2-014] and 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate additional mitigation for archaeology. The Project's mitigation strategy has been developed in consultation with heritage stakeholders including the Council and Historic England. Mitigation follows the mitigation hierarchy and measures include the avoidance of heritage assets where possible, sensitive siting and design, retention and reinstatement of landscape features (including hedgerows, earthworks, and boundaries), and archaeological investigation and recording. Regarding embedded mitigation, 5.15 Design Development Report [APP-122] provides an explanation of 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

Reference	Question	Applicant's Response
		into account environmental (including the historic environment) and socio-economic effects, engineering feasibility and risks, cost and programme amongst other factors. Given the assessment concludes at worst, less than substantial harm, and the mitigation hierarchy has been followed, NPS EN-1 (2024) does not require the Applicant to take any further measures. With regard to the case studies presented in the Objection Statement (2024) produced by Fuller Long on behalf of Pylons East Anglia, the Applicant reiterates that the Fuller Long document comments on the Preliminary Environmental Information Report (PEIR) and an early draft of 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209], both of which were based on draft Order Limits different from the Order Limits submitted to the Inspectorate in September 2025. In the first instance, therefore, the respondent is referred to the most recent documentation submitted to the Planning Inspectorate, comprising 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], 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], and 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]. However, the Applicant has reviewed the case studies considering the Examiners' comments. Case Study 1: Flordon Hall (1050698), Piggery 60 Yards South of Flordon Hall (1172231) and Barn to Flordon Hall (1373055). In its written representation [REP1-191], Historic England, statutory heritage advisor to the Secretary of State, agrees with the Applicant's assessment of Flordon Hall and so the Applicant is satisfied with the assessment. With regard to the piggery and the barn, whilst many of the elements of the setting of the hall are shared with these assets, the Applicant considers their settings to be more integral to the Flordon Hall complex with the wider agricultural landscape not as prominent an element of their settings as it is for the hall. The assessed low adverse magnitude of impact resulting in a direct, permanent minor adverse significance of effect (not significant) during the operation (and maintenance) phase is, therefore, the result of professional judgement and not the use of a matrix as claimed by the respondent.

Reference	Question	Applicant's Response
		Case Study 2: Manor House (1179387) and the Church Of All Saints (1049992). The Applicant acknowledges that the Project would introduce pylons and wirescape into the hinterland between the two assets and that this would interrupt long range (over 1.25 km) views of the church from Diss road and the Manor House to the west. However, the Manor House and the Project to the west, would not be visible from the church due to screening by trees and development. The Project would, however, likely be visible from the church to the north-northwest at a distance of over 1.4 km. The Applicant is, therefore, confident that the conclusions reached on 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] and the level of harm on these assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] are proportionate and appropriate. It should also be noted that Historic England does not comment on the Church of All Saints in its written representation [REP1-191] and so it is assumed it agrees with the Applicant's assessment. Case Study 3: Hempnalls Hall (1180451), Bridge (1032280) Moat and Farmstead (NDHA and Curtilage Listed). The Applicant rejects the respondent's opinion that the setting of the bridge extends to the Project, which is heavily screened and lies almost 0.5 km to the east. Both the non-designated heritage assets Hempnalls Hall Farmstead (2445) and the moat associated with Hempnalls Hall (2252) have been identified as medium value assets and both have had their settings assessed. The Applicant is confident that the conclusions reached on the significance of effect on the value of these designated and non-designated assets within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and the level of harm on these assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] are proportionate and appropriate. Case Study 4: Bleak Hall (1251669) and Farmstead (NDHA). The Applicant disagrees that the Project will result in substantial harm on the value of the Bleak Hall as the Project will not result in any substantial harm to designated heritage assets (see above). The nearest pylon (RG197) is located 170 m to the north-east of the asset and so the Applicant is satisfied that the assessment's conclusion of a permanent moderate adverse significance of effect (during the operation phase) (6.11.A2 Environmental

Reference	Question	Applicant's Response
		Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and Mid Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate. Case Study 5: Faulkbourne Hall (1337782) and Registered Park and Garden (1000341). The Applicant disagrees that the Project will '<i>dominate the landscape looking north from the park</i>', as the nearest pylon (TB100) would be almost 1 km to the north of the tree belt defined northern edge of the park. Historic England agrees with the Applicant's assessment of the park (1000341) [REP1-191] and so the Applicant is satisfied that the asset's setting does not extend to the Order Limits (6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]). Case Study 6: Rivenhall Place (1122598), the Church of St Mary and All Saints (1169594) and Scheduled Monument (1013831). With regard to Rivenhall Place (1337782) please see the Applicant's response to ExQ1 HE1.31. With regard to the current landscape garden (5036) associated with Rivenhall Place, the asset is identified in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and the impact of the Project on the asset is assessed in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. With regard to the Church of St Mary and All Saints (1169594) the nearest pylon (RG) is located c. 1.25 km to the north-northeast of the asset in the neighbouring parish of White Notley. The Applicant is, therefore, satisfied that the assessment's conclusion of a permanent negligible adverse significance of effect (during the operation phase) (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and lower Less Than Substantial Harm (during the operation phase) (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]) is proportionate and appropriate. Historic England agrees with the Applicant's assessment of the Church of St Mary and All Saints [REP1-191].

Reference	Question	Applicant's Response
		With regard to Scheduled Monument (1013831), please see the Applicant's response to [REP1-191] (8.8.1 Applicant's Comments on Written Representations [REP2-031]). Case Study 7: Langleys (1305533), Stables (1171617), Garden Block (1122115), Registered Park and Garden (1000241), and Great and Little Waltham Conservation Areas. With regard to Langleys (1305533), the Applicant concluded a permanent minor adverse significance of effect during the operation phase (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]) and Lower Less Than Substantial Harm during the operation phase (6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]). As Historic England agrees with the Applicant's assessment of Langleys [REP1-191], the Applicant is satisfied with the assessment. With regard to 'Garden Block to the South of Langleys' (1122115) and 'Stables to the North-East of Langleys' (1171617), the Applicant has reviewed its assessment considering the respondent's comments. The setting of these assets is informed by their interrelationships with Langleys and Langleys park and garden. The setting of the stables is further informed by its relationship with the shallow Chelmer valley to the north, however, a brick wall and screening by mature trees restricts its interactions with the house and garden block. The garden block's setting is further informed by its relationship with the large walled garden, greenhouses, the house's formal garden to the east and the parkland to the west. The setting of the stables and garden block is focused on the house and grounds and so the assessment concluded that the setting of the assets does not extend to the Order Limits. The Applicant is confident that this assessment as presented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is proportionate and appropriate. With regard to Langleys registered park and garden (1000241), Great Waltham conservation area and Little Waltham conservation area, please see the Applicant's response to [REP1-191], (8.8.1 Applicant's Comments on Written Representations [REP2-031]). Case Study 8: Ingatestone Hall (1187315) and associated Listed Buildings and Scheduled Monument.

Reference	Question	Applicant's Response
		With regard to Ingatestone Hall (1187315, listed grade I), Gatehouse and Courtyard Ranges (1197286) and Granary 130 m northwest of Ingatestone Hall (1298752) please see the Applicant's response to [REP1-191] (8.8.1 Applicant's Comments on Written Representations [REP2-031]). Case Study 9: St Mary's Church, Buttsbury (1264434). With regard to St Mary's Church, Buttsbury (1264434), please see the Applicant's response to [REP1-191] (8.8.1 Applicant's Comments on Written Representations [REP2-031]). Case Study 10: Wenham Parva (Little Wenham) Regarding scheduled monument/listed building Wenham Castle (Little Wenham Hall) (1003759/1033405), Church of St Lawrence, Formerly Church Of All Saints (1033410), Barn Approximately 150 Metres North Of Little Wenham Castle and West of Church of St Lawrence (1194552), Garden Wall Approximately 20 Metres North West Of Little Wenham Castle (1033406), Little Wenham Hall Farmhouse (1285599), Farm Buildings Complex to West of Barn and Buildings Listed 3/80 Little Wenham Castle (1351958), and Farm Buildings Complex Approximately 50 Metres North Of Little Wenham Castle Adjacent to South of the Churchyard (1194648), the errors identified by the respondent have been rectified in the updated documents noted above that were submitted to the Planning Inspectorate as part of the DCO application. It should also be noted that Historic England does not comment on the Grade I assets Wenham Castle and Church of St Lawrence in its written representation [REP1-191], and so it is assumed it agrees with the Applicant's assessment. Case Study 11: Vauxhall, Wenham Magna Regarding Vauxhall (1351957) and the associated medium value moat (3111) and medium value 19th century Vauxhall Farmstead (3112), the errors identified by the respondent have been rectified in the updated documents noted above that were submitted to the Planning Inspectorate as part of the DCO application. The Applicant has reviewed the assessment of these three assets and is satisfied that the conclusions presented in 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] are proportionate and appropriate.

Reference	Question	Applicant's Response
HE 1.19	Assessed harm to heritage assets The ExA have visited various heritage assets on its unaccompanied site inspections. The following assets are assessed in ES Chapter 11 [APP-208] as undergoing mid less than substantial levels of harm during construction but lower harm during operation of the proposed development. Provide additional justification for such views on the following assets: • Kenningham Hall • Piggery (Dower House) & Barn, Flordon Hall • Elm Farmhouse (1373558) • Spring Farmhouse • The Dower House • Moat Farmhouse • Stables Moat Farmhouse • Hascot Hill Farmhouse • East Gores Farmhouse • Barn East Gores Farmhouse • Newneys Farmhouse • Barn Newneys Farmhouse • Porters Farmhouse • Monk's Farm Cottages • Sturgeons House	The Applicant has reviewed the assessment of these assets considering the Examiners' comments. The review of each asset individually has confirmed that the assessment has concluded significant (mid less than substantial harm) impacts during the construction phase and not significant impacts (lower less than substantial harm) during the operation (and maintenance) phase. This is because the construction phase will introduce a combination of, but not all of, the following construction activities into the setting of the assets which contributes to value of the assets. As all the assets noted in the in the Examiners' comment will experience some of these construction phase impacts resulting in significant (mid less than substantial harm) impacts details are not presented on an individual basis. The construction activities comprise: • Construction of the pylon(s) • Installation of pulling location surfacing • Removal of existing local overhead services • Undergrounding of local services cables • Bellmouth works • The construction/deconstruction of crossing protection scaffolding • Excavation of SuDS basins • Temporary haul road construction • The construction and deconstruction of construction laydown areas • The construction and deconstruction of highways laydown areas • Dismantling of existing UKPN overhead cables • The construction and deconstruction of satellite compounds. These activities would introduce plant and vehicle noise, plant and vehicle movements, light, noise, dust, increased road traffic, compound structures and stockpiled materials, generator noise, and the workforce into the setting of these assets. This would result in changes to the rural landscape setting of the assets as construction activities replace rural/agricultural land activities temporarily changing the character of the landscape. These, activities are, however, temporary and once the construction phase is over the only impact on these assets' setting would derive from the operational pylon alignment. During the operation (and maintenance) phase the rural landscape will almost entirely

Reference	Question	Applicant's Response
	• Wardropers Farmhouse • Wayletts • Forge Cottage The list above does not indicate that the ExA agree with other assessments of heritage harm in the ES.	return to rural/agricultural production restoring the character of the landscape and its land use patterns and rotations. The operation (and maintenance) phase of the Project, therefore, would have less of an impact on the settings of the assets which contributes to their values than the construction phase. The Applicant, therefore, is confident in the results of the assessment as the construction phase activities noted above would cause a greater disturbance within the rural setting of these assets than the visual presence of the pylon alignment during the operation (and maintenance) phase as the landscape returns to rural/agricultural production.
HE 1.20	Roydon Hall and Barn 30m northwest These two heritage assets have been assessed in ES Appendix 11.7 – Assessment of Harm to Designated Heritage Assets [APP-215] (pages 53, 54, 235, 236). However, the title indicates that they are both Grade II* and the text states Grade II. Update and confirm whether this affects your assessment.	The Applicant acknowledges the omission on some occasions of the asterisk denoting that 'Roydon Hall' (1284584) and 'Barn 30 Metres North West of Roydon Hall' (1284584) are Grade II* listed buildings. The Inspectorate has identified the issue in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], however, the Applicant has also identified the same point in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and both will be addressed here. The Applicant can assure the Inspectorate that this omission is a simple typing error and that the assets were treated as high value II* Grade buildings throughout the assessment process and that the results of the assessment are not influenced by it. The Applicant confirms that it will be included in the next iteration of 8.1 Errata List. The errata will include the following text edits from 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]: • Page 53 - The Grade II* Listed 'Roydon Hall' (1033215) is located north-east of Creting St Peters and associated with 'Barn 30 Metres North West of Roydon Hall' (1284584) and 'Garden Wall Enclosing Garden to South Side of Roydon Hall' (1352074) • Page 54 - The Grade II* Listed 'Barn 30 Metres North West of Roydon Hall' (1284584) is located north-east of Creting St Peters and associated with 'Roydon Hall' (1033215) and 'Garden Wall Enclosing Garden to South Side of Roydon Hall' (1352074) • Page 235 - The Grade II* Listed 'Roydon Hall' (1033215) is located north-east of Creting St Peters and associated with 'Barn 30 Metres North West of Roydon Hall'

Reference	Question	Applicant's Response
		(1284584) and Garden Wall Enclosing Garden to South Side of Roydon Hall (1352074) • Page 236 - The Grade II* Listed 'Barn 30 Metres North West of Roydon Hall' (1284584) is located north-east of Creting St Peters and associated with 'Roydon Hall' (1033215) and 'Garden Wall Enclosing Garden to South Side of Roydon Hall' (1352074). The errata will include the following text edits from 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]: • Page 69 - The Grade II* listed 'Roydon Hall' (1033215) is located north-east of Creting St Peters and associated with 'Barn 30 Metres North West of Roydon Hall' (1284584) and Garden Wall Enclosing Garden to South Side of Roydon Hall (1352074) • Page 70 - The Grade II* listed 'Barn 30 Metres North West of Roydon Hall' (1284584) is located north-east of Creting St Peters and associated with 'Roydon Hall' (1033215) and 'Garden Wall Enclosing Garden to South Side of Roydon Hall' (1352074) • Page 1054 - The Grade II* listed 'Roydon Hall' (1033215) is located north-east of Creting St Peters and associated with 'Barn 30 Metres North West of Roydon Hall' (1284584) and Garden Wall Enclosing Garden to South Side of Roydon Hall (1352074).
HE 1.21	Heritage Asset no. 1493299 This heritage asset (name unknown) is shown on page 22 of ES Figure 11.2 – Designated Heritage Assets Assessed in the ES Chapter [APP-217] but is not assessed in ES Appendix 11.7 – Assessment of Harm to Designated Heritage Assets [APP-215]. Confirm the name and update ES Appendix 11.7.	The Applicant confirms that the asset is the Grade II listed 'Little Bromley War Memorial' (1493299). The asset is included in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] on page 650, and it can also be found in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] on pages 148 and 1103. The asset has, however, been omitted from 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] in error. The Applicant confirms that will be addressed in the next iteration of 8.1 Errata List at Deadline 4. <i>The errata will include the following text for the construction phase:</i> <i>The Grade II listed Little Bromley War Memorial (1493299) is located on the southern edge of the settlement of Little Bromley. During the construction phase, works</i>

Reference	Question	Applicant's Response
		associated with the Project would be partially located within the setting of the medium value asset. The Project works would comprise the excavation of a permanent infiltration drainage feature in the field c. 60 m to the north-west of the asset. The Project would result in a small change to the setting of the asset, but due to overall distance and the partial screening, there would be a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm. The errata will include the following text for the operation (and maintenance) phase: <i>The Grade II listed Little Bromley War Memorial (1493299) is located on the southern edge of the settlement of Little Bromley. During the operation (and maintenance) phase, the Project (a permanent infiltration drainage feature) would be partially located within the setting of the asset. The Project would result in a small change to the setting of the asset, but as the infiltration drainage feature would cause no vertical intrusion in the setting of the asset, there would be a slight impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm.</i>
HE 1.22	Bulphan WWII bombing decoy This heritage asset is shown on page 40 of ES Figure 11.2 – Designated Heritage Assets Assessed in ES chapter 11 [APP-217] but is only assessed in ES appendix 11.7 – Assessment of Harm to Designated Heritage Assets [APP-215] in relation to operation and maintenance and has not been assessed in relation to construction phase. Update ES Appendix 11.7 to include construction effects.	The Applicant confirms that the asset is the scheduled monument 'Bulphan World War II bombing decoy, 850m and 890m south west of Doesgate Farm' (1020998). The asset is included in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] on page 1061, in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] on pages 317 and 1218. The asset has is also included in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] on page 342 but only for the operation (and maintenance phase); it has, however, been omitted from the construction phase section of the document in error. The Applicant confirms that this will be addressed in the next iteration of 8.1 Errata List. The errata will include the following text for the construction phase: <i>The scheduled monument 'Bulphan world War II bombing decoy, 850m and 890 m south west of Doesgate Farm,' (1020998) is located east of Bulpham. The construction phase of the Project would alter the wider rural setting of the asset through the construction of pylons TB235-TB239 pulling locations associated with pylons TB36 and TB37, bellmouth works, six SuDS basin locations, overhead line mitigation works, OLV</i>

Reference	Question	Applicant's Response
		<i>crossing protection works, and the temporary haul road. The monument comprises two nigh shelters which were part of a dummy aerodrome built to draw attention away from bombing raids at RAF Hornchurch located 11 km to the west. Following decommissioning, all other features of the decoy site were removed. The setting of this asset is informed by its location within a rural and open landscape with gently rising topography to the east. This setting has seen limited change through the small-scale expansion of the villages and town and more tellingly, the imposition of Langdon Hills Golf Country Club and Hotel to the east-south-east. The open landscape would mean that the construction works would be visible from the asset. The Project would result in a small change to the setting of the asset, resulting in a low impact on the value of the asset. It is concluded, therefore, that the asset would experience Lower Less Than Substantial Harm.</i>
HE 1.23	Windmill House The ExA noted on their visit the prominence of Windmill House, at Minnow End across the Chelmer Valley from Chathamhall Lane. Provide an assessment (or signpost to an assessment) of any harm that the proposed development would cause to this non designated heritage asset.	Windmill House is not included in any of the sources agreed upon and noted in 6.19 Scoping Report [APP-288 – 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]. Furthermore, as a low value non-designated asset, its setting would not have been assessed. 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 the 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: <i>'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'</i> 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

Reference	Question	Applicant's Response
		complied with relevant policy in the NPS EN-1 (2024) regarding assessment of impacts to non-designated heritage assets including Windmill House.
HE 1.24	Gladwins Farmhouse Provide an assessment (or signpost to an assessment) of any harm that the proposed development may cause to this Grade II listed heritage asset.	In 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] the setting of Gladwins Farmhouse was assessed, and it was concluded that the setting of the asset does not extend to the Order Limits. The Applicant acknowledges that the Project will be seen from the Grade II asset. However, the Applicant rejects assumption that intervisibility means the setting of the asset extends to the Order Limits. The setting of an asset is not defined by those areas with which it shares intervisibility. Nor is an impact necessarily defined by the intervisibility of an asset with a development. In line with established heritage guidance (Historic England, 2017, The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)), the Applicant has considered all relevant factors and has concluded that the setting does not extend to the Order Limits despite some visibility. Therefore, the Applicant considers the assessment undertaken within 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is appropriate.
HE 1.25	Creeting Hall, Mid Suffolk ES Chapter 11 [APP-208] states that Creeting Hall is a Grade II Listed Building. Confirm if the Hall is graded II or II* and amend if necessary	The Applicant acknowledges the omission on some occasions of the asterisk denoting that 'Creeting Hall' (1352073) is a Grade II* listed building. The Inspectorate has identified the issue in 6.11 Environmental Statement Chapter 11- Historic Environment (Final Issue A) [APP-208], however, the Applicant has also identified the same error in 6.11 Environmental Statement Chapter 11 - Historic Environment (Rev B) [AS-068], which supersedes [APP-208], in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070], in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]. With regard to this error, the Applicant has reviewed the assessment of this asset and is satisfied that the assessment as presented in the above documentation is both appropriate and proportionate. The Applicant confirms that it will be addressed in the next iteration of 8.1 Errata List at Deadline 4. The errata will include the following text edits from 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]:

Reference	Question	Applicant's Response
		• Page 122, 11.7.16 - The high value Grade II* listed 'Creeping Hall' (1352073) • Page 142, 11.7.109 - The high value Grade II* listed 'Creeping Hall' (1352073). The errata will include the following text edits in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]: • Page 72 - In the 'Value' column of the table Medium ~~High~~ • Page 72 - In the 'Construction Impact' column of the table The Grade II* listed 'Creeping Hall' (1352073) is located south of Creeping St Peter. • Page 72 – In the 'Designation' column of the table Grade II* Listed Building • Page 1056 - In the 'Value' column of the table Medium ~~High~~ • Page 1056 - In the 'Operational (and Maintenance) Impact' column of the table The Grade II* listed 'Creeping Hall' (1352073) is located south of Creeping St Peter. • Page 1056 - In the 'Designation' column of the table Grade II* Listed Building The errata will include the following text edits from 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215]: • Page 56 - In the 'Value' column of the table Medium ~~High~~ • Page 56 - In the Assessment of Harm column of the table The Grade II* Listed 'Creeping Hall' (1352073) is located south of Creeping St Peter. • Page 56 - In the 'Designation' column of the table Grade II* Listed Building • Page 237 - In the 'Value' column of the table Medium ~~High~~ • Page 237 - In the Assessment of Harm column of the table

Reference	Question	Applicant's Response
		The Grade II* Listed 'Creeting Hall' (1352073) is located south of Creeting St Peter. • Page 237 - In the 'Designation' column of the table Grade II* Listed Building The errata will include the following text edits from 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]: • Page 339, 3.3.514 - The setting of asset (2249) is informed by its location in the Gipping river valley and by its relationship with the Grade II* listed Creeting Hall (1352073) and associated farming complex (2448).
HE 1.26	Church of St Remigius, Roydon The ExA visited Roydon and have viewed the viewpoints provided for the Church of St Remigius. It was noted that the Church stands on the north side of the Waveney valley with clear views across the valley, including where the proposed pylons would be located. Provide further justification for the view that the effect upon the Church from the proposed development in operation will be minor/negligible.	Please refer to the Applicant's Deadline 2 response to the Written Representation from Historic England, found in 8.8.1 Applicant's Comments on Written Representations [REP2-031], in response to paragraphs 2.17 – 2.23. Supporting justification can also be found in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070].
HE 1.27	Newneys Farmhouse, Braintree ES Chapter 11 [APP-208] states that Newneys Farmhouse is a Grade II Listed Building. Confirm if the Farmhouse is graded II or II* and amend if necessary.	The Applicant acknowledges the omission of the asterisk denoting that 'Newneys' (1123450) as a Grade II* listed building on one occasion. The Inspectorate has identified the issue in 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208] and the Applicant confirms that the error is repeated in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], which supersedes [APP-208]. The Applicant has reviewed all other related documentation and confirms that the error is restricted to ES Chapter 11 [AS-068]. The Applicant can assure the Inspectorate that this omission is a typing error and that the asset was treated as a high value II* Grade building throughout the assessment process and that the results of the assessment are not influenced by it. The Applicant confirms that it will be addressed in the next iteration of 8.1 Errata List at Deadline 4.

Reference	Question	Applicant's Response
		The errata will include the following text edits from 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]: 11.7.54- The high value Grade II* listed 'Newneys Farmhouse' (1123450).
HE 1.28	Southwoods Farm, Chelmsford ES Chapter 11 [APP-208] considers that the effect on Southwoods Farm will be significant during construction but not during operation. It is noted however that the effect upon the separately listed Barn at Southwoods Farm is considered significant for both construction and operation. Provide further justification for the findings of harm on Southwoods Farm.	The Applicant has reviewed the assessment of the three Grade II listed buildings of the former Southwoods farming complex considering the Examiners' comment. The Applicant acknowledges that the discrepancy between the impact of the operation (and maintenance) phase on the assets as reported in 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]. Following the review the Applicant concludes that the assessment of Southwoods (1237174) during operation (and maintenance) is incorrect as presented in the above document and also in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] where Southwoods (1237174) should be identified as experiencing a medium adverse magnitude of impact resulting in a permanent and significant moderate adverse residual significance of effect in concert with barn (1237421) and granary (1237420). This will be included in the next iteration of 8.1 Errata List at Deadline 4.
HE 1.29	Church of St Mary, Buttsbury The listing status for the Church is defined differently in separate parts of ES Chapter 11 [APP-208] as either Grade II or II*. Confirm the current status and amend if necessary.	The Applicant acknowledges the omission of the asterisk denoting that the 'Church of Saint Mary' (1264434) as a Grade II* listed building on one occasion. The Inspectorate has identified the issue in 6.11 Environmental Statement Chapter 11- Historic Environment [APP-208] and the Applicant confirms that the error is repeated in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068], which supersedes [APP-208]. The Applicant has reviewed all other related documentation and confirms that the error is restricted to ES Chapter 11. The Applicant can assure the Inspectorate that this omission is a typing error and that the asset was treated as a high value II* Grade building throughout the assessment process and that the results of the assessment are not influenced by it. The Applicant confirms that it will be addressed in the next iteration of 8.1 Errata List at Deadline 4. The errata will include the following text edits from 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]: 11.7.146 - The high value Grade II* listed 'Church of St Mary' (1264434).

Reference	Question	Applicant's Response
HE 1.30	Dunton Hall ES Chapter 11 [APP-208] considers that the effect on Dunton Hall will be significant during construction but not during operation. It is noted however that the effect upon the adjacent Church of St Mary (1122253) is considered significant for both construction and operation. Provide further justification for the findings of harm on Dunton Hall.	The Applicant has reviewed the assessment of the Church of Saint Mary (1122253) and Dunton Hall (1338380) considering the Examiners' comment. The assessment of Dunton Hall (1338380) reported in 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] concludes that, during the operation (and maintenance) phase, the asset will experience a medium adverse magnitude of impact resulting in a direct, permanent moderate adverse significance of effect on the asset (significant), and mid less than substantial harm, which is the same as the church.
HE 1.31	Rivenhall Place The Grade II* listed Rivenhall Place is assessed as being impacted with a lower level of less than substantial harm during both construction and operation. The ExA viewed the heritage asset and its setting from local public rights of way during a site visit and notes the heritage viewpoints from this location. Provide further justification for your assessment of the harm that would be caused to this asset, bearing in mind the status of the property (in listing • terms) and the purposely designed setting to the asset. Consider the cumulative effects of the proposed development and the permitted solar farm to the heritage asset.	The setting of Rivenhall Place (1122598), the Bridge to Rivenhall Place (1338253) and the current landscape garden (Project ID 5036) is shared and informed by their interrelationships and by their relationships with non-designated buildings within the complex, which contribute positively to the overall character of the estate. The setting is further informed by the wider rural agricultural landscape with which the former manor house and associated assets have historical and former functional relationships. Views in and out of the landscape garden and, therefore, the Place are restricted and almost entirely screened by mature tree cover in the garden and by defining tree belts to the west, north and east. The view to the south, which includes the Project, is only partially screened by scattered mature trees and a mature tree lined hedgerow. The setting of the Place extends to the extent of its landscape garden and out to the rural landscape to the south. The operation phase of the Project would impact the asset's setting through the introduction of pylons TB92-TB95, however, Figure 7.12.F211_HE5 Viewpoint HE5: Rivenhall Place in 7.11 Transport Assessment - Appendix I - Figures [APP-350] suggests that only pylons TB94 to TB96 will be visible from a viewpoint a little to the south of the south-facing facade of the asset at distances of 490 m, 590 m and 910 m respectively. At these distances, the Applicant believes the Project is at the limits of the asset's setting and whilst the Applicant acknowledges the Project would be partially visible, the Applicant is confident that the Project would impact only one element of and, therefore, a small proportion of the asset's setting. The Project would not impinge on views of the asset from within the landscape garden, nor would it interrupt the view from the public right of way along the southern boundary

Reference	Question	Applicant's Response
		of the garden. The Project would not be visible in the background of views of the asset's four facades from with the grounds, and so it would not impact the interrelationship between the designated and non-designated assets of the Rivenhall complex. The Applicant is, therefore, confident that the conclusions reached on the significance of effect on the value of Rivenhall Places within 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] and the level of harm in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215] are both proportionate and appropriate.
HE 1.32	The Gables, Darrow Lane, Snow Street Roydon PC state [RR-3204] that National Grid have purchased the above heritage asset and that the asset has deteriorated since this time. Please confirm is this is the case, if so has the property been purchased as part of the proposed development scheme and what the intentions are for the listed building. The ExA note that the property has been assessed as undergoing a mid level of less than substantial harm during construction and lower harm during operation.	The Applicant can confirm that National Grid did purchase the property known as Gables Farm, Darrow Lane. The purchase of the property was unrelated to the proposed development, the building's heritage, and there are no plans to change the use of the building or the surrounding land. The property isn't included within any of the Norwich to Tilbury consultation materials as it is not relevant to the Project's proposals. National Grid is currently undertaking survey works at the property to help determine appropriate next steps. It is the National Grid intention to place the property on the market in due course. However, it is anticipated that certain maintenance works will need to be completed prior to listing the property for sale. These measures are necessary to ensure the property is in suitable condition for potential buyers.
HE 1.33	Parish church of St Mary the Virgin, Fairstead The ExA noted this Grade I listed church on its visits, which has a clear aspect to the north towards the proposed pylon lines (this view is partially shown on Viewpoint 5.08 [APP-348]). Confirm your findings of harm to this heritage asset from the	Please refer to the Applicant's Deadline 2 response to the Written Representation from Historic England, found in 8.8.1 Applicant's Comments on Written Representations [REP2-031], in response to paragraphs 2.106 to 2.108.

Reference	Question	Applicant's Response
	proposed development for the operational stage.	
HE 1.34	Highfields Farmhouse and Coney Byes, West Bergholt The ExA noted these Grade II listed heritage assets on its visits. Both assets would appear to have reasonably clear views to their south and west respectively over a reasonably steep sided valley in which the pylons are proposed to be sited. Your assessment of harm to these assets consider that both will have a lower less than substantial harm caused to their significance from the proposed development. Provide further justification for this assessment.	The setting of Highfields Farmhouse (1225094) is informed by the asset's location within its associated farmyard and attractive garden which is defined by mature hedges with occasional trees. The setting is also informed by the asset's relationships with its associated non-designated outbuildings, some of which are recorded on the first edition OS map of 1880, and with the grade II listed King's Farmhouse (1266530) located c. 140 m to the south. The setting is further informed by the surrounding agricultural land with which the asset and associated buildings have a historic relationship and possibly an ongoing functional relationship. The operation (and maintenance) phase of the Project would result in pylons TB39 and TB40 entering the setting of the asset on the opposing, eastern bank of a shallow north/south aligned valley that separates the asset and the Project. Mature tree cover in the intervening landscape would provide some partial screening, however, a moderate proportion of the pylons would be visible for the asset with pylon TB39 lying c. 250 m and pylon TB40 located c. 310 m to the south-east. Pylon TB40 would be visible from the southern access driveway when departing the asset and the pylons would also likely be visible in the background of the view of the asset from the northern access driveway. The Project would not, however, impinge on the view of asset from the unnamed road to the south-west, nor would it interrupt street-level views from the same road to the south-east due to screening by mature tree cover in the intervening landscape. The Project would have no impact on the relationship between the asset and its garden, and its non-designated outbuildings, nor the relationship with King's Farmhouse to the south. The Project would not impact the understanding of the asset and its outbuildings as a post medieval farmstead nor would it detract from the cohesion of the farmstead. The Project, therefore, amounts to a minor change to the wider rural setting of the asset only and so the Applicant is confident in the assessment of the asset presented in 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].

Reference	Question	Applicant's Response
		The setting of Coney Byes (1225071) is informed by the asset's location within its possibly former farmyard location and a wider grassed grounds. There are also grassed lawns to the west and south and there is mature tree cover to the south, west and north. The setting is further informed by the asset's relationships with its non-designated outbuildings, some of which are recorded on the first edition OS map of 1880 and with the characterful modern residential property to the east. The surrounding rural/agricultural landscape, with which the asset and its outbuilding have historical and possibly ongoing functional relationships, also positively contributes to the setting of the asset. The operation (and maintenance) phase of the Project would result in pylon TB40 entering the setting of the asset within its wider rural/agricultural element c. 340 m to the north-west. The pylon would be partially screened by the mature tree cover of the asset's grounds and by a small copse and hedged and tree lined field boundaries in the intervening landscape. A moderate proportion of the pylon would, however, be occasionally visible at ground level from the asset. The Project would interrupt a long distance (c. 860 m) view of the asset from an unnamed road across the shallow valley to the west, but the asset is not visible from the roads to the east. The Project would have no impact on the relationship between the asset and its grounds, and its non-designated outbuildings, nor with the residential property to the east. The Project would not impact the understanding of the asset and its outbuildings as a post medieval farmstead, nor would it detract from the cohesion of the farmstead. The Project, therefore, amounts to a minor change to the wider rural setting of the asset only, and so the Applicant is confident in the assessment of the asset presented in 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].
HE 1.35	Dunton Hills Garden Village Provide further information regarding the effects of the proposed	Dunton Hills Garden Village (DHGV) Framework Masterplan⁴⁹ contains an extensive list of principles with the following relating to the historic environment: Mandatory Spatial Principles

⁴⁹ Broadway Malyan (2020) *Dunton Hills Garden Village Framework Masterplan* [Online] Available at: <https://brentwood.moderngov.co.uk/documents/s18277/Appendix%20A%20-%20Dunton%20Hills%20Garden%20Village%20Framework%20Masterplan%20-%20Part%201.pdf>

Reference	Question	Applicant's Response
	development on the DHGV Master Plan and key principles in relation to nearby heritage assets.	Layout And Spatial Organisation Bullet 02 Page 13: Definition of the Village Green - will provide a setting for the historic farmstead as well as a key communal open space for residents to interact and relax in. Applicant's response: The Project would not interact with this element of the DHGV development. The Applicant also notes that the development of DHGV would result in the removal of the farm's surrounding agricultural landscape, which would result in the restriction of its surviving setting to the farmyard and, therefore, the setting of the asset would not extend to the Order Limits. Vistas, Access and Movement Bullet 01 Page 13: Farmstead Avenue and view corridor - will preserve a direct visual relationship between the A128 and the Grade II listed farmhouse. This is one of many masterplanning approaches that ensures the historic farmstead becomes a focal point within the Garden Village. Applicant's response: The non-designated Farmstead Avenue is not identified as a heritage asset in any of the agreed sources of baseline data as set out 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]. Furthermore, the thoroughfare is located some distance outside the agreed Project Study Area for non-designated assets, and the Project would not be visible in views westwards along the Avenue. It is possible that the Project would be visible in the background of the views eastwards towards Dunton Hills Farm, however, this view currently includes a number of pylons which would be dismantled before replacing them with fewer, taller pylons and therefore this is not considered to affect the principle in the masterplan. Key heritage design features incorporated into the Framework Masterplan are: Bullet 1 Page 94: A comprehensive green infrastructure scheme, which seeks to improve the existing historic landscape features (such as the ancient woodland along Nightingale Lane, planting along Eastlands Spring and important hedgerows) and

Reference	Question	Applicant's Response
		mitigate potential harm, (e.g. structural planting), to protect views of All Saints Church from Thorndon Park and the church itself. Applicant's response: All the non-designated assets mentioned are outside the agreed heritage Study Area (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]). The Applicant believes that any views from Thorndon Park towards the Church of All Saints will not include long distance views of the Project and even if views were possible, they already include a number of pylons which would be dismantled before replacing them with fewer, taller pylons and therefore this is not considered to affect the principle in the masterplan. Bullet 2 Page 94: The provision of generous 'buffer zones' around historic buildings, which provide new publicly-accessible green spaces from which to appreciate historic buildings but also respect their setting. This includes the provision of a new village green to the west of Dunton Hills farmhouse and grassland meadows in the vicinity of St Mary's Church and Dunton Hall. Applicant's response: The Project will not affect the provision of green spaces around Dunton Hills Farmhouse. While the Project would be located close to St Mary's Church and Dunton Hall, the presence of pylons TB229 and TB230 would not prevent the use of the space as a green space for recreation and to appreciate the heritage assets. Bullet 3 Page 94: The retention of key views across the site, including those towards and between the Dunton Hills farmhouse, Church of All Saints and Church of St Mary. Applicant's response: Views between Dunton Hills Farmhouse towards the Church of All Saints would not be affected by the Project. It is possible the Project will be visible in the background of views towards Dunton Hills Farmhouse from within the DHGV development. Views between Dunton Hills Farmhouse towards the Church of Saint Mary will be interrupted by the Project, however, the view already includes several pylons which will be replaced by the Project. Also, the permeable nature of the pylons means that while they would be present in views they would not block views between these two assets.

Reference	Question	Applicant's Response
		Bullet 4 Page 94: The proposals also seek to retain and reinstate historic routes through the site (e.g. the farmstead driveway). Applicant's response: The Project would not affect any of these routes. Mandatory Spatial Principles - Heritage Setting and Routes Bullet 01 Page 95: Village Green setting - will provide an appropriate setting for the farmstead within which residents and visitors can interact, play and relax. The setting will be defined by the farmstead to the east, the fields existing to the north and south, and the Eastlands Spring to the west. New homes will define, and be orientated to activate the edge of the Village Green. Heights will be limited to three storeys and the design will respond to the architectural vernacular of the farmstead, sensitively respecting this historic setting within the Garden Village. Applicant's response: The Project will not affect the proposed layout of the development around Dunton Hills Farmhouse. Bullet 02 Page 95: Existing farmstead drive - to the east of the Eastlands Spring will be preserved and incorporated into the design of the Village Green. The existing farmstead drive will form a key part of the pedestrian and cycle route that connects the Village Centre to the Secondary School and Dunton Waters, in addition to connecting the farmstead with the Market Square. Applicant's response: The Project would not affect the farmstead drive. Bullet 03 Page 95: Historic farmstead drive - the original and historic drive to the farmstead will be reinstated, enhancing the connectivity between the Village Green, the historic farmstead and Nightingale Lane. Applicant's response: The Project would not affect the historic farmstead drive. Bullet 04 Page 95: Nightingale Lane - will be integrated into the design of the movement network, promoting sustainable movement within the wider Garden Village as well as healthy living.

Reference	Question	Applicant's Response
		Applicant's response: The Project would not affect Nightingale Lane. Bullet 05 Page 95: Nightingale Hall Woods - historic setting will be preserved and respected as a key feature within Dunton Woods. Applicant's response: The Project would not affect Nightingale Hall Woods. VIEW CORRIDORS Bullet 06 Page 95: Farmstead Avenue and view corridor - will preserve a direct visual relationship between the junction onto the A128 and the Grade II listed farm house and associated farmstead. This is one of many masterplanning approaches that ensures that the historic farmstead becomes a focal point within the overall Garden Village. There is potential to thin the trees along Eastlands Spring to improve visibility of the farmstead. Applicant's response: The Project would not affect views between the A128 and Dunton Hills Farmhouse. Bullet 07 Page 95: Church views: between the farmstead forecourt and All Saints Church – the silhouette of the Church against the skyline should be preserved, so new development in the foreground and middle ground should not occlude views of the Church, and should preserve the viewers' ability to recognise and appreciate the landmark. Applicant's response: The Project would not affect these views. Bullet 08 Page 95: Church views: development in the foreground and middle ground will not occlude the views of the Church of St Mary from the viewpoint to the east of the farmstead, and will preserve the viewers' ability to recognise and appreciate the landmarks. Applicant's response: Please see the Applicant's response to Bullet 3 Page 94 above.

Reference	Question	Applicant's Response
		Bullet 09 Page 95: Church view: development in the foreground and middle ground will not occlude the view of the Church of St Mary from the south-west of the site, and will preserve the viewers' ability to recognise and appreciate the landmark. Applicant's response: Please see the Applicant's response to Bullet 3 Page 94 above.
HE 1.36	Mid less than substantial harm – mitigation details Several Councils request full details of mitigation to any heritage assets assessed to be affected with a 'mid level' of Less than Substantial harm to their significance Provide such details (including standard, embedded and any additional mitigation if appropriate) or provide such justification for not doing so.	Where a mid less than substantial harm conclusion has been reached for the construction phase impacts on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], these impacts would be temporary, and the temporary construction works elements of the Project would be reinstated following construction. Therefore, it is not considered necessary to microsite all temporary elements of the works. However, the Applicant has considered embedded mitigation. 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. Changes to temporary construction works were considered as part of this. 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. The Applicant has also included standard mitigation during the construction phase to reduce change to setting for designated assets in 7.2 Outline Code of Construction Practice [REP2-014]. Commitments in Table 6.1, such as H06 which sets out the commitment to maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches) are an element that informs the settings of heritage assets. In addition, commitments including GG07, GG17, GG26, AQ01, NV01, NV02 and NV05 will control construction works to ensure disturbance is reduced as much as possible, which will contribute to reducing change within the settings of heritage assets. 7.4 Outline Landscape and Ecological

Reference	Question	Applicant's Response														
		Management Plan [REP2-018] includes measures to retain and reinstate landscape, ecological and historic landscape features, which inform the settings of heritage assets. Changes to the setting resulting from construction activities would be temporary and would be reversed once the construction phase is completed. No additional mitigation measures are proposed during the construction phase as any measures, such as tall construction hoardings, designed to lessen the visual impact of the Project would themselves be of a scale that would be a visually adverse alteration to the setting of the asset. Where a mid-level less than substantial harm conclusion has been reached for the operation (and maintenance) phase impacts on designated assets in 6.11.A7 Environmental Statement Appendix 11.7 - Assessment of Harm to Designated Heritage Assets [APP-215], the mitigation provided, or the reason for not providing mitigation, is described for each designated heritage asset with this assessment in the table below.														
		<table><tr><th>Asset</th><th>Asset Type</th><th>Value</th><th>Project Section</th><th>Mitigation Details</th></tr><tr><td>Flordon Hall (1050698)</td><td>Grade II* Listed Building</td><td>High</td><td>Section A</td><td> Flordon Hall (1050698) Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment, including historical Viewpoint HE1 to the east of Flordon Hall, giving a view to the front of the hall with the Project behind (7.12 Visualisations - Part 8 of 9 [APP-350]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. A localised diversion to the north-west between RG20 and RG22 was </td></tr></table>					Asset	Asset Type	Value	Project Section	Mitigation Details	Flordon Hall (1050698)	Grade II* Listed Building	High	Section A	Flordon Hall (1050698) Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment, including historical Viewpoint HE1 to the east of Flordon Hall, giving a view to the front of the hall with the Project behind (7.12 Visualisations - Part 8 of 9 [APP-350]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. A localised diversion to the north-west between RG20 and RG22 was
Asset	Asset Type	Value	Project Section	Mitigation Details												
Flordon Hall (1050698)	Grade II* Listed Building	High	Section A	Flordon Hall (1050698) Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment, including historical Viewpoint HE1 to the east of Flordon Hall, giving a view to the front of the hall with the Project behind (7.12 Visualisations - Part 8 of 9 [APP-350]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. A localised diversion to the north-west between RG20 and RG22 was												

Reference	Question	Applicant's Response
		identified but would require two additional angle pylons and was therefore not taken forward. An alternative diversion to the west, between RG18/RG19 and RG24, was also considered but rejected because it would transfer effects onto some residential properties. Full details of why these alternatives were not preferred are in 5.15 Design Development Report [APP-122] (paras 4.2.3 to 4.2.4). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. It was concluded that the intervening landscape, including buildings, copses, and mature tree-lined hedgerows, effectively interrupts and breaks up views toward the Project. While the asset can be viewed from Long Lane, approximately 480 m to the south-east, and this view may include the tops of pylons RG21 and RG22 cresting above mature vegetation to the north-west of the asset,

Reference	Question	Applicant's Response			
					further mitigation would not materially change the assessed impact. In particular, additional screening planting was considered but found unlikely to reduce the effect meaningfully and could potentially alter the existing character of the setting, making it unsuitable. Therefore, additional mitigation measures are not considered appropriate.
		Heywood Manor (1049736)	Grade II Listed Building	Medium Section A	Heywood Manor (1049736) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including historical Viewpoint HE10 (F216) located c.300 m north-west of the Manor - 7.12 Visualisations - Part 8 of 9 [APP-350]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. Alternatives were considered but were not preferred. Full details of why these alternatives were not preferred are in 5.15 Design Development Report [APP-122] (paras 4.5.1 to 4.5.3). The Applicant has also considered standard mitigation detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...]</i> Where such features cannot be

Reference	Question	Applicant's Response
		<i>retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the intervening landscape includes copses and mature tree-lined hedgerows that would interrupt and break up the view towards the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and further measures are not considered appropriate.
	Elm Farmhouse (1373558) Grade II Listed Building Medium Section A	Elm Farmhouse (1373558) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including historical Viewpoint HE21 located c.40.5 m south-west of the farmhouse and illustrating presence of the Project within the setting - 7.12 Visualisations - Part 9 of 9 [APP-351] and photomontage/viewpoint 1.06 Fundenhall Road - 7.12 Visualisations - Part 1 of 9 [APP-343]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development

Reference	Question	Applicant's Response
		Report [APP-122]. Alternatives were considered, deviating to the east between RG27 (or adjacent pylons) and either RG34 or RG39, to follow lower ground or to straighten the alignment as well as partially following lower ground. These were considered but not taken forward. Full details of why these alternatives were not preferred are in 5.15 Design Development Report [APP-122] (paras 4.3.1 to 4.3.5). The Applicant has also considered standard mitigation detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks)'</i>. In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the views of the agricultural landscape to the north-north-west (RG28) as the pylon would be visible above the hedgerow which defines the asset's garden, and to the south-west where pylon RG29 is located c.220 m away. Given the open views between Elm Farmhouse and pylons RG28 and

Reference	Question	Applicant's Response
		RG29, the Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the property, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the surrounding agricultural landscape is a key element of the asset's value, and planting would disrupt this connection. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.
Manor Farmhouse (1049998)	Grade II Listed Building	Medium Section A Manor Farmhouse (1049998) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including photomontage/ viewpoint 1.09 PRow west of Tibenham (Tibenham FP4), c.800 m east of the farmhouse - 7.12 Visualisations - Part 1 of 9 [APP-343]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. Alternatives were considered but were not preferred. Full details of why these alternatives were not preferred are in 5.15 Design Development Report [APP-122] (paras 4.5.1 to 4.5.3).

Reference	Question	Applicant's Response
		The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the mature trees and outbuildings of the farmhouse afford the asset some screening and would interrupt the view towards the Project. Additional mitigation such as screening planting would not materially change the assessed impact, therefore, further measures are not considered appropriate.
	Court Farmhouse (1251595) Grade II Listed Building Medium Section B	Court Farmhouse (1251595) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery. The Applicant has considered embedded mitigation and design alternatives as

Reference	Question	Applicant's Response
		documented in 5.15 Design Development Report [APP-122]. Near the asset, 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. It was noted that the grounds of the asset contain numerous trees and are defined by high, tree-lined hedgerows, which provide seclusion and privacy for the asset and its outbuildings. The Project would affect views away from the asset toward the farmland to the east and north-east; however, these views would be broken by the mature trees within the asset's grounds. In particular, additional screening planting was considered but found unlikely to reduce the effect meaningfully and could potentially alter the existing character of

Reference	Question	Applicant's Response			
					the setting, making it unsuitable. Therefore, additional mitigation measures are not considered appropriate.
		Hill Farmhouse (1032730)	Grade II Listed Building	Medium Section B	Hill Farmhouse (1032730) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery. The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route has been identified between RG130 and RG147, which largely parallels an existing 400 kV overhead line to the east. Full details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 5.3.4 to 5.3.12). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out '<i>Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018]

Reference	Question	Applicant's Response
		includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that views away from the asset to the farmland to the east and north-east would be broken by the asset's outbuildings and mature trees within its grounds, and that no key views of the asset would be affected by the Project. Additional mitigation such as screening planting would not materially change the assessed impact; therefore, further measures are not considered appropriate.
	Poplar Farmhouse (1182121) Grade II Listed Building Medium Section B	Poplar Farmhouse (1182121) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Photomontage/ Viewpoint 2.41 Mid Suffolk Footpath near Mendlesham Green, located c.500 m north-east of the asset and 2.43 PRow, Middlewood Green (Earl Stonham 8) situated c.870 m south-east - 7.12 Visualisations - Part 3 of 9 [APP-345]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between RG147 and RG165 was considered, however, this route was at a similar distance to the west of the asset as it is now to the east.

Reference	Question	Applicant's Response
		Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 5.4.1 to 5.4.6). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that the Project would impact views away from the asset to the farmland to the north-east through to the south-east, however, these views would be broken by the asset's outbuildings and mature trees of its grounds. No key views of the asset would be impacted by the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and is not considered appropriate.
	Doles Farmhouse (1352325)	Grade II Listed Building
	Medium	Section B
	Doles Farmhouse (1352325)	Doles Farmhouse (1352325) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11

Reference	Question	Applicant's Response
		Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Photomontage/ Viewpoint 2.43 PRoW, Middlewood Green (Earl Stonham 8) situated c.280 m south-east - 7.12 Visualisations - Part 3 of 9 [APP-345]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between RG147 and RG165 is identified, which would have placed the Project further to the west. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 5.4.1 to 5.4.6). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that the

Reference	Question	Applicant's Response			
		Project would impact views away from the asset to the farmland to the north-west through to the south-west, however, these views would be broken by the asset's outbuildings and mature trees of its grounds. No key views of the asset would be impacted by the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and is not considered appropriate.			
		Star Orchard (1032663)	Grade II Listed Building	Medium	Section B
		Star Orchard (1032663) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Photomontage/ Viewpoint 2.43 PRoW, Middlewood Green (Earl Stonham 8) situated c.690 m north-east - 7.12 Visualisations - Part 3 of 9 [APP-345]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between RG147 and RG165, which would have placed the Project to the west of the asset has been identified. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 5.4.1 to 5.4.6). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out			

Reference	Question	Applicant's Response
		<i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that, located partially within the asset's setting, the Project would impact views away from the asset to the farmland to the north-east through to the south-east. However, these views would be broken by the mature trees of the asset's grounds and mature hedgerows of the intervening landscape. No key views of the asset would be impacted by the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and is not considered appropriate.
	Firtree Farmhouse (1032662) Grade II Listed Building	Medium Section B Firtree Farmhouse (1032662) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Photomontage/ Viewpoint 2.43 PRoW, Middlewood Green (Earl

Reference	Question	Applicant's Response
		Stonham 8) situated c.790 m north-east - 7.12 Visualisations - Part 3 of 9 [APP-345] and Photomontage 2.12, Mid Suffolk Footpath / Gipping located c.990 m north-west - 7.12 Visualisations - Part 2 of 9 [APP-344]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between RG147 and RG165 has been identified, which would have placed the Project to the west of the asset. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 5.4.1 to 5.4.6). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that, located partially within the asset's setting, the Project would impact views away from the

Reference	Question	Applicant's Response			
		asset to the farmland to the north-east through to the south-east, however, these views would be broken by the asset's outbuildings, the mature trees of the asset's grounds, and mature hedgerows of the intervening landscape. No key views of the asset would be impacted by the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and is not considered appropriate.			
		Upland House (1182102)	Grade II Listed Building	Medium Section B	Upland House (1182102) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Photomontage/ Viewpoint 2.43 PRoW, Middlewood Green (Earl Stonham 8) situated c.1 km north-east - 7.12 Visualisations - Part 3 of 9 [APP-345] and Photomontage 2.12, Mid Suffolk Footpath / Gipping located c.1 km north-west - 7.12 Visualisations - Part 2 of 9 [APP-344]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between RG147 and RG165 has been identified, which would have placed the Project to the west of the asset. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 5.4.1 to 5.4.6).

Reference	Question	Applicant's Response			
		The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that located partially within the asset's setting, the Project would impact views away from the asset to the farmland to the east through to the north-east, however, these views would be broken by the mature trees of the asset's grounds, and mature hedgerows of the intervening landscape. No key views of the asset would be impacted by the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and is not considered appropriate.			
		Roydon Hall (1033215)	Grade II* Listed Building	High	Section B Roydon Hall (1033215) Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The assessment has been informed by site visits,

Reference	Question	Applicant's Response
		aerial and street-view imagery, and viewpoint assessment (including Photomontage/ Viewpoint 2.14 Creeting Lane, Creeting St Peter) situated c.630 m west - 7.12 Visualisations - Part 2 of 9 [APP-344]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between RG147 and RG165 has been identified, which would have placed the Project to the west of the asset. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 5.4.1 to 5.4.6). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that located partially within the asset's setting, the Project would impact views away from the asset to the

Reference	Question	Applicant's Response			
		farmland to the north-east through to the south-east, however, these views would be broken by the asset's outbuildings, the mature trees of the asset's grounds, and mature hedgerows of the intervening landscape. No key views of the asset would be impacted by the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and is not considered appropriate.			
		Barn 30 Metres North West of Roydon Hall (1284584)	Grade II* Listed Building	High	Section B Barn 30 Metres North West of Roydon Hall (1284584) Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Photomontage/ Viewpoint 2.14 Creeping Lane, Creeping St Peter) situated c.630 m west - 7.12 Visualisations - Part 2 of 9 [APP-344]. The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between RG147 and RG165 has been identified, which would have placed the Project to the west of the asset. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 5.4.1 to 5.4.5). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as

Reference	Question	Applicant's Response
		the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that, being partially within the asset's setting, the Project would affect views from the asset toward the farmland to the north-east and south-east; however, these views would be broken by Roydon Hall (1033215) to the south, by the farmyard buildings to the east and north, and by the mature trees within the asset's grounds and the mature hedgerows in the intervening landscape. No key views of the asset would be impacted by the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and is not considered appropriate.
	Hill Farmhouse (1182339) Grade II Listed Building	Medium Section B Hill Farmhouse (1182339) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint

Reference	Question	Applicant's Response
		assessment (including Photomontage/ Viewpoint 2.44 Fen Lane, near Woolney Hall, north of Creeping St Mary) situated c.1 km north-east - 7.12 Visualisations - Part 3 of 9 [APP-345]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between RG147 and RG165, Which would have placed the Project further to the west. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 5.4.5). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that located partially within the asset's setting, the Project would impact views away from the asset to the farmland to the west and south-

Reference	Question	Applicant's Response			
		west, however, these views would be broken by the building located south-west of the farmhouse, and also by the mature trees of the asset's grounds, and mature hedgerows of the intervening landscape. No key views of the asset would be impacted by the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and is not considered appropriate.			
		Creeting Hall (1352073)	Grade II Listed Building	Medium Section B	Creeting Hall (1352073) - Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including historical viewpoint HE35 - Creeting Hall - illustrating view from the rear of the house towards the Project to show presence within views and setting - located c.20 m north-east - 7.12 Visualisations - Part 9 of 9 [APP-351] as well as Photomontage/ Viewpoint 2.28 - Gipping Valley Path near Creeting Hall, situated c.375 m south-west - 7.12 Visualisations - Part 2 of 9 [APP-344]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between RG147 and RG165 has been identified, which would have placed the Project to the west of the asset. Details of why this alternative was not preferred are in 5.15

Reference	Question	Applicant's Response
		Design Development Report [APP-122] (paras 5.4.3 to 5.4.6). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that, located partially within the asset's setting, the Project would impact views away from the asset to the farmland to the north-east through to the south-east, however, these views would be broken by the asset's outbuildings, the mature trees of the asset's grounds, and mature hedgerows of the intervening landscape. No key views of the asset would be impacted by the Project. Therefore, additional mitigation such as screening planting would not materially change the assessed impact and is not considered appropriate.

Reference	Question	Applicant's Response			
		Bleak Hall (1251669)	Grade II Listed Building	Medium Section B	Bleak Hall (1251669) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits and aerial as well as street-view imagery. The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. The Applicant did not identify any alternative overhead line routes and pylon locations prior to the submitted prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact views away from the asset to the farmland to the north-west through to the north-east, however, these views would

Reference	Question	Applicant's Response
		be broken by the mature trees of the asset's grounds, and mature hedgerows and development of the intervening landscape. The view to pylon RG198 would also be broken by the building located north-west to the listed building within the yard. The Project would also impact the view of the asset from the south along Blood Hill as the pylons would be visible in the backdrop. Further mitigation would not materially change the assessed impact. In particular, additional screening planting was considered but found unlikely to reduce the effect meaningfully and could potentially alter the existing character of the setting, making it unsuitable. Therefore, additional mitigation measures are not considered appropriate.
	Bounds Farmhouse (1147743) Grade II Listed Building Medium Section C	Bounds Farmhouse (1147743) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits and aerial and street-view imagery. The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route between TB1 to TB4 which is preferred and has been taken forward. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras. 6.5.26 to 6.5.27). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as

Reference	Question	Applicant's Response
		the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that the Project would impact views away from the asset to the farmland to the east and the tops of pylons TB1 to TB4 may be visible over the top of mature tree cover to the south. However, further mitigation would not materially change the assessed impact. In particular, additional screening planting was considered but found unlikely to reduce the effect meaningfully and could potentially alter the existing character of the setting, making it unsuitable. Therefore, additional mitigation measures are not considered appropriate.
	Numbers 1, 2 And 3 Brick Cottages (1169966)	Grade II Listed Building Medium Section D Numbers 1, 2 And 3 Brick Cottages (1169966) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including

Reference	Question	Applicant's Response
		Photomontage/ Viewpoint 4.11 - PRow south of Aldham (Aldham 15), situated c.290 m north-east - 7.12 Visualisations - Part 4 of 9 [APP-346] and Photomontage/ Viewpoint 4.21, Brook Road, north of Marks Tey, which is a representative of people using the local road network and living and moving around north of Marks Tey - 7.12 Visualisations - Part 5 of 9 [APP-347]). The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 - Design Development Report [APP-359] dated 2024 identified an alternative route with modified pylon positions between TB53 and TB58 (identified as TB52 to TB57 in 2024) to increase separation was preferred and taken forward in the 2024 draft alignment. The addition of two pylons at Aldhamhall Wood were considered. Details of why this was not taken forward can be found in 7.21 2024 - Design Development Report [APP-359] dated 2024 (para 5.4.150). 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations since the 2024 draft alignment and prior to project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including</i>

Reference	Question	Applicant's Response			
		<i>reinstating hedgerows, fences, walls and earthworks).</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that this asset is secluded within its surrounding vegetation which would partially break up views towards the Project, although nearby pylons would be present within the asset setting. Further mitigation would not materially change the assessed impact. In particular, additional screening planting was considered but found unlikely to reduce the effect meaningfully and could potentially alter the existing character of the setting, making it unsuitable. Therefore, additional mitigation measures are not considered appropriate.			
		The Old Rectory (1224447)	Grade II Listed Building	Medium	Section D
		The Old Rectory (1224447) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including baseline photo 4.23, Great Tey Road, located c.230 m south, that is representative of people living, moving and using the local road network near Little Tey - 7.12 Visualisations - Part 5 of 9 [APP-347]). The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 -			

Reference	Question	Applicant's Response
		Design Development Report [APP-359] dated 2024, identified an alternative route at TB65 which would have placed the Project south of Upp Hall Farm. Details of why this alternative was not preferred are in 7.21 2024 - Design Development Report [APP-359] (para 5.4.156). 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations since the 2024 draft alignment and prior to project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that mature vegetation around the asset would partially break up views towards the Project. Further mitigation would not materially change the assessed impact. In particular, additional screening planting was considered but found unlikely to reduce the effect meaningfully and

Reference	Question	Applicant's Response			
					could potentially alter the existing character of the setting, making it unsuitable. Therefore, additional mitigation measures are not considered appropriate.
		King's Farmhouse (1266530)	Grade II Listed Building	Medium Section D	King's Farmhouse (1266530) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including historical viewpoint HE4 Coney Byes, located c.480 m north-west - 7.12 Visualisations - Part 8 of 9 [APP-350]). The Applicant has considered embedded mitigation and design alternatives. 5.15 Design Development Report [APP-122] identifies an alternative route at Great Horkesley. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 7.2.5). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out '<i>Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018]

Reference	Question	Applicant's Response
		includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that the Project would impact views to and from the asset to the south-west through to the north-east. However, the views to pylons TB39 and TB40 would be broken by vegetation (high hedgerows and high trees belonging to the asset, high trees and shrubs within the intervening landscape) and topography. Furthermore, the Project would also impact the view of the asset from the south as pylon TB41 would potentially be visible in the backdrop. However, further mitigation would not materially change the assessed impact. In particular, additional screening planting was considered but found unlikely to reduce the effect meaningfully and could potentially alter the existing character of the setting, making it unsuitable. Therefore, additional mitigation measures are not considered appropriate.
	Knaves Farmhouse (1266773) Grade II Listed Building Medium Section D	Knaves Farmhouse (1266773) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including baseline photo 4.23, Great Tey Road, located c.230 m south, that is representative of people living, moving and using the local road network near Little Tey - 7.12 Visualisations - Part 5 of 9 [APP-347]).

Reference	Question	Applicant's Response
		The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 - Design Development Report [APP-359] dated 2024, identified an alternative route at TB65 which would have placed the Project south of Upp Hall Farm. Details of why this alternative was not preferred are in 7.21 2024 - Design Development Report [APP-359] (para 5.4.156). 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that the asset has a relationship with two Grade II Listed ancillary buildings (1266823, 1266775) within the farm complex and the Project would not disrupt the intervisibility between the farmhouse and its designated ancillary

Reference	Question	Applicant's Response			
		buildings. Even if the Project, located partially within the asset's setting, would impact views away from the asset to the north-west and north-east, mature trees will break up the view north. Also, other vegetation would partially break up views towards the Project. Therefore, while additional screening planting was considered, it was found unlikely to reduce the effect meaningfully and could potentially alter the existing character of the setting, making it unsuitable. Additional mitigation measures are therefore not considered appropriate.			
		Range South Of Barn To South Of Knaves Farmhouse (1266775)	Grade II Listed Building	Medium	Section D Range South Of Barn To South Of Knaves Farmhouse (1266775) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including baseline photo 4.23, Great Tey Road, located c.230 m south, that is representative of people living, moving and using the local road network near Little Tey - 7.12 Visualisations - Part 5 of 9 [APP-347]). The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 - Design Development Report [APP-359] dated 2024, identified an alternative route at TB65 which would have placed the Project south of Upp Hall Farm. Details of why this alternative was not preferred are in 7.21 2024 - Design Development Report [APP-359] (para 5.4.156). 5.15 Design Development Report [APP-122] does not identify any alternative

Reference	Question	Applicant's Response
		overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. It was concluded that this asset forms part of the Knaves Farm complex, situated south-west of Knaves Farmhouse (1266773) and adjacent to the Barn To South Of Knaves Farmhouse (1266822). Located partially within the asset's setting, the Project would affect views toward the west, north-west and north-east. However, mature trees would break the view to the north, and Knaves Farmhouse and the barn would break up views toward TB61. Other vegetation would also partially break up views toward the Project. The intervisibility between the asset and the associated designated assets in the farm complex would not be disrupted. While additional screening planting was considered, it

Reference	Question	Applicant's Response			
					was found unlikely to meaningfully reduce the effect and could potentially alter the existing character of the setting, making it unsuitable. Consequently, additional mitigation measures are not considered appropriate.
		Barn To South Of Knaves Farmhouse (1266822)	Grade II Listed Building	Medium	Section D Barn To South Of Knaves Farmhouse (1266822) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including baseline photo 4.23, Great Tey Road, located c.230 m south, that is representative of people living, moving and using the local road network near Little Tey - 7.12 Visualisations - Part 5 of 9 [APP-347]). The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 - Design Development Report [APP-359] dated 2024, identified an alternative route at TB65 which would have placed the Project south of Upp Hall Farm. Details of why this alternative was not preferred are in 7.21 2024 - Design Development Report [APP-359] (para 5.4.156). 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within</i>

Reference	Question	Applicant's Response
		<i>the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. This asset is an ancillary building of Knaves Farmhouse (1266773), alongside the nearby range (1266775). Located partially within the asset's setting, the Project would affect views toward the west, north-west and north-east, although mature trees and other vegetation would partially break up views to the Project. Knaves Farmhouse (1266773), the range (1266775) and possibly buildings associated with the Old Rectory (1224447) would also interrupt the view north to TB64 and TB65 from the asset. The Project would not disrupt the intervisibility between the asset and the associated designated buildings within the farm complex. While additional screening planting was considered, it was judged unlikely to meaningfully reduce the effect and could alter the existing character of the setting, making it unsuitable. Consequently, further mitigation measures are not considered appropriate.

Reference	Question	Applicant's Response			
		Little Tey House (1266823)	Grade II Listed Building	Medium Section D	Little Tey House (1266823) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (Including Heritage Viewpoint HE27, Little Tey House and Barn to South West of Little Tey House, illustrating an open setting and views from the garden of converted barn (1266779) towards the Project - 7.12 Visualisations - Part 9 of 9 [APP-351] and photomontage 4.32, Essex Way, west of Teybrook Farm, representative of users of the PRoW network and Essex Way, south of Great Tey - 7.12 Visualisations - Part 1 of 9 [APP-343]). The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 - Design Development Report [APP-359] dated 2024, identified an alternative route at TB65 which would have placed the Project south of Upp Hall Farm. Details of why this alternative was not preferred are in 7.21 2024 - Design Development Report [APP-359] (para 5.4.156). 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows,</i>

Reference	Question	Applicant's Response			
		walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant acknowledges that the asset shares a setting with the 'Barn to South West of Little Tey House' (1266779), in the same complex of buildings, but vegetation screens views between the two buildings. A permanent access road would be located between the two assets, impacting their relationship, but the above-mentioned vegetation between the assets creates a reduced visibility between the two and movement along the access road would be irregular. The vegetation south of the house and modern buildings located south-east, partially breaks up views towards the Project. Therefore, while additional screening planting was considered, it was judged unlikely to meaningfully reduce the effect and could alter the existing character of the setting, making it unsuitable. Consequently, further mitigation measures are not considered appropriate.			
		Barn To South West Of Little Tey	Grade II* Listed Building	High	Section D Barn To South West Of Little Tey House (1266779) - Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental

Reference	Question	Applicant's Response
		House (1266779) Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (Including Heritage Viewpoint HE27, Little Tey House and Barn to South West of Little Tey House, illustrating an open setting and views from the garden of converted barn (1266779) towards the Project - 7.12 Visualisations - Part 9 of 9 [APP-351] and photomontage 4.32, Essex Way, west of Teybrook Farm, a representative of users of the PRoW network and Essex Way, south of Great Tey - 7.12 Visualisations - Part 1 of 9 [APP-343]). The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 - Design Development Report [APP-359] dated 2024, identified an alternative route at TB65 which would have placed the Project south of Upp Hall Farm. Details of why this alternative was not preferred are in 7.21 2024 - Design Development Report [APP-359] (para 5.4.156). 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including</i>

Reference	Question	Applicant's Response			
		<i>reinstating hedgerows, fences, walls and earthworks).</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant acknowledges that the asset shares a setting with Little Tey House (1266823), within the same complex, but vegetation screens views between the two buildings. A permanent access road would be located between the two assets, potentially affecting their relationship; however, the vegetation between the assets reduces visibility and movement along the access road would be irregular. Hedgerows and some mature trees partially break up views toward the Project to the south-west, south, and south-east, while the nearby modern farmyard located south-west, disrupts views east toward the Project. Therefore, while additional screening planting was considered, it was judged unlikely to meaningfully reduce the effect and could alter the existing character of the setting, making it unsuitable. Consequently, further mitigation measures are not considered appropriate.			
		Aldham Hall (1306270)	Grade II* Listed Building	High	Section D Aldham Hall (1306270) - Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (Including Photomontage/

Reference	Question	Applicant's Response
		Viewpoint 4.21 (Brook Road, north of Marks Tey), located c.90 m north-east, and being a representative of people using the local road network and living and moving around north of Marks Tey - 7.12 Visualisations - Part 5 of 9 [APP-347]). The Applicant has considered embedded mitigation and design alternatives. Alternative routes were identified within 5.15 Design Development Report [APP-122] such as passing to the immediate west of Aldham on an alignment similar to that published in the 2023 non-statutory consultation, passing further to the west of Aldham, Fordham and Ford Street on the basis that gliding was suggested to be ending at Wormingford Airfield and an alternative crossing point across the River Colne just to the west of Fordham Bridge. Other localised adjustments and micrositing of infrastructure were also proposed. Full details of why these alternative were not preferred are in 5.15 Design Development Report [APP-122] (paras. 7.3.1 to 7.3.2). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and

Reference	Question	Applicant's Response			
		Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that the asset's setting is influenced by its connection with the Grade II 'Wagon Lodge to the north of Aldham Hall' (1337391), although vegetation between the two buildings restricts views between them, as well as by the presence of a medieval moat approximately 45 m south of the Project (4072). The Project would not disrupt these relationships or this aspect of the setting. The asset is surrounded to the north by tall, mature vegetation that screens views of the asset from the Project and partially screens views from the asset towards the Project. While additional screening planting was considered, it was judged unlikely to meaningfully reduce the effect and could alter the existing character of the setting, making it unsuitable. Therefore, further mitigation measures are not considered appropriate.			
		Wagon Lodge To North Of Aldham Hall (1337391)	Grade II Listed Building	Medium	Section D Wagon Lodge To North Of Aldham Hall (1337391) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (Including Photomontage/ Viewpoint 4.21 (Brook Road, north of Marks Tey), located c.90 m north-east, and being a representative of people using the local road network and

Reference	Question	Applicant's Response
		living and moving around north of Marks Tey - 7.12 Visualisations - Part 5 of 9 [APP-347]). The Applicant has considered embedded mitigation and design alternatives. Alternative routes were identified within 5.15 Design Development Report [APP-122] such as passing to the immediate west of Aldham on an alignment similar to that published in the 2023 non-statutory consultation, passing further to the west of Aldham, Fordham and Ford Street on the basis that gliding was suggested to be ending at Wormingford Airfield and an alternative crossing point across the River Colne just to the west of Fordham Bridge. Other localised adjustments and micro-siting of infrastructure were also proposed. Full details of why these alternative were not preferred are in 5.15 Design Development Report [APP-122] (paras. 7.3.1 to 7.3.2). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment.

Reference	Question	Applicant's Response			
		The Project has also examined whether additional mitigation measures would be beneficial. The Applicant notes that this asset is in a roadside location which introduces traffic into the setting, though trees and hedges screen the asset from the road. While the wagon lodge is less secluded and more exposed than the nearby Aldham Hall (1306270), vegetation partially restricts views toward the Project. The asset lies within a modern farmyard, with other farmyard buildings located north, also disrupting views toward the Project. The asset has a connection to the Grade II* Listed Aldham Hall (1306270), although vegetation between the two buildings restricts views to each other, and this aspect of the setting would not be disrupted by the Project. While additional screening planting was considered, it was judged unlikely to meaningfully reduce the effect and could alter the existing character of the setting which is shaped by surrounding agricultural fields, making it unsuitable. Consequently, further mitigation measures are not considered appropriate.			
		Church Of St Margaret And St Catherine (1170063)	Grade II* Listed Building	High	Section D Church Of St Margaret And St Catherine (1170063) - Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] . The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (Including Photomontage/ Viewpoint 4.37 (Hines Close, Aldham), located c.130 m south-west and being a representative of residents in

Reference	Question	Applicant's Response
		Aldham - 7.12 Visualisations - Part 5 of 9 [APP-347]). The Applicant has considered embedded mitigation and design alternatives. Alternative routes were identified within 5.15 Design Development Report [APP-122] such as passing to the immediate west of Aldham on an alignment similar to that published in the 2023 non-statutory consultation, passing further to the west of Aldham, Fordham and Ford Street on the basis that gliding was suggested to be ending at Wormingford Airfield and an alternative crossing point across the River Colne just to the west of Fordham Bridge. Other localised adjustments and micrositings of infrastructure were also proposed. Full details of why these alternative were not preferred are in 5.15 Design Development Report [APP-122] (paras. 7.3.1 to 7.3.2). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment.

Reference	Question	Applicant's Response			
		The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that The setting of the asset is characterised by its location within the Aldham settlement and its relationship with a churchyard (4511). The churchyard features significantly in the asset's setting, acting as a buffer between the asset and the nearby road. The Project does not disrupt the relationship between the two assets and mature vegetation enclosing the churchyard would disrupt views towards the Project so it would be partially visible. Additional screening planting was considered but it was judged unlikely to meaningfully reduce the effect, therefore, further mitigation measures are not considered appropriate.			
	Ford Street (CA9)	Conservation area	Medium	Section D	Ford Street Conservation Area - The Applicant has assessed this conservation area following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (Including historical viewpoint HE26 (Fordstreet) which gives view from the southern end of Fordstreet Conservation Area to illustrate the presence of the Project within its setting - 7.12 Visualisations - Part 9 of 9 [APP-351] and Photomontage/ Viewpoint 4.24 (Essex Way near Fordstreet), located c.30 m east and illustrating people living and moving around the settlement of Fordstreet and using the Essex Way Long Distance Footpath and open access land within the Colne Valley.7.12 Visualisations - Part 5 of 9 [APP-347]).

Reference	Question	Applicant's Response
		The Applicant has considered embedded mitigation and design alternatives. Alternative routes were identified within 5.15 Design Development Report [APP-122] such as passing to the immediate west of Aldham on an alignment similar to that published in the 2023 non-statutory consultation, passing further to the west of Aldham, Fordham and Ford Street on the basis that gliding was suggested to be ending at Wormingford Airfield and an alternative crossing point across the River Colne just to the west of Fordham Bridge. Other localised adjustments and micro-siting of infrastructure were also proposed. Full details of why these alternative were not preferred are in 5.15 Design Development Report [APP-122] (paras. 7.3.1 to 7.3.2). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The northern section of the

Reference	Question	Applicant's Response			
		conservation area is characterised by a quiet rural feel, while the southern portion shows a denser settlement pattern with notable historic structures. The surrounding landscape contributes significantly to the setting, with views of agricultural fields, woodland, and the River Colne. Woodland around the southern exterior would break up views from the south toward the Project, and a mix of mature vegetation and buildings in the northern portion would break up views toward the Project. While we acknowledge the possible visibility between the pylons and the conservation area, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the surrounding agricultural landscape is a key element of the asset's value, and planting could disrupt this connection. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case. Consequently, further mitigation measures are not considered appropriate.			
		Houchin's Farmhouse (1123187)	Grade II* Listed Building	High	Section E Houchin's Farmhouse (1123187) - Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (Including Heritage Viewpoint HE28 (Houchin's Farmhouse, a view from the farmhouse towards the Project to illustrate visibility within the setting, located c.20 m north-

Reference	Question	Applicant's Response
		east - 7.12 Visualisations - Part 9 of 9 [APP-343]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122] but does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the wider agricultural setting of the asset due the presence of pylons to the south-east of the asset which would likely be visible above the already present mature trees. While it is acknowledged that there is visibility between the pylons and the asset, from a historic environment perspective, introducing further screening of suitable height beyond the

Reference	Question	Applicant's Response			
					moat would further significantly alter the relationship between the asset and its setting, especially beyond the moat. Therefore it is considered that further screening is not appropriate for this asset.
		Dines Hall (1123448)	Grade II Listed Building	Medium Section E	Dines Hall (1123448) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Landscape Viewpoint 5.07 (NCR 16 and Ranks Green Road) c.190 m north-east, a Representative of people living and moving around the community of Ranks Green, using the local PRow and road network and using NCR 16. Potential view of CSE compound - 7.12 Visualisations - Part 6 of 9 [APP-343]). The Applicant has considered embedded mitigation and design alternatives. 5.15 Design Development Report [APP-122] identified an alternative route around Feeringbury, which is preferred and has been taken forward. Details of this alternative can be found in 5.15 Design Development Report [APP-122] between paragraphs 8.4.1 to 8.4.2. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...]</i> Where such features cannot be

Reference	Question	Applicant's Response
		<i>retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the agricultural setting of the asset due to the proximity and visibility of the top of the pylons to the south and south-east. The Applicant has considered whether planting would be appropriate as additional mitigation. While it is acknowledged that there is visibility between the pylons and the asset, from a historic environment perspective, introducing further screening of suitable height beyond the moat could significantly alter the relationship between the asset and its setting. The asset draws significance from its surrounding agricultural land alongside the associated outbuilding and moat which surrounds it. The vegetation lining the moat, already provides an element of partial screening. Therefore, after careful consideration, further screening is not appropriate in this particular case.
	Cockerell's Farmhouse and Grade II Listed Building	Medium Section E Cockerell's Farmhouse and Bakehouse (1169484) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental

Reference	Question	Applicant's Response
		Bakehouse (1169484) Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery. The Applicant has considered embedded mitigation and design alternatives. 5.15 Design Development Report [APP-122] identified an alternative route around Feeringbury, which is preferred and has been taken forward. Details of this alternative can be found in 5.15 Design Development Report [APP-122] between paragraphs 8.1.1 to 8.1.3. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the setting of the asset's surrounding agricultural landscape with the introduction of pylons TB74 and TB75. The presence of the pylons would impact views

Reference	Question	Applicant's Response
		from the asset to the west and north-west, and would likely be visible above mature trees within the asset's ground. A greater extent of the asset's significance, however, is gained from its relationship to nearby non-designated residential buildings lining the road, contributing to the small unnamed hamlet. Additional screening to the north-west and west of the asset of a sufficient size may come at the expense of hindering the functional relationship to the wider setting of the rural landscape. For this reason, whilst it is acknowledged there will be intervisibility between the pylons and the asset, from an historic environment perspective, further screening is not appropriate in this case.
	Pound Farmhouse (1123812) Grade II Listed Building Medium Section E	Pound Farmhouse (1123812) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery. The Applicant has considered embedded mitigation and design alternatives. 5.15 Design Development Report [APP-122] identified an alternative route around Feeringbury, which is preferred and has been taken forward. Details of this alternative can be found in 5.15 Design Development Report [APP-122] between paragraphs 8.2.1 to 8.2.5. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out

Reference	Question	Applicant's Response
		<i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The setting of the asset lends significance through the large secluded garden surrounding the property as well as the wider agricultural landscape with which the asset has historical and former functional relationships. Pylons will likely be visible within and surrounding the asset's ground, changing views away from the asset to the west and north-west. The Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the property, and the current presence of some mature vegetation lying to the south and west of the asset, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its functional agricultural setting. This link to the agricultural fields provides an element of significance to understanding the asset, therefore, after careful consideration, the

Reference	Question	Applicant's Response			
					Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.
		Balls Farmhouse (1305428)	Grade II Listed Building	Medium Section F	Balls Farmhouse (1305428) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery. The Applicant has considered embedded mitigation and design alternatives. 5.15 Design Development Report [APP-122] identified alternative routes and other options between Great Waltham and Little Waltham between paragraphs 9.2.2 and 9.2.23, particularly paragraph 9.2.8. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014], such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment.

Reference	Question	Applicant's Response			
		The Project has also examined whether additional mitigation measures would be beneficial. The setting of the asset is defined by its enclosed farmyard and wider rural context. The Applicant acknowledges that pylons TB140–144 would be visible from the asset and would alter the character of its rural setting. While we recognise this visibility, from a historic environment perspective, introducing substantial screening of appropriate height could significantly disrupt the relationship between the asset and its setting. The openness to the surrounding agricultural landscape is a key element of the asset's significance, and additional planting would interrupt this important connection. Consequently, after careful consideration, the Applicant has concluded that further mitigation in the form of screening would not be appropriate in this case.			
		Granary and Cart Lodge at Southwoods Farm (1237420)	Grade II Listed Building	Medium	Section F
		Granary and Cart Lodge at Southwoods Farm (1237420) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery. The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 - Design Development Report [APP-359] dated 2024, identified an alternative route at which would have placed the Project west towards Edney Common. Details of why this alternative was not preferred are in 7.21 2024 - Design Development Report [APP-359] (para			

Reference	Question	Applicant's Response
		5.4.196). 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The setting of the asset is informed by its location within a former farming complex and by its relationship with a non-designated residential property immediately to the south. It also draws significance from the surrounding agricultural landscape where there is a functional relationship. The operation phase of the Project would impact the asset's setting through the introduction of pylons TB174-178 c.100 m to the asset. While the Applicant acknowledges that the pylons would be visible from the asset and change the rural setting of the asset, no additional mitigation measures

Reference	Question	Applicant's Response
		are proposed during the operation phase as any measures designed to lessen the visual impact of the Project would be of a scale that would adversely alter the setting of the asset visually, and disrupt the rural setting. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.
	Barn at Southwoods Farm (1237421) Grade II Listed Building Medium Section F	Barn at Southwoods Farm (1237421) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery. The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 - Design Development Report [APP-359] dated 2024, identified an alternative route at which would have placed the Project west towards Edney Common. Details of why this alternative was not preferred are in 7.21 2024 - Design Development Report [APP-359] (para 5.4.196). 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks</i>

Reference	Question	Applicant's Response
		<i>or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The setting of the asset is informed by its location within a former farming complex and by its relationship with a non-designated residential property immediately to the south. It also draws significance from the surrounding agricultural landscape where there is a functional relationship. The operation phase of the Project would impact the asset's setting through the introduction of pylons TB173-178 c.120 m near the asset. While the Applicant acknowledges that the pylons would be visible from the asset and change the rural setting of the asset, no additional mitigation measures are proposed during the operation phase as any measures designed to lessen the visual impact of the Project would be of a scale that would adversely alter the setting of the asset visually, and disrupt the rural setting. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.

Reference	Question	Applicant's Response
		Langleys (1000241) Grade II Medium Section F RPG TB124- 154 or 159 Langleys (1000241) Grade II - The Applicant has assessed this registered park and garden following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Viewpoints HE7 (Langleys) and HE8 (Langleys Park) are taken within Langleys RPG - 7.12 Visualisations - Part 8 of 9 [APP-350] and Viewpoint 6.18 (Langleys Park, north of Great Waltham) taken within Langleys RPG - 7.12 Visualisations - Part 7 of 9 [APP-349]). The Applicant has considered embedded mitigation and design alternatives as documented in 7.21 2024 - Design Development Report [APP-359] dated 2024. An alternative route was identified which would have placed the Project west towards Pleshey. Details of why this alternative was not preferred are in 7.21 2024 - Design Development Report [APP-122] (para 5.4.179). 5.15 Design Development Report [APP-122] also considered some alternative alignments and pylon types in the area to the north and south of the River Chelmer between TB135 and TB143. As per the Design Scenarios Table in 8.6.1 Deadline 1 Cover Letter [REP1-141], the Applicant has confirmed a decision to progress with Scenario B only in this location (TB141), with standard height pylons (not low height pylons) proposed to the south of the River Chelmer. In making this change, one of the low height pylons can be removed and the pylon (TB141) proposed closest to Chelmsford Road

Reference	Question	Applicant's Response
		can be moved approximately 70 m further west away from the road (subject to detailed design and Limits of Deviation). This does require a slight movement of the pylon closest to the river (within Limits of Deviation) to the south and west. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the setting of the asset which is informed by its interrelationship as elements of a high-status country estate. The setting of the asset is also informed by its relationship with the non-designated buildings of the estate and the Chelmer Valley to the north and east and the designed view from the house within the parkland to the east-north-east takes in a picturesque portion of the river and the eastern flank of the valley beyond the limits

Reference	Question	Applicant's Response				
		of the parkland. The pylons would pass to the immediate south of the asset and would be visible in designed views out to the south and east. Given the multiple locations for open views from within and between the periphery of the asset and the pylons, the Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the asset, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the surrounding rural landscape is a key element of the asset's value, and planting would disrupt this connection. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.				
		Botney Hill Farmhouse (1322862)	Grade II Listed Building	Medium	Section G	TB216-TB217-TB218 Botney Hill Farmhouse (1322862) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Viewpoint HE42 (Botney Hill Farmhouse) to the south of Botney Hill Farmhouse, which gives a view from the front of farmhouse towards the Project, to illustrate visibility within setting and views - 7.12 Visualisations - Part 9 of 9 [APP-351]). The Applicant has considered embedded mitigation and design alternatives. 5.15 Design

Reference	Question	Applicant's Response
		Development Report [APP-122] identifies alternative options south from Botney Hill between TB217 to TB219, which have been taken forward. Details of this alternative are in 5.15 Design Development Report [APP-122] (paras 10.3.3). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the rural agricultural setting surrounding the asset, with pylons TB216-TB218 being introduced close to the asset to the north-east, east and south-east. Vegetation close to the asset provides little to no screening to the north-east and east and provides a minor level to the south-east of the asset as it does not provide enough to entirely block the view of the pylons.

Reference	Question	Applicant's Response			
		Given the open views between the asset and the pylons, the Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the asset, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the surrounding rural landscape is a key element of the asset's value, and planting would disrupt this connection. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.			
		Church of St Mary (1122253)	Grade II Listed Building	Medium	Section G TB229 - TB230 Church of St Mary (1122253) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Viewpoint HE20 (Dunton Hall/Church of St Mary) to the west of Church of St Mary, which gives a view across the Project towards Dunton Hall and Church of St Mary, in close proximity to the Project - 7.12 Visualisations - Part 8 of 9 [APP-350]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122] which does not identify any

Reference	Question	Applicant's Response
		alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the rural agricultural setting of the asset due to the openness of the landscape, proximity of the asset and pylons and the elevated position the asset holds in the landscape. Despite there being some mature vegetation close to the asset, there will be intervisibility between the asset and the pylons to the north-west, west and south-west. Given the open views between the asset and the pylons, the Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the asset, from a historic environment perspective,

Reference	Question	Applicant's Response				
		introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the surrounding rural landscape is a key element of the asset's value, and planting would disrupt this connection. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.				
		Dunton Hall (1338380)	Grade II Listed Building	Medium	Section G	TB229 - TB230 Dunton Hall (1338380) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Viewpoint HE20 (Dunton Hall/Church of St Mary) to the west of Dunton Hall, which gives a view across the Project towards Dunton Hall and Church of St Mary, in close proximity to the Project - 7.12 Visualisations - Part 8 of 9 [APP-350]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122] which does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows,</i>

Reference	Question	Applicant's Response
		walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the rural agricultural setting of the asset due to the openness of the landscape, proximity of the asset and pylons and the elevated position the asset holds in the landscape. Despite there being some mature vegetation close to the asset, there will be intervisibility between the asset and the pylons to the north-west, west and south-west. Given the open views between the asset and the pylons, the Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the asset, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the surrounding rural landscape is a key element of the asset's value, and planting would disrupt this connection. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form

Reference	Question	Applicant's Response
		of screening would not be appropriate in this case.
	Margaretting Hall (1152104) Grade II Listed Building	Medium Section G Margaretting Hall (1152104) - Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits and aerial and street-view imagery. The Applicant has considered embedded mitigation and design alternatives. 7.21 2024 - Design Development Report [APP-359] dated 2024, identified an alternative route east of Margaretting. Details of why this alternative was not preferred are in 7.21 2024 -Design Development Report [APP-359] (para 5.4.197). 5.15 Design Development Report [APP-122] does not identify any alternative overhead line routes and pylon locations prior to the submitted Project design. The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out '<i>Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).</i>' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018]

Reference	Question	Applicant's Response			
		includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant concluded that its setting is primarily informed by its location within a working farm complex and the surrounding agricultural land. It was also observed that some tall trees around the asset would restrict views to the Project. While the Applicant acknowledges the potential visibility between the pylons and Margaretting Hall, from a historic environment perspective, the introduction of substantial screening planting of sufficient height could significantly alter the relationship between the asset and its setting. Moreover, such planting was judged unlikely to meaningfully reduce the visual effect. After careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.			
		White's Tyrrells Farmhouse (1236733)	Grade II Listed Building	Medium	Section G
		White's Tyrrells Farmhouse (1236733) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Viewpoint 7.12 (Ingatestone Road near White Tyrrells) to the west of White's Tyrrells Farmhouse, a representative of local residents and road users on Ingatestone Road, near White Tyrrells - 7.12 Visualisations - Part 7 of 9 [APP-349]).			

Reference	Question	Applicant's Response
		The Applicant has considered embedded mitigation and design alternatives. 5.15 Design Development Report [APP-122] identifies an alternative route between RG191 and RG195, which is preferred and has been taken forward. The use of low height pylons to reduce effects was also considered. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 10.1.1 to 10.1.3). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the agricultural setting of the asset due to the proximity and visibility between the neighbouring pylons and the asset, as well as the visual continuation of the pylon route travelling away from the asset into the distance, both northward and southward. Given this far-reaching visibility between the

Reference	Question	Applicant's Response			
		pylons, both near and far, and the asset, the Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the property, and the current presence of some mature vegetation lying to the south of the asset, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the surrounding agricultural landscape is a key element of the asset's value, and planting would disrupt this connection. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.			
		Church of St Mary (1264434)	Grade II* Listed Building	High	Section G Church of St Mary (1264434) Grade II* - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Viewpoint 7.01 (Ingatestone Road, Buttsbury) to the east of the Church of St Mary, which is a representative of people using the local PRow and road network in this area. View from the Church of St Mary - 7.12 Visualisations - Part 7 of 9 [APP-349]). The Applicant has considered embedded mitigation and design alternatives. 5.15 Design Development Report [APP-122] identifies an alternative route between RG191 and RG195, which is preferred and has been taken forward.

Reference	Question	Applicant's Response
		The use of low height pylons to reduce effects was also considered. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 10.1.1 to 10.1.3). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the rural setting of the asset with pylon TB193 c.220 m south-east of the asset, and would be clearly visible. Given the open views between the asset and the pylons, the Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the asset, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the

Reference	Question	Applicant's Response			
					surrounding rural landscape is a key element of the asset's value, and planting would disrupt this connection. Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.
		Barn to north of Wyfields Farmhouse (1111646)	Grade II Listed Building	Medium	Section H Barn to north of Wyfields Farmhouse (1111646) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Viewpoint HE43 (Wyfields Farmhouse and Barn to North of Wyfields Farmhouse) to the south of the Barn to north of Wyfields Farmhouse, which gives view from end of the drive to the farmhouse towards the Project, to illustrate visibility within setting and views - 7.12 Visualisations - Part 9 of 9 [APP-351]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route to the west of Bulphan rejoining the proposed route a little to the south of pylon TB245 and potentially a little further away from the asset. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 11.1.6 to 11.1.8). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out

Reference	Question	Applicant's Response
		<i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).'</i> In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the views of the agricultural landscape due to the introduction of pylons TB243-TB247, which would cross the agricultural landscape, in a north to south direction, with the closest pylon TB245, being c.180 m west of the asset. Given the open views, primarily to the west and north-west, between Wyfields Farmhouse and pylons TB243-TB247, the Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the property, and the current presence of some mature vegetation lying to the south of the asset, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the surrounding agricultural landscape is a key element of the asset's value, and planting would disrupt this connection.

Reference	Question	Applicant's Response
		Therefore, after careful consideration, the Applicant has concluded that additional mitigation in the form of screening would not be appropriate in this case.
	Wyfields Farmhouse (1337057) Grade II Listed Building	Medium Section H Wyfields Farmhouse (1337057) Grade II - The Applicant has assessed this listed building following the methodology outlined in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. The assessment has been informed by site visits, aerial and street-view imagery, and viewpoint assessment (including Viewpoint HE43 (Wyfields Farmhouse and Barn to North of Wyfields Farmhouse) to the south of Wyfields Farmhouse, which gives view from end of the drive to the farmhouse towards the Project, to illustrate visibility within setting and views - 7.12 Visualisations - Part 9 of 9 [APP-351]). The Applicant has considered embedded mitigation and design alternatives as documented in 5.15 Design Development Report [APP-122]. An alternative route to the west of Bulphan rejoining the proposed route a little to the south of pylon TB245 and potentially a little further away from the asset. Details of why this alternative was not preferred are in 5.15 Design Development Report [APP-122] (paras 11.1.6 to 11.1.8). The Applicant has also considered standard mitigations detailed within 7.2 Outline Code of Construction Practice [REP2-014] such as the commitment reference H06 which sets out <i>'Where practicable, maintain elements within the landscape such as vegetation, hedgerows, walls and earthworks (such as boundary banks</i>

Reference	Question	Applicant's Response
		or ditches). [...] Where such features cannot be retained, replacement [...] will be installed/provided as appropriate (including reinstating hedgerows, fences, walls and earthworks).' In addition to the commitments set out in H06, 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes other measures and mitigations to protect the historic environment. The Project has also examined whether additional mitigation measures would be beneficial. The Applicant has concluded that the Project would impact the views of the agricultural landscape due to the introduction of pylons TB243-TB247, which would cross the agricultural landscape, in a north to south direction, with the closest pylon TB245, being c.190 m west of the asset. Given the open views, primarily to the west and north-west, between Wyfields Farmhouse and pylons TB243-TB247, the Applicant has considered whether planting would be appropriate as additional mitigation. While we acknowledge the visibility between the pylons and the property, and the current presence of some mature vegetation lying to the south of the asset, from a historic environment perspective, introducing substantial screening of suitable height could significantly alter the relationship between the asset and its setting. The openness to the surrounding agricultural landscape is a key element of the asset's value, and planting would disrupt this connection. Therefore, after careful consideration, the Applicant has concluded that additional

Reference	Question	Applicant's Response
		mitigation in the form of screening would not be appropriate in this case.
HE 1.37	Mitigation Many Council LIRs refer to the issue of mitigation, noting that for many heritage assets mitigation of any adverse effects caused by the proposed development is effectively not possible or achievable. Such comments also refer to the potential for separate mitigation funds or agreements. Respond to such comments.	As already stated within 8.4.1 Applicant's Comments on Relevant Representations [REP2-023], embedded, standard and additional mitigation is already proposed for the historic environment, as set out in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and proposals in 7.2 Outline Code of Construction Practice [REP2-014], 7.4 Outline Landscape and Ecological Management Plan [REP2-018] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. While compensation is part of the mitigation hierarchy, NPS EN-1 and EN-5 (both 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. It is particularly noteworthy that none of the policies on heritage in EN-1 and EN-5 expressly mention compensation. This is in contrast to other NPS policy sections, e.g. biodiversity, where the provision of compensation is expressly referred to. Furthermore, the National Planning Policy Framework⁵⁰ does not make reference to a requirement for compensation for any harm to heritage assets. The provision of mitigation funds would not offset the effects identified to heritage assets as setting is specific to each individual heritage asset and harm to one asset's setting cannot be compensated by enhancing another's. Screen planting in proximity to heritage assets could itself adversely change the historic setting character. Furthermore, provision of mitigation funds or agreements would not meet the provisions of planning policy in relation to mitigation, as set out in NPS EN-1 paragraphs 5.9.16 – 5.9.21. Therefore, the residual effects that remain following the application of the mitigation hierarchy fall to the planning balance in accordance with the EN-1 and EN-5 policy framework, including the further Critical National Priority presumption set out in section 4.2 of EN-1. As set out in the Applicant's response to HE 1.16 the Project has followed the mitigation hierarchy and given consideration to sustaining and enhancing the significance of heritage assets where this is possible. Compensatory measures have

⁵⁰ Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework*

Reference	Question	Applicant's Response
		been considered as part of the development of the Project in relation to the mitigation hierarchy but the NPS policy framework in relation to the mitigation hierarchy does not require that all residual effects are avoided, reduced, mitigated or compensated. It is considered that the provision of a mitigation fund would fail to meet the tests for a section 106 Agreement on the basis that such a fund is not necessary to make the development acceptable in planning terms. The provision of a compensation fund would not reduce or remove harm and therefore does not materially inform the planning balance. The provision of a general fund which is not tied to a specific heritage asset would fail to meet a test on demonstrating that it is directly related to the Project. As stated above, there is no policy requirement to 'offset' heritage harm via a financial contribution.
HE 1.38	Non designated heritage assets (NDHA) Many submitted LIRs raise concerns over the consideration given to NDHAs in ES Chapter 11 [APP-208]. While noting the responses submitted at Deadline 1, provide further information and justification for the treatment of NDHAs in your assessment of heritage harm, and how this accords with paragraph 5.9.31 of NPS EN-1 (2023).	The methodology for assessment of non-designated heritage assets is set out in Annex C Historic Environment Assessment Methodology of 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 assessment of the non-designated assets set out in 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070] provides a scale of harm/loss in accordance with NPS EN-1 paragraph 5.9.33. During construction, the Project is predicted to have residual significant effects on 76 non-designated assets due to changes in their setting that affect their values or due to physical impacts during the construction phase of the Project. The non-designated assets which will be subject to these predicted adverse effects are identified in Section 11.7 of 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068]. Where residual significant effects on non-designated assets have been identified, they have been assessed as being of high or medium adverse magnitude of impact resulting in a temporary moderate adverse significance of effect (significant). During operation (and maintenance) phase the Project is predicted to have a significant effect on 29 non-designated heritage assets where the introduction of pylons results in a change in the setting of the non-designated assets which affects their values. The substantial public benefits and need for the Project, as set out in Chapter 3 of 5.6 Planning Statement [APP-085], including contribution towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the medium and lower end of the spectrum, to designated heritage assets.

Reference	Question	Applicant's Response
		The potential for harm or loss of significance upon non-designated heritage assets affected by the Project is also clearly outweighed by the substantial public benefits and need for the Project providing the judgement required under paragraph 5.9.33 of NPS EN-1. As paragraph 5.9.31 of NPS EN-1 is wholly concerned with designated heritage assets, the provisions of this paragraph do not apply to non-designated heritage assets. The Project does constitute Critical National Priority (CNP) Infrastructure; accordingly, the Secretary of State should consider that the Project meets the non-exhaustive list of tests set out in NPS EN-1 Paragraph 4.2.17 which includes '<i>where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.</i>' It is considered that the Applicant is able to clearly demonstrate the public benefits of the Project. Overall, the Project has followed the mitigation hierarchy in seeking to protect and conserve heritage assets where practicable, and the public benefits of the Project outweigh the less than substantial harm identified, in line with national policy. Although the Project will result in the loss of significance to heritage assets, this harm is necessary to achieve the substantial public benefit of delivering CNP Infrastructure, that outweighs the heritage impact.
HE 1.41	Tendring Local Impact Report To Tendring DC: Page 49 of your LIR [REP1-182] states in paragraph 15.6 that in Ardleigh certain heritage assets will encounter adverse effects during construction, effects with you consider to be underestimated. The assets include "several Grade II farmsteads". Please confirm which farmsteads you are referring to in this context. Paragraph 15.4 notes that listed cottages adjacent to Little Bromley	<u>A response to Tendring District Council's Local Impact Report can be found in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].</u> On the basis of information provided in the Essex County Council Relevant Representation [RR-1083] the Applicant believes that the listed cottages referred to are 'Pair of Cottages Approximately 10 Metres South of The Fox and Hounds Public House' (1111418). The properties in question are located approximately 7 m from proposed works. This is beyond the 2 m threshold distance within which there is a potential non-zero risk of damage from vibratory compaction during highway works. The Haywain (the adjacent non-listed property that has been identified as at risk of vibration damage) is located within approximately 1 m of the works location and is therefore identified as having a greater than zero risk, and is therefore highlighted. The assessment in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256] considers reasonable worst-case assumptions, and the Main Works Contractor(s) would specify mitigation measures to reduce vibration levels as set out in the 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and

Reference	Question	Applicant's Response
	war memorial are plausibly at risk from vibration. Please confirm which cottages. To the applicant Respond to the specific vibration point for Little Bromley heritage assets.	Vibration Management Plan [APP-306]. These measures would also reduce vibration levels at the properties to the south of the Haywain. Commitments NV01, NV02, NV03, NV04, NV05, and NV20 in 7.2 Outline Code of Construction Practice [REP2-014] ensure measures will be put in place first to avoid impacts from vibration. NV04 provides a means to repair damage in the highly unlikely event it occurs. The pre-condition surveys committed to in NV04 are an important element to ensure there is a check against which any concerns regarding damage can be measured.
HE 1.42	Outline Code of Construction Practice For the following commitments in the outline CoCP [APP-300]: - H04: Respond to the comment/suggestion from Braintree DC in its LIR [REP1-148] - H06: Expand on the definition of suitable 'replacement' features or justify why not	The Applicant confirms that the updated 7.2 Outline Code of Construction Practice (Rev B) [REP2-014] includes updates to H04 in accordance with the Council's recommendation, which now states: <i>'Where a previously unknown heritage asset has been discovered, or a known heritage asset has proven to be more significant than foreseen at the time of application, the Project will inform the LPA and Historic England and agree a solution that protects the significance of the new discovery, through preservation or excavation and recording, whichever is practicable within the Project construction requirements. The Main Works Contractor(s) will be responsible for making sure staff are aware of what to do in the event of an unexpected heritage asset. This will include toolbox talks within site inductions.'</i> H06 - The Applicant has already clarified the definition of appropriate replacement in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]: The term appropriate replacement in this context refers to the reinstatement of landscape features (such as hedgerows, fences, walls, and earthworks) in a manner that is sensitive to the local character, setting, and historic significance of the area. The general approach and reinstatement plans can be found in Section 9 of 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. Specifically, this means: - Replacement features will be of a similar type, scale, and material to those lost, wherever possible, reflecting the character and function of the original feature - Design and siting will be informed by local landscape character assessments, historic environment records, and, where relevant, consultation with Local Planning Authorities and heritage specialists

Reference	Question	Applicant's Response
		- Species selection for replanting (e.g. hedgerows) will seek to match historic or locally appropriate species mixes, and construction/restoration of walls or banks will use traditional techniques and materials where feasible - If retention of a feature is not possible, the replacement or reinstatement will be designed to ensure that the heritage, ecological, and landscape value is maintained or, where possible, enhanced. In 7.2 Outline Code of Construction Practice [REP2-014] H06 has been updated following comments from several Local Planning Authorities in their Local Impact Reports to state: '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).'
HE 1.43	Amount of archaeological survey information available A number of local authorities in their LIRs, for example Braintree DC [REP1-148], Colchester City Council in [REP1-156], and Suffolk CC, Mid Suffolk DC and Babergh DC in [REP1-178] and [REP1-191] have raised concerns about the amount of	The Applicant considers that it has provided proportionate and suitable archaeological evaluation for the Project, in accordance with paragraphs 5.9.11 and 5.9.12 of NPS EN-1. The fieldwork undertaken to date comprises a more comprehensive approach to evaluation than many other Nationally Significant Infrastructure Projects have completed and has been considered sufficient to determine consent by the Planning Inspectorate and the Secretary of State. Historic Environment walkover surveys have been undertaken across 97% of the Order Limits. Geophysical survey has been undertaken across 96% of priority areas and 30% of phase 2 areas, at the point of submission in January 2026 of the Supplementary Environmental Information [AS-068 to AS-083]. This represents a combined total of 74% of the overall geophysical survey

Reference	Question	Applicant's Response
	archaeological survey work and Historic England in its WR evaluation that has been undertaken so far, including outside of the 'priority areas', and consider there to be a significant shortfall. The ExA notes the flow diagram of the Written Scheme of Investigation (WSI) process that is set out in the outline Archaeological Mitigation Strategy (AMS) and outline WSI [APP-328] and also that, as stated in the applicant's Comments on RRs [REP1-132] the phase 2 stage of the geophysical survey and trial trenching will continue in 2026. Having regard to paragraphs 5.9.11 and 5.9.12 of NPS EN-1 (2023) the applicant is requested to justify its approach to the incomplete provision of archaeological evaluation at this stage. As indicated in the updated ES Chapter 11 [AS-068] it would appear that 30% of the phase 2 areas have now had geophysical survey work completed. However, the applicant is requested to either clarify, or to signpost to where it has been clearly set out, exactly how much of all the proposed archaeological geophysical survey work and trial	area and the area of intrusive impact for the Project. Archaeological trial trenching had been completed for 89% of priority areas at the point of submission of Supplementary Environmental Information [AS-068 to AS-083]. For the remainder of the Project's areas of intrusive impact, a reasonable worst-case assumption has been made regarding archaeological potential and Project impacts to inform assessment, on the basis of the extensive desk-based information and the available results of evaluation. The approach to the archaeological fieldwork and programme for this work was first raised with stakeholders in late 2023 and is included in the Statements of Common Ground [refs]. It is an agreed matter with Norfolk and Essex County Councils and Historic England, and is under discussion with Suffolk County Council. The remaining 11% of the priority archaeological trial trenching is in progress and fieldwork is expected to be complete in April 2026. The work had been programmed to be undertaken in 2025 but unfortunately land access issues prevented this. The trial trenching is being undertaken as soon as land access is available. The preliminary results of the work to date indicate that the geophysical survey and desk-based information for these areas has provided a good representation of the archaeology, which is already included in the historic environment baseline and assessment, and it is not anticipated that this element of the work would change the conclusions of assessment presented in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-070]. Final reports of this element of the archaeological trial trenching are expected in August 2026 and therefore are not expected to be available during examination. The reports will be shared directly with the Archaeological Advisors to the Local Planning Authorities for approval and in order to agree appropriate mitigation for these areas, as set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] secured through Requirement 5 of 3.1 Draft Development Consent Order [Revision C]. The phase 2 geophysical survey, as of 27 March 2026, was approximately 80% complete. Survey of all areas where land access is available, is expected to be completed in April 2026, with the final report expected six weeks from the end of survey. Therefore, this report and any associated updates to baseline and assessment will be submitted into the Examination as supplementary information, no later than Deadline 6.

Reference	Question	Applicant's Response
	trenching work within any of the order limits has now been carried out (and had the results submitted), and how much is still left to be undertaken and/ or have the results submitted. Also, the ExA is uncertain whether or not any of the results of the proposed 2026 evaluation work would be undertaken and submitted within the Examination period. The applicant is therefore requested to provide a more detailed timeline for all of its further proposed archaeological survey work to indicate what is to be undertaken and when. This should include a proposed timeline for the submission of all final reports and the archiving/ dissemination of information resulting from all outstanding archaeological evaluation work.	Phase 2 of the archaeological trial trenching is programmed to commence in summer 2026 and is expected to be mostly complete by the end of 2026. This programme has been agreed with the archaeological advisors to the Local Planning Authorities and Historic England (as set out in the Statements of Common Ground [Refs]) as this phase of fieldwork on comparable developments is often not undertaken until after consent has been granted. For the Project, the decision to proceed with this work as soon as possible is driven by construction programme constraints, should consent be granted. Therefore, the results of this work will not be available for the Examination but will be shared directly with the Archaeological Advisors to the Local Planning Authorities for approval and in order to agree appropriate mitigation for these areas as set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] secured through Requirement 5 of 3.1 Draft Development Consent Order [Revision C]. The archiving and dissemination of the fieldwork will be undertaken as a single phase of work on the completion of mitigation fieldwork for the Project. The evaluation archive would be transferred to the archaeological contractor(s) for the mitigation to ensure the evaluation results inform mitigation fieldwork and reporting, and to ensure the archive is deposited coherently for the different geographical areas of the Project. This approach has been requested by the archaeological advisors to the Local Planning Authorities and Historic England and will be secured through the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] once updated. Should the Project not gain consent, the evaluation archiving and dissemination would be undertaken at that point for all completed fieldwork.
HE 1.44	Understanding of the archaeology in the River Stour area In its WR [REP1-191] Historic England considers that further survey work is required in order to understand the complex of archaeology that exists on both sides of the River Stour and the potential paleoenvironmental deposits within the river itself. In	The Applicant acknowledges Historic England's comments regarding the need for further survey work and contingency for high value discoveries in the River Stour area. The Project design at the River Stour crossing comprises open-cut underground cable works to the north and south of the river, with a trenchless crossing technique beneath the river itself and beneath the field to the immediate south of Higham Road (in order to ensure preservation of high value non-designated archaeology within this field). Archaeological trial trenching has been completed to the north of the river and results are included in the historic environment baseline and assessment (6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment

Reference	Question	Applicant's Response
	paragraph 6.6 of [REP1-191] Historic England states that, in relation to the River Stour: “We are seeking contingency allowed for expected high value discoveries.” Therefore, the applicant is requested to set out what archaeological evaluation and mitigation measures are proposed for this location and explain how these are to be secured in the draft DCO.	Assessment Tables [AS-070]). Trial trenching is in progress to the south of the river and preliminary results indicates that the geophysical survey of this area has provided a good representation of the archaeology, which is already included in the historic environment baseline and assessment. The results of geoarchaeological and archaeological monitoring of ground investigation works at the River Stour are reported in 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]. A specific commitment within the 7.2 Outline Code of Construction Practice [REP2-014] secured through Requirement 4 of 3.1 Draft Development Consent Order [APP-056], commitment B26, requires the Main Works Contractor(s) to prepare a trenchless crossing method statement and contingency plan for the River Stour crossing, to be submitted to the relevant Local Planning Authority and Natural England once detailed design is available. Where there is potential for sensitive archaeological or palaeoenvironmental deposits and known areas of deep ground impact (such as at pylon bases or trenchless crossings), further geoarchaeological and palaeoenvironmental investigations will be undertaken. This provision for additional work in areas of impact is included in the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] secured through Requirement 5 of 3.1 Draft Development Consent Order [APP-056]. This document is being updated in consultation with Local Planning Authority Archaeological Advisors and Historic England, taking into account detailed comments received in Written Representations and Local Impact Reports. In addition, Commitment GH11 in the 7.2 Outline Code of Construction Practice [REP2-014] secures the requirement for a Hydrogeological Risk Assessment to be undertaken at all trenchless crossing locations, including the River Stour crossing. This ensures that any risks to groundwater and associated deposits are identified and managed appropriately as part of the Project. These measures ensure that appropriate evaluation and mitigation of archaeological and palaeoenvironmental assets will be secured and implemented.
HE 1.45	Adequacy of the outline Archaeological Mitigation Strategy and outline Written Scheme of	The Applicant acknowledges the comment regarding the adequacy of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. An early draft of the document was shared with the historic environment

Reference	Question	Applicant's Response
	Investigation (outline AMS/ outline WSI) Various local authorities in their RRs and LIRs, for example Colchester City Council in [REP1-156] and Historic England in [REP1-191], have stated their belief that the outline AMS/ outline WSI [APP-328] is not adequate in its current form and requires amendments. Explain your progress on discussions with the local authorities and Historic England on this matter and clarify when an amended version of the outline AMS/ outline WSI, as referenced by Norfolk CC in [REP1-173] and as stated in the applicant's Response to RRs [REP1-132], will be submitted into the examination.	stakeholders prior to submission of the DCO application, and the comments received were taken into account in the updates made for the version submitted with the DCO application. The document uses a format that has been adopted on several consented DCO projects. The Applicant has actively engaged with Local Planning Authorities and Historic England regarding this document since submission of the DCO application. We have 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 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 including Colchester City Council and Historic England. 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.
HE 1.46	Engagement with Suffolk CC In [RR-3520] Suffolk CC commented that as it currently stands the submitted outline AMS/ outline WSI [APP-328] does not meet national standards and requirements 5 of the draft DCO does not provide adequate protection. In light of the additional archaeological information you submitted, dated January 2026 and submitted into the examination on 2 February 2026 [AS-068] to [AS-083], comment on	The Applicant acknowledges Suffolk County Council's concerns regarding the adequacy of the submitted 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] (Outline AMS/OWSI) and the protections afforded by Requirement 5 of 3.1 Draft Development Consent Order [Revision C]. An early draft of the Outline AMS/OWSI was shared with Suffolk County Council prior to submission of the DCO application, and the comments received were taken into account in the updates made for the version submitted with the DCO application. The document uses a format that has been adopted on several consented DCO projects. It is our understanding that when the Outline AMS/OWSI is updated, and providing Suffolk County Council is content with these updates, the majority of the concerns regarding Requirement 5 will also be resolved. However, we will continue to engage to confirm this. The Applicant has also engaged in recent discussions with Suffolk County Council regarding progress on ongoing geophysical survey and trial trenching, the approach to

Reference	Question	Applicant's Response
	Suffolk CC's concerns, state whether you have been in recent discussions with Suffolk CC over this matter and what the outcomes of any such discussions have been.	Phase 2 trial trenching, and the timetable for updating the Outline AMS/OWSI. These discussions took place during meetings on 26 March and 1 April 2026. In light of these discussions as well as additional archaeological information submitted in 2026 [AS-068 to AS-083] , 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. Prior to this the updated document will be shared with Suffolk County Council for review.
HE 1.47	Reliability of geophysical survey data Essex CC in its LIR [REP1-161] has noted that "... the reliability of the geophysical survey to detect archaeological features has been demonstrated to be inconsistent." Essex CC goes on to consider that this could be due to the sandy nature of the local soils. Comment on Essex CC's views on the reliability of the geophysical survey work in detecting archaeological features and explain how any unreliability in geophysical data been accounted for in assessing areas for trial trenching and in drawing your conclusions on the assessment of effects on archaeology in ES Chapter 11 [AS-068].	Magnetometer survey (as used for the Project) is an extremely useful, rapid, cost effective, non-invasive technique for archaeological prospection that can identify anomalies derived from geological, archaeological, or modern origins. The Chartered Institute for Archaeologists defines geophysical survey as: '<i>Archaeological geophysical survey uses non-intrusive and non-destructive techniques to determine the presence or absence of anomalies likely to be caused by archaeological features, structures or deposits, as far as reasonably possible, within a specified area or site on land, in the inter-tidal zone or underwater. Geophysical survey determines the presence of anomalies of archaeological potential through measurement of one or more physical properties of the subsurface</i>'⁵¹. As magnetometer survey creates an image of below ground deposits by measuring the magnetic differences between the underlying superficial geological deposits and features cut into those deposits, it is well suited to detecting large features or features with sufficiently magnetic fills to be detected above the natural magnetic variability of the superficial geology. Magnetometry is also suited to identifying deposits altered through heating, organic decay, and containing burnt material ditches, pits, hearths and kilns. The technique does, however, have its limitations and it cannot inform the archaeological significance, function, date, depth, or state of preservation of those anomalies it does identify. Furthermore, the technique is not capable of detecting archaeological features that do not have a magnetic signature sufficiently different to the surrounding superficial geology to be distinguished by the magnetometer. Magnetometry, therefore, struggles to identify small, ephemeral archaeological features, such as graves which are rapidly backfilled with the same material which was dug out to create the grave, and features of pre-Iron Age date when metallurgy was

⁵¹ Chartered Institute for Archaeologists (2020) *Standard and guidance for archaeological geophysical survey*

Reference	Question	Applicant's Response
		much more prevalent resulting in magnetically enhanced industrial waste being incorporated into archaeological features. Due to these shortcomings, the lack of geophysical data has not been treated as negative evidence by the Project, and the absence of anomalies does not prove that archaeological features are absent. For this reason, and in agreement with the archaeological advisors to the Local Planning Authorities, all the geophysically surveyed areas within areas of impact within the Order Limits will be subject to a trial trenching programme that will target geophysical anomalies, cropmarks, old map features, LiDAR anomalies and also 'blank' areas in the geophysical data to test its efficacy. The assessment of the Project's effects on the archaeological resource presented in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] is based on all available sources comprising Historic Environment Record data (e.g. findspots and artefact scatters, cropmarks, results of previous fieldwork), Project mapped cropmarks, Project mapped LiDAR, Project mapped historic map features, a systematic walkover survey undertaken by the Applicant, and where fieldwork has been undertaken for the Project, the results of geophysical survey and archaeological trial trenching. The Applicant has, therefore, built up as complete a picture as possible of the archaeological resource within the Order Limits, and on the basis of the accumulated evidence, has been able to infer the potential for the presence of subsurface archaeological remains. In order to assess the impact of the Project on the potential archaeological resource, a realistic worst-case approach has been adopted when assessing the value of the archaeological baseline to ensure that the significance of effect is not underestimated. Both geophysical survey and trial trenching are ongoing but a lot of the evaluation work has been completed and the results have been submitted (6.11.A3 Environmental Statement Appendix 11.3 - EACN Substation Geophysical Survey Report [APP-211], 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey Results Report [APP-212], 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report - Part 1 [AS-072], 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report - Part 2 [AS-074], 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report - Part 3 [AS-076], and 6.11.A5 Environmental Statement

Reference	Question	Applicant's Response
		Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078]). The results of the ongoing geophysical survey and trial trenching will be made available to the archaeological advisors to the Local Planning Authorities as they become available and the combined results will inform the ongoing production of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will set out appropriate mitigation for the archaeological remains within the bounds of the Project's Order Limits. The Applicant is, therefore, confident that the archaeological resource within and potentially affected by the Project will be fully mitigated either through avoidance or full excavation.
HE 1.48	Assessment of residual effects on archaeology With potential issues over the complete reliability of geophysical survey information in some locations, some of the identified priority areas still to be fully surveyed and evaluated, and significant stretches of the route of the proposed development not having been surveyed at all, explain how at this stage you can be confident in your assessments of residual effects that are set out in section 11.7 of ES Chapter 11 [AS-068]. Furthermore, in the Secretary of State's decision letter for the Five Estuaries offshore wind farm, dated 17 December 2025, it was stated that: "The Secretary of State considers preservation by record	The Applicant's response regarding the reliability of geophysical surveys and confidence in the assessment of residual effects is set out in response to ExQ1 HE 1.43 and HE 1.47. As outlined in HE 1.43 and HE 1.47 the reliability of geophysical survey assessment has been taken into account in the planning of trial trenching, with trenches targeting both areas of "known archaeology" and those that appear blank in geophysics results. The geophysical survey and trial trenching are now both well progressed and to date the findings of both phases of fieldwork are correlating with the assessment of residual effects as set out in section 11.7 of ES Chapter 11 the Applicant remains confident in the assessment. Whilst the Applicant acknowledges that preservation by record is not accepted as a direct mitigation for harm which the recorded information cannot reverse, the knowledge created by the record increases our understanding of the archaeological resource and is a relevant consideration in any overall assessment and is best practice where conservation cannot be achieved. (6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]). Archaeological assessment in the form of excavation and recording ensures that the archaeological remains are not completely lost without any knowledge of them being obtained, as set out by Historic England.⁵² Preservation by record would only be applied for the Project when the mitigation hierarchy has been applied, no other reasonable options are available, and the impact prior to mitigation would not be unacceptable in terms of the provisions in NPS EN-1. The approach to archaeological

⁵² Historic England (2015) *Managing Significance in Decision-Taking in the Historic Environment Historic Environment Good Practice Advice in Planning: 2* (Paragraph 32)

Reference	Question	Applicant's Response
	does not amount to mitigation of harm for archaeological remains...". Comment on the implications of this for your assessment of the significance of effects in ES Chapter 11 [AS-068] .	excavation and recording and the cases in which it is proposed, align with the Historic England guidance ⁵² .
HE 1.49	Evaluation versus mitigation Comment on Norfolk CC's contention in [RR-2753] that your submitted archaeological assessment methodology needs to make a clearer distinction between pre-consent work which the NPPF labels as 'evaluation' and post-consent work which is usually termed as 'mitigation'.	We understand this comment from Norfolk County Council to relate to the approaches set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] . References to 'evaluation' and 'mitigation' in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] accord with the terminology in the National Planning Policy Framework ⁵³ . 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] is being updated in consultation with Local Planning Authority Archaeological Advisors and Historic England, taking into account detailed comments received in Written Representations and Local Impact Reports, and we will ensure that the requested clarity around these terms is added as part of these updates.
HE 1.50	Article 23: removal of human remains: Respond to the comments raised in the joint LIR from Suffolk CC, Babergh DC and Mid Suffolk DC [REP1-178] regarding article 23 of the draft DCO (Removal of human remains) [APP-056] , whilst also having regard to recent made Orders where this article has been deleted from the ExA's recommended DCO by the Secretary of State. (Also see question DCO 1.A28).	Please see response to DCO 1.A28

⁵³ Ministry of Housing, Communities and Local Government (2025) National Planning Policy Framework

Reference	Question	Applicant's Response
HE 1.51	Full discharge of requirement 5 At what stage of the proposed development do you consider that all elements of requirement 5 of the draft DCO [APP-056] would be fully discharged? Explain why an additional sub-paragraph to requirement 5 has not been provided that references the need for final approval from the relevant planning authority, in consultation with Historic England, of a completion report so as to enable the full discharge of requirement 5 (subject to any ongoing maintenance or decommissioning measures).	Requirement 5 would be fully discharged following completion of all archaeological mitigation works and post-excavations obligations secured through the approved Detailed Written Scheme(s) of Investigation prepared in accordance with 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The approach set out therein, and secured through Requirement 5 within 3.1 Draft Development Consent Order [Revision C], includes provision for a range of evaluation and mitigation strategies, including the preparation and implementation of preservation in situ management plans, where highly significant remains are identified. Completion of post-excavation assessment and reporting is integral to the approved Written Scheme of Investigation. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] explicitly provides for: • Post-excavation assessment • Analysis, reporting and publication • Deposition of the archaeological archive. All of these form part of the scope of each Detailed Written Scheme of Investigation and its implementation (7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], Sections 6.2 and 6.3). Requirement 5 already requires that: • Each Detailed Written Scheme of Investigation is approved by the relevant planning authority • Historic England is consulted where relevant, before works commence. This is the point at which archaeological methodology, reporting commitments and post-excavation outputs are formally agreed. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] (Sections 5.1.1 and 5.1.11) confirms that Historic England and Local Planning Authority (LPA) archaeological advisers are engaged both at Written Scheme of Investigation preparation and during its implementation. 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] makes clear that interim statements are prepared following completion of fieldwork and that post-excavation assessment reports are produced and agreed through the LPA archaeological advisory process (with Historic England where relevant). These

Reference	Question	Applicant's Response
		obligations are embedded within the approved Written Scheme of Investigation (7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], Sections 6.2.1 and 6.3.2). Post-excavation analysis, publication and archiving can also extend beyond the physical construction programme. The chosen drafting allows: • Full archaeological mitigation to be secured and delivered • Requirement 5 to be discharged once those obligations have been met in substance, without artificially tying discharge to a single document or date.

9. Health and wellbeing

Table 9.1 Health and wellbeing

Reference	Question	Applicant's Response
HW 1.1	Time periods' effect on health and wellbeing ES chapter 10 [APP-192] at paragraph 10.7.31 in relation to residual effects during construction in respect of landscape and townscape it is concluded that the magnitude of effect is low because construction activities are likely to be short term. It is stated this is 4 years but intermittent. What evidence is there to suggest an impact over 4 years would be less impactful on mental health and wellbeing? The stress over what would appear a significant period of time could potentially be impactful and the intermittency may indeed add to that if it is not time limited in short discreet time periods and then does not return. Explain your reasoning for this conclusion and add detail around what you mean by intermittent.	Paragraph 10.7.31 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] presents a conclusion of the impact on health and wellbeing relating to visual amenity during construction. The paragraph notes that the duration of impacts is likely to be short term (over a period of four years, but intermittent). The use of the word 'intermittent' is intended to describe the approach to construction of the Project, in that the Project would be constructed by multiple groups working sequentially along the route, with activities at different locations generally staggered over time. As such, for the majority of communities along the route, construction impacts would not be continuous in nature across the four years of construction, but time-restricted. It is appreciated that a more appropriate phrase to describe activities would have been 'non-continuous' rather than 'intermittent'. It is noted that stress and anxiety associated with construction of the Project would potentially have an impact on mental health and wellbeing. This aspect of the assessment is covered specifically in Table 10.14 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The table notes that, in terms of the level of control people feel they have over their physical environment, findings from consultation have highlighted the stress and anxiety experienced by people as a result of potential impacts of the Project on their local area (notably visual impacts). Construction phase mitigation has been identified and is included in 6.7 Environmental Statement Chapter 7 - Air Quality [APP-147], 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256].
HW 1.2	Clarity in Environmental Statement ES chapter 10 [APP-192] at paragraph 10.7.146 in relation to the perception of health risk from electric and magnetic	Paragraph 10.7.146 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] identifies the level of sensitivity attributed to the general population in relation to mental health and wellbeing. Referring back to Table 10.6 Approach to Defining Sensitivity, the various sensitivity categories include a variety of

Reference	Question	Applicant's Response
	fields (EMFs) what is the basis of the statement: "The majority of the general population is considered to be of low sensitivity (i.e. they have a high ability to adapt to change and could be described as 'a community whose outlook is predominantly ambivalence with some concern')." The suggestion the communities' outlook is predominantly ambivalent appears to underplay the level of concern expressed in the representations to date. Explain the factors that have been taken into account and the judgements taken to provide the basis for this statement.	statements relating to socio-economic status, and physical and mental health condition. A footnote to the table notes that judgement will be based on the most relevant criteria and that some criteria do span categories. With regard to the assessment of potential impacts concerning the perception of health risk from electric and magnetic fields (EMFs), professional judgement has focused on the elements of the sensitivity criteria relating to mental health and wellbeing, i.e. the likely 'outlook' of a community. It is appreciated that this can be subjective. The majority of the general population has been attributed a low sensitivity which reflects '<i>a community whose outlook is predominantly ambivalence with some concern</i>'. The reference to ambivalence reflects the fact that there are likely to be both strong positive and strong negative views about the Project; it is common for strong negative voices to dominate when proposals are consulted on, particularly where there is a perceived impact on people's property, livelihood or quality of life. The sensitivity identified does also acknowledge the fact that there is concern locally about the proposals which are acknowledged in representations received. It is stressed that the low sensitivity rating is for the general population. A high sensitivity (using the wording from Table 10.6) reflects '<i>a community whose outlook is predominantly anxiety or concern</i>' and this level of sensitivity has been attributed to '<i>people who have adverse feelings about the Project in general; people who consider themselves to be in close proximity to the overhead lines and associated infrastructure for long periods of time (for example people who are not only living, but also potentially working, or using social infrastructure facilities in close proximity); people who are concerned about dependants or family members who may live or work in close proximity to the overhead lines and associated infrastructure; people with more limited social support networks (for example older people) and people with poor mental health and wellbeing who may have less capacity to cope with change or additional anxiety</i>' (paragraph 10.7.147 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]).
HW 1.3	Communication strategy and electric and magnetic fields ES chapter 10 [APP-192] Table 10.16 sets out the Impacts on mental health and wellbeing relating to perceptions of	The Applicant can confirm that the reference to paragraph 10.7.146 in Table 10.16 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] should be to paragraph 10.7.145. This will be included in the next iteration of 8.1 Errata List.

Reference	Question	Applicant's Response
	EMFs during operation (and maintenance) and identifies protective factors for mental health and potential impacts and mitigation. In relation to Control and Participation factors it is stated these could be enhanced through the dedicated programme of communication and scientific information from National Grid relating to EMFs. The reference of Paragraph 10.7.146 does not appear to be correct. This should be corrected. Assuming the reference is to paragraph 10.7.145 this references a website and EMF helpline. If the purpose is to lessen anxiety through the provision of more accessible and accurate information this should be included as an active mitigation with information actively put into the public domain and actively signposted specifically in relation to this scheme during the construction and operation of the proposed development. Could this be achieved through commitments in the communication strategy? If so, provide some wording to cover the commitments and add to the CoCP and appropriate annex as is suggested in paragraph 10.7.149 but where no commitments have been provided or	As noted in the ExA's question, a wealth of scientific evidence clearly demonstrates the lack of health risks associated with EMFs below the guideline limits. The purpose of providing more accessible and accurate information about EMFs is intended to lessen anxiety through education, understanding and awareness raising. This includes explaining what EMFs are, how they are measured, information about public exposure guidelines, compliance with National Grid standards and relevant external guidance and processes. Greater understanding about these matters would help residents feel more informed about the changes proposed in their local area (i.e. that there is no health risk from EMFs arising from the Project) and may also contribute to giving residents a greater sense of control and a focus for participation (all of which are protective factors for mental health and wellbeing as described in the Mental Wellbeing Impact Assessment Toolkit⁵⁴). The Applicant's approach to engagement for the construction phase is currently outlined in 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305], which confirms that the Project website will be maintained and managed by a community relations team to enable up-to-date information to be provided to stakeholders, including provision of Project updates, information relating to a free Project hotline, Project email and freepost address, publication of Project contact details in newsletters, and provision of the same details on boards around the perimeter of construction sites in locations where they would be visible to the public. The Applicant suggests the following wording will be added to Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] in relation to EMFs: The Applicant is committed to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice

⁵⁴ Cooke, A., Friedli, L., Coggins, T., Edmonds, N., Michaelson, J., O'Hara, K., Snowden, L., Stansfield, J., Steuer, N., Scott-Samuel, A. (2011) Mental Wellbeing Impact Assessment Toolkit

Reference	Question	Applicant's Response
	secured through the DCO. This should also include how communications would be undertaken for harder to reach parties including those who may not have access to digital means and to address inequalities created through language.	- With regard to EMFs specifically, and in recognition of the importance of clear communication and scientific evidence, the Applicant will provide accessible, clear, and up-to-date information about EMFs, their nature, and the scientific consensus that EMFs at levels associated with the Project do not pose a health risk, in the following ways: - Hosting the latest information and FAQs on the Project website, also signposting to www.emfs.info as well as links to trusted health authorities (such as the World Health Organisation) and scientific bodies - Preparing and sharing an up-to-date information factsheet (alternative formats would be prepared upon requests) with key contacts along the route to facilitate access - Responding to queries via our usual channels of communication (hotline, email address, freepost) The above approach is considered to be proportionate and appropriate, taking into account the communication needs of local communities and setting out a range of methods of communication to support hard-to-reach groups. The Applicant will review their approach regularly in light of evolving needs and consider if any other methods of communication could also be beneficial in addition to the above.
HW 1.4	Estimated maximum field strengths at sensitive receptors The EMF Compliance Report [APP-330] paragraph 6.2.12 states "Although not required for assessing compliance, the graphs presented above can be used to estimate the maximum fields at any given distance from the line." Provide the estimated maximum field strengths for the closest residential/	Section 6 of 7.8 Electric and Magnetic Fields Compliance Report [APP-330] details the maximum electric and magnetic fields the Project will produce, using the principles detailed in the Government's voluntary Code of Practice⁵⁵. This reflects the requirements in NPS EN-5 to demonstrate that the Project in its entirety complies with the Government's policies on Electric and Magnetic Fields (EMF), irrespective of distance. The Code of Practice states that the Government will regard such evidence as sufficient to demonstrate compliance, therefore, calculations of fields at the closest receptors are not required by the Code of Practice or NPS EN-5. However, the Applicant is happy to provide such calculations as helpful additional information. One of these principles within the Code of Practice is to calculate EMFs using the lowest design clearance of the conductors to ground across the entire route to present a worst-case for the overhead line as a whole. To provide an accurate

⁵⁵ Department of Energy and Climate Change (2012) *Power Lines - Demonstrating compliance with EMF public exposure guidelines*

Reference	Question	Applicant's Response
	sensitive receptors, indicating the distances to the lines. As this may also assist with the perception of health effects and wellbeing arising from EMFs which are scoped in.	reflection of the EMFs at the closest residential properties, the minimum design clearance for the conductors closest to the receptor has been used instead. The closest residential property to the proposed underground cable route has been calculated using minimum burial depth of the cables and distance of residential property to the outermost cable. All other Code of Practice principles have been applied including maximum continuous pre-fault current flow. The maximum magnetic fields therefore reflect the overhead line and underground cables operating at 100% of its continuous current rating. In practice, the overhead line will operate carrying lower currents, and correspondingly, the magnetic fields during day-to-day operation will be lower. Where the proposed overhead line is close to existing overhead lines, the cumulative impacts of both have been calculated and included. The closest receptors are located adjacent to the existing overhead line span YYJ 118-119, however, no changes to the operation of these routes are proposed, so EMF levels will remain the same and have been excluded. Both standard and low height pylons have been included within the calculations for span TB140 to 141, to represent either option. The Applicant has notified the ExA that it is proposing to take the Project forward with standard lattice pylons south of the River Chelmer but has presented both arrangements pending ExA confirmation. <u>Span TB 29 to 30 – Closest residential property</u> <i>Standard height pylons</i> – Property approximately 56.5 m to conductors in still air Minimum conductor clearance adjacent to property: 13.1 m Maximum magnetic field: 1.39 µT Maximum electric field: 0.07 kV/m <u>Span TB 140 to 141 – Closest residential property</u> <i>Standard height pylons</i> – Property approximately 55 m to conductors in still air Minimum conductor clearance adjacent to property: 15.4 m Maximum magnetic field: 1.45 µT Maximum electric field: 0.06 kV/m <i>Low height pylons</i> – Property approximately 50 m to conductors in still air Minimum conductor clearance adjacent to property: 16.7 m

Reference	Question	Applicant's Response
		Maximum magnetic field: 1.75 μT Maximum electric field: 1.69 kV/m <u>Span RG7 to RG8 and existing overhead line span 4YM 191 to 192 – Closest residential property</u> <i>Standard height pylons</i> – Property approximately 44.5 m to conductors in still air Minimum conductor clearance adjacent to property: 19.5 m Maximum magnetic field: 2.10 μT Maximum electric field: 0.06 kV/m <u>Underground cable Chainage 900 – Closest residential property</u> Property approximately 15 m to outermost cable Maximum magnetic field: 0.85 μT As detailed in Section 6.3.1 of 7.8 Electric and Magnetic Fields Compliance Report [APP-330], underground cables produce no external electric fields. All estimated worst-case exposures at the closest residential receptors are a small fraction of the exposure limits, as detailed in Table 2.1 of 7.8 Electric and Magnetic Fields Compliance Report [APP-330].
HW 1.5	Written Representation from Helen Dorothy Keeler Respond specifically to the WR from Helen Dorothy Keeler [REP1-367] including comment on the issues raised and references cited to the scientific papers and whether any of these raise issues that would materially affect or provide justification to depart from the Government's adopted policy position in the designated NPS EN-5 (2023).	Health considerations are given a high priority in the process by which we arrive at any proposals for new electricity circuits. The UK has specific policies for managing electric and magnetic fields (EMFs), which include both numerical exposure guidelines to protect against established acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. These policies were adopted by Government on recommendation by the UK Health Security Agency (UKHSA) and are incorporated into the decision-making process for development consent in National Policy Statement (NPS) EN-5 (2024). The exposure guidelines in place are based on preventing established biological effects, which specifically cover magnetophosphenes, flickering flashes of light perceived in the visual field. These occur when the retina or visual cortex is exposed to high time-varying magnetic fields inducing weak electric current, which in turn stimulate retinal cells. The exposure limits are set to prevent these effects occurring,

Reference	Question	Applicant's Response
		with a considerable additional fivefold safety factor applied to the public limits as detailed in the references attached in [REP1-367]. The precautionary measures in place in the UK were adopted by Government following the outcomes of the Department of Health and Social Care's established Stakeholder Advisory Group to Government on Extremely Low Frequency Electric and magnetic fields (SAGE)⁵⁶. This process specifically considered the evidence on childhood leukaemia amongst other health outcomes, and recommended appropriate precautionary measures which have been adopted and detailed in NPS EN-5 (2024). Research into the potential health effects of EMF has been carried out for decades and the Applicant looks to independent authoritative review bodies such as UKHSA to review that science and for Government to advise on appropriate protective measures based on the outcomes of these reviews. Summaries of the scientific evidence and review body outcomes are provided in Section 2.6 of 7.8 Electric and Magnetic Fields Compliance Report [APP-330]. These review processes consider the totality of the scientific evidence, rather than being based on selected individual studies, though all relevant individual studies are taken into account. These reviews include research covering but not limited to, melatonin, fertility, and adult and childhood cancers. It is important to note that after decades of research into EMFs and health, no health effects have been established below the Government's adopted exposure limits. The Department of Health and Social Care, and UKHSA are responsible for ensuring that current guidelines and policies reflect the body of scientific research and provide adequate protection against EMFs. UKHSA continues to monitor the evidence applicable to exposure to power frequency electromagnetic fields, and has confirmed it will update its advice as necessary. Moreover, the Committee on Medical Aspects of Radiation in the Environment, (COMARE), has an EMF and Health Subgroup, which provides advice to the main committee on issues with EMFs that affect human health and maintain a watching brief on new publications. COMARE's reports and minutes of meetings can be found here:

⁵⁶ Department of Health (2009) *Government response to the stakeholder advisory group on extremely low frequency electric and magnetic fields (ELF EMFs) (SAGE) recommendations*. [Online] Available from http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

Reference	Question	Applicant's Response
		https://www.gov.uk/government/groups/committee-on-medical-aspects-of-radiation-in-the-environment-comare The UK Government's latest policy on EMFs in respect of new electricity infrastructure is set out in NPS EN-5 which was reissued in December 2025. This latest policy contains no material changes to those issued in 2024 and is reflective of the measures Government and its public health experts considered appropriate. Our approach ensures all our assets comply with those policies, as detailed in National Grid's Public Position Statement - Electric and Magnetic Fields, included in the references attached in [REP1-367]. Irrespective of the technology used, the Applicant will always ensure that all its equipment is designed to comply with Government's policies on EMF. This ensures that health concerns are properly and adequately addressed. The evidence concerning compliance with these policies, including the numerical guidelines, is included in 7.8 Electric and Magnetic Fields Compliance Report [APP-330]. The Applicant's response to HW1.4 details the maximum electric and magnetic fields at the closest property to TB140 for standard and low height pylons, demonstrating compliance with the exposure limits for both pylon designs. It is the Applicant's view that the continuous review process undertaken by UKHSA ensures any new research which would materially affect the current EMF guidance, would be captured and that guidance would be revised accordingly. The research presented has not triggered a change in policy under that process, and accordingly, the matters referenced are already reflected within, and appropriately addressed by, the existing EN-5 policy framework.
HW 1.6	OFH comments and subsequent post hearing submissions of Dr Anna Magee Respond specifically to the OFH comments and subsequent post hearing submissions of Dr Anna Magee [REP1-335] including comment on the issues raised and references cited to the scientific papers and whether any of these raise issues that would materially affect or provide	Research into the potential health effects of Electric and Magnetic Fields (EMFs) has been carried out for decades and National Grid look to independent authoritative review bodies such as the UK Health Security Agency (UKHSA) to review that science and for Government to advise on appropriate protective measures based on the outcomes of these reviews. Summaries of the scientific evidence and review body outcomes are provided in Section 2.6 of 7.8 Electric and Magnetic Fields Compliance Report [APP-330]. It is important to note that after decades of research into EMFs and health, no health effects have been established below the Government's adopted exposure limits.

Reference	Question	Applicant's Response
	justification to depart from the Government's adopted policy position in the designated NPS EN-5 (2023).	Several individual studies have been published over the last decade investigating a range of health outcomes, some of which are noted in the appendix of the post hearing submission [REP1-335]. Review bodies consider the complete body of scientific evidence, allowing a conclusion on risks to be drawn, rather than relying on a subsection of scientific literature. The UKHSA and Department of Health and Social Care are responsible for ensuring that current guidelines and policies are reflective of the body of scientific research and provide adequate protection against EMFs. UKHSA continues to monitor the evidence applicable to exposure to power frequency electromagnetic fields and have confirmed it will update its advice as necessary. Moreover, the Committee on Medical Aspects of Radiation in the Environment (COMARE) has an EMFs and Health Subgroup which provides advice to the main committee on issues with EMFs that affect human health, and maintains a watching brief on new publications. COMARE's reports and minutes of meetings can be found here: https://www.gov.uk/government/groups/committee-on-medical-aspects-of-radiation-in-the-environment-comare The UK Government's latest policy on EMFs as it relates to new electricity infrastructure is set out in National Policy Statement EN-5 (NPS EN-5) which was reissued in December 2025. This latest policy is reflective of the measures Government and their public health experts considered appropriate. As noted in the post hearing submission [REP1-335], some European countries have also introduced precautionary measures in addition to exposure limits. It is for each country to introduce the policies they consider appropriate. The UK has undertaken its own review of what precautionary measures should be applied to electricity infrastructure. In 2009, the outcomes of the Department of Health and Social Care's established Stakeholder Advisory Group to Government on Extremely Low Frequency Electric and magnetic fields (SAGE) were published. The aim of the process was to bring together the range of stakeholders to identify and explore the implications for a precautionary approach to Extremely Low Frequency (ELF) EMFs and make practical recommendations for precautionary measures. SAGE looked at a range of precautionary measures and made recommendations to Government on those which should be adopted.

Reference	Question	Applicant's Response
		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 or set distances around new and existing overhead lines, were considered but were judged to be disproportionate in light of the evidence and were not adopted. Based on the science and recommendations by SAGE, the UK has a carefully thought-out set of policies for protecting against EMFs, which includes both numerical exposure guidelines to protect against established, acute effects of EMFs, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMFs at lower levels, including, specifically, the possibility of a risk for childhood leukaemia. We believe it is right that the decision on what is acceptable or not is made independently of National Grid, rather than our own assessment of the science. The evidence concerning compliance with these policies, including the numerical guidelines and precautionary policies is included in the 7.8 Electric and magnetic fields compliance report [APP-330]. The post hearing submission also referenced impacts of EMFs on vertebrates and non-vertebrates. While some animal groups, particularly migratory birds and certain reptiles and amphibians, are known to possess a magnetic sense that enables them to detect the earth's geomagnetic field and contributes to orientation and navigation, the weight of current scientific evidence does not demonstrate that ELF EMFs generated by high voltage power lines, which have different physical characteristics to the geomagnetic field and therefore interact with matter in different ways, interfere with these behaviours under real world conditions. A recent review by Pophof <i>et al.</i>, 2023⁵⁷ concluded that studies reporting disruption of navigation are primarily associated with non-powerline frequencies (e.g. kHz–MHz radiofrequency ranges) or laboratory experiments applying field strengths substantially higher than those encountered near transmission infrastructure. Field-based studies near operational overhead lines generally find no consistent or repeatable effects on navigation or orientation attributable to ELF EMFs, with observed behavioural changes more

⁵⁷ Pophof, B. Henschenmacher, B., Kattinig, D.R., Kuhne, J., Vian, A., and Ziegelberger, G. (2023) *Biological Effects of Electric, Magnetic, and Electromagnetic Fields from 0 to 100 MHz on Fauna and Flora: Workshop Report*. Health Physics. 2023 Jan 1;124(1):39-52.

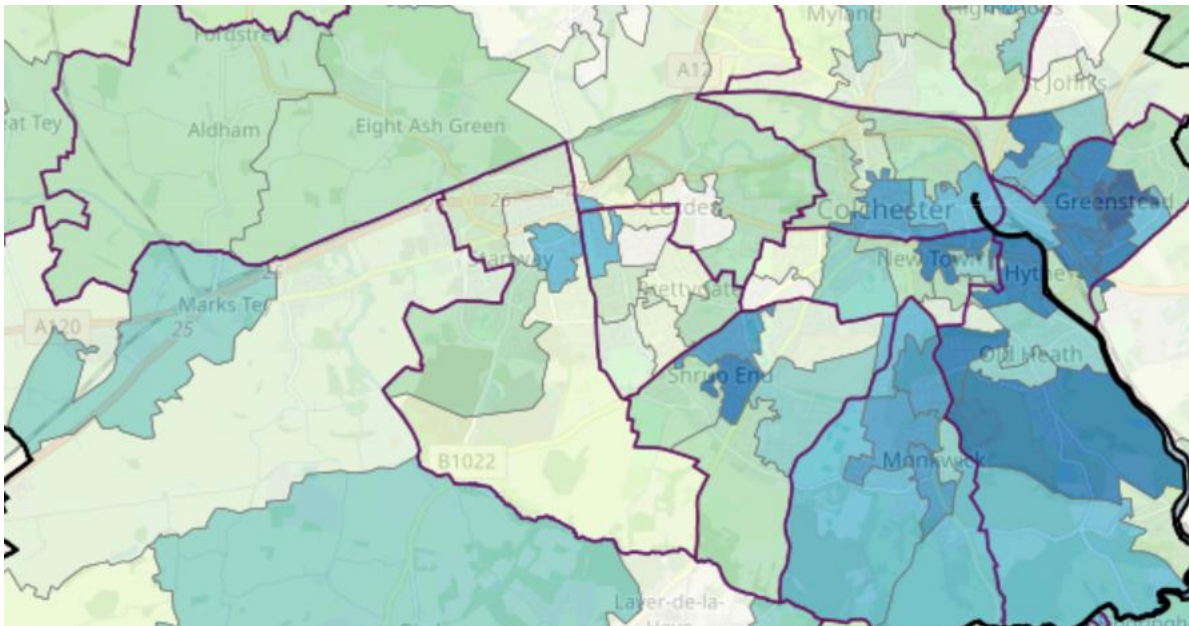
Reference	Question	Applicant's Response
		plausibly explained by habitat alteration, landscape features, noise, or other environmental factors rather than electromagnetic exposure itself. In the UK, the body of research regarding EMFs, human health and impacts to ecosystems is reviewed by authoritative groups who advise Government on the measures that should be put in place to protect against EMF exposure based on that body of evidence. The Government has acted on that advice and set EMF policies and guidelines which are detailed in NPS EN-5. This sets out clear guidance on the EMF requirements which industry needs to meet when developing new infrastructure, and is detailed in 7.8 Electric and Magnetic Fields Compliance Report [APP-330]. Within this guidance, both human health and impacts to ecosystems are considered. NPS EN-5 (2025) states: <i>'2.9.59 There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.'</i> It is the Applicant's view that the continuous review process undertaken by UKHSA ensures any new research, which would materially affect the current EMF guidance, would be captured and that the guidance would be revised accordingly. The research presented has not triggered a change in policy under that process, and accordingly, the matters referenced are already reflected within, and appropriately addressed by, the existing EN-5 policy framework.
HW 1.7	Compliance with threshold values and optimum phasing The EMF Compliance Report [APP-330] states that the proposed development will be compliant with the government position in NPS EN-5 (2023) and will meet the threshold values and will be designed to ensure optimum phasing. The outline CoCP [APP-300] at Table 6.1 Mitigation measures /	The Applicant is committed to ensuring the Project complies with the EMF requirements detailed in NPS EN-5. Additional wording will be included within 7.2 Outline Code of Construction Practice [REP2-014] at Table 6.1 Mitigation measures / environmental commitments, Commitment reference GG02 at Deadline 3 which are secured through the DCO: <i>'The Project design will be compliant with the guidelines and policies relating to Electric and Magnetic Fields (EMF) stated in National Policy Statement EN-5 (Department for Energy Security and Net Zero, 2024), including the International Commission on Non-ionizing Radiation Protection (ICNIRP) guidelines (1998).'</i>' This is mandated through the Applicant's Technical Specifications and Policy Statements which dictate that all designs must comply with these EMF policies, ensuring the Project is designed to meet these obligations.

Reference	Question	Applicant's Response
	environmental commitments Commitment reference GG02 states “The Project design will be compliant with the guidelines and policies relating to EMF stated in NPS EN-5 (DESNZ, 2024), including the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines (1998).” Whilst this states “the project design” will be compliant it does not appear to provide a commitment to implement that. The ExA is concerned as to whether the wording of the commitment is sufficiently robust; this should be reworded to ensure the proposed development will be constructed to ensure compliance and/or should be specifically secured through the DCO.	
HW 1.8	Brentwood Borough Council's local impact report – protected characteristics and complex sensory needs Paragraph 6.45 of Brentwood Borough Council's Local Impact Report [REP1-150] notes it “...has received representations indicating that some households within the Haverings Grove and Rayleigh Road corridor include individuals with protected characteristics and complex sensory needs, where noise, vibration, unexpected traffic conditions and sudden acoustic stimuli can cause	The Applicant has had due regard to individuals with protected characteristics in considering health and wellbeing, stress and anxiety as a result of the Project. Information is provided in 7.14 Equality Impact Assessment [APP-352] which presents an assessment of differential and disproportionate impacts on people with protected characteristics during the consultation, construction, operation (and maintenance) phases of the Project. The assessment concludes that the construction phase may give rise to temporary negative equality impacts, although these are not expected to be substantial in nature and are mitigated through embedded design measures, good practice construction management, and additional mitigation where required. The Equality Impact Assessment notes that this may include impacts arising from noise, vibration, and air quality changes, which may differentially affect children, older people, pregnant women, and people with sensory or respiratory conditions. Impacts on health and wellbeing, which include stress and anxiety, are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing

Reference	Question	Applicant's Response
	acute distress. These households report that prolonged construction activity, including extended working hours and associated traffic behaviours, would disproportionately affect their wellbeing and daily functioning. Given the Public Sector Equality Duty, [the Council] ...considers that vulnerable residents in this locality warrant particular regard within the DCO's mitigation framework, including the need for targeted measures to minimise disturbance." For the applicant, to what extent have you had regard to individuals with protected characteristics in considering health and wellbeing, stress and • anxiety? Explain how this has been considered and detail where this is explained. What additional measures have you sought to employ to minimise disturbance on individuals with protected characteristics and complex sensory needs and what further measures can be employed? For Brentwood Borough Council, what are the targeted measures to minimise disturbance, you reference that you are seeking from the applicant?	[APP-192]. The approach to identifying vulnerable groups (including individuals with protected characteristics, which include those with various types of disability or health need) has been set out in paragraph 10.4.19 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. For each potential impact during the construction and operation phases of the Project, a source-pathway-receptor analysis has been undertaken and this is set out for each topic assessed in 6.10 Environmental Chapter 10 – Health and Wellbeing [APP-192]. For noise, receptors include people with pre-existing physical and mental health conditions, which would include additional sensory needs and sensitivities. It is understood that this vulnerable group may experience particular sensitivities with regard to changes in noise level. The Hutton East ward, within which Havering's Grove is located (and the Rayleigh Road corridor passes through), has been categorised in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] as being of medium sensitivity by virtue of the fact that the ward presents slightly higher levels of deprivation, self-reported bad / very bad health and a slightly higher proportion of people who are disabled under the Equality Act 2010 than is the case for Brentwood as a whole. The assessment of impacts on health and wellbeing is informed by other assessments as appropriate, for example 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] and 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]. An extensive range of relevant standard/good practice measures and best practicable means (BPM) relating to noise and vibration have been identified and are set out in section 14.6 of 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] and in 7.2 Outline Code of Construction Practice [REP2-014]. The framework for how noise and vibration will be controlled and managed is set out in 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306]. This confirms that the Main Works Contractor(s) will conduct detailed construction noise and vibration assessments to determine whether any additional measures, including site specific BPM, may be required. With the use of mitigation in the form of BPM, 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] confirms that no significant effects in relation to construction noise as a result of construction activities have been identified during

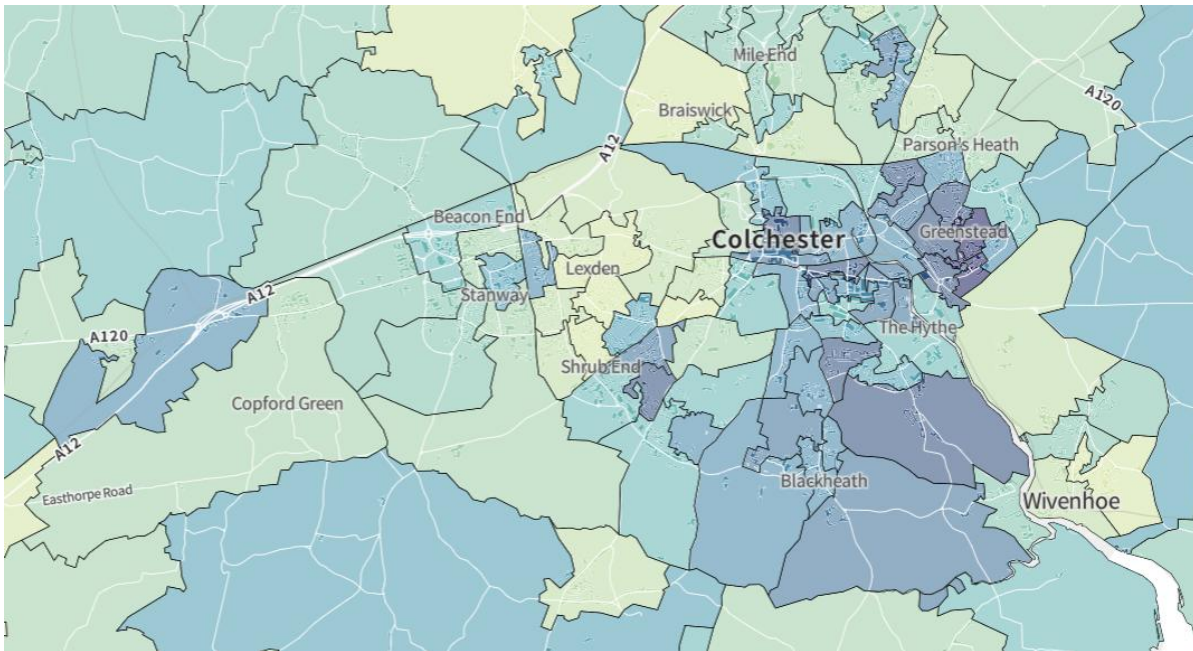
Reference	Question	Applicant's Response
		daytime, night-time or weekend and bank holiday working periods. In relation to vibration as a result of construction activities, 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] concludes that the residual effect of construction vibration effects on people in buildings is not significant at all nearby Noise Sensitive Receptors. The outputs of the vibration assessment are shown on 6.14.F3 Environmental Statement Figure 14.3 - Construction Vibration Assessment Outputs [APP-264]; for the Rayleigh Road / Haverings Grove area, vibration outputs are identified on Page 22 and show a negligible level of effect for all NSRs in this location. In relation to construction traffic noise, the construction traffic noise assessment presented in 6.14.A2 Environmental Statement Appendix 14.2 - Construction Traffic Noise Assessment [APP-258] indicates that construction traffic noise impacts are negligible or small on most routes. Table A14.2.1 sets out the assessment of construction traffic noise for Primary Access Routes, which include the Rayleigh Road corridor; the table shows that the percentage of HGVs using this route is anticipated to increase from 1.1% to 1.6% with Project construction vehicles, resulting in a change of 0.3 dB (reported as negligible and not significant). Other sections of Rayleigh Road show a smaller increase in HGV numbers and a resultant smaller change in noise levels as a result. Proposals for the management of construction-related traffic along the Local Highway Network within the vicinity of the construction route during the construction period of the Project, in order to limit any potential disruptions and implications on the overall transport network are set out in 7.3 Outline Construction Traffic Management Plan [APP-306]. Whilst it is noted that even small changes in noise levels have the potential to impact individuals with particular sensory needs, with good practice mitigation the Applicant has ensured that disturbance to residents has been minimised. Paragraph 10.4.28 in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] notes as part of the limitations of the assessment that health effects are considered at a population level, rather than an individual level. Whilst it is acknowledged that there are individuals along the Project route with different health needs and vulnerabilities, effects are presented in relation to the general population, in relation to vulnerable groups, or at ward level where relevant for particular effects. This population-based approach is consistent with health impact assessment

Reference	Question	Applicant's Response
		methodologies and is proportionate and appropriate for a project of this scale and nature. The medium sensitivity for Hutton East ward has been noted earlier in this response; ward-level sensitivity has been considered in the assessment of health and wellbeing impacts where relevant (for example in relation to visual amenity effects and effects relating to physical activity). In the assessment of impacts on mental health and wellbeing as a result of construction activity, it is noted more generally that this may impact the level of control people feel they have over their physical environment and contribute to stress and anxiety. However, this would be effectively managed through good practice mitigation as described earlier and through appropriate community liaison / communications. The Applicant has suggested additional wording be added to 7.2 Outline Code of Construction Practice [REP2-014] in relation to this as follows: • The Applicant is committed to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice The Applicant would be interested to understand what Brentwood Borough Council considers to be additional appropriate and achievable targeted measures to minimise disturbance for these specific communities.
HW 1.9	Colchester City Council's local impact report – assessment of health and wellbeing Paragraph 9.42 of Colchester City Council's LIR [REP1-156] identifies a number of actions the Council suggests the applicant needs to undertake to address its concerns with the assessment of health and wellbeing. These include: • Updated assessment incorporating October 2025 Index of Multiple	The Applicant's response to each of the actions identified in Colchester City Council's Local Impact Report [REP1-156] is as follows, providing further justification and evidence as required for each: 1) Updated assessment incorporating October 2025 Index of Multiple Deprivation (IMD) and Lower Layer Super Output Area (LSOA) level data for Colchester As previously set out in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], the assessment undertaken in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] reported the available IMD data at the time it was prepared to understand baseline health and socio-economic characteristics of populations potentially affected by the Project. A review of the updated IMD data published in October 2025 (after the DCO application was

Reference	Question	Applicant's Response
	Deprivation (IMD) and Lower Layer Super Output Area (LSOA) level data for Colchester. - Integration of local health and wellbeing strategies and Integrated Care System Joint Forward Plans. - Inclusive engagement measures for language-vulnerable communities. - Consideration of cumulative mental health impacts through Mental Wellbeing Impact Assessment workshops. - A robust Health and Wellbeing Monitoring Framework with enforceable commitments. The applicant is requested to respond to each of the requests identified, taking account of the justification and background in the preceding paragraphs of the LIR and provide commentary on how these can be addressed including the information and assessment requested or explain why it is not necessary. Note: Your response to updating the IMD, as set out in [REP1-132] is noted. However, the ExA would ask what evidence has been put forward to substantiate there is no need to update the document with the most up to date data. In the absence of adequate evidence, you must revisit the relevant	submitted) shows that, as a whole, deprivation levels have reduced for the Colchester City Council area, with fewer neighbourhoods now ranking among the most deprived in England. The images below show deprivation by LSOA for 2019 (top image) and 2025 (bottom image). The darker colours indicate areas of higher deprivation.  Index of Multiple Deprivation, 2019 (Source: Indices of Deprivation 2015 and 2019)

Reference	Question	Applicant's Response

chapter of the ES and address any changes as a result of the IMD being updated. (Also see question SET 1.1 below).



Index of Multiple Deprivation, 2025 (Source: [Overall \(IMD\)](#) | [Local Deprivation Explorer](#))

The 2019 IMD and the October 2025 IMD provide snapshots of relative deprivation across LSOAs, with Colchester City Council showing overall improvement in its national position between the two time periods. Nationally, Colchester ranked better in 2025 at 173rd out of 296 local authorities (less deprived than 57% of districts), compared to its 2019 position among 317 authorities, where it had higher proportions of deprived LSOAs. Only 2% of Colchester's 116 LSOAs fell in England's most deprived 10% in 2025 (well below the national 10% average) down from more neighbourhoods in that category in 2019, reflecting continued progress in tackling deprivation.

In consideration of deprivation domains that may be of particular relevance to vulnerable communities, notably the income and health domains, again, there have been general improvements between 2019 and 2025. In 2019, income deprivation

Reference	Question	Applicant's Response
		contributed significantly to deprivation rankings in areas like Greenstead (to the east of Colchester), where multiple LSOAs ranked among Colchester's most deprived, driven by low income indicators such as benefit receipt. By 2025, fewer LSOAs overall showed extreme deprivation, with just two in Greenstead remaining in the most deprived national index, reflecting local regeneration efforts. Similarly for the health deprivation domain, 2019 saw health metrics (mortality rates, morbidity, disabilities) elevating deprivation scores in vulnerable LSOAs, particularly in eastern wards. The 2025 update shows sustained low overall health deprivation relative to national averages, although it is noted that persistent challenges remain in two of the Greenstead LSOAs. Across Colchester's LSOAs, 592 nationally moved out of the most deprived decile since 2019, although domain-specific shifts have been modest. Colchester wards included in the baseline assessment for 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] fall outside of the urban area and comprise Marks Tey and Layer; Lexden and Braiswick; and Rural North. Between 2019 and 2025, deprivation trends in these specific wards have diverged. Marks Tey and Layer has exhibited modest improvements in income deprivation by 2025; several LSOAs that were previously ranked nearer the mid-to-lower quintiles moved toward less deprived positions, driven by slight increases in employment and reductions in benefit dependency, potentially linked to local housing developments and improved transport links. Health deprivation in this ward showed limited change, with chronic illness prevalence remaining broadly stable. Lexden and Braiswick ward has continued to perform relatively well in terms of general deprivation, consolidating its status as one of the less deprived areas in Colchester; marginal positive shifts in 2025 potentially reflect rising household incomes and stable access to healthcare. The Rural North ward displays a mixed picture: although some LSOAs have experienced small increases in income deprivation, potentially influenced by factors such as lower access to well-paid employment, others have benefitted. Health deprivation in Rural North has showed slight deterioration in a subset of LSOAs, where older populations and limited local service access have potentially contributed to higher morbidity scores. Overall, as previously noted in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], it is not considered that use of the updated dataset would result in material changes to the conclusions of the health and wellbeing

Reference	Question	Applicant's Response
		assessment presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] and no chapter updates are considered to be required as a result. 2) Integration of local health and wellbeing strategies and Integrated Care System Joint Forward Plans As previously noted within 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], local health and wellbeing strategies, Joint Strategic Needs Assessments and the health priorities they contain, have been used to inform the health and wellbeing assessment. Colchester City Council sits within Essex County Council, and the health priorities set out within the Essex Joint Health and Wellbeing Strategy are already summarised in Table 10.1 on page 5 of 6.10 Environmental Statement Chapter 10 - Health and Wellbeing [APP-192]. For Essex, health priorities include improving mental health and wellbeing; healthy lifestyles – obesity and physical activity; levelling up health inequalities (addressing root causes such as poverty, education and housing); supporting long-term independence; alcohol and substance misuse; and health inequalities and the wider determinants of health. A review of Colchester City Council's Three-Year Plan 2023-26: A City fit for the Future⁵⁸ shows complementarity between the City Council's local health priorities and those of Essex County Council. The Three-Year Plan prioritises health and wellbeing as a cornerstone for sustainable community development, emphasising the creation of inclusive, healthy environments that support physical and mental wellbeing across all ages. Key objectives include improving access to quality healthcare services, promoting active lifestyles through enhanced green spaces and recreational facilities, and addressing social determinants of health such as housing, employment, and education. Mental health receives dedicated focus, with initiatives aimed at reducing stigma, increasing awareness, and improving early intervention and support services. The plan also seeks to tackle inequalities by focusing resources on deprived wards and communities experiencing poorer health outcomes, aligning with broader regeneration and economic inclusion strategies. Furthermore, the City Council aims to enhance community resilience by fostering social connectedness and supporting wellbeing through cultural and social activities.

⁵⁸ Colchester City Council (2024) A City fit for the Future – Colchester City Council's Three-Year Plan April 2023 – April 2026

Reference	Question	Applicant's Response
		Colchester City Council also requests the integration of Joint Forward Plans into the Health and Wellbeing assessment. The Mid and South Essex Integrated Care System Joint Forward Plan⁵⁹ (refreshed for 2024-2029) outlines a five-year strategy for NHS partners to collaboratively meet local health needs and improve population health. Core ambitions centre on enhancing health outcomes through partnerships with local authorities, public health teams, social care and communities. Integration strategies emphasise community-based care, digital transformation, patient-centred pathways to address elective backlogs, cancer diagnostics and mental health investment. The Joint Forward Plan underscores the NHS system's capacity constraints and need for coordinated planning to manage potential health service pressures arising from new developments and proposals which have the potential to generate temporary demand spikes for primary care, mental health support, and emergency services due to construction-related disruptions, traffic, noise, or community anxiety. No significant health and wellbeing impacts have been identified for the Project in relation to these areas, although it is noted that community anxiety is likely to be heightened in wards in closest proximity to the Project route. It is not considered that inclusion of the specific documents suggested would result in material changes to the conclusions of the health and wellbeing assessment presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] and no chapter updates are considered to be required as a result. 3) Inclusive engagement measures for language-vulnerable communities The following wording has been added to 7.2 Outline Code of Construction Practice [REP2-014] at Deadline 3 (the Outline Code of Construction Practice is secured by Requirement 4 of the Draft Development Consent Order): • The Applicant is committed to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice and will include how we will engage with seldom heard and hard-to-reach groups, including those with linguistic vulnerabilities. The Applicant will liaise with

⁵⁹ Mid and South Essex Integrated Care System (2025) Mid and South Essex Integrated Care System Joint Forward Plan

Reference	Question	Applicant's Response
		Local Planning Authorities ahead of construction to agree timescales and implementation. On request, the Applicant will consider providing materials in alternative formats. The Applicant's approach is considered to be proportionate and appropriate, taking into account communication needs of local communities and setting out both digital and non-digital methods of communication to assist with harder-to-reach parties who may not have access to digital means and to address inequalities created through language. 4) Consideration of cumulative mental health impacts through Mental Wellbeing Impact Assessment workshops The Applicant's position has not changed from that presented in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], in that it is recognised that people have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure Projects and other schemes in the local area and that adverse effects on mental health and wellbeing are likely to be 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 construction periods. It is not considered that holding specific mental wellbeing impact workshops would raise new or additional information to that presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. Measures to alleviate concerns about cumulative impacts will be focused on effective community communication and liaison for individual development proposals, ensuring that relevant communities clearly understand timelines and the nature of construction activities. Where further engagement may be beneficial relates to awareness-raising about electric and magnetic fields (EMFs) and proposals for targeted community engagement in relation to this matter (to allay concerns) are set out in response to question HWB 1.3. 5) A robust Health and Wellbeing Monitoring Framework with enforceable commitments As set out in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], no significant health and wellbeing impacts have been identified in 6.10

Reference	Question	Applicant's Response
		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. It may, however, be appropriate to identify specific actions in addition to the above that could help with understanding community mental health over the pre-construction, construction and operation periods. This could include reviewing the number and type of complaints or concerns raised during construction works through the complaints procedure identified. Complaints / concerns could be categorised by theme, type of action and speed of escalation. This would help understand where further communication may be required with local communities.
HW 1.10	Essex CC's local impact report – inadequacies in baseline for health and wellbeing Essex CC's LIR [REP1-161] at paragraph 4.9.24 concludes that the baseline in the ES in respect of health and wellbeing is not sufficiently granular, underestimates vulnerability and does not meet NPS EN-1's expectation to assess how projects may impact different populations differently. It is further noted that in its relevant representation [RR-1083] the County Council had requested granular	It is not considered that there are any deficiencies in data to address. The approach to baseline data collection and assessment is proportionate for a Project of this scale and nature. Our assessment is compliant with NPS EN-1's expectation to assess how projects may impact different populations differently. Data provided in Section 10.5 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] describe baseline conditions along the Project route using data at various geographies, including local authority, ward and (for baseline conditions relating to deprivation domains) Lower Super Output Areas (LSOAs). It is noted that paragraph 10.5.9 refers to the Indices of Multiple Deprivation ward-level score, which has been used as part of the indicators for baseline assessment, however later paragraphs (for example paragraph 10.5.18) summarise findings from a review of domain-level deprivation data which have been reviewed at LSOA-level. The paragraph acknowledges the variations by ward along the Project route in relation to health deprivation and disability domain data. Baseline data supporting the health and

Reference	Question	Applicant's Response
	LSOA analysis and renewed deprivation data to prevent underassessment of effects on vulnerable groups (see paragraph 4.9.23 of Essex CC's LIR). Explain why the deficiencies in data have not been addressed, whether it is your intention to do so and, if not, justify why it is not necessary explaining why there is not a potential underestimation of effect on vulnerable groups.	wellbeing assessment by ward (where available) along the Project route is presented in 6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline Statistics [APP-193]. It is refuted that vulnerability of populations along the Project route are underestimated. Careful consideration has been given to the distribution of health and wellbeing effects within the population, including the assessment of vulnerability. Paragraphs 10.4.17 to 10.4.19 and Table 10.5 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] identify vulnerable groups relevant to the assessment, relevant social receptors and justification for inclusion. Vulnerable groups broadly comprise age (younger and older people), people who may be vulnerable as a result of income or social support requirements (including people who are unemployed or otherwise on low-incomes, and people who may not have access to private transport), and people who are vulnerable as a result of their health status. Baseline data for each of these groups is presented at ward level where available in 6.10.A1 Environmental Statement Appendix 10.1 - Health and Wellbeing Baseline Statistics [APP-193]. Reference has been made to updating baseline data in relation to the 2025 Index of Multiple Deprivation; a comparison between the 2019 and October 2025 Index of Multiple Deprivation (IMD) data for Essex County Council reveals nuanced shifts in deprivation patterns across LSOAs, particularly within the income and health deprivation domains. Overall, Essex maintains a relatively moderate position in England's deprivation rankings, with some areas showing improvement while others experience persistent challenges. In the income deprivation domain, which reflects indicators such as benefit receipt and low earnings, several LSOAs in Essex demonstrated slight reductions in deprivation levels by 2025 compared to 2019. This improvement is attributed in part to broader economic recovery, employment initiatives, and targeted local regeneration efforts. However, pockets of income deprivation remain entrenched, particularly in urban centres and former areas of industry, where unemployment and low-income prevalence continue to impact community wellbeing. The health deprivation domain, encompassing measures of morbidity, disability, and premature mortality, shows a more mixed picture. While some LSOAs exhibit modest gains in health outcomes, likely influenced by improved healthcare access and public health interventions, other areas reflect stagnation or

Reference	Question	Applicant's Response
		slight deterioration. This is particularly evident in communities with higher proportions of older residents or longstanding socio-economic disadvantage, where chronic health conditions remain prevalent. The 2025 IMD data also highlight the complex interplay between income and health deprivation; areas with persistent income deprivation often correlate with poorer health outcomes, reinforcing the multidimensional nature of deprivation. Notably, Essex's overall ranking has remained relatively stable between 2019 and 2025, suggesting that while localised progress has occurred, systemic deprivation challenges persist. Our understanding of how the Project may impact different populations differently is not restricted to deprivation information. 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] has clearly identified which population groups might be more vulnerable to different aspects of the Project; this is set out within each assessment topic (vulnerable groups specific to that topic are set out in the source-pathway-receptor section) and assessment of likely health effects for both general populations and vulnerable groups are identified. It is not considered that additional baseline data collection would result in material changes to the conclusions of the health and wellbeing assessment presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] and no chapter updates are considered to be required as a result.
HW 1.11	Essex CC's local impact report – linguistic vulnerabilities Essex CC [REP1-161] raises the issue of linguistic vulnerability, deprivation domain differences and disability prevalence not being linked to impacts. Furthermore, concerns are also expressed about the treatment of mental health prevalence. Explain how you have taken account of these issues and what mitigation or communication strategies are secured through the DCO or communication strategies. If no such strategies exist	The assessment of potential impacts on the health and wellbeing of local residents is presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. Section 10.4 sets out the approach to assessment, including how population groups and receptors have been identified. Paragraph 10.4.18 highlights how impacts experienced within a population can be influenced by factors such as age, gender, ethnicity and disability, which means that different groups of people are likely to be more (or less) sensitive to changes in health determinants resulting from the Project. These are described as vulnerable populations and have been identified in Table 10.5 and include people in low-income households (which can be related to deprivation domain differences, although not exclusively) and health status (which includes people with poor or pre-existing health conditions, relating to both physical and mental health and wellbeing). Linguistic vulnerability is noted – the baseline analysis summarised in Section 10.5 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] has considered data relating to the proportion of

Reference	Question	Applicant's Response
	set out how you will secure such strategies, or if it is considered such strategies are not required explain and justify your position. See question HW 1.3 which also references communication strategies.	people along the Project route for whom English is the main language. Baseline data relating to mental health and wellbeing have also been reviewed within Section 10.5, in relation to scores for life satisfaction, anxiety and happiness as part of the Office of National Statistics wellbeing survey, and for hospital admissions for self-harm. This is considered to be an appropriate and proportionate assessment of baseline information for a project of this nature. For each area of impact presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], the assessment has clearly identified which population groups are most vulnerable. This is set out in the source-pathway-receptor section of each topic. Relevant information about how these vulnerable groups may be particularly impacted is then presented within the sections summarising potential impacts and likely effects. For example, for the air quality topic, vulnerable groups identified include children, older people and people in low-income households / areas of social deprivation; the assessment of likely health effects has attributed sensitivity to both the general population and to vulnerable groups, which has then been taken into account when determining significance of impact. It is noted that effective communication will play a critical role in helping to reduce some of the impacts on health and wellbeing identified, particularly in helping to reduce uncertainty, increase resilience and enhance the sense of control that people may feel in relation to their local environment. The Applicant places considerable importance on the role of communication during the pre-construction and construction phases in particular. The overarching approach to communication is set out in 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] which confirms that a community relations team will be appointed to engage with local residents and provide dedicated community relations and external communications support, working with the internal, established communications team at National Grid, providing Project updates and ensuring appropriate information sharing to stakeholders including interested parties, local communities and affected landowners. The following wording has been added to 7.2 Outline Code of Construction Practice [REP2-014] at Deadline 3 (the Outline Code of Construction Practice is secured by Requirement 4 of the Draft Development Consent Order:

Reference	Question	Applicant's Response
		The Applicant is committed to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice and will include how we will engage with seldom heard and hard-to-reach groups, including those with linguistic vulnerabilities. The Applicant will liaise with Local Planning Authorities ahead of construction to agree timescales and implementation. Our response to question HW 1.3 sets out the approach to communication in relation to EMFs specifically, including reference to communication with harder to reach groups and those with linguistic vulnerabilities.
HW 1.12	Essex CC's local impact report – mitigation and other benefits Essex CC seeks various mitigation and other benefits including in relation to skills and training, community benefits fund that invests in community benefits active travel support for mental health resilience and village enhancements. Without such additional mitigation Essex CC considers several health impacts should be reviewed to ensure there is not an underestimation or unassessed impacts. Explain what benefits the applicant is committed to provide and how this is secured including whether there will be a community benefit fund and how that would operate. If the applicant does not intend to secure any of these commitments explain and justify why they are not necessary. See question	The Applicant is preparing a community funds package, which would be delivered outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order (DCO), as per the Community Funds for Transmission Infrastructure: Guidance. The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure community funds are delivered fairly and effectively, driving lasting, positive change for the people and places integral to our developing electricity network. This sits outside the EIA process. The assessment of impacts on health and wellbeing presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] is robust and complies with guidance set out in EN-1. Health and wellbeing impacts have been assessed in accordance with information presented in 6.20 Scoping Opinion [APP-297] and health determinants identified in Table 10.4 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. As such, there are not considered to be underestimated or unassessed impacts. No residual health and wellbeing impacts have been identified during construction or operation (and maintenance) phases that merit mitigation of the nature proposed by Essex County Council. For example no significant impacts have been identified in relation to physical activity or active travel during construction as a result of changes to the PRow network or walking and cycling routes. Information relating to duration of impacts, good practice processes and mitigation measures (e.g. temporary

Reference	Question	Applicant's Response
	HW 1.11 above and HW 1.13 and HW 1.14 below.	diversions) are set out in 7.6 Outline Public Rights of Way Management Plan [APP-329]. Similarly, although changes in visual amenity during construction and operational phases have been assessed, no impacts have been identified of relevance to village enhancements. Measures to reduce impacts associated with mental health and wellbeing (for example as a result of stress and anxiety during the construction period) have been included in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] and relate to effective communication and community liaison. Further detail relating to this has been included in the Applicant's response to HW 1.3 and HW 1.14. 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 funds, and later in spring 2026, we will begin consulting on how the community funds should be used, subject to the Project receiving consent. Throughout that consultation, we will engage with local communities and elected representatives to understand local priorities and where community funds could deliver long-lasting benefits. The feedback we receive will help shape and inform our approach to community funds. Following the consultation, we will develop a community benefit programme to address key themes and priorities. While community benefits are not secured through the Development Consent Order or relied upon as mitigation, their delivery is subject to external scrutiny through established regulatory reporting mechanisms. This provides transparency and accountability for the use of community benefit funding, independently of the planning regime. In terms of how a community benefit fund would operate, we will outline an application process for funding following the consultation process.
HW 1.13	Suffolk CC's, Babergh DC's and Mid Suffolk DC's joint local impact report – mental health monitoring Paragraph 17.3 of Suffolk CC's Joint LIR [REP1-178] notes "The absence of dedicated mental health monitoring limits the ability to identify, respond to	The Applicant notes that various representations have been made in relation to potential mental health impacts as a result of the Project and associated requests for monitoring mental health outcomes over time, as a way of understanding, responding to and mitigating emerging adverse impacts. In the assessment of potential impacts on health and wellbeing presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], it is noted that there are likely to be individuals across the Project route who experience some degree of impact on their mental

Reference	Question	Applicant's Response
	and mitigate emerging adverse impacts, particularly for those living closest to the works and for vulnerable groups with fewer options for respite” This further underlines the concerns raised by Essex CC. This is further expanded upon in the following paragraphs in the LIR. The applicant is requested to provide a mental health monitoring plan with appropriate thresholds and potential mitigations if adverse impacts are forth coming. See question HW 1.11 and 1.12 above and HW 1.14 below.	health and wellbeing (for example anxiety or stress) due to either the construction or operation phase of the Project. This may be as a result of uncertainty about programme and timescales, cumulative impacts associated with other Nationally Significant Infrastructure Projects, as a result of disruption associated with construction activities, or changes to the local environment once the Project has been developed. It is acknowledged that people living closest to the Project or particular vulnerable groups may experience effects differently. The Applicant has 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, as set out in 5.1 Consultation Report [APP-066]. 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. Ways to manage and/or mitigate potential mental health impacts have been identified by the Applicant and include: • Construction phase mitigation for specific environmental effects (e.g. noise, air quality, landscape and visual impacts) has been identified and is included in 6.7 Environmental Statement Chapter 7 – Air Quality [APP-147], 6.13 Environmental Statement Chapter 13 – Landscape and Visual [APP-226], and 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256]. Construction mitigation is secured in 7.2 Outline Code of Construction Practice [REP2-014], 7.3 Outline Construction Traffic Management Plan [APP-309] and 7.6 Outline Public Rights of Way Management Plan [APP-329]. Best practice measures and mitigation approaches have been identified by the Applicant in line with experience of other similar linear infrastructure projects • 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. In response to HW 1.3, further wording is proposed 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

Reference	Question	Applicant's Response
		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 a communication and complaint resolution is referenced further in HW 1.14 - As set out in the response to HW 1.12, 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. As set out in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], 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. It may, however, be appropriate to identify specific actions in addition to the above that could help with understanding community mental health

Reference	Question	Applicant's Response
HW 1.14	Tendring DC's local impact report – communications and complaint resolution At paragraph 14.7 of its LIR [REP1-182] Tendring DC states that “During operation, the ES accepts perceived EMF risks may affect wellbeing but again offers no additional mitigation beyond generic information measures. Given project clustering and the EACN proximity to Tendring communities, this is inadequate.” At paragraphs 4.19 and 4.20 specific commitments related to psychological support and EMF communications and Community Liaison and Complaints resolution are suggested, amongst others, The applicant is requested to specifically address these issues and confirm whether it considers them appropriate and if so set out how they will be secured and if not explain and justify its position. See also questions HW 1.11 - 1.14 and HW 1.3.	over the pre-construction, construction and operation periods. This could include reviewing the number and type of complaints or concerns raised during construction works through the complaints procedure identified. Complaints / concerns could be categorised by theme, type of action and speed of escalation. This would help understand where further communication may be required with local communities. The Applicant's responses to HW 1.4 and HW 1.5 highlight that, after decades of research into EMFs and health, no health effects have been established below the Government's adopted exposure limits and that all estimated worst-case exposures at the closest residential receptors for the Project are a small fraction of the exposure limits. The latter conclusion, presented in the Applicant's response to HW 1.4, notes that where the proposed overhead line is close to existing overhead lines, the cumulative impacts of both have been calculated and included. Information relating to EMF exposure is presented in 7.8 Electric and Magnetic Fields Compliance Report [APP-330]. It is acknowledged in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] that perceived impacts of pylons and power lines, while not linked to adverse health effects by scientific consensus, can nevertheless impact mental wellbeing and quality of life. There are many factors that can shape risk perception, including proximity to power infrastructure but also factors including community beliefs, personal experiences and media campaigns. The assessment of impacts relating to mental health and wellbeing in relation to perceptions of impacts associated with EMFs, identifies that particularly sensitive groups of people may include those who have adverse feelings about the Project in general; people who consider themselves to be in close proximity to the overhead lines and associated infrastructure for long periods of time (for example people who are not only living, but also potentially working, or using social infrastructure facilities in close proximity) (which includes people living close to the proposed new EACN Substation and Tendering community); people who are concerned about dependants or family members who may live or work in close proximity to the overhead lines and associated infrastructure; people with more limited social support networks (for example older people) and people with poor mental health and wellbeing who may have less capacity to cope with change or additional anxiety. These categories of

Reference	Question	Applicant's Response
		potentially affected people will include residents within Tendring communities, including those in proximity to proposed new EACN Substation infrastructure. The Applicant recognises that people may feel concerned about these issues and therefore provides open and transparent information about EMFs for members of the public to access, on a website (www.emfs.co.uk), including what EMFs are, exposures from electricity infrastructure, research into health effects and the policies and guidelines in place to protect against EMFs. An EMF helpline is also available to answer any questions or concerns about the subject. EMF specialists have been present at all public consultation events to discuss and address any concerns. These measures are aimed at providing information on EMFs and the protection measures in place, helping to reduce anxiety around the subject prior to construction and operation (and maintenance) of the Project. Provision of support and information in this way will continue during the operation (and maintenance) phase of the Project. An approach to community liaison specifically relating to sharing information about EMFs is set out in the Applicant's response to HW 1.3 and references information to be included in 7.2 Outline Code of Construction Practice [REP2-014] and 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] in relation to EMFs. The Applicant will liaise with local authorities ahead of construction to agree timescales and implementation.
HW 1.15	Thurrock Council local impact report – cumulative effects and public health Thurrock Council in its LIR [REP1-187] raises concerns in relation to the approach of the ES to cumulative effects and public health see paragraphs 6.8.3– 6.8.45 for a summary of its position. Concerns are also raised in relation to mental health workshops not being undertaken, eg paragraph 6.8.42. Respond to the issues raised setting out how any further mitigation could be	The concerns raised by Thurrock Council in its Local Impact Report [REP1-187] are noted. The Applicant's response to specific paragraphs are as follows: Paragraphs 6.8.6 and 6.8.43: Thurrock Council has raised that the cumulative assessment information presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has not been drawn through into 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The Applicant's position is that both chapters have been undertaken in accordance with guidance and good practice. It is standard practice for the topic chapters (e.g. health and wellbeing) to inform the assessment of cumulative effects and not vice versa. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] includes findings from an intra-project assessment, which assesses the combined impacts across different environmental topics, and an inter-project

Reference	Question	Applicant's Response
	introduced and secured to address the concerns, what additional analysis has been undertaken to address the matters and if no further mitigation or assessment is deemed necessary explain and justify your position.	assessment of the potential impacts from other development proposals and schemes on environmental topics, including health and wellbeing - Paragraphs 6.8.7 and 6.8.23: Thurrock Council has raised the matter of cumulative impacts associated with multiple PRoW closures / diversions due to the Project and Lower Thames Crossing potentially being constructed at the same time. 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] notes that, where other development presents a potential inter-project cumulative effect in relation to specific PRoWs, appropriate PRoW management measures (for example diversion routes) would be implemented to minimise, for example, disruption to physical activity. 7.6 Outline Public Rights of Way Management Plan [APP-329] identifies routes affected by the Project, including duration of impact and management measures (which relate to temporary closures and diversions). The Outline PRoW Management Plan would be developed into a final document by National Grid's appointed Main Works Contractor(s) to discharge Requirement 4 of 3.1 Draft Development Consent Order [APP-056] ahead of the commencement of any construction activities. A regular dialogue would be maintained with PRoW Officers throughout the construction period of the Project. It is noted that other development would apply PRoW management measures to minimise disruption, including diversions - Paragraph 6.8.21: Thurrock Council raises the issue of cumulative construction impacts on transport routes and access to healthcare facilities. 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134] references ongoing engagement undertaken with other infrastructure projects that may impact on these matters (for example paragraph 3.2.20 references coordination activities which have taken place with Lower Thames Crossing) - Paragraphs 6.8.25 and 6.8.42: Thurrock Council raises the issues of cumulative impacts on mental health and wellbeing, arising from delivery of multiple developments over the same time period, referencing the need for targeted community engagement and the potential opportunity for Mental Wellbeing Impact Assessment workshops. The Applicant's position has not changed from that presented in 8.4.1 Applicant's Comments on Relevant Representations [REP1-132], in that it is recognised that people have concerns about the cumulative effects arising from overlapping Nationally Significant Infrastructure

Reference	Question	Applicant's Response
		Projects and other schemes in the local area and that adverse effects on mental health and wellbeing are likely to be 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 construction periods. It is not considered that holding specific mental wellbeing impact workshops would raise new or additional information to that presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. Measures to alleviate concerns about cumulative impacts will be focused on effective community communication and liaison for individual development proposals, ensuring that relevant communities clearly understand timelines and the nature of construction activities • Paragraph 6.8.45: Thurrock Council raises the matter that only a general overview of cumulative health and wellbeing impact is provided and not broken down by local authority or topic. The cumulative assessment information presented in 6.17 Environmental Statement Chapter 17 – Cumulative Effects [APP-281] has been undertaken in accordance with NPS EN-1, guidance and good practice and is appropriate for a project of this scale and nature.

10. Land use and soils green infrastructure

Table 10.1 Land use and soils green infrastructure

Reference	Question	Applicant's Response
LUS 1.1	Written submissions on agriculture issues Several WRs submitted at Deadline 1 seek responses to outstanding queries regarding: • Impact on individual farms • Impact on individual farming practices • loss of agricultural land • movement of individual pylons within the Order limits. Please ensure that your response to these WRs speaks to the individual points raised, properly referenced and in sufficient detail to enable for IPs to understand your position on their specific concerns.	The Applicant provided an individual response to all Written Representations (WRs) at Deadline 2, in 8.8.1 Applicant's Comments on Written Representations [REP2-029]. This included all WRs which related to individual farms or impacts to agricultural businesses, with specific responses provided to each. The Applicant lists these entries below which can be located in REP2-029 via name or Examination Library reference. The Applicant therefore does not repeat these individual responses, in response to this question, however a summary of our overarching position on the matters highlighted in the question is provided below. • John Gaymer on behalf of Copyhold Farms [REP1-246] • Robert Moore [REP1-454] • Robert Pearce [REP1-455] • David Salmon REP1-328 • T W Salmon & Co REP1-280 • Douglas McTurk REP1-334 • Gillian Parrish [REP1-359] • D&J Starling [REP1-225] • The Cole Family [REP1-484] • DN Grady and Sons Ltd [REP1-226] • G W Webster & Son Ltd & Rex Webster [REP1-239] • Tritton Farming Partnership LLP [REP1-281] • Stephen March [REP1-476] • John Briggs [REP1-391]

Reference	Question	Applicant's Response
		• Richard Marriage & RPM Farming Ltd [REP1-273] • Paul Lanham [REP1-435] • Stacey Farms Ltd [REP1-276] • J and C Rayner Farms Ltd [REP1-245] • 2 Agriculture Growing Limited [REP1-196] • Roydon Malcolm Burrridge [REP1-457] • CJH Farming & CJH Holdings [REP1-219] • Andrew Bullock [REP1-295] • E B Gowing and N & J Gowing [REP1-338] • Trisha and Gary Gooding [REP1-491] • Alexander Micklem [REP1-291] • Clare Lanham and Dick Lanham, Jeannette Lanham [REP1-317/385] • Miss Rosemary Sarah Lee [REP1-421] • E S Cole and Sons Limited [REP1-229] • E R Ling & Sons Limited [REP1-228] • John Frederick Strutt [REP1-393] • Tamasyn Holland [REP1-498] • Jeremy Fisher [REP1-338] • R D & J Burrridge [REP1-448] • Sarah Elizabeth Frances Beevers [REP1-465] • Gareth Pressley [REP1-350] • Phil and Laura Cottey [REP1-444] • Lord Rayleigh's Farms Ltd [REP1-247] • Clarke and Simpson Chartered Surveyors on behalf of Andrew D'Angibau, Maria Hitchcock, DebraMarie Cook, Danny Cook, Angela Mary Wilson D'Angibau [REP1-220] • Holly E Mountfort [REP1-372]

Reference	Question	Applicant's Response
		• Henry Ruffle [REP1-370] • Richard Prentice [REP1-453] • Griffin Farms Ltd [REP1-241] • Richard Langton [REP1-452] • Alison Mary Hayward [REP1-294] • J A Brooks Holdings Ltd [REP1-244] • Brian Knock [REP1-300] • The Brice Family [REP1-301] • PG Rix [REP1-433] • Cullum Agri Ltd. [REP1-223] • Charlie Warburton [REP1-312] • Boxford (Suffolk) Holdings Ltd [REP1-208] • George Durrant and Sons Ltd [REP1-240] The Applicant also directs the ExA to its responses to Written Representations REP1-170, REP1-185, REP1-166, REP1-304, REP1-343, REP1-366 and REP1-375 as provided in 8.8.1 Applicant's Comments on Written Representations [REP2-029], which relate to comments on agricultural land which are not specific to particular businesses or land parcels. The Applicant also provided a response to general concerns raised regarding impacts to agricultural land and livestock at page 15 of 8.4.1 Applicant's Comments on Relevant Representations [REP2-023]. i) <i>Impact on individual farms; Impact on individual farming practices; loss of agricultural land</i> The Applicant recognises the potential disruption to established farming practices that may arise, including impacts on cropping regimes, livestock movements, field access, and seasonal operations. These concerns have been thoroughly considered within 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], which specifically assesses both construction and operational effects on agricultural activities. The Environmental Statement identifies measures designed to minimise disruption, such as carefully planning the timing of works, providing

Reference	Question	Applicant's Response
		temporary access arrangements, and designing accommodation works like crossings, gates, and drainage to facilitate continued farming operations. The Applicant's standard procedure involves collaborating directly with individual farmers and their agents, aiming to accommodate normal farming activities during the construction phase wherever practicable. This approach is supported by ongoing engagement to agree holding-specific mitigation measures. The Applicant's Land Agents, Fisher German, are actively meeting with all affected landowners and their appointed representatives to discuss and agree upon such matters, as outlined above. Any losses resulting from disturbance or temporary possession will be addressed in line with the statutory compensation code, ensuring affected parties are appropriately compensated for impacts experienced. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] sets out the standard mitigation measures to manage disruption to agricultural operations (for example maintaining/providing alternative access and water supplies, reinstating land drains and reinstating land required temporarily) as recorded in 7.2 Outline Code of Construction Practice [REP2-014] (commitments AS03–AS05). These measures are applied across the Project as standard mitigation but would be implemented on a farm-by-farm basis through direct communication and agreement with affected landowners and occupiers. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] sets out the assessment of impacts on agricultural land, confirming the extent of each land grade (based on the Agricultural Land Classification system) and the extent of each grade required temporarily and as a result of the construction of permanent infrastructure. <i>ii) movement of individual pylons within the Order limits.</i> The Applicant confirms that the precise locations of individual pylons are not fixed and may be adjusted within the Order Limits and the defined Limits of Deviation (LoD) as shown on the 2.3 Works Plans [APP-017 to APP-024]. The LoD provide a controlled degree of flexibility to allow for micro-siting of pylons at detailed design and construction stages to respond to localised constraints or unforeseen issues, such as ground conditions, access requirements, existing features or third-party interfaces. The Environmental Statement has assessed the Project on the basis of

Reference	Question	Applicant's Response
		these parameters, and any movement of pylons would remain within the assessed envelope and the controls secured by the 3.1 Draft Development Consent Order [Revision C]. Where practicable, the Applicant will continue to engage with affected landowners to seek to refine pylon positioning within the Order Limits, without prejudice to the conclusions of the Environmental Statement.
LUS 1.2	Best and most versatile agricultural land (BMV) and soils - 1 It would appear from Paragraph 6.4.7 of the ES that detailed Agricultural Land Classification (ALC) survey was undertaken on approximately 1,011 ha (representing 54% of the proposed survey areas within the Order Limits). Predictive ALC grading was then carried out where it was not possible to undertake a detailed ALC survey. Given the coverage of actual survey work how much confidence can be placed on the applicants response on acid soils in document 8.4.6 page 22 that 'the detailed surveys did not identify the presence of jarosite in the soil and in locations where desk-based information suggested a potential for acid sulphate soils some of the soils were found to be moderately calcareous. There is no evidence to indicate the presence of actual or potential sulphate soils within the surveyed areas'. As being a representative conclusion that can be applied across the whole Order Limits as they are not all 'surveyed areas'.	In relation to this issue, the surveys undertaken have focused on the areas within the Order Limits where these potentially acid sulphate soils could be present, and have confirmed that, at least to 1.2 m bgl at the locations surveyed, these soils. 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). As presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139], the 1,877 auger bore locations were 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. substations). These are the locations which were surveyed or where the Agricultural Land Classification (ALC) grade was predicted. These points were set out early in the Project to enable surveys to commence. As part of the iterative design process, the design was reviewed at a number of points to assess if survey locations needed to be added or changed. These reviews considered what was proposed in each location. For example, in some locations for third-party utility works there would be limited impact (e.g. no soil stripping, short-term access required) and as such surveys were not considered necessary, but the areas were covered by the predictive model. As such, the survey work undertaken focused on the key aspects where there was the greatest potential for impacts. Soil Alert 1: Acid Sulphate Peats and Alluvium (available on the LandIS website) identifies multiple soil series that may be acid generating. Of these, within the Order Limits, 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

Reference	Question	Applicant's Response
		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 Agricultural Land Classification (ALC) surveys within the Waveney Valley did not identify any acid-generating soils down to 1.2 m below ground level (bgl). The Wallasea 1 Soil Association is only present within the Order Limits 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]. Therefore, the potential for these materials to be encountered is limited. The detailed ALC surveys did not identify the presence of jarosite in the soil, and in locations where desk-based information suggested a potential for acid sulphate soils, some of the soils were found to be moderately calcareous. There is no evidence to indicate the presence of actual or potential acid sulphate soils within the surveyed areas. 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 [REP2-014] (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 – 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). In relation to this issue, the surveys undertaken have therefore focused on the areas within the Order Limits where these potentially acid sulphate soils could be present, and have confirmed that, at least to 1.2 m bgl, they are not present. The Applicant recognises that ALC surveys are point-based and only sample soil profiles to a depth of 1.2 m; therefore, not all potentially acid-generating soils within the Order Limits may have been identified. However, as noted, any occurrences encountered during construction would be managed as required by 7.2 Outline Code of Construction Practice [REP2-014] (commitments GH02 and GH08) along with any additional measures from emerging research outputs.
LUS 1.3	BMV and soils - 2	Soil Alert 1: Acid Sulphate Peats and Alluvium (available on the LandIS website) identifies multiple soil series that may be acid generating; within the Study Area,

Reference	Question	Applicant's Response
	At OFH1 (part 2) Pylons East Anglia Ltd spoke about the potential presence of acid sulphate soils and referred to the report submitted with their RR [RR-2973] by Dr David Dent. In Dr Dent's report, he notes: "The correct test for an acid sulphate soil is soil reaction (pH below 4,) iron hydroxide precipitation in drainage water and straw yellow mottles of jarosite in the soil itself. But in the case of potential acid sulphate soils (i.e. not yet disturbed and, therefore, not yet acid) it is necessary to, incubate soil samples for three months in oxidising conditions, recording soil reaction before and after. Alternatively, apply hydrogen peroxide and record to resulting soil reaction. A potential acid sulphate soil will have an initial pH in the normal range and certainly greater than 4.0, but a pH below 3.5 after incubation or peroxide treatment. No chemical analyses of soil samples are reported in the National Grid documentation other than reaction to hydrochloric acid to assess carbonates". Explain your methodology for testing and identification for acid sulphate soils.	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 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). The 6.6.A1 Environmental Statement Appendix 6.1 – Agricultural Land Classification Report [APP-139] states that 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 between auger bores 305–309 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 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.

Reference	Question	Applicant's Response
		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 [REP2-014] (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 – 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).
LUS 1.5	BMV and soils - 4 Paragraph 12.5.6 of Braintree DC's LIR [REP1-148] identifies an anomaly with regard to the ALC grade derived for the total area of agricultural land between that surveyed and the predictive model. Explain the different figures and the differences in how they are reported and which should be relied on.	A response to paragraph 12.5.6 of Braintree District Council's Local Impact Report can be found in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. As presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139], the 1,877 auger bore locations were 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. substations). These are the locations which were surveyed or where the Agricultural Land Classification (ALC) grade was predicted. These points were set out early in the Project to enable surveys to commence. As part of the iterative design process, the design was reviewed at a number of points to assess if survey locations needed to be added or changed. These reviews considered what was proposed in each location. For example, in some locations for third-party utility works there would be limited impact (e.g. no soil stripping, short-term access required) and as such surveys were not considered necessary, but the areas were covered by the predictive model. As such, the survey work undertaken focused on the key aspects where there was the greatest potential for impacts. The recognition by Braintree District Council is noted that, although the whole Study Area was not surveyed, most soil types result in a major significant effect; therefore, this is not critical for the assessment.
LUS 1.6	BMV and soils - 5 Paragraph 12.6.7 of Braintree DC's LIR [REP1-148] proposes that Paragraph 1.7.3 of the outline CoCP Appendix C	The Applicant's position is that the Outline CoCP already provides an appropriate basis for controlling this risk. 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] states in Section 1.7 that soils shall be handled when they are in a

Reference	Question	Applicant's Response
	Outline Soil Resource Plan (APP-303) should be altered to state that soil stripping operations must not be started until the ground has a full dry day and the soil moisture criteria set out in Annex B have been met to allow the restarting of soil handling operations. They are concerned that there is a high likelihood that the soil will still be in a plastic state after one full dry day. It is further noted that there is a paragraph later in the section that allows the handling of wet soils in exceptional circumstances so this would cover it if there is an urgent critical requirement to handle soils when they are plastic. The applicant is requested to amend the CoCP Appendix C to accommodate the request. If it is proposed not to make the amendment please explain why not and address how potential plasticity would be addressed.	dry and friable state or have passed the test for soil plasticity. It also states that handling soils in a plastic or frozen state should only occur in some exceptional cases (for example due to engineering constraints). In such cases, location-specific methods would be agreed with the Soil Scientist prior to work commencing. The Applicants position is that these mechanisms provide appropriate control and oversight but do allow for some flexibility within certain parameters. As such no update to the 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] is required as any measures to address soil handling when in a plastic state will need to be location and work-task specific.
LUS 1.7	BMV and soils - 6 Paragraph 12.6.4 of Braintree's LIR [REP1-148] notes that "For measure AS02 contained within the CoCP (APP-300): 'Land required temporarily for construction will be returned to its former agricultural use / condition or a use / condition as discussed with the landowner, where practicable'. There is no specific reference to ensure land is returned to its baseline ALC grade. The	For areas where surveys were undertaken, as presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139] , the full soil profile information is presented in Annex B1. This forms a suitable baseline against which reinstatement can be assessed. As stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] , a soil survey would be required post-consent / pre-construction in the areas where a detailed Agricultural Land Classification (ALC) survey was not undertaken, to inform a final Soil Resource Plan and to ensure all relevant site-specific soil information was available. This measure would ensure there is sufficient information available as the baseline to inform the assessment of success of

Reference	Question	Applicant's Response
	Outline Soil Resource Plan details what the reinstatement and monitoring requirements should be to ensure land is returned to its former condition. The inclusion of this measure would mean that any land parcel will need to have a pre-construction soil assessment carried out so that the soil condition is known. The use of the predictive ALC grade or baseline data from the desk study would not be suitable". Provide clarity that land will be returned to its baseline ALC grade and ensure that appropriate commitments are included to require pre-construction soil assessments are to be undertaken to provide a suitable baseline. Where it is not proposed to return soils to their baseline ALC grade explain why not and how this potentially impacts the conclusions as to the scale of effect.	reinstatement. It has not been proposed to use the predictive data to assess reinstatement success. The objective of reinstatement is to return soils to their baseline condition as demonstrated by pre-construction soil surveys, not merely to the nominal ALC grade. Although ALC grade is an important indicator, each grade covers a range of soil physical and chemical properties. Returning land to the same ALC grade does not necessarily guarantee that all soil quality attributes, such as soil structure, depth, and organic matter content, are restored to their pre-construction state. Therefore, the post-consent / pre-construction soil surveys and the final Soil Resource Plan will define a site-specific baseline, including full soil profile data, and establish measurable reinstatement targets. These targets will be used to confirm successful reinstatement in practice, rather than relying solely on returning land to the same ALC class, which may mask sub-grade variations in soil condition. All works will aim to restore soils to their pre-construction condition. There may be instances where land is not returned to its preconstruction condition, for example where a farm track is widened/improved and the landowner requests the improvement works are not removed. Any such instances are likely to be limited in extent and only affect field margins, and as such would not affect the impact assessment as reported.
LUS 1.8	BMV and soils - 7 Suffolk CC's Joint LIR [REP1-178], at paragraph 5.30 notes that BMV land would require reinstatement to the same or greater soil quality. Appropriate mitigation for severed or sterilised remaining land is necessary. Field drainage systems should be replaced as required after construction and decommissioning. • Suffolk CC: confirm if the mechanisms in the draft DCO and	For areas where surveys were undertaken, as presented in 6.6.A1 Environmental Statement Appendix 6.1 - Agricultural Land Classification Report [APP-139], the full soil profile information is presented in Annex B1. This forms a suitable baseline against which reinstatement can be assessed. As stated in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] and 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303], a soil survey would be required post-consent / pre-construction in the areas where a detailed Agricultural Land Classification (ALC) survey was not undertaken, to inform a final Soil Resource Plan and to ensure all relevant site-specific soil information was available. This measure would ensure there is sufficient information available as the baseline to inform the assessment of success of

Reference	Question	Applicant's Response
	other control documents provide them with the assurance that these matters are adequately secured, if not explain what other specific measures would be required and how these can be secured. The applicant: comment on whether these matters are secured in the draft DCO and signpost where or whether further commitments are to be introduced to address the matters.	reinstatement. It has not been proposed to use the predictive data to assess reinstatement success. During route optioneering the impacts on agricultural land, including on agricultural land-take (such as sterilisation) 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]. The Applicant has sought to minimise impacts on Best and Most Versatile land but notes that this is one of a range of considerations within the balanced decision-making process. and proposes to implement mitigation measures to protect soil resources (5.6 Planning Statement [APP-085]). Temporary disruption to field drainage systems disturbed during construction will be addressed by their reinstatement to no worse than their former condition, and any installed pre-construction land drainage to replace existing land drains affected by permanent infrastructure, as well as any drainage improvements resulting from the Project, would be retained (commitment AS05 within 7.2 Outline Code of Construction Practice [REP2-014], secured by Requirement 4 of 3.1 Draft Development Consent Order [Revision C]).
LUS 1.9	BMV and soils - 8 To what extent and how has BMV been taken account in the route alignment identification process, including in respect of the identification of the locations for the EACN substation, other substations and CSEs and how has the applicant sought to avoid BMV or at least use the lowest value ALC land.	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 set out in 5.6 Planning Statement [APP-085], the Project has sought to minimise impacts on Best and Most Versatile (BMV) agricultural land as far as practicable and includes mitigation measures to reduce impacts on the soil resource and on agricultural activities (as set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]). It is nonetheless noted that routing and siting decisions about the East Anglia Connection Node (EACN) Substation were taken in light of a wide range of factors influencing both the site of the EACN Substation (factoring in the potential for co-location of the North Falls and Five Estuaries substations) and the effects of the 400 kV connections to the EACN Substation as well as the customer cable corridors from the offshore generation site to potentially co-located substations.

Reference	Question	Applicant's Response
		Given the predominance of BMV agricultural land within East Anglia and the geographical extent and scale of the Project, it has not been possible to avoid both temporary and permanent effects on this resource. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for critical national priority (CNP) Infrastructure such as the Project. The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project. It is acknowledged that the Project will result in a loss of BMV land and is therefore contrary to the National Policy Statement for Energy (EN-1)⁶⁰ and relevant local planning policy. The extent of BMV land across Norfolk, Suffolk and Essex significantly constrains the ability to avoid this particular resource. However, we consider that the significant benefits arising from this CNP Infrastructure justify the permanent loss of BMV agricultural land.
LUS 1.10	Green Belt - 1 Paragraphs 7.3.519 and 7.3.521 in the applicant's Planning Statement states that National Grid's position is that the proposed OHLs are engineering operations (and therefore, may be considered appropriate development in the Green Belt) and that the proposed CSE compounds and Tilbury North substation constitute inappropriate development in the Green Belt. However, the designated NPS EN-1	With reference to the first part of the question regarding how transmission lines and pylons benefit from exception h) ii in paragraph 154 of the National Planning Policy Framework (NPPF)⁶¹. The 5.6 Planning Statement [APP-085] (paragraphs 7.3.514 to 7.3.529) sets out that the Applicant's position is that new pylons, overhead lines and reconductoring works to existing overhead lines are an engineering operation. In its report on the Hinkley Point C Connection Project (EN020001), the Examining Authority accepted National Grid's position that: 'the construction of an overhead line would be classified as an engineering operation' (paragraph 7.5.13)⁶². This was adopted by the Secretary of State in their decision (paragraph 63)⁶³.

⁶⁰

Department for Energy Security and Net Zero (2024) Overarching National Policy Statement for Energy (EN-1)

⁶¹ Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework*

⁶² Planning Inspectorate (19 October 2015) *Hinkley Point C Connection Project: Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy and Climate Change*

⁶³ Department of Energy and Climate Change (19 January 2016) *Secretary of State Decision Letter*

Reference	Question	Applicant's Response
	(2023) notes that energy infrastructure projects may comprise 'inappropriate development' and cross refers to the NPPF. Paragraph 154 of the NPPF advises that development in the Green Belt is inappropriate unless one of a number of exceptions applies. Exception h) refers to other forms of development, including engineering operations, but is clear that exception is "...provided they preserve its openness and do not conflict with the purposes of including land within it." Therefore, to benefit from the exception and not be inappropriate development an engineering operation must preserve the openness of the Green Belt and Not conflict with the purposes of land within it. The planning statement does not appear to include an assessment of the potential effects of the proposed development on the openness and purposes as required in this context to justify the reliance on the exception. On this basis the applicant should fully explain how the transmission lines and pylons benefit from the exception h) ii in paragraph 154. As reference is made to other schemes including Yorkshire Green	This position was also adopted in the Yorkshire GREEN Project (EN020024) with the Examining Authority setting out that: 'Taking all of the above matters into consideration, the ExA finds that it is an acceptable approach, given the scale and context of the Proposed Development, to treat the proposed new pylons, overhead lines, reconductoring works to existing overhead lines and pylons and temporary construction works as "engineering operations" for the purposes of NPPF para 150....' (paragraph 3.9.40)⁶⁴. Paragraph 153 of the NPPF identifies that local authorities should ensure that substantial weight is given to any harm to the Green Belt when considering planning applications. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in Very Special Circumstances (VSC). VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Paragraph 154 notes that development is inappropriate in the Green Belt unless an exemption applies. Subsection 154 (h)(ii) notes that engineering operations may be appropriate development provided that the proposal preserves the openness and does not conflict with the purposes of including land in the Green Belt. Consideration of the impact of Pylons and Transmission Lines on the Openness of the Green Belt In Green Belt policy terms, openness is not explicitly defined in the National Planning Policy Framework, but its meaning is well established through policy and case law including <i>Turner v Secretary of State for Communities and Local Government</i> (2016) and <i>Samuel Smith Old Brewery v North Yorkshire County Council</i> (2020), that openness is concerned primarily with the absence of built development and is to be assessed in spatial terms, having regard to factors such as the volume, massing and extent of built form. Visual considerations may be relevant, but are not considered to be determinative. Accordingly, development which does not introduce substantial built mass, enclosure, or urbanising form will not necessarily result in harm to the openness of the Green Belt.

⁶⁴ Planning Inspectorate (14 December 2023) *Yorkshire Green Energy Enablement Project: Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy Security and Net Zero*

Reference	Question	Applicant's Response				
	provide a comparison table to show the length of line included in the Green Belt, the number of pylons and other features that are within the green belt for each of the schemes to demonstrate the comparability of the schemes. • Reference should be made to how much of the proposed works related to restringing etc and small adjustments to pylon locations. • Comment on why it is reasonable to disaggregate the proposed development into constituent parts to make an assessment of whether the development is inappropriate and why consideration should not be given to the proposed development as a whole and whether it amounts to inappropriate development. • Comment on the comments on the LIRs from Local Authorities which conclude the development is inappropriate.	The Applicant's position is that pylons and overhead line works do not give rise to a material loss of openness. By the nature of their design, and the sensitive siting these works do not conflict with maintaining the openness of the Green Belt. The Applicant considers that pylons and conductors are 'functionally lightweight' by virtue of their slender design which do not introduce built mass or enclosure and do not occupy land in a manner comparable to buildings or other volumetric development. Although overhead lines would give rise to landscape and visual effects they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open. As pylons are spaced up to approximately 360 m apart the perception of openness is maintained as one is able to 'see through' the widely spaced pylons and conductors to whatever is beyond. The Applicant's view is that the Project would not introduce built mass or urbanising influences. The impacts of the Project are predominately visual rather than spatial. Accordingly, the proposal preserves the essential spatial characteristics of openness and does not conflict with the fundamental Green Belt purpose of maintaining the openness of the Green Belt. Consideration of the impact of Pylons and Transmission Lines on the Purposes of the Green Belt The Applicant considers that pylons and overhead lines do not harm four of the five purposes of the Green Belt (as set out in paragraph 143 of the NPPF). Table X.1 below demonstrates the impact upon the five purposes of the Green Belt. This is an extract of Table 3.14 included in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. Table 10.1.1 Assessment of the new pylons and overhead lines against the five purposes of the Green Belt <table><tr><th>Purposes</th><th>Assessment</th></tr><tr><td>To check the unrestricted sprawl of large built-up areas</td><td>There is no physical connection with any settlement, and the proposal would not constitute a form of urban sprawl that this purpose is seeking to constrain.</td></tr></table>	Purposes	Assessment	To check the unrestricted sprawl of large built-up areas	There is no physical connection with any settlement, and the proposal would not constitute a form of urban sprawl that this purpose is seeking to constrain.
Purposes	Assessment					
To check the unrestricted sprawl of large built-up areas	There is no physical connection with any settlement, and the proposal would not constitute a form of urban sprawl that this purpose is seeking to constrain.					

Reference	Question	Applicant's Response
	To prevent neighbouring towns merging into one another	The new pylons and overhead lines are located through the Green Belt in Basildon, Brentwood, Chelmsford and Thurrock. They do not result in urban coalescence and neighbouring towns or settlements will not merge into one another as a single entity.
	To assist in safeguarding the countryside from encroachment	The purposes of the Green Belt in relation to new pylons and overhead lines in the ExA recommendation for Yorkshire GREEN concluded that <i>'In considering the purposes of including land within the Green Belt, we find that the proposed new pylons, new overhead lines and construction compounds would, albeit to a limited extent, represent encroachment into the countryside. We are satisfied that they would not conflict with the four other Green Belt purposes...'</i> (paragraph 3.9.44). Considering the ExA recommendation for Yorkshire GREEN, in terms of Purpose 3, the Applicant does consider that there may be limited encroachment into the countryside. However, the new pylons and overhead lines do not act as a precedent for other forms of development and are not an enabler or facilitator for other forms of development, because the pylons and overhead lines would not draw development towards them, and the pylons would not divert other development away from more appropriate locations.
	To preserve the setting and special character of historic towns	The proposed pylons and overhead lines are not located near to any historic towns. Particularly in Thurrock, the Council's Green Belt Assessment does not assess Purpose 4 as none of the towns within the borough are regarded as truly historic towns.
	To assist in urban regeneration, by encouraging the	As the location of the pylons and overhead lines is dictated by the location of existing infrastructure (as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting

Reference	Question	Applicant's Response
		recycling of derelict and other urban land Study [APP-356]), it would not be possible from an engineering perspective to locate them in an alternative location (such as derelict / urban land) unless such land happens to be on the route of the proposed overhead line and can be utilised for that purpose.
		In summary, the Applicant concludes that the pylons and overhead line works do not conflict with Green Belt purposes and preserve openness and as such benefit from exception h) ii in paragraph 154 of the NPPF. The ExA for the Yorkshire GREEN application for development consent concluded at paragraph 3.9.44 of their recommendation report that: <i>'In considering the purposes of including land within the Green Belt, we find that the proposed new pylons, new overhead lines and construction compounds would, albeit to a limited extent, represent encroachment into the countryside. We are satisfied that they would not conflict with the four other Green Belt purposes set out in NPPF para 138.'</i> The Applicant acknowledges that for both the Hinkley C Connection Project and Yorkshire GREEN Project, whilst the ExA accepted that the overhead lines were an engineering operation, it was concluded on both of those projects that there would be an adverse effect on Green Belt openness and as a consequence those proposals were considered to be inappropriate development in the Green Belt. In the ExA assessment of both the Hinkley C Connection and Yorkshire GREEN Project, it was concluded that any harm to the Green Belt would be clearly outweighed by the need to connect new low carbon generating capacity in order to meet the UKs energy needs and carbon reduction targets as set out in EN-1 and that this represents the very special circumstances to justify development in the Green Belt. Accordingly, should the ExA decide to adopt a similar position, the 5.6 Planning Statement [APP-085] sets out the urgent and compelling need case which provides the VSC that are considered to outweigh any potential harm. In addition, as stated within the 5.6 Planning Statement [APP-085] the Project is critical national priority (CNP). Paragraph 4.2.17 of National Policy Statement (NPS) EN-1 (2024) confirms that <i>'...the Secretary of State will take as a starting point that</i>

Reference	Question	Applicant's Response
		<i>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'.</i> Consideration of the impact of CSE Compounds and Tilbury North Substation on the Purposes of the Green Belt Whilst the ExA question focuses on the overhead line works, the following commentary on CSE compounds and the Tilbury North Substation has been included for completeness. As set out in previous paragraphs, it is National Grid's position that the proposed CSE compounds and substation may be considered inappropriate development as they would not preserve the openness of the Green Belt. VSC would be required to justify their acceptability. 6.13.A2 ES Appendix 13.A2: Landscape Baseline and Assessment [APP-228] notes that the <i>'introduction of the Tilbury North Substation and overhead line, as well as two CSE compounds, would affect the 'panoramic views from high points', although would generally not affect the views 'across the neighbouring marshes and the Thames estuary' which are directed away from the Project. Seen in the context of existing infrastructure and set within the large scale field pattern and landform, the Project would not overwhelm the underlying landscape, but would be a noticeable new feature'</i>. The assessment notes that once the landscape mitigation and enhancement shown in 7.4 Appendix D of the Outline Landscape and Ecological Management Plan [APP-325] would by Operational Year 15 help to integrate the Tilbury North Substation within the surrounding landscape reducing the significance of effect. Taking these considerations into account, and acknowledging that there would be some harm, VSC need to exist to outweigh the harm. National Grid considers that the substations and CSE compounds do not harm four of the five purposes of the Metropolitan Green Belt (as set out in Paragraph 143 of the NPPF). Table X.2 below demonstrates the impact upon the five purposes of the Green Belt.

Reference	Question	Applicant's Response				
		Table 10.1.2 Assessment of the Substation and CSE compounds against the five purposes of the Green Belt <table><tr><th>Purposes</th><th>Assessment</th></tr><tr><td>To check the unrestricted sprawl of large built-up areas</td><td> The proposed substation at Tilbury North is not located adjacent to a large built-up area and would not result in unrestricted sprawl. The substation and associated CSE compounds are located as close as possible to the existing infrastructure where it can interface with the existing ZB and YYJ line in the Green Belt The proposed future development sites in the wider surrounding area (identified as opportunity areas within the Regulation 18 Thurrock Local Plan) currently remain at an early stage in the plan-making process, and subject to progressing into future stages there will be opportunities for these potential development sites to be carefully planned and designed. Within the Green Belt in Thurrock CSE compounds are required to allow for modifications to the existing ZB and YYJ infrastructure south of the proposed Lower Thames Crossing (LTC) project. They do not have any physical connection with a settlement and have been located away from built up areas. Accordingly, it is considered that the nature of these isolated features would not facilitate future outward growth or constitute a form of urban sprawl that this purpose is seeking to constrain. The Applicant does note the interaction between the Project and consented Lower Thames Crossing (TR010032) and the EIA Screening submitted on behalf of Bloor Homes to Thurrock Council in March 2025 (Thurrock Application Reference 25/00333/SCO) for residential development of up to 1,500 dwellings (Use Class C3), a primary school (Use Class F1), retail floor space and healthcare floor space as part of a mixed use neighbourhood centre (Use Classes E, F1, F2, C3, C2, Sui Generis hot food takeaway, drinking establishment), site accesses and highway works (Scenario A without Lower Thames Crossing and Scenario B with Lower Thames Crossing), associated infrastructure, ancillary works, green and blue infrastructure including sustainable drainage systems, ecological habitat areas, children's play areas, public open space, playing fields and Suitable Alternative Natural Greenspace. The boundaries of the proposed development </td></tr></table>	Purposes	Assessment	To check the unrestricted sprawl of large built-up areas	The proposed substation at Tilbury North is not located adjacent to a large built-up area and would not result in unrestricted sprawl. The substation and associated CSE compounds are located as close as possible to the existing infrastructure where it can interface with the existing ZB and YYJ line in the Green Belt The proposed future development sites in the wider surrounding area (identified as opportunity areas within the Regulation 18 Thurrock Local Plan) currently remain at an early stage in the plan-making process, and subject to progressing into future stages there will be opportunities for these potential development sites to be carefully planned and designed. Within the Green Belt in Thurrock CSE compounds are required to allow for modifications to the existing ZB and YYJ infrastructure south of the proposed Lower Thames Crossing (LTC) project. They do not have any physical connection with a settlement and have been located away from built up areas. Accordingly, it is considered that the nature of these isolated features would not facilitate future outward growth or constitute a form of urban sprawl that this purpose is seeking to constrain. The Applicant does note the interaction between the Project and consented Lower Thames Crossing (TR010032) and the EIA Screening submitted on behalf of Bloor Homes to Thurrock Council in March 2025 (Thurrock Application Reference 25/00333/SCO) for residential development of up to 1,500 dwellings (Use Class C3), a primary school (Use Class F1), retail floor space and healthcare floor space as part of a mixed use neighbourhood centre (Use Classes E, F1, F2, C3, C2, Sui Generis hot food takeaway, drinking establishment), site accesses and highway works (Scenario A without Lower Thames Crossing and Scenario B with Lower Thames Crossing), associated infrastructure, ancillary works, green and blue infrastructure including sustainable drainage systems, ecological habitat areas, children's play areas, public open space, playing fields and Suitable Alternative Natural Greenspace. The boundaries of the proposed development
Purposes	Assessment					
To check the unrestricted sprawl of large built-up areas	The proposed substation at Tilbury North is not located adjacent to a large built-up area and would not result in unrestricted sprawl. The substation and associated CSE compounds are located as close as possible to the existing infrastructure where it can interface with the existing ZB and YYJ line in the Green Belt The proposed future development sites in the wider surrounding area (identified as opportunity areas within the Regulation 18 Thurrock Local Plan) currently remain at an early stage in the plan-making process, and subject to progressing into future stages there will be opportunities for these potential development sites to be carefully planned and designed. Within the Green Belt in Thurrock CSE compounds are required to allow for modifications to the existing ZB and YYJ infrastructure south of the proposed Lower Thames Crossing (LTC) project. They do not have any physical connection with a settlement and have been located away from built up areas. Accordingly, it is considered that the nature of these isolated features would not facilitate future outward growth or constitute a form of urban sprawl that this purpose is seeking to constrain. The Applicant does note the interaction between the Project and consented Lower Thames Crossing (TR010032) and the EIA Screening submitted on behalf of Bloor Homes to Thurrock Council in March 2025 (Thurrock Application Reference 25/00333/SCO) for residential development of up to 1,500 dwellings (Use Class C3), a primary school (Use Class F1), retail floor space and healthcare floor space as part of a mixed use neighbourhood centre (Use Classes E, F1, F2, C3, C2, Sui Generis hot food takeaway, drinking establishment), site accesses and highway works (Scenario A without Lower Thames Crossing and Scenario B with Lower Thames Crossing), associated infrastructure, ancillary works, green and blue infrastructure including sustainable drainage systems, ecological habitat areas, children's play areas, public open space, playing fields and Suitable Alternative Natural Greenspace. The boundaries of the proposed development					

Reference	Question	Applicant's Response
		overlap with the Project's proposed YYJ temporary and permanent overhead line works, and several cable compounds. The boundary of the site would sit outside, but immediately west, of the Cable Sealing End Compound 2 Tilbury and immediately south of Tilbury North Substation. Both the Bloor Homes proposal and consented Lower Thames Crossing will further urbanise this part of the Green Belt. While the proposed Tilbury North Substation and CSE compounds would introduce built form into the Green Belt, it would be compact, self-contained operational infrastructure, physically and functionally separate from the edge of the nearest built-up areas. As such, they would not contribute to the outward expansion of Chadwell St. Mary nor represent unrestricted sprawl. Any harm arising is therefore limited in relation to this specific Green Belt purpose.
	To prevent neighbouring towns merging into one another	The proposed Tilbury North Substation is located between Chadwell St Mary, Southfields and Linford. The Project is not an extension of the existing settlements, rather it sits between them and does not adjoin the settlements. The development would not result in the merging of settlements, and there would be no coalescence. The Project has considered LTC and the Southfields development, should it come forward, ensuring that it will not constraint the ability to bring the development forward. The proposed CSE compound does not adjoin any settlements and in isolation, or cumulatively result in a merger of towns.
	To assist in safeguarding the countryside from encroachment	The proposed Tilbury North Substation and CSE compound would encroach into the countryside. The purposes of the Green Belt in the ExA recommendation for Yorkshire GREEN also concluded that <i>'the Proposed Development would result in a moderate adverse effect on Green Belt openness and would conflict with the purpose of the Green Belt to safeguard the countryside from encroachment'</i>. Considering the ExA recommendation for Yorkshire GREEN, in terms of Purpose 3 (to assist in safeguarding the countryside from encroachment), particularly Tilbury North Substation, by its presence and physical scale, would unlikely safeguard the countryside from encroachment. It would therefore conflict with Purpose 3 (or 'c') of the Green Belt. This approach is consistent

Reference	Question	Applicant's Response
		with the recommendations as set out in the Yorkshire GREEN ExA recommendation.
	To preserve the setting and special character of historic towns	The proposed Tilbury North Substation and CSE Compounds are not located near to any historic towns. Particularly in Thurrock, the Council's Green Belt Assessment does not assess Purpose 4 as none of the towns within the borough are regarded as truly historic towns.
	To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	The locations of the CSE compounds required to underground existing overhead lines are dictated by the location of existing infrastructure (as set out in the 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]), and therefore it would not be possible from an engineering perspective to locate them in an alternative location (such as derelict / urban land), without significant additional infrastructure and associated environmental impacts. The position of the proposed Tilbury North Substa has been subject to an iterative design development. The 5.15 Design Development Report [APP-122] and the 6.3 Environmental Statement Chapter 3 - Alternatives [APP-127] detail the changes to the Project following the 2024 statutory consultation and 2025 targeted consultations. The changes included connecting electrically to Tilbury Substation via a new substation (Tilbury North) connected to the existing Tilbury Substation via a modification to the 400 kV YYJ line, rather than into the Freeport area. T alternative connection arrangement was developed following consultation feedback and technical review identifying challenges with the Freeport interaction and development constraints. It avoids potential impacts on economic viability of the Freeport area.
		The Applicant acknowledges that for the Yorkshire GREEN Project, the ExA concluded that the proposed Overton and Monk Fryston Substations and proposed Cable Sealing End compounds constituted inappropriate development in the Green Belt due to their presence and physical scale. As noted above, in the ExA assessment Yorkshire GREEN Project, it was concluded that any harm to the Green Belt would be clearly outweighed by the need to connect new low carbon generating capacity in order to meet the UKs energy needs and

Reference	Question	Applicant's Response																
		carbon reduction targets as set out in EN-1 and that this represents the very special circumstances to justify development in the Green Belt. Bullet Point 1: Provide a comparison table to show the length of line included in the Green Belt, the number of pylons and other features that are within the green belt for each of the schemes to demonstrate the comparability of the schemes. In response to Bullet Point 1, Table 10.1.3 provides a comparison between the Project and the Yorkshire GREEN and Hinkley C Connection Project. This includes the length of overhead line, the number of pylons and other features that are within the Green Belt for each of the schemes to demonstrate comparability of the schemes.																
		Table 10.1.3 Comparison table <table><tr><th>Infrastructure</th><th>Norwich to Tilbury</th><th>Yorkshire GREEN</th><th>Hinkley C Connection</th></tr><tr><td>Total project length</td><td>180 km</td><td>39 km</td><td>57 km</td></tr><tr><td>Total new overhead line length</td><td>159 km</td><td>10 km</td><td>48.5 km (T-pylons)</td></tr><tr><td>New pylons and overhead line (within Green Belt)</td><td>Total Length within Green Belt – 37 km. Overhead Line works comprise 103 standard height lattice and 6 low height lattice pylons. Low height pylons to the west of Langdon Hills Golf and Country Club (between TB238 and TB243)</td><td>Total Length within Green Belt – 9.2 km (6.9 km within City of York Council and 2.3 km within Leeds City Council). Overhead Line works comprising 30 new pylons.</td><td>Total Length within Green Belt – 7.46 km. Overhead Line works comprising 23 T-pylons.</td></tr></table>	Infrastructure	Norwich to Tilbury	Yorkshire GREEN	Hinkley C Connection	Total project length	180 km	39 km	57 km	Total new overhead line length	159 km	10 km	48.5 km (T-pylons)	New pylons and overhead line (within Green Belt)	Total Length within Green Belt – 37 km. Overhead Line works comprise 103 standard height lattice and 6 low height lattice pylons. Low height pylons to the west of Langdon Hills Golf and Country Club (between TB238 and TB243)	Total Length within Green Belt – 9.2 km (6.9 km within City of York Council and 2.3 km within Leeds City Council). Overhead Line works comprising 30 new pylons.	Total Length within Green Belt – 7.46 km. Overhead Line works comprising 23 T-pylons.
Infrastructure	Norwich to Tilbury	Yorkshire GREEN	Hinkley C Connection															
Total project length	180 km	39 km	57 km															
Total new overhead line length	159 km	10 km	48.5 km (T-pylons)															
New pylons and overhead line (within Green Belt)	Total Length within Green Belt – 37 km. Overhead Line works comprise 103 standard height lattice and 6 low height lattice pylons. Low height pylons to the west of Langdon Hills Golf and Country Club (between TB238 and TB243)	Total Length within Green Belt – 9.2 km (6.9 km within City of York Council and 2.3 km within Leeds City Council). Overhead Line works comprising 30 new pylons.	Total Length within Green Belt – 7.46 km. Overhead Line works comprising 23 T-pylons.															

Reference	Question	Applicant's Response			
		Substations and Cable Sealing End (CSE) compounds (within Green Belt)	New 400 kV GIS Substation at Tilbury North (to the south of Orsett Golf Course) CSE compound associated with undergrounding existing infrastructure	Overton Substation and Monk Fryston Substation Shipton CSE Compound North and South and Tadcaster CSE Compound East and West	n/a
		Underground cables (within Green Belt)	Modifications to the existing ZB circuits to be diverted and changed to underground cable to allow for YYJ circuits to be connected into the new Tilbury North Substation.	n/a	n/a
		Works to existing pylons and overhead lines (including reconductoring) (within Green Belt)	Modifications to the existing National Grid Electricity Transmission overhead lines to facilitate the connection to the existing network into the new Tilbury North Substation.	Modifications to existing overhead lines and pylons, including replacing existing overhead line conductors, replacement of pylon fittings and works to pylon foundations.	n/a

Bullet Point 2: Reference should be made to how much of the proposed works related to restringing etc and small adjustments to pylon locations.

The restringing and modifications of existing works are with regards to the YYJ Scenario B to facilitate the underground cable turn in and out of Tilbury North Substation. Under Scenario B, the YYJ circuit would be diverted via short underground cable sections beneath the Lower Thames Crossing corridor before re-

Reference	Question	Applicant's Response
		emerging to reconnect with the existing overhead line, as described in Section 11.4 of the 5.15 Design Development Report [APP-122]. This includes four new pylons, a new CSE compound and cables into the substation. Three existing pylons will be removed. Bullet Point 3: Comment on why it is reasonable to disaggregate the proposed development into constituent parts to make an assessment of whether the development is inappropriate and why consideration should not be given to the proposed development as a whole and whether it amounts to inappropriate development. The Applicant's approach to disaggregate the Project into constituent parts is consistent with the approach from Yorkshire GREEN (EN020024) and Hinkley Point C Connection Project (EN020001). NPPF paragraph 153 sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in VSC. Paragraphs 154 and 155 of the NPPF sets out a list of exceptions to this, with paragraph 154 stating that: <i>'Development in the Green Belt is inappropriate unless one of the following exceptions applies:</i> <i>h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:</i> <i>i. mineral extraction;</i> <i>ii. engineering operations;'</i> In order for the Project to benefit from paragraph 154 of the NPPF, the Applicant accepts that the relevant components of the Project will need to be capable of falling within paragraph (ii) 'engineering operations'. In accordance with the Hinkley Point C Connection Project (EN020001), and Yorkshire GREEN Project (EN020024) applications for development consent, the Applicant considers that the proposed CSE compound works and Tilbury North substation may be considered inappropriate development as they would not preserve the openness of the Green Belt. VSC would be required to justify their acceptability. The Applicant notes that Grey Belt policy didn't exist at the time of Hinkley Policy C Connection Project and Yorkshire GREEN. Consideration of how

Reference	Question	Applicant's Response
		the Project accords with Grey Belt is provided in response to the question raised by the ExA (see Applicants response to LUS 1.13). Consistent with the approach from Yorkshire GREEN and Hinkley Point C Connection Project, the Applicant considers that the new overhead lines and pylons would amount to an engineering operation and are not inappropriate development provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. In its report on the Hinkley Point C Connection Project (EN020001), the Examining Authority accepted National Grid's position that • <i>'the construction of an overhead line would be classified as an engineering operation'</i> (paragraph 7.5.13) • This was adopted by the Secretary of State in their decision (paragraph 63). This position was also adopted in the Yorkshire GREEN Project (EN020024) with the Examining Authority setting out that: <i>'Taking all of the above matters into consideration, the ExA finds that it is an acceptable approach, given the scale and context of the Proposed Development, to treat the proposed new pylons, overhead lines, reconductoring works to existing overhead lines and pylons and temporary construction works as "engineering operations" for the purposes of NPPF para 150....'</i> (paragraph 3.9.40). Consistent with this position, the Applicant considers that the new overhead lines, including the pylons which support them, amount to an engineering operation and are not inappropriate development provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within the Green Belt. The Applicant's position is that the proposed Tilbury North Substation and CSE compound works may be considered inappropriate development as they would not preserve the openness of the Green Belt. VSC would be required to justify their acceptability. Regardless of the Applicant's position on whether any part of the Project amounts to development which is or is not inappropriate, the 5.6 Planning Statement [APP-085] sets out the urgent and compelling need case which provides the VSC that are considered to outweigh any potential harm.

Reference	Question	Applicant's Response						
		In addition, as stated within the 5.6 Planning Statement [APP-085] the Project is CNP. Paragraph 4.2.17 of NPS EN-1 confirms that ‘...<i>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</i>’ (Applicant’s added emphasis). The Applicant notes the consultation draft NPPF (December 2025)⁶⁵ and proposed Policy GB7: Development which is not inappropriate in the Green Belt states that ‘<i>the following categories of development are not inappropriate in the Green Belt, and therefore should not be regarded as harmful to the Green Belt or required to demonstrate very special circumstances:...(f) certain other forms of development provided the impact on the openness of the Green Belt is minimised, and there would not be a significant conflict with the Green Belt purposes. These are: (iii) ...electricity network...required in a Green Belt location</i>’. Bullet Point 4: Comment on the comments on the LIRs from Local Authorities which conclude the development is inappropriate. Table 10.1.4 Local Impact Report commentary on Green Belt <table><tr><th>Local Impact Report Feedback</th><th>Applicant Response</th></tr><tr><td>Essex County Council</td><td>In their Local Impact Report Essex County Council reference Green Belt at paragraphs 4.3.11 and 4.3.48. This is in the context of Dunton Hills Garden Village Development rather than a commentary on the Project and its acceptability (or otherwise) against Green Belt Policy.</td></tr><tr><td>Chelmsford City Council Paragraph 8.19 The fundamental aim of Green Belt policy is to prevent urban sprawl</td><td>The Applicant acknowledges this feedback from Chelmsford City Council. The assessment of the Project against Green Belt policy was based on the substation and</td></tr></table>	Local Impact Report Feedback	Applicant Response	Essex County Council	In their Local Impact Report Essex County Council reference Green Belt at paragraphs 4.3.11 and 4.3.48. This is in the context of Dunton Hills Garden Village Development rather than a commentary on the Project and its acceptability (or otherwise) against Green Belt Policy.	Chelmsford City Council Paragraph 8.19 The fundamental aim of Green Belt policy is to prevent urban sprawl	The Applicant acknowledges this feedback from Chelmsford City Council. The assessment of the Project against Green Belt policy was based on the substation and
Local Impact Report Feedback	Applicant Response							
Essex County Council	In their Local Impact Report Essex County Council reference Green Belt at paragraphs 4.3.11 and 4.3.48. This is in the context of Dunton Hills Garden Village Development rather than a commentary on the Project and its acceptability (or otherwise) against Green Belt Policy.							
Chelmsford City Council Paragraph 8.19 The fundamental aim of Green Belt policy is to prevent urban sprawl	The Applicant acknowledges this feedback from Chelmsford City Council. The assessment of the Project against Green Belt policy was based on the substation and							

⁶⁵ Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework: draft text for consultation*

Reference	Question	Applicant's Response
		and keep land permanently open. Openness has both visual and spatial qualities. The pylons would be between approximately 40-50 metres high, rising higher to about 56 metres accounting for the Limits of Deviation. Together with other elements of the Project including overhead lines, any buildings, enclosures, boundary fencing or operational equipment, they do not fall within any of the exceptions in paragraph 154 of the National Planning Policy Framework (NPPF) or the relevant policies in the Adopted Chelmsford Local Plan. Paragraph 8.20 Paragraph 160 of the NPPF agrees that elements of many renewable energy Projects will comprise inappropriate development. In such cases, developers will need to demonstrate very special circumstances if Projects are to proceed. This may include the wider environmental benefits associated with increased production of energy from renewable energy sources. Paragraph 8.21
		CSE compounds being considered inappropriate development as they would not preserve the openness of the Green Belt. VSC have been identified to justify their acceptability as set out in the 5.6 Planning Statement [APP-085]. An Assessment of Green Belt Policies contained in the NPPF and those adopted Chelmsford Local Plan (2020) policies (e.g. Strategic Policy S1 – Spatial Principles, Strategic Policy S11 – The Role of the Countryside, DM6 – New Buildings in the Green Belt) are presented in the 5.6 Policy Compliance Document [APP-086]. It is considered by the Applicant that the overhead line works constitute an engineering operation and that they do not harm four of the five Green Belt purposes (set out in paragraph 143 of the NPPF). However, regardless of the Applicant's position on whether the overhead line works amounts to development which is or is not inappropriate, VSC have been demonstrated in the 5.6 Planning Statement [APP-085] Whilst the need case justifies the Project's VSC, the current position as set out in NPS EN-1, is that CNP Infrastructure, subject to the application of the mitigation hierarchy, meets the test in relation to requiring VSC to justify development and the Green Belt tests have been met. Paragraph 4.2.17 of NPS EN-1 (2024) also confirms that '<i>...the Secretary of State will take as a starting</i>

Reference	Question	Applicant's Response
		The approach is supported by paragraph 5.11.36 of National Policy Statement (NPS) EN-1 states that when located in the Green Belt, energy infrastructure Projects may comprise 'inappropriate development'. Inappropriate development is by definition harmful to the Green Belt with references to the National Planning Policy Framework (NPPF). Paragraph 8.22 Paragraph 5.11.37 of NPS EN-1 states that very special circumstances are not defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. It states that substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account the extent to which its physical characteristics are, such that it has limited or no impact on the fundamental purposes of the Green Belt designation. Very special circumstances may include the wider environmental benefits <i>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'.</i>
		Paragraph 8.22 Paragraph 5.11.37 of NPS EN-1 states that very special circumstances are not defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. It states that substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account the extent to which its physical characteristics are, such that it has limited or no impact on the fundamental purposes of the Green Belt designation. Very special circumstances may include the wider environmental benefits The VSC are set out at paragraph 8.2.43 in the 5.6 Planning Statement [APP-085]. The VSC to justify inappropriate development in the Green Belt include: • 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,

Reference	Question	Applicant's Response
		associated with increased production of energy from renewables and other low carbon sources. 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 to 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.
		Paragraph 8.23 From a spatial element, the Project would introduce substantial development into the area in terms of ground cover and built form that would diminish the openness of the Green Belt spatially. Visually, the landscapes that would be affected by the Project are often undeveloped, rural landscapes where intervisibility can be quite high due to being either large scale flat or gently undulating landscapes Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. The Applicant's position regarding pylons and overhead line works impacting on the openness of the Green Belt is that by the nature of their design, and the sensitive siting these works do not conflict with Green Belt purposes. Although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from

Reference	Question	Applicant's Response
		or where the scale and height of the pylons and overhead wires mean the effect is an industrialisation of the countryside. development and therefore open. As pylons are spaced up to approximately 360 m apart the perception of openness is maintained as one is able to 'see through' the widely spaced pylons and conductors to whatever is beyond. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the Landscape and Visual Impact Assessment (LVIA) in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The Applicant would set out that landscape and visual impacts do not in themselves engage the fundamental purpose of Green Belt policy, which is concerned with preventing urban sprawl and maintaining the openness and permanence of the Green Belt, rather than protecting landscape quality or visual amenity.
		Paragraph 8.24 The Project would conflict with the purposes of including land within the Green Belt. In terms of encroachment, the Project would place a large number of pylons and associated infrastructure within an extensive number of fields within the countryside. Although maintaining some separation The Applicant considers that the Project would have limited encroachment into the countryside. The new pylons and overhead lines do not act as a precedent for other forms of development and are not an enabler or facilitator for other forms of development, because the pylons and overhead lines would not draw development towards them, and the pylons would not

Reference	Question	Applicant's Response
		between them, the pylons and associated infrastructure would fundamentally alter the appearance of the fields and landscape that they would be sited within it. These would alter from a sequence of open green spaces to spaces accommodating large, industrialised development that would result in encroachment, in contradiction of a Green Belt purpose.
		divert other development away from more appropriate locations.
		Paragraph 8.25 The Project, as inappropriate development, would by definition be harmful to the Green Belt. It would result in encroachment and moderate harm to the openness of the Green Belt in both visual and spatial terms. The proposed development would conflict with national and local planning policies. These seek to resist inappropriate development and only allow engineering operations that would preserve openness and not conflict with the purposes of including land within the Green Belt. All harm to the Green Belt carries substantial weight.
		Paragraph 8.26 The Applicant notes this feedback and would reiterate the response provided to paragraph 8.19 above noting that the assessment of the Project against Green Belt policy was based on the basis of the substation and CSE compounds being considered inappropriate development as they would not preserve the openness of the Green Belt. VSC have been identified to justify their acceptability. It considered by the Applicant that the overhead line works constitute an engineering operation and that they do not harm four of the five Green Belt purposes (set out in paragraph 143 of the NPPF). However, regardless of the Applicant's position on whether any part of the Project amounts to development which is or is not inappropriate, VSC have been demonstrated in the 5.6 Planning Statement [APP-085] to justify inappropriate development.

Reference	Question	Applicant's Response
		The very special circumstances put forward by NGET would need to be considered alongside any other identified harm arising from the scheme, acknowledging that the Project is inappropriate development. Whilst the need case justifies the Project's VSC, the current position as set out in NPS EN-1, is that CNP Infrastructure, subject to the application of the mitigation hierarchy, meets the test in relation to requiring VSC to justify development and the Green Belt tests have been met. Paragraph 4.2.17 of NPS EN-1 (2024) also confirms that '<i>...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</i>'.
	Paragraph 8.27 With regard to the Grey Belt, the Adopted Chelmsford Local Plan policies are out of date and CCC refers to paragraphs 155 to 159 of the NPPF as appropriate. CCC defers to the ExA regarding the Grey Belt.	Commentary regarding Grey Belt is provided in response to the question raised by the ExA (see Applicants response to LUS 1.13).
	Brentwood Borough Council Paragraph 6.4 Whilst BBC has previously been receptive to some of the detail changes to the overall proposals at Haverings Grove made during NGET's targeted consultation – including the undergrounding of approximately 2km of the existing UKPN 132kV line, the repositioning	The Applicant, through the routeing and siting exercise, has sought to reduce the impact on landscape character and visual amenity and notes the support for changes made through the design process. Measures to reduce such effects have included the use of underground cables in the areas of highest amenity value such as the Dedham Vale National Landscape and its setting and careful consideration of siting of infrastructure and pylons. Projects of this

Reference	Question	Applicant's Response
		of pylons TB209 to TB211, and the relocation of the temporary construction laydown area – the Council maintains its general objection to the proposed alignment that crosses Green Belt land in this locality and severs the two neighbouring localities of Haverings Grove and Hutton. nature are required to assess the potential environmental impacts of the proposals, report on those, and set out proposed mitigation, in an Environmental Statement in accordance with the relevant Environmental Impact Assessment (EIA) Regulations. The EIA started early in the process, and, in that respect, a considerable amount of assessment work was undertaken to allow preliminary judgements to be made about the design and routeing of the Project. This is set out in various publications including 5.1 Consultation Report [APP-066] and 5.15 Design Development Report [APP-122], with feedback helping shape the Project proposals. The LVIA set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Mitigation measures of relevance to landscape and visual effects are summarised in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The Project is routed between Havering's Green and Hutton. The routeing of the Project between Havering's Grove and Hutton is set out in 5.15 Design Development Report [APP-122] and has sought to reduce potential adverse effects by undergrounding a 2 km section of

Reference	Question	Applicant's Response
		UKPN's PUB 132 kV overhead line from north of Bushwood Farm to south of Cressey's Farmhouse. The 400 kV overhead line will run broadly parallel to the dismantled 132 kV overhead line to the south of A129. The undergrounding of sections of the existing 132 kV overhead line east of Dunton Hills Farm and west of Havering's Grove would help to reduce cumulative 'wirescape' effects within this localised area. Noting the reference made by Brentwood Borough Council to the Project to severing Hutton and Havering's Green, the Applicant would note that the Project will not create a physical barrier between these settlements but recognises that there will be significant effects on landscape and visual receptors at locations along the length of the Project, and extending to some distance from it, as explained within the assessment presented in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. The effects on landscape character will affect a sequence of places along the length of the line, with the effects being described in relation to each of the assessment units (in this case Landscape Character Types). Again, they will not typically be experienced as a whole, but the total effect on landscape character can be understood from the LVIA, by looking at all of its component parts, each of which is set out in detail. It is noted that overall, these effects will be significant, as

Reference	Question	Applicant's Response
		would be expected for any project of this size and nature. Transmission infrastructure (including overhead lines) is found throughout rural landscapes across England. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant effects on landscape character and visual amenity will occur.
	Paragraph 6.5 The fundamental aim of Green Belt policy is to both prevent urban sprawl and to keep land permanently open, which has both visual and spatial qualities. Newly introduced pylons in this area will be approximately 50m high and together with overhead lines, enclosures, boundary treatments and operational equipment, do not form any of the exceptions in paragraph 154 of the NPPF or of the relevant policies in the Brentwood Local Plan, in particular being to maintain its openness. The newly introduced substantial new development will conflict with the fundamental purposes of including this land as Green Belt, be harmful to it and will diminish the openness of the surrounding Green Belt that is predominantly	The Applicant notes this feedback. The assessment of the Project against Green Belt policy was based on the substation and CSE compounds being considered inappropriate development as they would not preserve the openness of the Green Belt. VSC have been identified to justify their acceptability. It considered by the Applicant that the overhead line works constitute an engineering operation and that they do not harm four of the five Green Belt purposes (set out in paragraph 143 of the NPPF). However, regardless of the Applicant's position on whether any part of the Project amounts to development which is or is not inappropriate, VSC have been demonstrated in the 5.6 Planning Statement [APP-085] to justify inappropriate development. Whilst the need case justifies the Project's VSC, the current position as set out in NPS EN-1, is that CNP Infrastructure, subject to

Reference	Question	Applicant's Response
		undeveloped and rural in nature, creating a sense of industrialisation in an otherwise pastorate setting. the application of the mitigation hierarchy, meets the test in relation to requiring VSC to justify development and the Green Belt tests have been met. Paragraph 4.2.17 of NPS EN-1 (2024) also confirms that '<i>...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</i>'.
		Paragraph 6.6 Despite this being a location where OHL's are already present, these are currently the less imposing 132kV line and have become established into the landscape and in the setting. The routing of the more visually imposing 400kV OHL to effectively replace the undergrounded 132kV line is proposed to run along the northern, western, and southern boundaries of Haverings Grove. BBC considers that this will create a visibly harmful and severing effect that, once completed, will act as a more imposing and extended physical barrier between the settlement and nearby Hutton, damage the function and setting of the surrounding Green Belt and be Brentwood Borough Council is correct in identifying that the 400 kV pylons will be taller than the existing 132 kV pylons which are to be removed. The Applicant's position regarding pylons and overhead line works impacting on the openness of the Green Belt is that by the nature of their design, and the sensitive siting these works do not conflict with Green Belt purposes. Although overhead lines may occupy long corridors within Green Belt, they involve little physical change to the land through which they pass and leave a large majority of the land beneath them free from development and therefore open. As pylons are spaced up to approximately 360 m apart the perception of openness is maintained as one is able to 'see through' the widely spaced pylons and conductors to whatever is beyond. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised

Reference	Question	Applicant's Response
		contrary to the strategic policies set out above. by the Applicant that significant effects on landscape character and visual amenity will occur. These effects are reported in the LVIA in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226].
	Paragraph 6.12 The allocation at DHGV is designated to deliver circa 4,000 new homes together with affordable housing and associated infrastructure to support a sustainable community. Due to BBC's significant green belt constraints on new housing and development, this strategic site allocation (R01(i) and (ii) in the Local Plan) is identified to meet most of the borough's housing need over the Plan period and beyond.	The Local Impact Reports (LIRs) for Essex County Council (ECC) [REP1-161] and Brentwood Borough Council (BBC) [REP1-150] express concern about the potential effect that the Project will have on Dunton Hills Garden Village (DHGV). The Applicant fully recognises the strategic importance of DHGV and has amended the overhead line alignment (to align with the existing gas pipeline) in order to reduce the potential for impacts on the development. The 2023 preferred draft alignment was amended to take forward the preference to follow the gas pipeline corridor for a greater distance in this location. As set out at Section 3.8 (Alternatives – Dunton Hills Garden Village) in 8.8.2 Applicants Comments on Local Impact Reports [REP2-030], the Applicant does not consider that the Project will impact the gross development value to any meaningful significant extent, and certainly not enough to impact viability to the extent it will prevent deliverability. There is also no evidence provided by the Councils to suggest that the Project will impact the viability of DHGV: the LIRs do not say that the site will not be

Reference	Question	Applicant's Response
		delivered; and, importantly, the site owner, Land Investment Holdings, do not say that either and do not raise the issue of viability in their Relevant Representation. Furthermore, any loss suffered will be suffered by the landowner (in land value) for which there is recourse to compensation.
		Basildon Borough Council No Local Impact Report was submitted.
		Thurrock Council No specific commentary on the Project's interaction with the Green Belt was identified.
LUS 1.11	Green Belt - 2 In terms of other works that would be associated with the proposed development in the Green Belt, construction compounds and haul road works although temporary have the potential to impact on the Green Belt. These works could include mounding of soil, stripping of soil, temporary hoarding and fencing, site accommodation within compounds and so on. Detail the extent of land take and the duration of time that such construction works would impact on the Green Belt and assess whether this would be engineering operations and whether they would benefit from the appropriate exception and the impact on the Green Belt in association with the other permanent elements.	The extent of the land take for the temporary works (including buffers) in the Green Belt is 43.6 hectares. This includes overhead line compounds, cabling and construction haul roads, crossing protection and construction access roads. 6.4 Environmental Statement Chapter 4 – Project Description [APP-130] (Image 4.1) sets out the following construction programme. • Tilbury North Substation – works commence 29/04/2027 and demobilisation complete by 31/12/2031 • OHL works TB route – works commence 21/09/2027 and demobilisation complete by 31/12/2031. The temporary works are engineering operations by their nature, the works are reversible and will not give rise to permanent harm to the Green Belt. The works include, for example, site preparation works, site clearance (including for fencing, vegetation removal), scaffolding of crossings, works within temporary construction compounds comprising temporary laydown, assembly and storage areas, security fencing, construction related buildings, welfare facilities, construction and security lighting, and wheel cleaning facilities. However, once the Project is operational, the effects associated with temporary works would be very limited and would result in no harm to the openness of the Green Belt and as a result no permanent impact on the openness of the Green Belt.

Reference	Question	Applicant's Response
		Should the ExA consider that there is harm to the Green Belt, the 5.6 Planning Statement [APP-085] sets out the urgent and compelling need case which provides the Very Special Circumstances, including all components of the Project (both temporary and permanent) which are within the Green Belt.
LUS 1.13	Green Belt - 4 Does the applicant consider that policies in the NPPF related to the Grey Belt are relevant in the consideration of the proposed development, and if so explain your reasoning.	The Applicant provided a response on the Grey Belt in paragraphs 3.14.23 to 3.14.25 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], and the Applicant has developed this response further in response here. The infrastructure proposed in the Green Belt for the Project includes new pylons and overhead lines, underground cables, Tilbury North Substation, 400kV Cable Sealing End (CSE) compounds and works to existing pylons and overhead lines. The policies relating to Grey Belt set out within the National Planning Policy Framework (NPPF)⁶⁶ are considered to apply to the Project, insofar as they relate to the proposed siting of the Tilbury North Substation and the two 400kV CSE compounds at Tilbury North. Specifically, the proposed substation at Tilbury North and two CSE compounds are sited on Grey Belt land, and thus the development should not be considered inappropriate development in the Green Belt in this regard. Paragraph 155 of the (NPPF) sets out the criteria whereby development within the Green Belt should not be regarded as inappropriate. Criterion 'a' sets out that development would not be regarded as inappropriate if: <i>'The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.'</i> The NPPF defines 'Grey Belt' land as <i>'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'</i> Paragraph 143 of the NPPF sets out the purposes of the Green Belt. Purposes (a) (b) and (d), relevant to the definition of Grey Belt, are:

⁶⁶ Ministry of Housing, Communities and Local Government (2025) *National Planning Policy Framework*

Reference	Question	Applicant's Response
		a) <i>'to check the unrestricted sprawl of large built-up areas</i> b) <i>to prevent neighbouring towns merging into one another</i> d) <i>to preserve the setting and special character of historic towns'</i> With regards to the Tilbury North Substation and two CSE compounds, their status as Grey Belt, and the three purposes of the Green Belt, the following assessment is made: a) The proposed substation at Tilbury North and two CSE compounds are not located adjacent to a large built-up area and would not result in unrestricted sprawl. The substation and CSE compounds are located as close as possible to the existing transmission infrastructure where it can interface with the existing ZB and YYJ lines within the Green Belt. The proposed future development sites in the wider surrounding area (identified as opportunity areas within the Regulation 18 Thurrock Local Plan Consultation)⁶⁷ currently remain at an early stage in the plan-making process, and subject to progressing into future stages there will be opportunities for these potential development sites to be carefully planned and designed to avoid coalescence with the substation. While the proposed substation and two CSE compounds would introduce built form into the Green Belt, they would be compact, self-contained operational infrastructure, physically and functionally separate from the edge of the nearest built-up areas. As such, they would not contribute to the outward expansion of Chadwell St. Mary (the settlement boundary would be defined by Lower Thames Crossing), Southfields (Thurrock) and Southfields (Basildon) nor represent unrestricted sprawl. Any harm arising is therefore limited in relation to this specific Green Belt purpose. b) The proposed Tilbury North Substation and two CSE compounds are located between Chadwell St Mary, Southfields and Linford. The Project is not an extension of these existing settlements, rather it sits between them and does not adjoin them, avoiding coalescence. Therefore, the development would not result in the merging of settlements. The Project has considered the Lower Thames

⁶⁷ Thurrock Borough Council (2023) *Local Plan: Initial Proposals*

Reference	Question	Applicant's Response
		Crossing proposals and development sites associated with the Regulation 18 Thurrock Local Plan Consultation, to ensure that in combination with these developments it would not result in the extension of any settlement as they come forward. c) Thurrock Council's Green Belt Assessment (2019)⁶⁸ does not assess Purpose (d) of the Green Belt purposes as none of the towns within the borough are regarded as truly historic towns; as such the Tilbury North Substation does not conflict with this purpose. In view of the above, the proposed Tilbury North Substation and two CSE compounds are proposed to be sited on Grey Belt land. Accordingly, criterion a. of paragraph 155 of the NPPF applies, and the Tilbury North Substation and two CSE compounds meets this test (acknowledging the further three criteria) for not being inappropriate development in the Green Belt. Whilst the Applicant views the Tilbury North Substation and two CSE compounds as being sited on Grey Belt land, if the Examining Authority is not minded to agree, then it is considered that 'Very Special Circumstances' apply, as permitted in paragraph 160 of the NPPF. These Very Special Circumstances are set out in full at paragraph 7.3.530 of the 5.6 Planning Statement [APP-085]. These circumstances are underpinned by the fact that the Project is critical national priority infrastructure, as established in National Policy Statement EN-1 (2024).
LUS 1.15	Green infrastructure and open space - 2 Paragraph 4.11.8 of Essex CC's LIR [REP1-161] 1. recommends various measures to ensure that Green Infrastructure is properly integrated into the mitigation and delivery of the proposed development these include: Secure a Green Infrastructure Strategy within the DCO or Landscape Strategy	The Applicant has provided a response to the points raised on Green Infrastructure in Essex County Council's Local Impact Report response at Deadline 2 – see paragraphs 3.13.21 to 3.13.26 of the 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. We summarise and supplement that response in answer to this direct question. 5.6 Planning Statement [APP-085] confirms at paragraph 7.3.476 that the Project is able to demonstrate it has applied the mitigation hierarchy to avoid adverse impacts on open space (including Green Infrastructure) and therefore no further mitigation or compensation is required to fulfil paragraph 5.11.25 of National Policy Statement (NPS) EN-1 (2024).

⁶⁸ Thurrock Council (2019) *Thurrock Strategic Green Belt Assessment Stages 1a and 1b*

Reference	Question	Applicant's Response
	to ensure multifunctional benefits, habitat connectivity, and climate • resilience. Mandate +10% BNG for all habitats, with a Biodiversity Gain Plan approved prior to commencement and robust monitoring/reporting obligations • within the DCO. - Align all mitigation and compensation measures with Local Nature Recovery Strategy priorities, including habitat creation and species corridors. Extend maintenance periods for planting and Green Infrastructure features to ensure long-term success (minimum 10 years for landscaping or • reset five-year maintenance period upon replanting failed plants; 30 for BNG areas). - Strengthen compensation provisions, including a minimum 3:1 ratio for priority habitats delivered within Essex. Respond to each of the recommendations explaining how it can be addressed and providing any necessary updated documents. If you consider any of the recommendations are not necessary explain and justify your position.	The Applicant recognises Green Infrastructure is also expressly referred to at paragraphs 4.6.12 and 4.6.13 of NPS EN-1 (2024) as an appropriate part of the applicant's assessment of environmental and biodiversity net gain: <i>'4.6.12 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.'</i> <i>'4.6.13 In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as:</i> <i>reductions in GHG emissions</i> <i>reduced flood risk</i> <i>improvements to air or water quality,</i> <i>climate adaptation,</i> <i>landscape enhancement</i> <i>increased access to natural greenspace, or</i> <i>the enhancement, expansion or provision of trees and woodlands</i> <i>The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.'</i> The Applicant takes NPS policy as the starting point when appraising the applicability of requests for additional benefits including Green Infrastructure and any other environmental net gains. Paragraph 4.6.12 says (our emphasis) <i>'...developments should deliver biodiversity net gains in a manner that best contributes to the achievement of relevant wider strategic outcomes...'</i>. Paragraph 4.6.13 deliberately then says that (our emphasis) <i>'...development may also deliver wider environmental net gains'</i> The Primary planning policy for Nationally Significant Infrastructure Projects (NSIPs) in relation to Green Infrastructure as a net benefit is that securing delivery is not required but may also be part of a wider holistic approach to delivering environmental net gain. The Applicant is committed to

Reference	Question	Applicant's Response
		achieving wider strategic outcomes at the local level through Biodiversity Net Gain (BNG) commitments; this includes contribution towards the aims of the Essex Green Infrastructure document and Local Nature Recovery Strategies where applicable and appropriate. Any local plan policy requiring Green Infrastructure or wider environmental net gains based on the requests being made must be consistent with the relevant provisions of NPS EN-1 and EN-5 (2024) to be considered requirements. The Applicant stands by its response in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]; see paragraphs 3.13.21 to 3.13.26. Based on the above starting position, the Applicant has provided a summary response on how each recommendation can be addressed with signposting and reference to any necessary updated documents. • <i>Secure a Green Infrastructure Strategy within the DCO or Landscape Strategy to ensure multifunctional benefits, habitat connectivity, and climate resilience</i> The Applicant supports the delivery of Green Infrastructure and Environmental Net Gain (ENG) but does not consider a separate strategy is necessary or required by national policy for the purposes of granting a consent for this project. The Applicant's commitment to the delivery of 10% BNG forms part of ENG and includes the delivery of wider environmental and societal benefits which includes Green Infrastructure. For further details see 7.1 Biodiversity Net Gain Report [APP-299]. 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. The Applicant has in fact committed to deliver at least 10% BNG for the Project. On-site (within the Order Limits) measures will be secured through 7.4 Outline Landscape and Ecological Management Plan (LEMP) [REP2-018] and Requirement 4 of 3.1 Draft Development Consent Order [REP2-004]. The final LEMP, which would be approved by the Local Planning Authority prior to commencement will include habitat monitoring and management plans for each of the Environmental Areas. Off-site BNG will be secured by legal agreement and managed by third-party providers in accordance with the habitat management and monitoring plan prepared for the off-site location. Natural England is in agreement

Reference	Question	Applicant's Response
		with the approach taken by the Project which is reflected in 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]. The Applicant has prepared Heads of Terms regarding a unilateral undertaking to be given by National Grid to the Local Planning Authorities along the Project route under s106 of the Town and Country Planning Act 1990 ('s106 UU'), relating to obligations designed to secure at least a 10% BNG as part of the Project. A s106 UU is seen as the most appropriate option to legally secure the Applicant's commitment to delivering a 10% BNG as it allows greater flexibility to draft detailed obligations and secures strong enforcements for the benefit of the Local Planning Authorities receiving the s106 UU. • <i>Mandate +10% BNG for all habitats, with a Biodiversity Gain Plan approved prior to commencement and robust monitoring/reporting obligations within the DCO</i> BNG is being offered for this Project on a voluntary basis since there is no mandatory requirement for BNG for NSIPs granted development consent under the Planning Act 2008. DEFRA propose introducing BNG for NSIPs where the application is accepted post May 2026. 10% is not seen as a specific target or cap and the Applicant will seek opportunities to deliver more than 10% where viable. The Applicant has prepared Heads of Terms regarding a unilateral undertaking to be given by National Grid to the Local Planning Authorities along the Project route under s.106 of the Town and Country Planning Act 1990 ('s.106 UU'), relating to obligations designed to secure at least 10% BNG as part of the Project. The UU will set out the terms for robust monitoring/reporting/assessments and mechanisms for delivery. • <i>Align all mitigation and compensation measures with Local Nature Recovery Strategy priorities, including habitat creation and species corridors</i> The Applicant has detailed in the response to written question BIO 1.38 how the Environmental Areas will align with the goals and opportunities set out in the Local Nature Recovery Strategies (LNRs) and also how the off-site BNG selection process would take into consideration the potential for wider habitat connectivity and enhancement, as well as specific areas of importance to biodiversity. The

Reference	Question	Applicant's Response
		Applicant's response to BIO 1.38 has also demonstrated how the proposals of a number of the Environmental Areas relate to the Essex LNRS. <i>Extend maintenance periods for planting and Green Infrastructure features to ensure long-term success (minimum 10 years for landscaping or reset five-year maintenance period upon replanting failed plants; 30 for BNG areas).</i> A commitment to a five-year monitoring/management of all hedgerow/tree planting on-site, with a commitment to maintaining the habitats in the Environmental Areas for a period of up to 30 years, has been included in 7.4 Outline Landscape and Ecological and Management Plan [REP2-018]. The five-year monitoring period for replacement planting (outside the Environmental Areas) is considered sufficient to ensure successful plant establishment and in line with many other granted Development Consent Orders. The Environmental Areas which will be multi-functional areas providing on-site mitigation or enhancements for the environment including biodiversity gains and landscape mitigation will be subject to the 30-year management period due to the nature of the proposals, which will ensure their long-term success. <i>Strengthen compensation provisions, including a minimum 3:1 ratio for priority habitats delivered within Essex.</i> The Applicant has sought to minimise impacts on priority habitats through careful route selection and siting of the Project. Where ecological impacts are anticipated, appropriate mitigation has been identified and secured in accordance with relevant guidance and good practice. 7.4 Outline Landscape and Ecological Management Plan [REP2-018] sets out all ecological mitigation measures to be implemented, including embedded, standard and additional mitigation. Following the application of mitigation, impacts are assessed as negligible, with no significant residual effects on priority habitats. Whilst there is no legal obligation for BNG on NSIPs, the Applicant has committed to deliver at least 10% BNG for the Project which will result in habitat enhancement and creation. Delivering at 10% is not seen as a specific cap and the Applicant will seek opportunities to deliver more than 10% where viable. It is not considered that further commitments in relation to habitat creation are necessary.

Reference	Question	Applicant's Response
LUS 1.16	Food security Whilst consideration has been given to agricultural land and BMV land lost there is no detailed assessment on how this would potentially affect food production, an issue raised by a number of IPs. Provide a breakdown of the land use by arable and livestock providing details of crop and animal by area across the order limits. This should be contextualised against figures for the county, region and nationally to illustrate the amount of productive land that would be lost during construction and operation and whether this would have a material effect on food production in any of the areas.	The Department for Environment, Food and Rural Affairs (Defra) (2024)⁶⁹ UK Food Security report states that the impacts of climate change both at home and abroad remains a pressing risk to food security. The Project is a vital part of the transition to net zero and is critical to delivering a network which supports clean power pathways by 2030, in efforts to tackle climate change and significantly reduce carbon emissions. The Project is therefore responding to a major threat to food security. 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] confirms the amount of agricultural land to be permanently impacted. Food security, as set out by the Defra report, is complex and multi-faceted, shaped by domestic production capabilities, import dependencies, land use patterns (including landowner/manager decisions and preferences), and environmental challenges. Government data⁷⁰ is available which shows how land is being used and how this is changing over time. In the three years between 2019–20 to 2021–22: 238,000 hectares of land in England are reported as having seen a change in use, equivalent to approximately 1.8% of England's total land area. Of this, 20% (48,500 hectares) was from non-developed uses to developed uses, equivalent to approximately 0.4% of England's total land area. The extent of land available and utilised for agriculture is an important component of the food system. Agriculture is a significant land use in the UK, with 69.7% of the country's land – approximately 17 million hectares – designated as Utilised Agricultural Area (UAA) in 2023. Between 2021 and 2023 UAA decreased by 1.2%; this is reported to be consistent with a longer-term gradual decrease. However, the Land Use Framework for England (2026)⁷¹ states that there is enough land to '<i>build the homes needed to address the housing crisis, maintain domestic food production, restore nature at scale, and build clean, homegrown power to provide energy security</i>' and that '<i>these are not competing demands</i>'. It also states that '<i>we can... locate energy infrastructure alongside nature-rich food production</i>'.

⁶⁹ Defra (2024) *United Kingdom Food Security Report 2024: Theme 2: UK Food Supply Sources*

⁷⁰ Department for Levelling Up, Housing and Communities (2023) *Land use change statistics – hectareage 2019-20 to 2021-22 statistical release*

⁷¹ Defra (2026) *The Land Use Framework for England*

Reference	Question	Applicant's Response
		6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138] notes that all land required temporarily would be reinstated to its pre-construction condition, including land grade with all works undertaken in accordance with good practice as set out in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303]. As such, once land has been returned, pre-construction land use will be able to continue, including local food production and any loss of production is limited to areas of permanent land take (comprising approximately 0.001% of the UAA) for substations, cable sealing end compounds, pylon foundations and permanent access routes. Actual land use (crop choice, grazing regime, etc.) is determined by individual landowners and may not relate to productivity potential (as defined by the Agricultural Land Classification system). Land use may change as a result of ownership change, personal circumstances or market forces and as such a detailed breakdown by crop and animal choice within the Order Limits has not been prepared, as the assessment is driven by extent and permanence of land take and reinstatement commitments rather than crop/animal-type disaggregation.

11. Landscape and visual

Table 11.1 Landscape and visual

Reference	Question	Applicant's Response
LV 1.1	ES Chapter 13, landscape and visual: parameters Paragraph 13.4.20 of [APP-226] gives key parameters for assessment and assumptions, and states that habitat removed during construction would be largely reinstated, with a 3:1 replacement ratio for individual trees and trees within groups. It is stated that replanting will be prioritised within the Order Limits but that offsite provision may be required. Where will offsite provision be required for reinstatement planting and how will this be secured?	The Project will prioritise the replanting for individual trees and small groups of individual trees within the Order Limits. Paragraph 9.3.1 of 7.4 Outline Landscape and Ecological Management Plan [REP2-018] states that where practicable, trees will be replanted in the same, or close to the location from which they were removed. If constraints preclude tree planting in the same location or in close proximity to where the trees were removed, tree planting will be undertaken as close as possible to the original location. The constraints on tree planting within the Order Limits are primarily related to the restrictions on tree planting below the overhead line and directly on top of the underground cables and have been detailed in response to question LV1.34. Where it is not possible to replant the trees within the Order Limits due to constraints, then off-site provision will be provided. Off-site provision is likely to be required because of siting restrictions which limit availability of planting locations (e.g. areas located underneath overhead lines, above underground cables, or areas with existing constraints to tree planting). The commitment to off-site tree planting will be secured via a legal agreement and delivered in collaboration with landowners and/or third parties on a voluntary basis. The off-site provision (on-site deficit) can only be finalised following detailed design during which tree removal will be reduced as far as practicable in accordance with commitments (GG14, B08, B15, LV04) in 7.2 Outline Code of Construction Practice [REP2-014] and once final details of the on-site provision have been approved under the final LEMP through Requirement 4 or Reinstatement Planting Plan through Requirement 9 of the 3.1 Draft DCO [REP2-004]. A draft Heads of Terms for a unilateral undertaking committing National Grid to a 3:1 replanting ratio for individual trees and individual trees within small groups was first shared with the Local Planning Authorities in August 2025. At the time of writing,

Reference	Question	Applicant's Response
		comments have been received from two Local Planning Authorities. The agreement will be progressed and submitted into the examination by Deadline 7.
LV 1.2	ES Chapter 13, landscape and visual: embedded mitigation Paragraph 13.6.4 of [APP-226] contains a number of embedded mitigation measures. - Bullet point 2 notes that existing 132kV OHLs north of Flowton and north of Mellis are to be undergrounded. Why can the proposed lines not be undergrounded instead? - Bullet point 3 states that the use of full line tension gantries at CSE compounds means that the use of bulkier terminal pylons can be avoided. Provide a visual representation of the two separate technologies.	In response to the comment on bullet point 2, theoretically it may be possible to install the new 400 kV connection as underground cable to the north of Flowton and north of Mellis. National Policy Statement (NPS) EN-5 (2024) requires the Applicant to operate in an efficient, coordinated and economical way⁷². To meet the duty to build efficient and economic networks, an overhead line is the strong starting presumption for electricity network developments in general. Having regard to this duty, the strong starting position is only reversed for nationally designated landscapes. The areas around Flowton and Mellis are not within a nationally designated landscape. In response to the relevant EN-5 paragraphs 2.9.14 and 2.9.23 to 2.9.25, the strong starting presumption in favour of overhead lines is not displaced, and it is not even displaced 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. In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in 5.15 Design Development Report [APP-122] and 5.6 Planning Statement [APP-085]. The Project has therefore complied with the relevant EN-5 policies on undergrounding. In guiding decision making, paragraph 2.9.24 of NPS EN-5 also positions rationalisation of lower voltage lines as a consideration ahead of installing 400 kV cables. The impacts of installing the 400 kV connection as underground cable would be greater than those of installing the 132 kV as underground cable (as is proposed) and would be significantly more expensive. The greater impacts would be due to the width of a 400 kV underground cable construction corridor, which would typically be

⁷² Electricity Act 1989, Section 9

Reference	Question	Applicant's Response
		120 m wide, as set out in paragraph 4.8.66 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. In contrast, the 132 kV underground cable construction would typically be a single trench up to 3 m in width and with a 35 m Limit of Deviation as set out in paragraph 4.8.96 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. So, whilst potentially feasible to underground the 400 kV new connection, both policy in NPS EN-5 and consideration of cost place emphasis on undergrounding 132 kV infrastructure in the first instance. In response to the comment on bullet point 3, the Applicant confirms a visual representation of a typical terminal pylon is included as Image 4.18 on page 77 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. A visual representation of a full line tension gantry is included as Image 4.12 on page 63 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. Cross sections of a full line tension gantry are also included in 2.6.2 Design and Layout Plans - Overhead Lines [APP-042] titled 'Illustrative Full Line Tension Gantry Regulation 5(2)(o), Sheet 3 of 7'. The Applicant has also included cross sections of a low duty gantry in 2.6.2 Design and Layout Plans - Overhead Lines [APP-042] titled 'Illustrative Low Duty Gantry Wireframe Drawing, Regulation 5(2)(o), Sheet 5 of 7'. The image below illustrates a low duty gantry being used in combination with a terminal pylon located just outside the fenceline of a Cable Sealing End (CSE) compound.

Reference	Question	Applicant's Response
		 If a full line tension gantry is used, this removes the need for a terminal pylon. The gantry would connect to a standard tension pylon, which could be up to approximately 200 m away from the CSE compound.
LV 1.3	ES Chapter 13, landscape and visual: residual effects Paragraph 13.7.4 of [APP-226] states that a full summary of effects on Landscape Character Areas and Landscape Character Types is provided in • Table A13.2.73 of Appendix 13.2. However, this table number appears wrong. Check and amend if necessary.	The Applicant has reviewed and the following will be corrected within the next iteration of 8.1 Errata List: • The reference to Table A13.2.73 is corrected to refer to Table A13.2.78 • The reference to Table A13.2.80 is corrected to refer to Table A13.2.81

Reference	Question	Applicant's Response
	Paragraph 13.7.5 states that a full summary of effects on visual receptors is provided in Table A13.3.80 of Appendix 13.3 [APP-229]. However, this table number appears wrong and the actual table is not listed in the list of tables at the start of that document. Check and amend if necessary.	
LV 1.4	ES Chapter 13, landscape and visual: monitoring Paragraph 13.8.1 of [APP-226] states that habitats reinstated after construction would be monitored/managed for a five year period to ensure their successful establishment and regrowth. Provide further justification for this length of time.	The five-year monitoring/management period for reinstated woodland, trees and hedgerows is considered sufficient to ensure successful establishment and is in line with other recently consented Nationally Significant Infrastructure Projects including Bramford to Twinstead Reinforcement Project (The National Grid (Bramford to Twinstead Reinforcement) Order 2024, Schedule 3, paragraph 10), Yorkshire Green Energy Enablement Project (The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, Schedule 3, paragraph 10) and Hinkley Point C Connection Project (The National Grid (Hinkley Point C Connection Project) Order 2016, Schedule 3, paragraph 10). 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 [REP2-018]. This 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 [REP2-004] 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]. The Applicant is committed to ensuring a good planting regime (i.e. stock quality, planting technique and site preparation) which can be more determinative than the length of aftercare alone. 7.4 Outline Landscape and Ecological and Management Plan [REP2-018] has highlighted some good practice principles, and these will be

Reference	Question	Applicant's Response
		expanded upon with full details provided within the final Landscape and Ecological Management Plan to be discharged in accordance with Requirement 4 of 3.1 Draft DCO [Revision C]. 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. Planting sizes and species will be selected based on those which would naturalise more easily than larger trees stock, for example smaller whips and transplants.
LV 1.5	ES Chapter 13, landscape and visual: limits of deviation Paragraph 13.9.4 of [APP-226] notes that the movement of pylons up to 50 metres (laterally) or anywhere along the proposed alignment (longitudinally) could result in changes to landcover including the temporary loss of vegetation during construction. Provide additional information regarding the longitudinal LoD in relation to: a) what circumstances may lead to a longitudinal change of position b) how could this limitless deviation be managed c) what additional controls will be put in place to ensure no greater impact will occur d) how will any greater impacts be mitigated	In response to a), Limits of Deviation (LoDs) are representative of the maximum deviation to allow for the adjustment to final positioning (and height) of pylons to avoid localised constraints or unknown or unforeseeable issues that may arise, such as poor ground conditions or archaeological finds, as detailed in Table 4.3 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. As stated in 8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139], the longitudinal movement is restricted by technical requirements on a span-by-span basis with regards to maintaining electrical clearances and the subsequent potential swing of the conductor (both of which vary from one span to another, subject ground topography, land use and cover and span length). In response to b and c), the Applicant must deliver the Project in line with stringent technical design requirements including regulatory and other constraints (such as operational, safety and security requirements); please see 7.15 Design and Access Statement [REP2-020] paragraphs 5.3.50 to 5.3.58 for further information. Combined, these regulatory and other constraints ensure the design meets certain standards and provides adequate controls across the LoDs. Where circumstances may lead to a longitudinal or lateral change in position, the Project has a robust internal governance and assurance process to ensure compliance with the DCO, to ensure the change does not give rise to any materially new or materially different environmental effects, and to secure mitigation where relevant. In response to d), utilising of the LoDs has the potential to impact on trees reported as 'potentially affected' identified within 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] but may also reduce the effects on the trees identified as being 'removed'. Mitigation measures for trees have

Reference	Question	Applicant's Response
		been identified within 7.4 Outline Landscape and Ecological Management Plan [REP2-018] and 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan [REP2-018] confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice [REP2-014]. Measures to avoid/mitigate impacts to all trees (including veterans) are also a Project commitment, commitment LV05 in 7.2 Outline Code of Construction Practice [REP2-014].
LV 1.6	Landscape and visual methodology In ES Appendix 13.1– Landscape and Visual Methodology [APP-227], you state that: “Recognition of the value of a view is determined with reference to... whether it is recorded as important in relation to heritage assets (such as designed views recorded in citations of Registered Parks and Gardens (RPG) or views recorded as of importance in Conservation Area Appraisals or Neighbourhood Plans)”. However, in ES Chapter 13 Landscape and Visual [APP-226] under Regional and Local policy, no neighbourhood plans or conservation area appraisals are noted as source material. It is understood from the Roydon PC WR [REP1-175] several views are protected under policy 16 of the Diss	The Applicant confirms that all relevant Neighbourhood Plans, Registered Park and Garden (RPG) descriptions and Conservation Area Appraisals were reviewed and any relevant information on views considered. The Applicant notes the point that these were not referenced under Data Sources, in paragraph 13.4.2 or within the bibliography on page 93 within 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. This was in error and a list of relevant Neighbourhood Plans, RPG descriptions and Conservation Area Appraisals will be included in the next iteration of 8.1 Errata List. As stated in paragraph 13.4.52 on page 24 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227], recognition of the value of a view was determined with reference to the following: • Planning designations specific to views • Whether it is recorded as important in relation to designated landscapes (such as views specifically mentioned in the special qualities of a National Landscape) • Whether it is recorded as important in relation to heritage assets (such as designed views recorded in citations of Registered Parks and Gardens (RPG) or views recorded as of importance in Conservation Area Appraisals or Neighbourhood Plans) • The value attached to views by visitors, for example through appearances in guidebooks or on tourist maps, provision of facilities for their enjoyment and references to them in literature and art.

Reference	Question	Applicant's Response
	and District Neighbourhood Plan, October 2023. Ensure that all relevant neighbourhood plans, RPG description and conservation area appraisals are considered and any relevant references provided.	Any relevant contributors to the value of a view were recorded under 'Sensitivity of Receptor' in the viewpoint assessment in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 - APP 232]. This included whether the viewpoint was located within a Conservation Area or RPG, or whether the viewpoint was identified as an important view in an adopted Neighbourhood Plan. An example of this can be found in the assessment of Viewpoint 3.29 as set out on PDF page 157 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]. This viewpoint is located on the edge of a Conservation Area and RPG, and is representative of a Neighbourhood Plan important view. With regards to the Diss and District Neighbourhood Plan, viewpoints identified within this plan were identified and considered within the viewpoint selection process. As stated in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229], Viewpoint 1.15 is representative of Diss and District Neighbourhood Plan Viewpoint 25 (PDF page 469) and Viewpoint 2.03 is representative of views from Diss and District Neighbourhood Plan Viewpoints 19 and 21 (PDF page 494). The judgement on the value of views also takes this into account. Visual Receptor Area (VRA) A12 Roydon and Diss and VRA B2 Palgrave also consider the Diss and District Neighbourhood Plan in sensitivity judgements, as set out in paragraphs 13.4.134 and 13.5.15 respectively. Conservation Area Appraisals were also used to inform the historic environment baseline and assessment. Key views identified within Conservation Area Appraisals informed the selection of cultural heritage viewpoints, which are shown on 7.12 Visualisations - Part 8 and Part 9 of 9 [APP-350 - APP-351]. The assessment of effects on these designations is included in 6.11 Environmental Statement Chapter 11 – Historic Environment [AS-068]. The historic environment assessment also considers potential effects on RPGs in terms of direct effects and effects on setting. Neighbourhood Plans were also given consideration, as noted in Section 5.3 to Section 5.10 on pages 86 to 108 of 5.6 Planning Statement [APP-085].
LV 1.7	The visual baseline and assessment The Visual Baseline and Assessment [APP-229] includes a precis summary of effects for the Visual Receptor	The Applicant has provided updates in response to points a) to d) below. In response to a), a tabular summary of effects on long-distance walking and cycle routes is provided in Table X.

Reference	Question	Applicant's Response																																		
	Areas but not for the assessment of effects on routes. There is no explanation for the choice of viewpoints on these routes and whether or not they reflect the worst-case scenario point/s; where a major adverse (significant) effect is identified. There are no visualisations for St Edmunds Way or National Cycle Route 50, even though major adverse (significant) effects are assessed during construction and operation. Whilst it is acknowledged that PRow within the 3km study area are shown on the Visual Receptors and Viewpoints plan [REP1-066], indication of the routes assessed would be a useful addition, such as in different colours for walking/cycling routes, and labelled with the route name. Provide the following updates: a) A tabular summary of the assessment of the effects on routes from [APP-229] b) A written explanation of the choice of viewpoints c) Additional viewpoints (at worst-case scenario points) for St Edmunds Way and National Cycle Route 50	Table X: Summary of effects on long-distance walking and cycle routes <table><tr><th>Route</th><th>Sensitivity of Visual Receptor</th><th>Construction Effect</th><th>Year 1 Operation Effect</th><th>Year 15 Operation Effect</th></tr><tr><td>Boudicca Way</td><td>High</td><td>Minor and not significant (adverse) to no effect (not significant)</td><td>Minor and not significant (adverse) to no effect (not significant)</td><td>Minor and not significant (adverse) to no effect (not significant)</td></tr><tr><td>Angles Way</td><td>High</td><td>Major and significant (adverse) to no effect (not significant)</td><td>Moderate-major and significant (adverse) to no effect (not significant)</td><td>Moderate-major and significant (adverse) to no effect (not significant)</td></tr><tr><td>Middy Railway Footpath</td><td>High</td><td>Major and significant (adverse) to negligible and not significant (adverse)</td><td>Major and significant (adverse) to negligible and not significant (adverse)</td><td>Major and significant (adverse) to negligible and not significant (adverse)</td></tr><tr><td>Mid Suffolk Footpath</td><td>High</td><td>Major and significant (adverse) to minor and not significant (adverse)</td><td>Major and significant (adverse) to minor and not significant (adverse)</td><td>Major and significant (adverse) to minor and not significant (adverse)</td></tr><tr><td>Gipping Valley River Path</td><td>High</td><td>Moderate-major and significant (adverse) to negligible and not significant (adverse)</td><td>Moderate-major and significant (adverse) to negligible and not significant (adverse)</td><td>Moderate-major and significant (adverse) to negligible and not significant (adverse)</td></tr></table>					Route	Sensitivity of Visual Receptor	Construction Effect	Year 1 Operation Effect	Year 15 Operation Effect	Boudicca Way	High	Minor and not significant (adverse) to no effect (not significant)	Minor and not significant (adverse) to no effect (not significant)	Minor and not significant (adverse) to no effect (not significant)	Angles Way	High	Major and significant (adverse) to no effect (not significant)	Moderate-major and significant (adverse) to no effect (not significant)	Moderate-major and significant (adverse) to no effect (not significant)	Middy Railway Footpath	High	Major and significant (adverse) to negligible and not significant (adverse)	Major and significant (adverse) to negligible and not significant (adverse)	Major and significant (adverse) to negligible and not significant (adverse)	Mid Suffolk Footpath	High	Major and significant (adverse) to minor and not significant (adverse)	Major and significant (adverse) to minor and not significant (adverse)	Major and significant (adverse) to minor and not significant (adverse)	Gipping Valley River Path	High	Moderate-major and significant (adverse) to negligible and not significant (adverse)	Moderate-major and significant (adverse) to negligible and not significant (adverse)	Moderate-major and significant (adverse) to negligible and not significant (adverse)
Route	Sensitivity of Visual Receptor	Construction Effect	Year 1 Operation Effect	Year 15 Operation Effect																																
Boudicca Way	High	Minor and not significant (adverse) to no effect (not significant)	Minor and not significant (adverse) to no effect (not significant)	Minor and not significant (adverse) to no effect (not significant)																																
Angles Way	High	Major and significant (adverse) to no effect (not significant)	Moderate-major and significant (adverse) to no effect (not significant)	Moderate-major and significant (adverse) to no effect (not significant)																																
Middy Railway Footpath	High	Major and significant (adverse) to negligible and not significant (adverse)	Major and significant (adverse) to negligible and not significant (adverse)	Major and significant (adverse) to negligible and not significant (adverse)																																
Mid Suffolk Footpath	High	Major and significant (adverse) to minor and not significant (adverse)	Major and significant (adverse) to minor and not significant (adverse)	Major and significant (adverse) to minor and not significant (adverse)																																
Gipping Valley River Path	High	Moderate-major and significant (adverse) to negligible and not significant (adverse)	Moderate-major and significant (adverse) to negligible and not significant (adverse)	Moderate-major and significant (adverse) to negligible and not significant (adverse)																																

Reference	Question	Applicant's Response				
	d) An updated Visual Receptors and Viewpoints plan that indicates the routes assessed [REP1-066]	Hadleigh Railway Walk	High	No effect (not significant)	No effect (not significant)	No effect (not significant)
		Essex Way	High	Major and significant (adverse) to minor and not significant (adverse)	Major and significant (adverse) to no effect (not significant)	Major and significant (adverse) to no effect (not significant)
		St Edmund Way	High	Major and significant (adverse) to no effect (not significant)	Minor and not significant (adverse) to no effect (not significant)	Minor and not significant (adverse) to no effect (not significant)
		Stour Valley Path	High	Major and significant (adverse) to no effect (not significant)	Minor and not significant (adverse) to no effect (not significant)	Minor and not significant (adverse) to no effect (not significant)
		Saffron Trail	High	Major and significant (adverse) to no effect (not significant)	Major and significant (adverse) to no effect (not significant)	Major and significant (adverse) to no effect (not significant)
		Centenary Circle	High	Moderate-major and significant (adverse) to negligible and not significant (adverse)	Moderate-major and significant (adverse) to negligible and not significant (adverse)	Moderate-major and significant (adverse) to negligible and not significant (adverse)
		St Peter's Way	High	Major and significant (adverse) to negligible and not	Major and significant (adverse) to negligible and not	Major and significant (adverse) to negligible and

Reference	Question	Applicant's Response			
			significant (adverse)	significant (adverse)	not significant (adverse)
	King Charles III England Coast Path	High	Minor and not significant (adverse)	Minor and not significant (adverse)	Minor and not significant (adverse)
	NCN Route 1	High	Major and significant (adverse) to no effect (not significant)	Major and significant (adverse) to no effect (not significant)	Major and significant (adverse) to no effect (not significant)
	NCN Route 13	High	Major and significant (adverse) to no effect (not significant)	Major and significant (adverse) to no effect (not significant)	Major and significant (adverse) to no effect (not significant)
	NCN Route 16	High	Major and significant (adverse) to minor and not significant (adverse)	Major and significant (adverse) to minor and not significant (adverse)	Major and significant (adverse) to minor and not significant (adverse)
	NCN Route 30	High	Major and significant (adverse) to negligible and not significant (adverse)	Moderate-major and significant (adverse) to negligible and not significant (adverse)	Moderate-major and significant (adverse) to negligible and not significant (adverse)
	NCN Route 50	High	Major and significant (adverse) to negligible and not significant (adverse)	Major and significant (adverse) to negligible and not significant (adverse)	Major and significant (adverse) to negligible and not significant (adverse)

Reference	Question	Applicant's Response			
		NCN Route 51 High	Major and significant (adverse) to negligible and not significant (adverse)	Major and significant (adverse) to negligible and not significant (adverse)	Major and significant (adverse) to negligible and not significant (adverse)

In response to b), 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 with relevant Local Planning Authorities, as set out in the relevant **Statements of Common Ground (5.9.1 – 5.9.12 [APP-089 to APP-100])**. The viewpoints are a representative selection of publicly accessible locations along the Project route, capturing a range of receptors and a variety of distances and viewing directions. The visualisations from each of the viewpoints have been produced to assist stakeholders and the Examining Authority with understanding the likely effects of the Project on landscape character and views / visual amenity, and are provided in **7.12 Visualisations [APP-343 to APP-351]**.

Table X provides the rationale for the inclusion of viewpoints on long-distance walking and cycle routes and a summary of effects at these viewpoints.

Table X: Rationale for inclusion of viewpoints on long-distance walking and cycle routes and summary of effects

No	Name	Distance from Project (nearest structure) (km)	Reason for Selection	Effects		
				Construction	Operation Year 1	Operation Year 15
Boudicca Way (worst-case visibility is represented by Viewpoint 1.16)						
1.01	Venta Icenorum Roman Town, near Caistor St Edmund	1.7	Representative of Venta Icenorum Roman Town at Caistor St Edmund (Scheduled Monument) and views	Minor and not significant (adverse)	Minor and not significant (adverse)	Minor and not significant (adverse)

Reference	Question		Applicant's Response			
			from the nearby Boudicca Way.			
1.16	Chandler Road / Boudicca Way, south of Caistor St Edmund	2.2	Representative of people using Boudicca Way and the local road network along Chandler Road and Wash Lane. Located on the edge of Venta Icenorum Scheduled Monument.	Minor and not significant (adverse)	Minor and not significant (adverse)	Minor and not significant (adverse)
1.17	Grove Lane / Boudicca Way, near Tasburgh Hill Fort	2.8	Representative of people visiting the Scheduled Monument with information board and using the Boudicca Way.	Negligible and not significant (adverse)	Negligible and not significant (adverse)	Negligible and not significant (adverse)
Angles Way (worst-case visibility is represented by Viewpoint 1.22)						
1.21	PRoW near Roydon Fen	0.6	Representative of people visiting Roydon Fen and the local PRoW network and people moving and living within Roydon. Located just to the north of the Angles Way.	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)
1.22	Doit Lane, near Roydon	0.3	Representative of people travelling on Doit Lane (part of the Angles Way), south-west of Roydon.	Major and significant (adverse)	Moderate-major and significant (adverse)	Moderate-major and significant (adverse)
Middy Railway Footpath (worst-case visibility is represented by Viewpoint 2.11)						
2.10	Whiteup's Lane, north of Mendlesham Green	1.1	Representative of people living and moving around the community of Mendlesham Green and using the local PRoW network. Close	Moderate and significant (adverse)	Minor-moderate and not significant (adverse)	Minor-moderate and not significant (adverse)

Reference	Question	Applicant's Response				
					to the Middy Railway Footpath long distance trail.	
2.11	Middy Railway Footpath near Stonham Road	0.3	Representative of people living and moving around scattered community, people using the Middy Railway Footpath long distance trail and local PRow network in the area.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)
	Mid Suffolk Footpath (worst-case visibility is represented by Viewpoint 2.41)					
2.12	Mid Suffolk Footpath / Gipping Road, west of Saxham Street	1.2	Representative of people living and moving around scattered community, people using the Mid Suffolk Footpath long distance footpath and local PRow and road network in the area.	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)
2.35	Mid Suffolk Footpath north of Tan Office	2.5	Representative of people travelling on PRow and the Mid Suffolk Footpath to the north-east of Mendlesham Green.	Minor and not significant (adverse)	Minor and not significant (adverse)	Minor and not significant (adverse)
2.41	Mid Suffolk Footpath near Mendlesham Green	0.3	Representative of people travelling along the Mid Suffolk Footpath long distance route and using the local PRow network south of Mendlesham Green.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)
2.53	Mid Suffolk Footpath near Mendlesham	2.3	Representative of users of the Mid Suffolk	Minor and not significant (adverse)	Minor and not	Minor and not

Reference	Question	Applicant's Response				
				Footpath near Mendlesham.	significant (adverse)	significant (adverse)
		Gipping Valley River Path (worst-case visibility is represented by Viewpoint 2.28)				
2.28	Gipping Valley Path near Creeting Hall	0.4	Representative of people using the PRow network and the Gipping Valley River Path.	Moderate-major and significant (adverse)	Moderate-major and significant (adverse)	Moderate-major and significant (adverse)
		Essex Way (worst-case visibility is represented by Viewpoints 4.24, 4.25, 4.26 and 5.16)				
3.19	Essex Way / Mill Hill, west of Lawford	2.4	Located within Dedham Vale National Landscape and on the Essex Way near to Lawford Park. Representative of people using the PRow and road network within this historic landscape.	Minor-moderate and not significant (adverse)	Minor-moderate and not significant (adverse)	Minor-moderate and not significant (adverse)
3.26	Essex Way, near Langham Hall	3.7	Representative of users of the Essex Way near Langham.	Negligible and not significant (adverse)	No effect	No effect
4.03	Broad Lane / Essex Way, east of Great Horkesley	0.4	Representative of users of the Essex Way near Great Horkesley.	Major and significant (adverse)	Moderate and significant (adverse)	Minor and not significant (adverse)
4.24	Essex Way near Fordstreet	0.5	Representative of people living and moving around the settlement of Fordstreet and using the Essex Way Long Distance Footpath and open access land within the Colne Valley.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)
4.25	Essex Way, Mill Road, south of Fordham	0.2	Representative of people using PRow and the Essex Way within the Colne Valley.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)

Reference	Question	Applicant's Response					
	4.26	Essex Way, East Gores	0.2	Representative of people living and moving within East Gores, including along the local road and PRow network and the Essex Way.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)
	4.28	Essex Way near Poole's Farm	1.0	Representative of users of the Essex Way in the Colne Valley.	Minor-moderate and not significant (adverse)	Minor-moderate and not significant (adverse)	Minor-moderate and not significant (adverse)
	4.32	Essex Way, west of Teybrook Farm	0.6	Representative of users of the PRow network and Essex Way, south of Great Tey.	Minor-moderate and not significant (adverse)	Minor-moderate and not significant (adverse)	Minor-moderate and not significant (adverse)
	4.36	Green Lane / Essex Way, Horkesley Green	1.6	Representative of users of the local road network and Essex Way, west of Boxted.	Minor and not significant (adverse)	Negligible and not significant (adverse)	Negligible and not significant (adverse)
	4.38	Essex Way, West Bergholt	1.8	Representative of users of the Essex Way and residents in West Bergholt.	Minor and not significant (adverse)	Minor and not significant (adverse)	Minor and not significant (adverse)
	5.08	Fairstead Hall Road, Fairstead	1.0	Representative of people living and moving around Fairstead and people using the local road and PRow network including the Essex Way long distance footpath. NCN Route 16 passes close by.	Moderate-major and significant (adverse)	Moderate-major and significant (adverse)	Moderate-major and significant (adverse)
	5.14	Essex Way south of Coggeshall	1.1	Representative of people using the PRow / Essex Way along the	Minor and not significant (adverse)	Minor and not significant (adverse)	Minor and not significant (adverse)

Reference	Question	Applicant's Response				
				River Brain, south of Coggeshall.		
5.15	Essex Way south-east of White Notley	0.5	Representative of people using the Essex Way along the River Brain.	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)
5.16	Essex Way near Troy's Hall, north-east of Fairstead	0.1	Representative of people travelling on the Essex Way between Fairstead and White Notley.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)
5.19	PRoW north of Gambles Green (Terling 15)	2.2	Representative of the local community and users of the PRoW network and Essex Way north of Gambles Green.	Minor and not significant (adverse)	Minor and not significant (adverse)	Minor and not significant (adverse)
6.02	Essex Way, west of Fuller Street	0.6	Representative of people using the Essex Way long distance footpath.	Major and significant (adverse)	Moderate -major and significant (adverse)	Moderate -major and significant (adverse)
6.03	Essex Way, Chatham Green	0.8	Representative of people living and moving around the community of Chatham Green, travelling along the Essex Way long distance footpath and the local PRoW Network.	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)
6.18	Langleys Park, north of Great Waltham	1.0	Representative of people visiting Langleys RPG and people on the PRoW network. Representative of people living and moving around Great	Minor-moderate and not significant (adverse)	Minor-moderate and not significant (adverse)	Minor-moderate and not significant (adverse)

Reference	Question	Applicant's Response				
				Waltham and using the local road network. In proximity to the Essex Way and Saffron Trail.		
		Stour Valley Path (worst-case visibility is represented by Viewpoint 1.7)				
4.07	School Road / Stour Valley Path, west of Little Horkesley	1.7	Within the National Landscape. Representative of people using the Stour Valley Path long distance footpath and people living and moving within the community of Little Horkesley and using the local road network.	Negligible and not significant (adverse)	Negligible and not significant (adverse)	Negligible and not significant (adverse)
		Saffron Trail (worst-case visibility is represented by Viewpoint 6.04)				
6.04	PRoW, Broad's Green (Great Waltham 85)	0.3	Representative of people living and moving around the community of Broad Green and travelling along the Saffron Trail long distance footpath and the local PRoW Network.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)
6.18	See row above.					
		Centenary Circle				
6.05	Centenary Circle, north-west of Chelmsford	0.9	Representative of people living and moving along the western edge of Chelmsford and people walking on Centenary Circle long distance footpath.	Moderate-major and significant (adverse)	Moderate-major and significant (adverse)	Moderate-major and significant (adverse)

Reference	Question	Applicant's Response						
		6.26	Hylands Park, near Hylands House	1.4	Representative of people visiting Hylands Park. Not located on the Centenary Circle but broadly representative of views.	Negligible and not significant (adverse)	Negligible and not significant (adverse)	Negligible and not significant (adverse)
		St Peters Way						
		6.10	St Peter's Way, east of Millgreen Common	1.5	Representative of people travelling along St Peters Way long distance footpath and the local PRoW network in this area. Located within the boundary of 'Roman villa 100m north-west of Handley Barns' Scheduled Monument.	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)
		6.11	St Peter's Way, south of Margaretting Tye	2.1	Representative of people travelling along St Peters Way long distance footpath, NCN Route 13 and the local PRoW and road network.	Minor and not significant (adverse)	Minor and not significant (adverse)	Minor and not significant (adverse)
		King Charles III England Coast Path						
		8.04	Thurrock Thameside Nature Park	2.5	Representative of views from Thurrock Thameside Nature Park including visitor centre. Broadly representative of views from the King Charles III England Coast Path	Minor and not significant (adverse)	Minor and not significant (adverse)	Minor and not significant (adverse)
		NCN Route 1						
		3.05	The Street / NCR 1, Chattisham	0.6	Representative of people living and moving around the	Moderate and significant (adverse)	Moderate and	Moderate and

Reference	Question	Applicant's Response				
				community of Chattisham and using local PRow and NCN Route 1 on the local road network.	significant (adverse)	significant (adverse)
3.08	NCR 1, Woodlands Road	1.0	Representative of people using the local PRow and road network in this area and cyclists along NCN Route 1.	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)
3.24	Higham Hill, south of Lower Raydon	4.2	Representative of people using NCN Route 1 and living, moving and using the local road network within Dedham Vale National Landscape and using Sully Hills Quiet Lane.	Negligible and not significant (adverse)	Negligible and not significant (adverse)	Negligible and not significant (adverse)
4.18	NCN Route 1 / Langham Lane, north of Colchester	0.4	Representative of people using NCN Route 1 and Langham Lane.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)
6.23	NCN Route 1 / PRow near Writtle College (Writtle 19)	1.1	Representative of people using the PRow network and NCN Route 1 near Writtle College.	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)
NCN Route 13						
4.08	Fordham	0.5	Representative of people living and moving around Fordham and using the local road and PRow network within open access land. Listed buildings at Fordham including Church of All	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)

Reference	Question	Applicant's Response				
				Saints Grade I listed church. Close to NCN Route 13.		
4.09	NCR 13, Fiddlers Hill	0.8	Representative of people living and moving around Fordham Heath, using the local road network and NCN Route 13.	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)
4.30	Mill Road, south of Fordham	0.2	Representative of residents in Fordham, users of the local road network on NCN Route 13 and open access land.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)
NCN Route 16						
5.07	NCR 16 and Ranks Green Road, east of Rank's Green	0.4	Representative of people living and moving around the community of Ranks Green, using the local PRoW and road network and using NCN Route 16.	Major and significant (adverse)	Major and significant (adverse)	Major and significant (adverse)
NCN Route 30						
2.01	Ling Road, Wortham Ling	0.4	Representative of people visiting Wortham Ling and users of NCN Route 30.	Moderate-major and significant (adverse)	Moderate-major and significant (adverse)	Moderate-major and significant (adverse)
2.33	Mellis Road, south of Thrandeston	1.0	Representative of people using the local road and PRoW network and NCN Route 30 and living and moving around Thrandeston and Mellis.	Moderate and significant (adverse)	Moderate and significant (adverse)	Moderate and significant (adverse)

Reference	Question	Applicant's Response					
		NCN Route 51					
2.27	All Saints Road, Creeping Hills	1.5	Representative of people using NCN Route 51 and the local road network at Creeping Hills and Needham Market.	Negligible and not significant (adverse)	Negligible and not significant (adverse)	Negligible and not significant (adverse)	

In response to c), St Edmund Way – The major and significant (adverse) effect identified on users of the St Edmund Way is related to close views of construction of the underground cable from part of the long-distance route. As noted in paragraph 13.12.131 of **6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]** there is no theoretical visibility of the overhead line element of the Project from the St Edmund Way within the Study Area (3 km of the overhead line). For this reason, no viewpoints were proposed on the St Edmund Way. Given the lack of theoretical visibility of the Project, no additional viewpoints or visualisations are provided from the St Edmund Way.

National Cycle Network (NCN) Route 50 – Although there are no viewpoints located directly on the route, the following viewpoints are nearby and therefore considered to be broadly representative of similar views:

- Viewpoint 6.01 – approximately 275 m to the south-west of NCN Route 50, on the edge of Great Leighs
- Viewpoint 6.02 – approximately 250 m to the south-west of NCN Route 50, west of Fuller Street
- Viewpoint 6.25 – approximately 300 m to the south of NCN Route 50, on the edge of the Study Area.

It is important to note that the sequential assessments undertaken for long distance paths and NCN Routes are based on first hand observations during site visits and not on viewpoints and visualisations alone. The Applicant considers Viewpoint 6.02, taken approximately 250 m to the south-west of NCN Route 50, would represent the worst-case scenario. This is because the view is in an elevated location, relatively close to the Project. Similar views would be experienced by people travelling westwards on part of NCN Route 50 just north-east of this viewpoint. The viewpoint is also west of

Reference	Question	Applicant's Response
		the existing 132 kV overhead line which is visible from NCN Route 50 but would be removed as part of the Project. As views from NCN Route 50 are considered to be represented by Viewpoints 6.01, 6.02 and 6.25 as listed above, no additional viewpoints or visualisations are provided from the route. In response to d), an updated 6.13.F7 Environmental Statement Figure 13.7 - Visual Receptors and Viewpoints [REP1-066] that indicates the routes assessed will be provided in the next iteration of 8.1 Errata List.
LV 1.8	Residential visual amenity assessment (RVAA): Tables A13.4.3 and A13.4.14 - 1 At Table A13.4.3 you have provided the assessment of properties within the 200m study areas (steps 2 and 3) and whether they trigger the requirement for step 4 assessment. You have also included a column on whether the lateral and/or vertical LoD could affect the magnitude of effect. There are 24 instances where the response to 'Step 4 Triggered?' is No, but the LoD could affect the magnitude of effect, as indicated by a Yes in this column. In the interests of exploring the worst-case scenario, please included these properties in an updated Stage 4 assessment. Please also ensure that visualisations for these properties are included.	An update to 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] will be provided at Deadline 4, with updates to Table A13.4.3 to rectify this, and properties included in the Stage 4 assessment to be revised accordingly. Visualisations will also be provided for any additional properties which fall into the Stage 4 assessment. It is proposed that these are taken from a 3D model comprising the following data: • 1 m Lidar Digital Terrain Model • Cesium Bing Maps aerial imagery overlay • Trees modelled based on National Tree Map (NTM) (inclusive of any trees over 3 m) as either evergreen or broadleaf trees in winter • White massing models of all buildings included within the National Geographic Database (NGD) Building dataset, with pitched roofs calculated based on 1 m Lidar Digital Surface Model (DSM). Justification for taking this approach to the visualisations is provided within the Applicant's response to question LV 1.10.
LV 1.9	Residential visual amenity assessment : Tables A13.4.3 and A13.4.14 - 2	Conclusions as to whether the Residual Visual Amenity Threshold (RVAT) would be breached or not have considered the Project as presented on 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-

Reference	Question	Applicant's Response
	In Table A13.4.3 [APP-233] & [APP-234], where Step 4 is triggered and the response to whether the lateral and/or vertical LoD could affect the magnitude of effect is Yes, the ExA would expect additional assessment of this matter within Table A13.4.5. However, in Table A13.4.5 the possible improvement or worsening of the effect due to movement within the LoD is not assessed and the response to the question “Would the latitudinal, longitudinal or vertical LoD affect the RVAT result, assuming a worst-case scenario?” is, in every case, No. Update the Table to show how this has been concluded, providing additional visualisations where necessary.	134] and worst-case scenarios, when taking into account potential movement of the proposed pylons and overhead lines within the Limits of Deviation (LoD). An update to 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] will be provided at Deadline 4, with amendments to Table A13.4.5, to provide more clarity on how conclusions regarding worst-case scenarios within the LoDs have been assessed for each of the Step 4 properties. Additional visualisations will also be provided for all Step 4 properties. These will be taken from 3D modelling which is based on the following data: • 1 m Lidar Digital Terrain Model • Cesium Bing Maps aerial imagery overlay • Trees modelled based on National Tree Map (NTM) (inclusive of any trees over 3m) as either evergreen or broadleaf trees in winter • White massing models of all buildings included within the National Geographic Database (NGD) Building dataset, with pitched roofs calculated based on 1 m Lidar Digital Surface Model (DSM). Justification for taking this approach to the visualisations is provided within the Applicant's response to question LV 1.10.
LV 1.10	Residential visual amenity assessment - visualisations The wireframe viewpoints provided in the RVAA [APP-233] and [APP-234] are useful to give a general understanding of the proximity of the pylons to any residential dwellings and it is noted that these are provided in accordance the Landscape Institute Technical Guidance Note (LI TGN) 2/19. However, this guidance note also allows for the type and nature of visualisations to vary depending on the project circumstances. The ExA	The Applicant agrees and accepts that photomontage visualisations for the properties included within Stage 4 of the Residential Visual Amenity Assessment (RVAA) would be useful. However, due to timescales involved in agreeing land access to all properties for which this would be required, and the subsequent time which would be required to prepare each of the visualisations, providing these by Deadline 4 is not a practicable option. The Applicant instead proposes the production of a digital model that will replicate the baseline, as an alternative to capturing on-site photography, inclusive of the following elements: • 1 m Lidar Digital Terrain Model • Cesium Bing Maps aerial imagery overlay • Trees modelled based on National Tree Map (NTM) (inclusive of any trees over 3 m) as either evergreen or broadleaf trees in winter

Reference	Question	Applicant's Response
	would find it useful to have photo-montage visualisations of the properties that are included in the Stage 4 assessment to better understand the baseline views, including any existing foliage, wirescape and buildings. Provide these by Deadline 4, 12 May 2026.	White massing models of all buildings included within the National Geographic Database (NGD) Building dataset, with pitched roofs calculated based on 1 m Lidar Digital Surface Model (DSM). The visual outputs from the model would not be verified views, and would be seen as supporting, illustrative imagery alongside the verified wirelines already produced. Should this be an acceptable option, we will provide these supporting images, taken from the 3D model, at Deadline 4. If following submission of this material the ExA still wishes the relevant or any further photomontages to be produced this can be considered further with the ExA.
LV 1.11	Residential visual amenity assessment – heritage assets Whilst it is acknowledged that this assessment [APP-233] and [APP-234] is primarily associated with landscape and visual effects, it also provides useful information when assessing the setting of heritage assets. Cross reference the RVAA with the lists of heritage assets and add a column to indicate which dwellings are also listed buildings, and their grades.	Of the properties scoped into the Residential Visual Amenity Assessment, the following are listed: - A1 - Glebe Farmhouse (Grade II) - A5 - Kenningham Hall (Grade II) - A8 - Elm Farmhouse (Grade II) - A17 - Limetree Farmhouse (Grade II) - B5 - Spring Farmhouse (Grade II) - B13 - Roydon Hall (Grade II*) - B14 - Hill Farmhouse (Grade II) - B16 - Creeping Hall (Grade II*) - B20 - Top Farmhouse (Grade II) - B26 - Bleak Hall (Grade II) - D25 - 1, 2 and 3 Brick Cottages (Grade II) - D29 - Barn to south west of Little Tey House (Grade II*) - D33 - Upp Hall (Grade II) - E4 - Monk's Farm Cottages (Grade II) - E5 - Porter's Farmhouse (Grade II) - E9 - Hungry Hall Farmhouse (Grade II) - F3 - Goodmans Farmhouse (Grade II)

Reference	Question	Applicant's Response
		• F8 - Lace Cottages (Grade II) • F15 - Ball's Farmhouse (Grade II) • G13 - Botney Hill Farmhouse (Grade II) • G17 - Dunton Hall (Grade II) • H2 – Wyfields Farmhouse (Grade II) An updated 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] will be provided at Deadline 4 which will include an updated Table A13.4.3, identifying which properties are listed, and their grades. However, it is noted that this would not affect the outcome of the report.
LV 1.12	Residential visual amenity assessment – Braintree DC LIR In its LIR, Braintree DC [REP1-148] notes that the RVAA [APP-233] & [APP-234] examined visual effects on 10 no. groups or individual properties within its district and that of these, two were identified as potentially experiencing effects that may breach residential visual amenity (E7 West Ford Farm Cottage and E8 Whiteheads Farm). In both instances, the Step 4 assessment concluded that amenity would not be breached. However, the Council are concerned about the visual amenity of E7 and E8 taking into account LOD. In the case of E7 and E8, the OL is adjacent to their residential boundaries. Provide additional assessment based on the worst-case scenario in relation to the possible LoD.	With regards to property E7 (West Ford Farm Cottage), a detached residence, the worst-case scenario for this property is expected to be the placing of the closest proposed pylon in direct view of the primary/rear elevation, along the eastern edge of the lateral Limits of Deviation (LoD), at a distance of 150 m from the building, and approximately 130 m from the garden boundary. In this scenario, the rear and primary elevation would experience direct views of the Project within a relatively open landscape. In addition, unfiltered views of cumulative scheme B8 (solar farm) would be directly visible at close range from the south-western (front) elevation. Cumulatively, there would be one property elevation from which no elements of these projects would be visible – the side / south-east facing elevation – and they 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, and allow for the open character of the views to be retained. Therefore, the Residual Visual Amenity Threshold (RVAT) would not be breached at this location. For E8 (Whiteheads Farm), the worst-case scenario for this property is expected to be the placing of the closest proposed pylon in direct view of the side (south-east facing) elevation, along the eastern edge of the lateral LoD, at a distance of 90 m from the building, and 70 m from the garden boundary. However, this is not anticipated to breach the RVAT, due to intervening elements of screening for the elevations which would look towards the Project, and the front (south-west facing) and side (south-east facing) elevations facing away from the Project completely. It is noted that an

Reference	Question	Applicant's Response
		additional energy infrastructure scheme (cumulative scheme B42, a solar farm at Land South West of Cressing Temple Witham Road, Cressing, Essex) is proposed to the south-west of this property. The front (south-west facing) elevation overlooks the land on which this scheme is proposed; however, no significant adverse visual effects have been highlighted for this property within the Landscape and Visual Impact Assessment for this scheme, and beneficial landscape effects are anticipated due to the introduction of new tree and hedgerow planting as part of the cumulative development (and not as part of the Project), with minimal loss of the existing green infrastructure network across the site. Taken in the round, the new solar scheme and worst-case scenario Project location would not be so unpleasant or have such an overwhelming effect, that the RVAT would be breached. 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, with an openness of character retained. Therefore, the Project is not considered to be 'unpleasantly encroaching' or 'inescapably dominant', overall, in views from this residence. Whilst the assessments above have been based on 'worst-case' scenarios, whereby the Projecalignment would sit at the very edge of the LoD, it should be noted 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. An update to 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] will be submitted at Deadline 4 which will include additional detail, as provided above, for properties E7 and E8, and for the remaining Stage 4 properties, regarding assessment of worst-case scenarios in relation to the LoD.
LV 1.13	ES Appendix 13.5 National Landscape Assessment Study - 1 The study [APP-235] explains how the proposed Wenham Grove and Great Horkesley CSE compounds, and the EACN substation, have been excluded from the assessment of	In response to a), the Applicant wishes to clarify the reasons for excluding Wenham Grove and Great Horkesley Cable Sealing End (CSE) compounds and the EACN Substation from the assessment of effects on the Dedham Vale National Landscape. The reasons are explained in Table A13.1.1 of 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. These were based on professional judgement and assessment and include a combination of distance and intervening vegetation which would greatly reduce the

Reference	Question	Applicant's Response
	effects on the National Landscape (Dedham Vale) due to the zone of theoretical visibility images indicating that very few publicly accessible locations within 3km of the proposed infrastructure exist. a) Publicly accessible locations change over time. Are there many areas which may be privately owned but are still in the NL where visibility of the stated infrastructure would be possible? If so provide a commentary on such areas b) Has an assessment within this study of the potential cumulative effects of infrastructure around Ardleigh taken place (including but not limited to the EACN, and potential Five Estuaries and North Falls substations) upon the NL? If not provide one.	visibility/perception of this proposed infrastructure from the National Landscape, in combination with the limited extent and nature of potential views from publicly accessible locations. It is important to note that Zone of Theoretical Visibility (ZTV) mapping is just one of the tools from which to understand potential visibility. Judgements were also informed by field work undertaken in different seasons. The fact that a ZTV suggests potential visibility does not necessarily equate to visual effects. The assessment undertaken and reported in the Landscape and Visual Impact Assessment (LVIA) was based on a combination of desktop analysis and field work undertaken from publicly accessible locations and is set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and accompanying appendices including 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235]. The Applicant appreciates that publicly accessible locations can change over time but considers the approach taken to be reasonable and proportionate. In response to the question posed by the Examining Authority, the Applicant confirms that a combination of ZTV analysis and first-hand observation from field work confirms the following, in relation to the likely extent of privately owned areas that may have views of the infrastructure: • The potential for views of Wenham Grove CSE compound from private land within Dedham Vale National Landscape would be extremely limited within the 3 km Study Area. The limited theoretical extent of visibility is illustrated by the ZTV in 6.13.F11 Environmental Statement Figure 13.11 - ZTV of Wenham Grove CSE Compound [APP-247] • With respect to potential views of the Great Horkesley (EACN side) CSE Compound, the ZTV in 6.13.F13 Environmental Statement Figure 13.13 - ZTV of Great Horkesley (EACN side) CSE Compound [APP-249] illustrates very few areas of private land within the National Landscape with theoretical visibility. Field work has confirmed the extent of visibility from the National Landscape would be lower than the ZTV suggests. For example, Viewpoint 4.36: Green Lane / Essex Way, Horkesley Green represents views from the edge of the National Landscape in a location where the ZTV suggests theoretical visibility of the CSE compound. The analysis of the baseline photography compared to the ZTV confirms the CSE

Reference	Question	Applicant's Response
		compound would be a very small component of the Project which would be screened by intervening vegetation. A wireline from Viewpoint 4.36 is provided on PDF pages 114 to 118 of 7.12 Visualisations - Part 5 of 9 [APP-347]. Private land within the National Landscape would be further away and there would be more intervening layers of vegetation filtering and screening views to the south • With respect to potential views of the Great Horkesley (Tilbury side) CSE Compound, the ZTV in 6.13.F14 Environmental Statement Figure 13.14 - ZTV of Great Horkesley Tilbury side CSE Compound [APP-250] illustrates few areas of private land within the National Landscape with theoretical visibility. Field work has confirmed the extent of visibility from the National Landscape would be lower than the ZTV suggests. For example, views towards the CSE compound from the edge of the National Landscape are represented by Viewpoint 4.07: School Road / Stour Valley Path, west of Little Horkesley and also nearby Viewpoint 4.13: B1508 Main Road, Wormingford. These viewpoints are located in places where the ZTV suggests theoretical visibility of the CSE compound. The analysis of the baseline photography compared to the respective photomontage and wireline confirms the CSE compound would be screened by a combination of intervening landform and vegetation. A wireline from Viewpoint 4.07 is provided on PDF pages 63 to 67 of 7.12 Visualisations - Part 4 of 9 [APP-346]. A photomontage from Viewpoint 4.13 is provided on PDF pages 2 to 4 of 7.12 Visualisations - Part 5 of 9 [APP-347]. Privately owned areas within the National Landscape would be further away and there would be more intervening layers of vegetation filtering and screening views to the south • The potential for views of the EACN Substation from areas of private land within Dedham Vale National Landscape is extremely limited within the 3 km Study Area. The limited theoretical extent of visibility is illustrated by the ZTV in 6.13.F12 Environmental Statement Figure 13.12 - ZTV of East Anglia Connection Node EACN [APP-248]. Field work has confirmed the extent of visibility from the National Landscape would be lower than the ZTV suggests. For example, views towards the EACN Substation from within the National Landscape are represented by Viewpoint 3.19: Essex Way / Mill Hill, west of Lawford. This viewpoint is where the ZTV suggests theoretical visibility of the EACN Substation. The analysis of the baseline photography compared to the photomontage confirms the EACN

Reference	Question	Applicant's Response
		Substation would be screened by intervening vegetation. A photomontage from Viewpoint 3.19 is provided on PDF pages 148 to 150 of 7.12 Visualisations - Part 3 of 9 [APP-345]. In response to b), the Applicant has reviewed the LVIA's undertaken for North Falls and Five Estuaries and subsequent submissions made during their respective DCO examinations. Based on this information the Applicant has concluded that there is no potential for significant cumulative effects on Dedham Vale National Landscape due to limited visibility of these projects from the National Landscape. Cumulative effects between the Project, Five Estuaries and North Falls are considered in 6.17.A3 Environmental Statement Appendix 17.3 - Inter-Project Cumulative Effects [APP-284]. The cumulative assessment is being reviewed and any changes to the conclusions of likely significant effects will be published into the Examination (the review includes the Tarchon Interconnector Project and other newly identified schemes in the area to the south of Dedham Vale National Landscape around Ardleigh post April 1 2025). The review considers the potential for cumulative effects on Dedham Vale National Landscape.
LV 1.15	National Landscapes - duty to seek to further the purposes report - 1 Provide responses to the following queries on the above report [APP-120]: a) Provide any update on the adoption of the Dedham Vale NL and Stour Valley Project Area Management Plan 2026-2031, and update the Report [APP-120] if necessary. b) Consider the relevance of otherwise of the results of the Manningtree Station Judicial Review to the proposed development and	In response to a), the Applicant notes the Dedham Vale National Landscape and Stour Valley Project Area Management Plan 2026-2031 has been adopted. The draft Management Plan was taken into consideration when the measures and projects identified within 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120] were identified. Paragraph 2.4.9 of [APP-120] acknowledges that the 2026-2031 Management Plan was given appropriate consideration as part of the Applicant's approach to fulfilling the seek to further duty alongside the 2021-2026 Management Plan, which was the adopted plan at the time of submission. Annex A of 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120] which identifies the list of potential projects is based around the 2026-2031 Management Plan principles. The measures and projects identified to meet the duty to seek to further the purpose of the National Landscape are considered in accordance with the newly adopted Management Plan.

Reference	Question	Applicant's Response
	update the report if necessary, providing justification if not. c) Please explain further the conclusions outlined in paragraph 4.5.4 over the disbenefits of routing around the NL. d) Explain why the construction swathe for trenchless crossing locations is considerably wider than that required for open cut trenches (200m v 120m) e) Clarify which option has been chosen for the River Stour crossing west of Stratford St Mary. It is a little unclear whether a single crossing has been selected or not. f) In relation to the CoCP and the outline and final versions of this document, provide further information over the phrase 'substantially in accordance' and what this means in practice (paragraph 5.3.4). g) Provide further information over the 'PJ Line' and the stated initial feasibility study. When is the study to be produced and will it be submitted to the Examination?	The Dedham Vale National Landscape and Stour Valley Project Area Management Plan 2026-2031 was also included within 8.4.2 Policy Compliance Tracker [REP1-133]. In response to b), the Applicant's understanding (noting there is no judgement available as the Secretary of State consented to judgement) is that the Manningtree Station judicial review concerned a car park extension at Manningtree Railway Station, which is located within the Dedham Vale National Landscape. The judicial review challenge related to a Screening Direction issued by the Secretary of State which concluded that the development did not require an Environmental Impact Assessment. The government conceded and accepted that it had erred in law by failing to apply the statutory duty introduced by section 245 of the Levelling-up and Regeneration Act 2023 (LURA) which places a duty on relevant authorities, who must now seek to further the statutory purpose of protected landscapes. The Screening Direction was quashed. The judicial review related to the application of the duty introduced by section 245 of the LURA and emphasises the importance of the strengthened duty to decision-makers. The Applicant has considered and applied the duty, and has proactively engaged with the National Landscape Partnership, relevant Local Authorities and Natural England on this matter and set out how the duty has been sought to be met in 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The details of the Manningtree Station case are therefore of limited relevance to the Application given the Applicant has clearly considered and applied the duty. The Applicant has also considered other relevant case law in relation to the duty as set out in Section 2.2 of 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. In response to c), the summary bullet points made in paragraph 4.5.4 of 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120] have been expanded below. In overview, there are four general route combinations available from combining either a route through or a route around the National Landscape from Bramford to the East Anglia Connection Node (EACN) Substation with either a route to the north or a route to the south of Colchester for connections from the EACN Substation to Tilbury

Reference	Question	Applicant's Response
		Substation. Routes south of Colchester lead to interactions with Special Protection Area (SPA) and Special Area of Conservation (SAC) designations which are not fully mitigated by the use of underground cable. With these constraints, the consideration is then the need for routing to the north of Colchester (avoiding the SPA/SAC designations) and an option with one connection through the corridor (as this corridor is avoided by the Bramford to EACN Substation route through the National Landscape) or an option with two connections through this corridor. The two corridor option arises as a consequence of routeing around the National Landscape for Bramford to the EACN Substation and in the same corridor from the EACN Substation to Tilbury Substation. The Applicant has concluded that the route through the National Landscape and a single route north of Colchester is preferred. Further detail is provided below. Options BE3 and Option BE4 comprised preliminary corridor options which passed to the west of the Dedham Vale National Landscape as detailed in Sections 5.3 to 5.5 and shown on Figure 5.3 of 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]. These were identified to ensure consideration against Holford Rule 1 to avoid, where possible, routeing through areas of highest amenity value. These options required a longer length of connection than the preferred and submitted alignment to connect the start and finish points for this section which were iteratively emerging from project activity being undertaken. Options around the National Landscape could not avoid the Stour Valley Project Area (SVPA) and in some cases would also pass in close proximity to the Dedham Vale National Landscape. There was also emerging information that a further reinforcement (Bramford to Twinstead 400 kV) would create the potential for three close routes to the north of the Dedham Vale National Landscape. The strong preference in landscape and visual terms was for a more direct connection via underground cable through the National Landscape as proposed. The route around the Dedham Vale National Landscape would have resulted in: • At least an additional 25 km of overhead line • The potential for three parallel 400 kV connections to the north of the Vale (or required additional route length to separate the alignments)

Reference	Question	Applicant's Response
		The likely requirement to have at least 3 km of underground connection (due to precedent of the Bramford to Twinstead Project cabling across the SVPA) compared with 5.8 km Dedham Vale National Landscape crossing width. Routeing from the Bramford Substation to the EACN Substation, by going around the Dedham Vale, also presents a number of challenges over and above the additional length of route. The route through to the EACN Substation would have to be developed on the basis that two connections would need to be routed between the north side of Colchester and the southern boundary of the Dedham Vale National Landscape. Apart from the limitations of space for two connections which may render this unviable, there would be expected to be a need for additional underground cable to achieve the connection by this route offsetting the apparent benefit. Paragraphs 2.2.15 to 2.2.21 of 5.15 Design Development Report [APP-122] provide further explanation and conclude that the limited reduction in route through the Dedham Vale National Landscape (given the expected need to still require consideration of the adoption of underground cable within its setting) does not justify the additional 25 km of overhead line. This in part is because the onward connection from the EACN Substation would either require additional cabling to accommodate the two connections to the north of Colchester, or require similar use of cable to adopt a route to the south of Colchester but with the addition of impacts to the qualifying features of SPAs. Taking all factors into account, the route across the Dedham Vale National Landscape to the EACN Substation and onwards past the north of Colchester was preferred. The Applicant does not consider that the slight reduction in the extent of the routeing within the National Landscape, justifies the much greater connection length (approximately 25 km) and costs of overhead line to achieve this. Whilst the Environmental Statement reports significant effects on the special qualities of the National Landscape during construction, once the Project is operational and the land has been restored, effects on the special qualities of the National Landscape would not be significant. The assessment of effects on the special qualities of Dedham Vale National Landscape during construction and operation (and maintenance) is provided in Table A13.1.3 in 6.13.A5 Environmental Statement Appendix 13.5 - National Landscape Assessment Study [APP-235].

Reference	Question	Applicant's Response
		In response to d), trenchless crossings require a wider construction swathe and permanent easement than open cut installation, because trenchless crossings (such as Horizontal Directional Drilling (HDD)) require the cables to be installed at a greater depth. The deeper the installation, the greater the separation between the cables needs to be for them to maintain their effective capacity. An illustrative HDD plan arrangement under a crossing feature is demonstrated in 2.6.1 Errata Design and Layout Plans - Subs and Cables [REP1-003]. Trenchless crossings require dedicated launch and reception compounds to accommodate specialist drilling plant, pipe handling and assembly areas, drilling fluid circulation and treatment equipment, welfare facilities and site offices. In addition, sufficient space is required for pipe stringing prior to pull back, safe plant movements, environmental protection measures (including drilling fluid management), and appropriate safety and contingency buffers. Illustrative HDD launch and reception compound layouts are demonstrated in 2.6.1 Errata Design and Layout Plans - Subs and Cables [REP1-003]. In response to e), two options for the crossing of the River Stour are proposed, one option comprising two underground cable crossings and a second option which presents a single underground crossing in either the western or eastern corridors. The Project has been assessed on the worst-case two crossing option as shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design – Permanent Features [APP-134]. The sensitivity testing section of each chapter however presents an assessment of a single crossing. The Applicant is not able at this stage to confirm whether the single crossing option is deliverable and needs to maintain the flexibility to utilise the two crossing option. In response to f), reference to the term ‘substantially in accordance’ in the final bullet point in paragraph 5.3.4 confirms that the final Code of Construction Practice (CoCP) must be substantially in accordance with 7.2 Outline Code of Construction Practice [REP2-014]. This is referencing the text in Requirement 4 (Construction Management Plans) paragraph (1)(a) of 3.1 Draft Development Consent Order [REP2-004]. The Outline CoCP provides the preliminary framework for the principles and procedures that the Main Works Contractor(s) must implement to minimise, manage and mitigate the potential environmental impacts of the construction works. The final CoCP will

Reference	Question	Applicant's Response
		include additional detail and be fully developed based on detailed design information which is not available at this time. The term 'substantially in accordance' ensures the final CoCP reflects the core substance, principles and commitments set out in the outline version. This is a standard term which is widely used in the drafting of development consent orders. In response to g), the PJ Line is an existing 132 kV overhead line which runs south of Bramford to an existing substation at Lawford. The infrastructure is owned and operated by UK Power Networks and not National Grid. There is a potential from a network perspective, and this is not yet confirmed, that the delivery of the Project could enable part of the PJ Line removal. As set out in Section 6.3 of 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120], this would be a substantial, costly and complex project with significant works required to the UK Power Networks infrastructure with uncertain timeframes. A commitment to the removal of the PJ Line is not considered appropriate or proportionate to include as part of the Project works in the Development Consent Order given its anticipated cost, complexity and uncertain timescales and taking into account the Project's impacts on the National Landscape. In recognition of this, the Applicant has therefore proposed an initial feasibility study to assess the feasibility for the potential PJ Line removal in the longer term only. The feasibility study will be produced post consent and therefore will not be submitted into the examination. Once complete, the study will be shared with the National Landscape Partnership and relevant Local Planning Authorities. The feasibility study alongside the Dedham Vale National Landscape Fund will be secured by a legal agreement which will include a commitment to undertake the study and share the study with the relevant stakeholders. The Applicant is currently engaging on the Heads of Terms for the legal agreement with Suffolk County Council and the National Landscape Partnership. The legal agreement will be submitted to the examination by Deadline 7.
LV 1.16	National Landscapes - duty to seek to further the purposes report - 2 Appendix A of the report [APP-120] proposes a sum of £2,426,752 to be	In response to a), the sum was calculated based on an estimated cost assigned to the list of potential projects and measures identified within Annex A of 5.10 National Landscapes – Duty to Seek to Further the Purposes Report (s85 Countryside and Rights of Way Act 2000) [APP-120]. The list of projects and measures were

Reference	Question	Applicant's Response
	paid to the County Council to deliver benefits and to enhance the NL and its setting. To both parties: a) Explain how this sum has been calculated. b) Give your views on whether this sum should be indexed. c) Does this sum provide mitigation for the project?	identified in collaboration with the Dedham Vale National Landscape Partnership. The projects and measures are considered appropriate, reasonable and proportionate having regard to the impacts of the Project on the National Landscape and are in line with the previous and current Dedham Vale Management Plans⁷³ and in accordance with the Defra guidance⁷⁴. At the time of the application submission the management plan for the National Landscape was the Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Project Area Management Plan 2021-2026, however the draft Dedham Vale National Landscape and Stour Valley Project Area Management Plan 2026-2031 was taken into consideration and has since been adopted. Please see response to Written Question LV1.15 a) for further information. In response to b), the Applicant is amenable to the inclusion of indexation and will propose terms within the detailed agreement, which is to be submitted by Deadline 7 or earlier if possible. In response to c), the financial contribution in the form of a Dedham Vale National Landscape Fund does not provide mitigation for the Project but comprises compensation and enhancement/furtherance.
LV 1.18	Mitigation Several local authorities raise concerns over mitigation measures, both in terms of language and terminology used, and also the principal of mitigation which in many cases may not be effectively possible or achievable. In particular: Mitigative planting should not fall into the category of 'additional	Mitigative planting should not fall into the category of 'additional mitigation' or compensation and is instead required and necessary mitigation The Applicant confirms that any proposed mitigation whether referred to as 'embedded, standard or additional' is mitigation required to reduce environmental effects. The Applicant has also stated in 6.5 Environmental Statement Chapter 5 - EIA Approach and Method [APP-135] that each topic chapter of the Environmental Statement 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:

⁷³ Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Project Area Management Plan 2021-2026 and Dedham Vale National Landscape and Stour Valley Partnership (2025) *Dedham Vale National Landscape and Stour Valley Management Plan 2026-2031*

⁷⁴ Department for Environment, Food and Rural Affairs (2024) *Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes* [online]. Available at <https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes>.

Reference	Question	Applicant's Response
	mitigation' or compensation and is instead required and necessary mitigation. - The proposed time length for maintenance and after care for replacement/reinstatement landscaping is inadequate. - Mitigation in many cases is not possible or achievable and so under the mitigation hierarchy compensation is required. Compensation packages should be put in place as part of a package to offset landscape and visual effects of the proposed development. Respond to such concerns.	- Embedded mitigation measures - Standard mitigation measures - Additional mitigation measures Mitigative planting that falls into the category of 'additional mitigation' is considered by the Applicant to be required and necessary mitigation. The consideration of additional mitigation measures is presented in Section 8.6 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and confirms additional mitigation comprises measures over and above any embedded and standard mitigation measures to further reduce significant environmental effects. The Applicant confirms the 'additional mitigation' is considered appropriate and adequate, in terms of its nature and scale, to address potential effects and has reached agreement on this position with Natural England - see ID 3.3.17 in 5.9.13 Draft Statement of Common Ground - Natural England [REP1-034]. 7.4 Outline Landscape and Ecological Management Plan [REP2-018] provides a clear definition: <i>'Additional mitigation refers to measures implemented beyond the initial Project design to further reduce or manage environmental impacts identified during the planning or construction phases. These measures are bespoke to the specific site and its unique constraints, ensuring they address the particular challenges and sensitivities of the location effectively.'</i> The proposed time length for maintenance and after care for replacement/reinstatement landscaping is inadequate 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 [REP2-018] states the planting will be undertaken by suitably experienced contractors 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 [REP2-018]. For example, Section 11.2 of BS 8545:2014+A1:2026 states <i>'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.'</i> The Applicant's commitment to a five-year aftercare period adheres to the

Reference	Question	Applicant's Response
		recommendation set out in the British Standard. Further justification for this length of time is provided in response to written question LV 1.4. 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]. Based on the advice given in Mandatory Biodiversity Net Gain in England A Guide (CIEEM, IEMA, CIRIA, 2024) only 'on-site significant enhancements' would be subject to be maintained for at least 30 years after the development is completed. Mitigation in many cases is not possible or achievable and so under the mitigation hierarchy compensation is required. Compensation packages should be put in place as part of a package to offset landscape and visual effects of the proposed development The Applicant has addressed the need for landscape compensation in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] (see section 3.10) and the response to written question LV1.28. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) state in Regulation 14(2)(c) that an Environmental Statement must include: <i>'a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment'</i>. The important points here being that: • The Environmental Statement must include a description of measures envisaged, but not that this must result in all significant effects being mitigated or offset • The words 'if possible' are inserted before the word 'offset'. The EIA Regulations therefore do not treat offsetting (or the similar word 'compensation') in the same way as prevention or reduction. The Environmental Statement is fully compliant with the EIA Regulations; it clearly sets out measures incorporated to avoid, prevent, reduce and, if possible, offset likely significant effects. The above aligns with The National Grid (Bramford to Twinstead Reinforcement) Order 2024, where the Examining Authority and the Secretary of State were similarly satisfied that there is no requirement in policy to compensate all residual landscape and visual effects.

Reference	Question	Applicant's Response
		The Applicant is also of the view that compensation is not required for every environmental effect, unless it is expressly referred to in National Policy Statement (NPS) EN-1 (2024). It is particularly noteworthy that none of the policies on landscape and visual effects or historic environment in EN-1 or EN-5 (2024) expressly mention compensation. This is in contrast to text on biodiversity in particular and offshore wind, for example, the following paragraphs in EN-1 (2024): <i>'5.4.6 The British Energy Security Strategy committed to establishing strategic compensation for offshore renewables NSIPs, to offset environmental effects but also to reduce delays for individual projects. See paragraphs 2.8.276 – 2.8.283 of EN-3 for further information.'</i> Or, for example, under the heading of Biodiversity and Geological Conservation, NPS EN-1 (2024) states (our emphasis): <i>'5.4.35 Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development.'</i> <i>'5.4.42 As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.</i> Similarly for ancient woodland, ancient trees, veteran trees and other irreplaceable habitats: <i>'5.4.53 The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.</i> Also, compensation is required where woodland loss is unavoidable: <i>'5.11.27 Existing trees and woodlands should be retained wherever possible. In the EIP, the Government committed to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as</i>

Reference	Question	Applicant's Response
		a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured.' The above policy context for biodiversity and loss of woodland is not present in the same way for landscape and visual impacts or heritage. None of the policies above on landscape and visual or heritage effects in EN-1 or EN-5 (2024) state that residual impacts are required to be compensated if they cannot be mitigated in the way they do for biodiversity and loss of woodland. 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] details the compensation and mitigation strategies for veteran trees and ancient woodland affected. The commitments already made by the Applicant in relation to Biodiversity Net Gain (BNG), measures proposed to seek to further the purpose of the National Landscape and the 3:1 replanting ratio for individual trees are considered to provide an appropriate package of compensation and enhancement measures to be delivered by the Project.
LV 1.19	Landscape designations Several local authorities note that county, district and local level landscape designation was not government policy in the late 1990s and 2000s, and Valued Landscape Assessments have not been carried out at a district or local level to replace local landscape designation. Concern is raised that this in turn has leads to the value of local landscapes	Landscape designations and landscape value are considered as part of the Environmental Statement, in the Landscape and Visual Impact Assessment (LVIA). The findings of the LVIA are reported in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. 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], which includes the Guidelines for Landscape and Visual Impact Assessment⁷⁵ (GLVIA3) and Clarification Notes⁷⁶. The approach to making judgements on the value of landscape receptors is set out from paragraph 13.4.25 to Table A13.1.4 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. Paragraph

⁷⁵ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition*

⁷⁶ Landscape Institute (2024) *TGN-2024-01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)*

Reference	Question	Applicant's Response
	not being recognised and harm to landscape not being minimised. Respond to such concerns.	13.4.25 notes the European Landscape Convention's assertion that all landscape is of value, whether it is the subject of a defined landscape designation or not. Value judgements have been informed by the Landscape Institute's Technical Guidance Note (TGN) 02/21: Assessing Landscape Value Outside National Designations⁷⁷. This defines landscape value as '<i>the relative value or importance attached to different landscapes by society on account of their landscape qualities</i>' (page 3). The value of landscape receptors has been determined with reference to: • A review of relevant designations and the level of policy importance that they signify (such as landscapes designated at international, national or local level), and/or • Application of criteria that indicate value (such as natural heritage, cultural heritage, landscape condition, associations, distinctiveness, recreational, perceptual (scenic), perceptual (wildness and tranquillity) and functional) as described in Table 1 of TGN 02/21. Paragraph 13.4.28 notes that there is variation across both designated and undesignated areas of landscape, and so judgements regarding value are also informed by field work. Judgements have also been informed by published district and county level Landscape Character Assessments, taking into consideration Landscape Character Areas (LCAs) as noted in paragraph 13.4.29. Where LCAs do not currently exist, Landscape Character Types (LCTs) have been used. Each landscape unit (LCA or LCT) has been systematically and therefore consistently assessed against the value factors shown in Table A13.1.4, to avoid the potential for downplaying specific qualities in areas that are not designated. Value judgements for each factor have been evaluated on a sliding scale indicating a higher or lower value. The factors have been adapted from TGN 02/21, with those of relevance to the Study Area being included. These judgements have been considered together to inform a consistent overall evaluation of the relative value of the landscape unit, which has been given a rating of high, medium-high, medium, low-medium or low. The landscape value judgements are detailed in Annex A: Landscape Value Assessment

⁷⁷ Landscape Institute (2021) *Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations*

Reference	Question	Applicant's Response
		of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228], and were considered when making judgements on the assessment of landscape effects. The assessment has been reviewed in light of the comments made, and it is considered that the judgements made remain fair and reasonable and are not considered to understate the effects of the Project on landscape character.
LV 1.20	Holford rules Holford Rule No 6 states that in a county which is flat and sparsely planted, keep high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration or 'wirescape'. Is there a risk that in following such a rule the adverse landscape effects of OHLs and pylons are in fact spread out over a larger area and maximised (particularly in generally flat countryside) instead of concentrating harm along corridors?	The Holford Rules have been considered as part of the decision making for the Project. This is evidenced by 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, the Design Development Report (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), the DDR published for the 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]). In completing decision making on routeing and siting, the Applicant would note that application of the Holford Rules typically involves judging 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 Rules 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 respect of Holford Rule 6 the Applicant would make a number of observations on the application to the Project: The Applicant notes that the Project is routed through low-lying topography of typically flat to gently undulating landform, incised by numerous river valleys. There are areas where layers of hedgerows and tree cover filter views. Land use is typically a mix of arable and pasture interspersed with hedgerows, woodland and corridors of riparian vegetation associated with the many watercourses. Larger scale arable fields and more open landscapes are usually associated with the plateaux landscapes whereas a smaller scale patchwork of pastoral field patterns, hedgerows, woodland, small clusters and individual trees are often found to be associated with river valleys and in closer proximity to settlement.

Reference	Question	Applicant's Response
		• Due to the need to achieve electrical safety clearances, wires supported on wood distribution poles (of whatever type whether electrical or telecoms) are proposed to be replaced by underground cable. This reduces wirescape where crossing is unavoidable. • Where crossing of lattice pylon supported distribution circuits (or convergence at grid supply point substations) is unavoidable, the Applicant has generally extended the distance over which the existing lower voltage line is replaced by underground cable. Examples include to the south of Stowupland where two 132 kV pylon lines and one 33 kV pylon line have more than the minimum replaced. • Where lower voltage lines are broadly parallel to a preferred alignment for the 400 kV overhead line, the Applicant has adopted a number of strategies appropriate to the specific circumstances: – Replacing the lower voltage overhead line with underground cable and adopting the lower voltage overhead alignment for the 400 kV overhead line. Some examples include to the north from RG110 to the west of Mellis or south from Offton Middle Wood around RG185 through to Bramford Substation – Addressing wirescape effects by replacing lower voltage lines with underground cable. Examples include to the south of Bramford Substation – Following in a close parallel arrangement (to the extent possible). There are sections, such as south from the rail line south of Dunton Hills Garden Village to Horndon on the Hill (TB232 to TB248) where the 400 kV alignment follows alongside the route of an existing overhead lattice pylon). • Finally, whilst not directly related to Rule 6 (though it does relate to wirescape), we have considered carefully the potential to closely follow existing 400 kV overhead lines. In the case of this Project, decision making has been informed by the presence or not of barriers to routeing a second line in parallel and the extent to which some effects are made materially worse. We report in 5.15 Design Development Report [APP-122] that following either the existing 400 kV overhead line from Norwich to Bramford or that to the east of Chelmsford, the presence of blockers to route leads to the preference for alignment sufficiently distant to reduce cumulative effects.

Reference	Question	Applicant's Response
		The Applicant acknowledges that regardless of routeing there will be effects that arise as a result of the introduction of new infrastructure. As such it is clear that there is potential for effects to either be concentrated along corridors or dispersed. Whilst recognising the potential for concentration of effects, this pre-supposes that such routeing is physically possible or does not lead to wholly unacceptable effects. The Applicant has preferred an approach that has considered corridors and locations on a case-by-case basis informed by consultation feedback and engagement, location-specific constraints and also using environmental appraisal to inform the balance and define the proposals that the Applicant takes forward. Concentration on an existing corridor where there are barriers to routeing in some locations either presents an arrangement with wholly unacceptable effects or leads to an arrangement that requires multiple instances of convergence and divergence to work around the barrier. The Applicant considers these to be the poorer outcome and instead our approach seeks to take forward a project where decision making in the context of Holford Rule 6 has responded to potential wirescape concentrations in a manner that is flexible to respond to the effects. This may mean that effects are more dispersed over a larger area but acceptable in policy where the alternative is that effects are concentrated but unacceptable for some receptors.
LV 1.21	Landscape Institute Technical Guidance Note 02/21 Assessing landscape value outside national designations The use of the above guidance as part of the landscape assessment methodology is noted. Several local authorities note their concerns that this note has been used at a character area rather than looking at the details of the landscape value, which could result in downplaying of specific qualities. Respond to such concerns.	The Applicant confirms that baseline landscape information, taken into consideration with a range of other factors, has informed the routeing of the alignment. This is evidenced in the information about routeing and decision making presented in 7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356] (CPRSS) and 7.18 Errata 2022 - Corridor and Preliminary Routeing and Siting Study Appendices [REP1-068] published in 2022, the Design Development Reports (DDRs) published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), the 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]). When defining and appraising strategic options, the Applicant followed a systematic approach to routeing and siting. This has included consideration of National Grid's statutory duties, the Holford and Horlock Rules and national policy. The supplementary notes on the Holford Rules state '<u>Where possible choose routes which minimise the effect on Special Landscape Areas, areas of Great Landscape</u>

Reference	Question	Applicant's Response
	Did the use of the Guidance Note and the landscape value assessment affect the alignment of the proposed overhead line route at all, or did it come too late in the process to meaningfully impact the route? If it did affect the alignment, then please outline how it did and provide examples.	<i>Value and other similar designations of County, District or Local value.</i> Several of these local landscape designations were in existence and considered when the strategic options were developed and appraised. Many were related to river valleys. It was noted in 7.18 CPRSS [APP-356] that the north to south alignment of the required connection largely runs against the 'grain' of the landscape, with plateaux and valleys generally being on an east/west alignment. Due to the need to reinforce the transmission network between Norwich and Tilbury, the options for routeing could not avoid local landscape designations. The development of the Project, since identification of the preferred corridor, has sought to minimise landscape impacts. This has included consideration of detailed routeing and siting of pylons to minimise vegetation loss as well as minimising effects on views from the most sensitive receptors. Paragraph 5.10.12 of National Policy Statement (NPS) EN-1 (2024) states (<i>'emphasis added</i>): <u>beside nationally designated areas, there are <i>local landscapes that may be highly valued locally</i>. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, <i>these should be paid particular attention</i>. However, <i>locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development</i>.</u> Please refer to the response to question LV1.19, which sets out how landscape value outside of national designations has been judged, with reference to Technical Guidance Note (TGN) 02/21: Assessing Landscape Value Outside National Designations⁷⁸. The approach has been applied consistently across the landscape and visual Study Area to avoid the potential for downplaying specific qualities in areas that are not designated. TGN 02/21 was considered as part of the landscape assessment in the Preliminary Environmental Information Report⁷⁹ and in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and supporting appendices. Annex A: Landscape Value Assessment from PDF page 271 of 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] is

⁷⁸ Landscape Institute (2021) *Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations*

⁷⁹ National Grid (2024) *Norwich to Tilbury, Preliminary Environmental Information Report*

Reference	Question	Applicant's Response
		based on the criteria set out in TGN 02/21 and baseline landscape information gathered during the course of the Project, including published desktop studies, field work and consideration of relevant consultation feedback. The results of the Landscape Value Assessment were considered in the final assessment of landscape effects.
LV1.23	Landscape visualisations - 2 The ExA have concerns over the following landscape visualisations within [APP-343] to [APP-349]. Please provide a response addressing such concerns or submit additional visualisations: 1.14 PRoW south of Bressingham Road. View to north east of limited use. Would a viewpoint from further south along the footpath be more useful? 2.09 PRoW Dandy Corner. Only wireframe provided when seems to indicate that the pylons would be clearly visible. 2.23 Road south of Elm Pollard, west of Wickham Skeith. Viewpoint from underneath pylons of very limited use to show effect landscape. 2.40 A1120, Forward Green. Only wireframe provided when seems to indicate that the pylons may be visible. 3.21 Barn Lane, Little Bromley. Query over whether the best	The Applicant has carefully considered the points raised by the Examining Authority and provides responses below. The Applicant provides further justification for the location of Viewpoints 1.14, 6.20, 7.01 and 7.02 as set out below: - Viewpoint 1.14 PRoW south of Bressingham Road (Roydon South Norfolk FP10) – the viewpoint represents views from the edge of Bressingham as well as users of the Public Right of Way (PRoW). Although the Applicant agrees that there is the potential for greater visibility of the Project further south along the PRoW, this would be less representative of views from the settlement. The Applicant notes that the location of viewpoints was agreed with Norfolk County Council as set out in 5.9.1 Draft Statement of Common Ground - Norfolk County Council [REP1-010]. No change to the viewpoint location is therefore proposed. - Viewpoint 6.20 PRoW, Chignall St James (Chignall 30) – Chelmsford City Council requested a viewpoint adjacent to the Former Church of St James. The viewpoint represents people using the local PRoW network and living and moving around Chignall St James. The baseline photography was taken from the PRoW looking through a gap in the hedge. Although the Applicant agrees that there is the potential for greater visibility of the Project further east along the PRoW, this would be less representative of views from the settlement and Church of St James. No change to the viewpoint location is therefore proposed. - Viewpoint 7.01 Ingatestone Road, Buttsbury – the viewpoint location was chosen to represent recreational receptors on the PRoW network, people visiting the Church of St Mary and road users on Ingatestone Road, with close views towards the Project. Although it is acknowledged that there are elements in the foreground of the view which screen and filter parts of the Project, the location was chosen to illustrate views in multiple directions (north-east and south-east). No change to the viewpoint location is therefore proposed.

Reference	Question	Applicant's Response
	available viewpoint. Large hedge/trees and image quite dark. • 4.08 Fordham. Only wireframe provided when seems to indicate that the pylons would be clearly visible. • 4.17 Lodge Lane, Colchester. Only wireframe provided when seems to indicate that the pylons would be clearly visible. • 4.23 Great Tey Road. Only baseline photographs provided, no visualisations. • 5.03 Rivenhall Place, Silver End. Only baseline photographs provided, no visualisations. • 5.10 PRoW near Coggeshall Hall. Only baseline photographs provided, no visualisations, appears to be very close to pylons. • 5.15 Essex Way near Troy's Hall. Only baseline photographs provided, no visualisations. • 6.07 A414 south of Writtle. Only wireframe provided when seems to indicate that the pylons may be visible. • 6.09 The Causeway, Edney Common. Viewpoint does not	• Viewpoint 7.02 Old Church Lane, Mountnessing Hall – the viewpoint location was chosen to represent views from the PRoW network, visitors to the Church of St Giles and people living at Mountnessing Hall. There are slightly elevated and open views towards the Project from this location. Relocating the viewpoint behind the hall and church would result in parts of the Project being screened in the visualisation. No change to the viewpoint location is therefore proposed. The Applicant confirms that the following amendments were made to the visualisations in 7.12 Visualisations [APP-343 to APP-351] and are submitted into the Examination at Deadline 3: • A photomontage will be provided from Viewpoint 2.09 PRoW Dandy Corner (Cotton 18). • A photomontage will be provided from Viewpoint 2.40 A1120, Forward Green. • A photomontage will be provided from Viewpoint 4.08 Fordham. • A photomontage will be provided from Viewpoint 4.17 Lodge Lane, Colchester. • A photomontage will be provided from Viewpoint 4.23 Great Tey Road. • A photomontage will be provided from Viewpoint 5.03 Rivenhall Place, Silver End. • A photomontage will be provided from Viewpoint 5.10 PRoW near Coggeshall Hall. • A photomontage will be provided from Viewpoint 5.15 Essex Way south-east of White Notley. • A photomontage will be provided from Viewpoint 6.07 A414 south of Writtle. • A wireline will be provided from Viewpoint 6.09 The Causeway, Edney Common, in addition to the existing photomontage. Consideration was given to relocating the viewpoint further north along The Causeway as suggested. However, at the point where open views to both sides of the road would become available the viewpoint would be located either underneath the Project or on its northern side, and would therefore not be representative of views from Edney Common. Although it is acknowledged that hedgerows screen some views, this is seen as a representation of general views from this area.

Reference	Question	Applicant's Response
	appear very chosen, with large hedge at close quarters. 6.10 St Peter's Way, east of Milgreen Common. Only wireframe provided when seems to indicate that the pylons may be visible. 6.20 PRow, Chignal St James. View to south west has hedge/bush at very close quarters. 7.01 Ingatestone Road, Buttsbury. Location of viewpoint from church parking area not the best siting. 7.02 Old Church Lane, Mountnessing Hall. Would a viewpoint from a PRow behind the Hall & Church provide a more useful view encompassing heritage assets? 7.12 Ingatestone Road near White Tyrells. Only wireframe provided when seems to indicate that the pylons would be very clearly visible.	- A photomontage will be provided from Viewpoint 6.10 St Peter's Way, east of Millgreen Common. - A photomontage will be provided from Viewpoint 7.12 Ingatestone Road near White Tyrells. The Applicant confirms that the following amendments will be made to the visualisations in 7.12 Visualisations [APP-343 to APP-351] and submitted into the Examination at a subsequent deadline: - The baseline photography for Viewpoint 2.23 Road south of Elm Pollard, west of Wickham Skeith will be re-taken and an updated photomontage will be provided. - The baseline photography for Viewpoint 3.21 Barn Lane, Little Bromley will be re-taken and an updated photomontage will be provided.
LV 1.24	Local impact reports – comments on visualisations and visual assessments Several of the local authorities' in their LIRs have commented on the visualisations and visual assessments. The ExA expect the applicant to respond to these points in full but have noted the following	A full response to the Local Impact Reports is provided in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. Where the Examining Authority's comment is addressed within REP2-030, an ID cross reference is provided below. Further clarification is provided where necessary. <u>Brentwood BC [REP1-150]:</u> Comment: Brentwood BC considers that adverse impacts relevant to the open and rural nature of the borough will extend up to 1.5 km, particularly in relation to Visual Receptor Area (VRA) G1 Ingatestone & Fryerning (significant adverse effects on

Reference	Question	Applicant's Response
	specific queries. Respond to such concerns or show where a detailed response has been made. Brentwood BC [REP1-150]: - Brentwood BC considers that adverse impacts relevant to the open and rural nature of the borough will extend up to 1.5km, particularly in relation to Visual Receptor Area (VRA) G1 Ingatestone & Fryerning (significant adverse effects on PRow and heritage settings) and VRA G4 Ingrave & Herongate (major adverse effects on Thorndon Country Park and DHGV). - Viewpoint (VP) 7.07 - wireline does not convey actual impacts, use photomontages - VP 7.06 - location poorly chosen Chelmsford CC [REP1-153]: - Chelmsford CC considers there are still considerable gaps in the provision including: VRA F9 Edney Common: (Longer distance views) and VRA F6 Chelmsford Northwest (Longer distance views) The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on	PRow and heritage settings) and VRA G4 Ingrave & Herongate (major adverse effects on Thorndon Country Park and DHGV). Response: See Section 4.11, ID 6.59 [REP2-030]. Comment: Viewpoint (VP) 7.07 - wireline does not convey actual impacts, use photomontages Response: See Section 4.11, ID 6.60 [REP2-030]. A photomontage will be provided from Viewpoint 7.07 PRow east of Ingrave (Herongate and Ingrave 49) at Deadline 3. Comment: VP 7.06 - location poorly chosen Response: See Section 4.11, ID 6.60 [REP2-030]. During consultation on viewpoints the Applicant and Essex County Council agreed to move the formerly proposed location of Viewpoint 7.06 to the east to its current location (Octagon Plantation, Thorndon Country Park) where there is a car park with a promoted viewpoint. The majority of the Country Park is outside the 3 km Landscape and Visual Impact Assessment Study Area and the viewpoint is located from its eastern side, which is closest to the Project. The Applicant notes that there would be limited views out from the north and centre of Thorndon Country Park due to the wooded nature of the landscape. It is therefore considered that Viewpoint 7.06 represents a reasonable worst-case view from Thorndon Country Park. Chelmsford CC [REP1-153]: Comment: Chelmsford CC considers there are still considerable gaps in the provision including: VRA F9 Edney Common: (Longer distance views) and VRA F6 Chelmsford Northwest (Longer distance views) The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRow network in particular. Response: See Section 4.11, ID 8.418 – 8.425 and ID 4.10.23 [REP2-030] (in response to Essex County Council). Comment: In VRA D2 Little Horkesley and Wormingford. Chelmsford CC suggests that effects on visual receptors may be significant adverse between 1-2km of the Project and additional viewpoint assessments and visualisations are needed to demonstrate this. Response: See Section 4.11, ID 12.209 [REP2-030] (in response to Colchester City Council).

Reference	Question	Applicant's Response
	the PRoW network in particular. In VRA D2 Little Horkesley and Wormingford. Chelmsford CC suggests that effects on visual receptors may be significant adverse between 1-2km of the Project and additional viewpoint assessments and visualisations are needed to demonstrate this. In terms of the visualisations, it notes: - VP 7.10 location behind a hedgerow, better views could have been chosen. - VP 7.12 wireline does not convey actual impacts, use photomontage Colchester CC [REP1-156]. Colchester CC considers there are still considerable gaps in the provision of visualisations including in VRA C12 Ardleigh); VRA D3 Great Horkesley and Horkesley Heath); VRA D10 Copford and VRA E3 Kelvedon. The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRoW network. In terms of the visualisations, it notes: - VP 4.08 wireline does not convey actual impacts, use photomontages	In terms of the visualisations, it notes: Comment: VP 7.10 location behind a hedgerow, better views could have been chosen. Response: See Section 4.11, ID 8.437 – 8.438 [REP2-030]. Comment: VP 7.12 wireline does not convey actual impacts, use photomontage Response: See Section 4.11, ID 8.437 – 8.438 [REP2-030]. A photomontage will be provided from Viewpoint 7.12 Ingatestone Road near White Tyrells at Deadline 3. Colchester CC [REP1-156]: Comment: Colchester CC considers there are still considerable gaps in the provision of visualisations including in VRA C12 Ardleigh; VRA D3 Great Horkesley and Horkesley Heath; VRA D10 Copford and VRA E3 Kelvedon. The shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects on the PRoW network. Response: See Section 4.11, ID 12.1.86 and 4.10.23 [REP2-030] (in response to Essex County Council). In terms of the visualisations, it notes: Comment: VP 4.08 wireline does not convey actual impacts, use photomontages Response: See Section 4.11, ID 12.87 and 12.109 [REP2-030]. A photomontage will be provided from Viewpoint 4.08 Fordham at Deadline 3. Comment: VP 4.17 wireline does not convey actual impacts, use photomontages Response: See Section 4.11, ID 12.213 [REP2-030]. A photomontage will be provided from Viewpoint 4.17 Lodge Lane, Colchester at Deadline 3. Comment: VP 4.22 needs at least to have a wireframe Response: See Section 4.11, ID 12.94, 12.181 and 12.243 [REP2-030]. A wireline will be provided from Viewpoint 4.22 PRoW between Great Tey and Little Tey at Deadline 3. Comment: VP 4.28 needs at least to have a wireframe Response: See Section 4.11, ID 12.230 [REP2-030]. A wireline will be provided from Viewpoint 4.28 Essex Way near Poole's Farm at Deadline 3. Tendring DC [REP1-182]:

Reference	Question	Applicant's Response
	- VP 4.17 wireline does not convey actual impacts, use photomontages - VP 4.22 needs at least to have a wireframe - VP 4.28 needs at least to have a wireframe - Tendring DC [REP1-182]: - Tendring DC states that the setting of the National Landscape extends well beyond the statutory boundary. In particular, the northern plateau edge above the River Stour is integral to the perception of a wide, rural, tranquil panorama and maintains Constable-country associations. The proposed concentration of pylons and supporting infrastructure in this location would introduce strong vertical and repetitive engineered lines, erode the visual quietness and aesthetic simplicity essential to the NL's special qualities, and generate permanent discordant elements in cross-valley views. Joint LIR for Suffolk CC, Babergh DC, Mid Suffolk DC [REP1-178]: - The Councils consider that there is potential for significant visual effects beyond the 3km study	Comment: Tendring DC states that the setting of the National Landscape extends well beyond the statutory boundary. In particular, the northern plateau edge above the River Stour is integral to the perception of a wide, rural, tranquil panorama and maintains Constable-country associations. The proposed concentration of pylons and supporting infrastructure in this location would introduce strong vertical and repetitive engineered lines, erode the visual quietness and aesthetic simplicity essential to the NL's special qualities, and generate permanent discordant elements in cross-valley views. Response: See Section 4.11, ID 20.5 and 20.6 [REP2-030]. Joint LIR for Suffolk CC, Babergh DC, Mid Suffolk DC [REP1-178]: Comment: The Councils consider that there is potential for significant visual effects beyond the 3km study area, for example where there are particularly sensitive visual receptors and where topography allows more far-reaching views, and that there may also be additional viewpoints closer to the scheme that should have been assessed to demonstrate the effects are minor. Response: See Section 4.11, ID 4.10.25, 4.10.26 and 4.10.27 [REP2-030] (in response to Essex County Council). The Applicant notes the following viewpoints are located beyond 3 km from the nearest above ground structure within Suffolk (approximate distance provided in brackets): Viewpoint 3.20 (4.2 km), Viewpoint 3.24 (4.2 km), Viewpoint 3.26 (3.7 km) and Viewpoint 3.27 (4.8 km). No significant effects were identified at these viewpoints as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment Part 2 of 4 [APP-230]. Comment: Such gaps in the provision occur in VRA B1 Wortham, VRA B3 Mellis, VRA B4 Finningham and Gislingham, VRA B6 Stowupland, VRA B11 Barking and Willisham and VRA C4 Chattisham. The Council's note that the shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects, particularly on the PRoW network. Response: See Section 4.11, ID Annex C, 1.14 [REP2-030]. Comment: The Councils also note that for visual receptors in particularly sensitive locations and/or in close proximity to the route, the potential changes within the proposed LoD could result in significant changes in visual effects and that these

Reference	Question	Applicant's Response
	area, for example where there are particularly sensitive visual receptors and where topography allows more far-reaching views, and that there may also be additional viewpoints closer to the scheme that should have been assessed to demonstrate the effects are minor. - Such gaps in the provision occur in VRA B1 Wortham, VRA B3 Mellis, VRA B4 Finningham and Gislingham, VRA B6 Stowupland, VRA B11 Barking and Willisham and VRA C4 Chattisham. The Council's note that the shortfall is particularly noticeable from beyond 1.5 Kms and is in danger of undervaluing the significance of the effects, particularly on the PRoW network. - The Councils also note that for visual receptors in particularly sensitive locations and/or in close proximity to the route, the potential changes within the proposed LoD could result in significant changes in visual effects and that these potential changes in effects should have been discussed or at least highlighted within the assessment. Essex CC [REP1-161] (appendix I):	potential changes in effects should have been discussed or at least highlighted within the assessment. Response: See Section 4.11, ID 13.16 [REP2-030]. Essex CC [REP1-161] (appendix I): Comment: Respond to the overall comment that the sensitivity of receptors and significant effects have been downplayed. Respond to the many queries regarding both landscape and visual effects in this appendix, using the paragraph numbers as references. Response: Appendix I of the Essex Local Impact Report [REP1-161] contains a summary of effects on landscape and visual receptors within the following local authority areas: Tendring District Council, Colchester City Council, Braintree District Council, Chelmsford City Council, Brentwood Borough Council and Basildon Borough Council. The relevant response to each query on landscape and visual effects is summarised in the table in Appendix F with reference to the paragraph numbers in [REP1-161]. Where the Examining Authority's comment is addressed within [REP2-030], an ID cross reference is provided. Further clarification is provided where necessary.

Reference	Question	Applicant's Response
	Respond to the overall comment that the sensitivity of receptors and significant effects have been downplayed. Respond to the many queries regarding both landscape and visual effects in this appendix, using the paragraph numbers as references.	
LV 1.25	Babergh DC, Mid Suffolk DC and Suffolk CC's local impact report - 1 Respond to the following suggestions raised by the Council's joint LIR [REP1-178]: - An opportunity arises for biodiversity net and historic landscape gains west of Wickham Skeith - Pylons of a lesser height should be considered in the Mellis area, and photomontages produced - The overhead alignment should be moved to the west of Creeting Hall between RG161 and 167 - Undergrounding of existing 132kV lines should take place to the south side of Gipping River.	In respect of the four separate locations / suggestions, the Applicant would note that these have been responded to previously both within meetings and within Consultation and Design Development Reports (DDR): An opportunity arises for biodiversity net and historic landscape gains west of Wickham Skeith Response: The Applicant's assumption is that this refers to a narrow belt of mature trees that are oversailed and of which a number will need to be removed (noting the Applicant's commitment to a 3:1 replacement planting for individual trees and small groups of individual trees within 7.4 Outline Landscape and Ecological Management Plan [AS-046]). Firstly, alternative alignments have been considered here but are less preferred as set out in Section 5.3 of 5.15 Design Development Report [APP-122]. In relation to Biodiversity Net Gain (BNG), the Project proposes to provide BNG at a landscape scale. The Project's proposed on-site BNG will be delivered through replacement planting within the Order Limits and through landscape proposals within proposed Environmental Areas. The Applicant will own the land upon which the proposed Environmental Areas are created and therefore will be responsible for maintaining the on-site habitats for up to 30 years. On-site BNG provision has primarily been proposed in areas where the Applicant will have an ongoing environmental maintenance programme. It is intended that off-site BNG will provide strategic and consolidated legacy sites within Norfolk, Suffolk and Essex to maximise benefits for nature. Given the scale of the Project, and because most of the land within the Order Limits will be returned to its original use, predominantly agriculture, the majority of the Project's BNG is not deliverable on-site (within the Order Limits). Therefore, off-site BNG will be sought through large-scale registered

Reference	Question	Applicant's Response
		habitat banks delivered by a registered body which will ensure that the overall BNG commitment with wider environmental and societal benefits can be achieved. For the Project to be able to consider specific off-site BNG sites they would need to be a registered habitat bank or soon to be registered. The historic landscape assessment concluded not significant effects in this area, so while retention of mature trees would be desirable there is no policy basis for the Applicant to implement a change due to effects on the historic landscape. Pylons of a lesser height should be considered in the Mellis area, and photomontages produced Response: Progression up the mitigation hierarchy (to consider a different pylon type) is determined by whether effects of the standard lattice pylon are or are not acceptable. The policy basis for this approach is further explained below. Around Mellis the Applicant's assessment is that effects are not unacceptable. This is partly due to the magnitude of effect being reduced by following the alignment of an existing 132 kV lattice line that is replaced by underground cable. The Applicant also notes that there are different effects and reasons why, even if considered, a lesser height pylon may be less preferred. For example, in the case of a low height lattice pylon, additional tree removal would be necessary (less consistent with Holford Rule 2) where the alignment of the 132 kV line is followed. There are technical limitations on the angle of direction change for low height lattice pylons and T-pylons. Both alternatives require additional angle pylons which would be less consistent with Holford Rule 3. There are increased visual effects due to the squat nature of low height lattice pylons and solid nature of T-pylons to a number of nearby residential properties and additional restrictions for a proposed solar farm development. Please also see responses to ExQ1 DES 1.10 and DES 1.11 which discuss consideration of T-pylons. In summary, there is no policy basis to change from standard lattice pylons and, even if there were, there are clear counter factors. On this basis there is no requirement to change pylon type. We do not consider there is a need to illustrate this with the requested photomontage. Decision making on pylon types is in response to our duties under the National Policy Statement (NPS) EN-1 and EN-5 (2024) policy framework, including the further critical national priority presumption in Section 4.2 of EN-1. The NPS position is also consistent with the Infrastructure Planning (Environmental Impact

Reference	Question	Applicant's Response
		Assessment) Regulations 2017. It also draws on duties under the Electricity Act 1989 to be economical and efficient which is under the oversight of Ofgem who confirm the acceptability of the Project funding. To support this decision making in a consistent manner, we adopt an evidence-based approach informed by the Environmental Impact Assessments from technical topic experts. In particular there is an emphasis from assessments being undertaken by specialists in Landscape & Views and Historic Environment. We consider the assessment findings in the context of the application of the mitigation hierarchy. The basis for progressing up the mitigation hierarchy depends on whether the effects are unacceptable in planning terms. The residual effects that remain following the application of the mitigation hierarchy which therefore fall to the planning balance in accordance with paragraphs 5.10.5, 5.10.13, 5.10.14 and 5.10.35 of NPS EN-1 (2024) confirm that residual landscape and visual effects are likely for all energy infrastructure, and it is not expected that the mitigation hierarchy will remove all residual effects. NPS EN-5 (2024) paragraph 2.9.11 is also explicit that mitigation is not expected to result in the removal of landscape and visual effects for overhead lines <i>'and the impossibility of full mitigation in these cases does not countermand the need for overhead lines'</i>. The overhead alignment should be moved to the west of Creeting Hall between RG161 and 167 Response: This requested change has been raised by the councils at previous stages and considered carefully. A detailed explanation for why change is less preferred has been provided in paragraph 5.4.5 of 5.15 Design Development Report [APP-122]. In brief whilst noting the opinion of the requester and acknowledging the positioning to the same side as other infrastructure, the change is not considered preferred. Most notably this is because it would increase heritage effects passing within 100 m of the Grade I listed Church of St Peter and increase effects on other Grade II* and II designated heritage assets. Undergrounding of existing 132kV lines should take place to the south side of Gipping River Response: Two 132 kV and a 33 kV lattice pylon line are crossed to the south of the River Gipping. The Applicant has already extended the length of undergrounding beyond the minimum required for necessary safety clearances.

Reference	Question	Applicant's Response
		Any further undergrounding is considered in the context of policies referred to above in the context of the mitigation hierarchy. We acknowledge that such undergrounding may reduce effects but do not consider it necessary as effects are not unacceptable. This was at least partly considered previously as per paragraph 5.4.3 of 5.15 Design Development Report [APP-122] but was not considered a necessary change.
LV 1.28	Coordinated masterplans In their LIR, Babergh DC, Mid Suffolk DC and Suffolk CC [REP1-178] request that coordinated masterplans be produced covering landscape, ecology, archaeology and rights of way in highly affected areas – suggesting that plans are produced for Bramford, Burstall and the Gipping and Waveney Valleys. The ExA consider there is merit in this request and ask that coordinated masterplans are produced for the following areas, and that built heritage is also included in the plans: • Gipping Valley • Waveney Valley (including Snow Street, Roydon, Roydon Fen and Wortham Ling) • Burstall & Bramford • Ardleigh & Little Bromley	This question raises the potential for coordinated cross-cutting masterplans covering landscape, ecology, archaeology, heritage and rights of way. There is an issue of principle to be addressed which goes to the nature, extent, scope and legality of the masterplans as sought by the relevant Local Authorities. The ExA might not be aware that the same Local Authorities raised the same in principle point at the Bramford to Twinstead Reinforcement (BTNO) Examination where it was rejected by the ExA and Secretary of State. The Local Authorities are clear that they take the view that any residual adverse impact that will not be mitigated must be compensated or offset in full by an applicant. For completeness, the premise for the request for full compensatory provision by Babergh DC, Mid Suffolk DC and Suffolk CC in paragraph 13.224 of the Joint Local Impact Report [REP1-178] is quoted below: <i>‘The Councils consider that residual adverse impacts, that cannot be mitigated, will need to be compensated, by means of wider landscape restoration and a coordinated Landscape, Ecology, Archaeology, and Rights of Way Masterplan, in particular, but not exclusively, in areas which are disproportionately affected by energy infrastructure, such as Bramford, Burstall, and the Gipping Valley, and in sensitive areas, such as the Waveney Valley.’</i> This strategic compensation masterplan approach is the same as that advanced by Babergh DC, Mid Suffolk DC and Suffolk CC and rejected by the ExA in the Bramford to Twinstead Examination (see paragraph 3.9.141 of the Bramford to Twinstead ExA Report⁸⁰ for full report of issues by ExA).

⁸⁰ 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>

Reference	Question	Applicant's Response
	- Colne Valley (including Fordham, Ford Street, Aldham) - Great & Little Waltham - Ingatestone & Butbury - Hutton/ Mountnessing/ Havering's Grove	It is important before any work on masterplans or other documents takes place that there is a correct understanding of what can and cannot be required of an individual applicant in the context of the Planning Act 2008 and relevant policy. 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 National Policy Statement (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 (2024) indicates that residual impacts for critical national priority (CNP) infrastructure (even significant residual impacts 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 (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): <i>'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.'</i> 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.

Reference	Question	Applicant's Response
		4. NPS EN-1 paragraph 4.1.7 provides that for CNP infrastructure <i>'it is likely that the need case will outweigh the residual effects not capable of being addressed by the application of the mitigation hierarchy'</i>. 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 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

Reference	Question	Applicant's Response
		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 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 in BTNO. 10. In the present case, in any event, the Local Authorities do not produce or even sketch out the extent of suggested strategic masterplan works in broad outline to be considered. 11. Such a requirement would also be inconsistent with the strategic mitigation principles being developed by and under NPS EN-3 by government and set out above. The suggestion that there be a coordination between Nationally Significant Infrastructure Projects in the production of formal masterplans is an interesting one and the ExA will know that the interaction between projects is taking place and is reported in 8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP1-134]. 12. The Applicant does not consider that the preparation of a coordinated binding compensation masterplan between schemes is workable in the present circumstances. This is due to the following factors: – The Applicant does not have control over third-party land or schemes, nor certainty as to their delivery, timing, or detailed design. – Many neighbouring proposals remain at varying stages of development and are subject to change. – There is no policy or legislative requirement to produce a unified masterplan across multiple independently promoted schemes.

Reference	Question	Applicant's Response
		– The Environmental Statement provides a robust and proportionate mechanism for assessing and presenting cumulative landscape and visual effects. – The government is working up a specific strategic compensation approach as signposted in NPS EN-3 (see above) because of the difficulties involved in a single applicant engaging in such an enterprise and the delays that might arise. 13. In these circumstances, the underlying premise supporting the nature and extent of coordinated cross-scheme/cross-cutting masterplans is not accepted. The content of the masterplans potentially to be produced are the subject of a significant disconnect between the Local Authorities and the Applicant as to what can and cannot be required of the Applicant by way of compensation requirements. The Applicant is clear that the approach adopted by the ExA for the Bramford to Twinstead Reinforcement is correct in principle. <u>Continuing Engagement by the Applicant with the Relevant Authorities</u> The Project proposes a range of mitigation, compensation, enhancement and Biodiversity Net Gain (BNG) measures as set out in the application documents and other submissions to the ExA. These can and will be set out by area as identified in the question and agreed with the relevant authorities if possible. Further, the Applicant is continuing to engage with the relevant Local Authorities and stakeholders, as to how these measures can be most effectively implemented and coordinated, including in relation to certain targeted locations as in the BTNO case (see paragraph 3.9.194). The Applicant will provide further updates to the ExA as these discussions progress. The Applicant's position on providing coordinated cross-cutting cross-scheme compensation masterplans for the areas identified is very clear. The underlying premise upon which such a masterplan is envisaged by the Local Authorities to be based, namely the full compensation for all harmful impact, is simply not accepted to form part of the legal or policy tests of acceptability. Whilst we have set out our reasons why such coordinating masterplans of the type envisaged by the Local Authorities here and in BTNO are not necessary or required, the Applicant is and will continue to engage constructively in further discussions with relevant authorities to understand more specifically what is being requested and how

Reference	Question	Applicant's Response
		best to utilise the proposed BNG and 3:1 tree planting and other commitments in targeted locations and will report back on progress by Deadline 4.
LV 1.29	Waveney Valley Provide further justification for the route and method chosen for traversing the Waveney Valley south of Roydon. Include in your justification consideration of other pylon methods where relevant and applicable, such as shorter pylons or T-pylons, and the potential impact of such methods in terms of landscape impacts. The contents of ES Chapter 3 [APP-127] are noted by the ExA regarding other reasons for choice of OHL over undergrounding in this location.	All alternative routes necessitate a crossing of the Waveney Valley and have been considered to both the east and west of the proposed alignment. Corridors and routes diverging further west interact with Special Protection Areas and Special Areas of Conservation and would have been longer so were not progressed. The routes considered and reasons for the selection of that taken forwards are set out in detail in Section 4.6 of 5.15 Design Development Report [APP-122]. In summary, other corridors/routes to the east (either closely paralleling the existing overhead line or passing further to the east) encounter barriers to development such that the Applicant's position is that they are not viable. Other corridors/routes further west present a different balance of effects to that of the proposed connection, and whilst community effects may be reduced this does not offset increased effects on ecological resources including peaty soils. The preferred corridor and route has been refined through field survey, data acquisition and informed by feedback with a series of adjustments to the east for the valley crossing and alignment to the south. The use of alternative pylon types or underground cable comes through application of the mitigation hierarchy and is sequentially applied if the effects arising from the standard lattice design are considered to be unacceptable in planning terms. It is the Applicant's position that the appropriate decision making basis is not that there is a reduction in effects through the use of T-pylon compared with lattice pylons, but that, in line with the mitigation hierarchy, the lattice pylon effects must be unacceptable in policy terms before T-pylons are considered. The area is not subject to national landscape designation so the presumption in National Policy Statement (NPS) EN-5 (2024) for the use of overhead line is not reversed. The Applicant also notes that the test against paragraph 2.9.23 of NPS EN-5 (2024) is 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. In terms of landscape and visual effects, these are set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], with reasoning provided for the judgements of the levels of effect identified.

Reference	Question	Applicant's Response
		The Waveney Valley is underlain by three Landscape Character Types (LCTs) / Landscape Character Areas (LCAs). The following landscape effects are identified during construction and operation, as set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]: • Waveney Rural River Valley LCA (high sensitivity) - effects are identified as major and significant (adverse) within 0.5 km, moderate and significant (adverse) between 0.5 km and 1.5 km, and minor and not significant (adverse) elsewhere in the LCA (paragraphs 13.3.155 to 13.3.170). • Wooded Valley Meadowlands and Fens LCT (high sensitivity) - effects are identified as moderate and significant (adverse) within 0.5 km, minor and not significant (adverse) between 0.5 km and 1.5 km, and negligible and not significant elsewhere in the LCT (paragraphs 13.3.198 to 13.3.212). • Rolling Valley Farmlands and Furze LCT (medium sensitivity) - effects are identified as moderate-major and significant (adverse) within 0.5 km during construction, reducing to moderate and significant (adverse) during operation. Between 0.5 km and 1 km effects are identified as moderate and significant (adverse). Elsewhere in the LCT effects are identified as minor and not significant (adverse) (paragraphs 13.3.183 to 13.3.197). The level of landscape effects reported in the assessment indicate that significant adverse effects are largely contained within approximately 0.5 km of the Project, generally reducing to not significant between approximately 0.5 km and 1.5 km, depending on local variations in landscape character. The following visual effects on Visual Receptor Areas (VRAs) are identified during construction and operation, as set out in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]: • VRA A11 Fen Street - major and significant (adverse) within approximately 0.5 km, reducing to moderate and significant (adverse) between approximately 0.5 km and 1.5 km (from page 46). • VRA A12 Roydon and Diss - major and significant (adverse) within approximately 0.5 km, reducing to minor and not significant (adverse) between approximately 0.5 km and 1.5 km (from page 49).

Reference	Question	Applicant's Response
		• VRA B1 Wortham - major and significant (adverse) within approximately 0.5 km, reducing to moderate and significant (adverse) between approximately 0.5 km and 1.5 km (from page 52). • VRA B2 Palgrave - major and significant (adverse) within approximately 0.5 km, reducing to moderate and significant (adverse) between approximately 0.5 km and 1.5 km (from page 56). These assessments are supported by representative viewpoints where the following effects are identified in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]: • Viewpoint 1.19 Bressingham Steam Museum – approximately 0.6 km from the Project, minor and not significant (adverse) visual effects during construction and operation (from PDF page 479). • Viewpoint 1.21 PRoW near Roydon Fen – approximately 0.6 km from the Project, moderate and significant (adverse) visual effects during construction and operation (from PDF page 484). • Viewpoint 2.01 Ling Road, Wortham Ling – approximately 0.4 km from the Project, moderate-major and significant (adverse) visual effects during construction and operation (from PDF page 490) • Viewpoint 2.03 PRoW Palgrave – approximately 0.8 km from the Project, moderate and significant adverse visual effects during construction and operation (from PDF page 494) The level of visual effects reported in the assessment indicates that significant adverse effects are largely contained within approximately 0.5 km of the Project, noting that effects would not be significant from everywhere between approximately 0.5 km and 1.5 km. The level of effect would vary due to local variations in visual screening from factors such as landform, topography and intervening vegetation. The Applicant's position is that widespread landscape and visual consequences of the change are not reported at the Waveney Valley and thus paragraph 2.9.23 of NPS EN-5 is not engaged. Even if effects were at a level to engage consideration of the use of underground cable, the Applicant's position is that the combination of ground conditions, soils and ecology (including implications for the WaLOR Landscape Recovery Project – a

Reference	Question	Applicant's Response
		project looking to renaturalise and restore wetland environments of the Waveney and Little Ouse rivers) create limitations and disadvantages to different methods of cable installation to make them far less preferred, and potentially incompatible with WaLOR objectives. The potential use of a tunnel broadly between the CSEs proposed for the WVA (at an additional estimated cost of over £100m more than underground cable installed by more conventional open cut trenching means) may overcome the disadvantages of other cable installation techniques but at a cost that the Applicant considers is not justified noting the policy (NPS EN-5 in paragraph 2.9.23 and following paragraphs) and mitigation hierarchy points raised above in the context of the Applicants regulatory duties on being economic and efficient. Likewise heritage effects arising from a standard lattice overhead line design solution are not unacceptable. The Applicant's assessment concluded less than substantial harm to the grade I listed Church of St Remigius on the northern edge of the valley, and while there is disagreement between the Applicant and Historic England on the level of less than substantial harm, Historic England do not disagree with the conclusion of less than substantial harm (for more detail on this please refer to the Applicant's Deadline 2 response to the Historic England's Written Representation, in 8.8.1 Applicant's Comments on Written Representations [REP2-029]). As less than substantial harm is concluded, this does not engage the provisions of NPS EN-1 (2024) paragraph 5.9.31. On this basis there is no reason to consider progressing up the mitigation hierarchy to consider other pylon types or other installation techniques and the Applicant's position is that the route and use of Overhead Line on Lattice Pylons is consistent with NPS EN-1 and EN-5. Nonetheless the potential to utilise low height pylons for the crossing of the Waveney Valley was considered in paragraph 4.6.11 of 5.15 Design Development Report [APP-122]. This previous consideration noted that changes of direction were expected to restrict low height lattice use to RG87 (now renumbered as RG86) and one or two pylons to the south, and also that whilst reducing height and visibility somewhat their use would not remove the limited visibility of the tops of pylons. It also noted that the different appearance from the more squat form along with the transitional wirescape from the different crossarm configurations may increase visual effects for users of recreational routes and may also increase the tree removal needed due to the wider span. On balance, low height lattice pylons were not

Reference	Question	Applicant's Response
		preferred. T-pylons are further up the mitigation hierarchy and in this case bring additional disadvantages due to the need to maintain mobile work platform access in an area of floodplain and high water table and are similarly less preferred.
LV 1.30	Outline landscape and ecology management plan Respond to the following queries regarding the outline LEMP [AS-046]: a) Provide clarification on tree and vegetation protection during pre-commencement works. b) Will the mitigation hierarchy for veteran trees be agreed with relevant local authorities? c) Provide further detail regarding minimised working widths for the protection of hedgerows. d) Where works are temporary will traffic management be utilised instead of tree/vegetation removal? (for example in instances of low visibility for haul road junctions). If so, how would this be controlled and secured? e) Provide further detail and definition of any potential nighttime working and attendant lighting measures.	In response to a), from an arboricultural perspective pre-commencement and enabling works are considered as 'construction elements' and addressed in Section 7 of 7.4 Outline Landscape and Ecological Management Plan [Revision D]. For example, the proposed locations for ground investigation works have been reviewed to assess any encroachment of root protection areas. Requirement 4(3) of 3.1 Draft DCO [Revision C] states that all pre-commencement works must be carried out in accordance with the outline management plans including the Outline Landscape and Ecological Management Plan. In response to b), yes, the mitigation hierarchy for veteran trees is contained within Table 7.1 of 7.4 Outline Landscape and Ecological Management Plan [Revision D]. 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] also contains the mitigation hierarchy in Table 5.1, this strategy will be updated and submitted as part of the final LEMP. The final LEMP will be agreed with relevant planning authorities. In response to c), Section 8.3 of 7.4 Outline Landscape and Ecological Management Plan [Revision D] provides detail regarding the minimum impact to hedgerows. These are reported as 2 m in width to facilitate the stringing of 400 kV conductors and 70 m for the underground cabling of the 400 kV. Where the 132 kV is proposed for undergrounding, the working swathe is reported as 15 m for hedgerows. Commitments in 7.2 Outline Code of Construction Practice [Revision C] seek to reduce loss of hedgerows; these commitments are listed as GG14, B08, B14, H06 and LV04. In response to d), the Applicant has developed proposals for each junction between the proposed haul road and public highway (referred to as site access points and site crossover points) on a case-by-case basis, considering the existing geometry, highway use, traffic survey data, environmental constraints, and land use. This has primarily been guided by proactive design, where junctions have been strategically positioned in locations already benefiting from clear visibility envelopes where available and reasonably located within the proximity of the proposed alignment.

Reference	Question	Applicant's Response
		Traffic management is proposed to be deployed where visibility splays can be safely reduced from the existing speed limits. This potential has been determined using traffic volume and speed data, in combination with vegetation/tree information, and verified through the completion of Stage 1 Road Safety Audits. These reductions in visibility splay are secured through the Order Limits, which represent the land required for the reduced design speeds, rather than the existing speed limits. In some locations, it may be possible to maintain isolated trees / vegetation within the Order Limits. Whilst the DCO assessments make the reasonable assumption that that all trees and vegetation within the visibility envelopes will be removed / cut back, there is an opportunity for these to be retained through discussion and agreement with the Local Highway Authority through detailed design. Due to the potential safety implications of retaining obstructions within the visibility envelopes, this approval is at the discretion of the detailed designer and relevant Local Highway Authority, when detailed design information is available, and cannot be committed to by the Applicant at this stage. In response to e), the core construction working hours are set out in Requirement 7(1) of 3.1 Draft DCO [Revision C]. Depending on the time of year and available daylight, some of the core construction activities may be carried out in darkness using temporary, task-specific lighting. In addition, certain activities may commence outside core working hours, as listed in Requirement 7(4) of the 3.1 Draft DCO [Revision C]. Further details regarding nighttime lighting can be found in the response to Written Question DES 1.9, which also confirms that further detail on operational lighting parameters and illustrative light contours will be provided during the Examination by Deadline 4 to assist the Examining Authority and Interested Parties.
LV 1.31	ES Appendix 13.6 – arboricultural impact assessment - veteran trees The ExA note that this document presents the findings of the Arboricultural Impact Assessment [APP-236] and that four veteran trees are proposed for removal, with a further 15 noted as being impacted (managed) by the project. Figure	In response to a) and b), the Applicant acknowledges paragraph 5.4.53 of NPS EN-1 (2024) which states <i>'The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.'</i> Footnote 192 provides further clarity on the 'wholly exceptional reasons' stating, <i>'For example where the public benefits (including need) of the nationally significant energy infrastructure would clearly outweigh the loss or deterioration of the habitat'</i>.

Reference	Question	Applicant's Response
	A13.6.1 notes the position of these trees, all of which appear to be affected because they are on the centre line within the order limits; the line chosen to represent the position of the OHL. Further information relating to the survey of veteran trees is within the outline LEMP Appendix B [APP-323]. Paragraph 5.4.53 of NPS EN-1 (2023) states 'The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.' The mitigation hierarchy for veteran trees (Table 7.1 in the outline LEMP [AS-046] states, as a first principal, that the design should be refined in order to avoid the buffer zones of veteran trees. In light of the NPS paragraph and mitigation hierarchy: a) What is the justification for the loss of four veteran trees? b) What is the justification for the impact on 15 veteran trees?	The public benefits of, and need for, the Project are set out in Chapter 3 of 5.6 Planning Statement [APP-085]. The Applicant considers that the public benefits and need case provide the wholly exceptional reasons to justify the loss or deterioration of irreplaceable habitat. These reasons have been summarised below: • 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 50GW 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 to 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 • The Clean Power 2030 Report (NESO 2024) states that 'Three projects have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030.' The Project is specified as one of those three projects. The critical

Reference	Question	Applicant's Response
	c) Why has an alternative route within the Order limits not been explored so that the loss of veteran trees, and the impact to others, could be altogether avoided? d) Using the Order limits and LoD, what options are there for retaining these trees?	and urgent nature of the Project is therefore also recognised in the strongest terms in a recent report in achieving Clean Power 2030 objectives. In addition to requiring wholly exceptional reasons, paragraph 5.4.53 of NPS EN-1 (2024) also requires '<i>a suitable compensation strategy exists</i>'. Table 5.1 in 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] details compensation measures for veteran trees. If the veteran trees cannot be retained during the design stage, the compensation measures would be agreed on a case-by-case basis with landowners and detailed in the final LEMP which is subject to the approval of the relevant Local Planning Authority. The compensation measures proposed will be implementable and proportionate to the impacts attributed to the final detailed design. Impacts to veteran trees are currently reported as a reasonable worst-case and as indicated, will be reviewed during detailed design to determine if impacts can be further avoided. 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 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. In relation to the four veteran trees, the reasons for their removal is detailed below together with details of further work currently being undertaken to understand whether the veteran trees can be retained: • T296: Reported as removed due to its roadside location and position below the overhead lines. The design team are working to confirm if T296 can be retained by micro-siting noting that 5.15 Design Development Report [APP-122] summarises previous considerations of alternative alignments at paragraph 5.3.1 and that avoidance of this tree may impact another veteran tree. • T328: Reported as removed due to its position below the overhead lines, noting that change to benefit this tree has potential to make the circumstances worse for T329 below. The design team are working to confirm if the tree can be managed without impacting on the 400 kV conductors. This is subject to the findings of detailed design and the ability to make small adjustment within the Limits of

Reference	Question	Applicant's Response
		Deviation. Avoidance would introduce two additional angle pylons or move the alignment closer to residential property depending on the direction and may potentially increase the risk of removal of T329. • T329: Reported as removed due to its position below the overhead lines, noting that change to benefit this tree has potential to make the circumstances worse for T328 above. The design team are working to confirm if the tree can be managed without impacting on the 400 kV conductors. This is subject to the findings of detailed design and the ability to make small adjustment within the Limits of Deviation. Avoidance would introduce two additional angle pylons or move the alignment closer to residential property depending on the direction and may potentially increase the risk of removal of T328. • T566: Reported as removed due to its location within the working swathe for the underground cable works and an overlapping area for UK Power Networks' pole uplifting where the corridor is constrained by residential properties to each side. The Applicant, via its contractors is seeking through detailed design to reduce or offset the cable trenches from the tree but noting the restriction on westward movement due to residential property. The Applicant is also working with UK Power Networks to confirm if the working swathe can be reduced and the tree managed without impacting on conductors. There are 15 veteran trees identified as being managed (which are subject to change depending on outcome of the design work in relation to the four removed trees). These trees are reported as managed due to their proximity to overhead lines. In response to c), whilst at this stage, it has not been possible to avoid the loss of the four veteran trees for the reasons detailed above, where practicable veteran trees have been avoided and/or impacts reduced through the iterative design process. The response to parts a) and b) provides a summary of the key constraints to the routing options considered for the four veteran trees. In addition, many other alignment design variations were considered and preferred due to the avoidance or reduction on impacts on veteran trees, these are set out within 5.15 Design Development Report [APP-122] and are listed below with the relevant paragraph number / section of the report identified:

Reference	Question	Applicant's Response
		• TB50 to TB53 moved marginally to avoid removal of veteran trees (paragraph 3.1.2) • TB93 to TB96 realigned to avoid veteran tree associated with historic entrance to adjacent Grade II* house (Table ES1, Table 3.1, Section 8.3) • TB136 to TB142 alignment change to avoid veteran trees and protected species (Table ES1, Table 3.1, Section 9.2) • RG30 to RG39 alignment change which avoids a veteran tree (paragraph 4.3.5) • RG112 to RG119 alignment change and consequential changes to permanent and temporary access to avoid veteran trees and benefit from screening by existing woodland (Table 3.1) • Crossing of Tas Valley to reduces impacts on veteran tree (Section 4.4) • Routeing changes at Gislingham to avoid veteran trees (Section 5.2) • Modification to alignment of underground cable for existing 132 kV overhead line which avoids a veteran tree (paragraph 5.5.4) In addition to alignment design variations considered to avoid and/or reduce impacts on veteran trees some potential design changes were considered but not taken forward after weighing up all the constraints (see paragraphs 4.2.3 and 4.2.4 of 5.15 Design Development Report [APP-122]). In response to d) impacts to veteran trees are currently reported as a reasonable worst-case and will be reviewed during detailed design to determine if impacts can be further avoided and/or reduced. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan [Revision D] confirms that, following detailed design and prior to construction, surveys will be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice [Revision C]. During detailed design, different options within the Limits of Deviation will be considered. Options may include reduced working widths, micro-siting, utilising the Limits of Deviation, installation methods and tree protection.
LV 1.32	Outline LEMP Appendix B – ancient woodland and veteran trees - compensation	The assumed mitigation to tree ID T62 was originally misreported in Table D.1 of Annex D of 7.4 Outline Landscape and Ecological and Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] . The

Reference	Question	Applicant's Response
	This document [APP-323] outlines the principal measures that are required to help avoid, minimise, and compensate for the potential ecological effects of the Project on ancient woodland and veteran trees. Regarding Veteran trees, it notes the mitigation hierarchy as avoid, minimise, rectify and compensate, with compensation noted for trees being removed/managed. In Appendix D, Table D1, seven trees are proposed for compensation. Four of these (T298, T328, T329 and t560) are those identified as being removed and two (T61 and T107) are identified for pruning. T62 does not appear on either the removal or pruning list; please explain why this tree is proposed for compensation.	assumed mitigation was identified as 'compensate', the assumed mitigation should have however been identified as 'minimise'. This error has been corrected within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision B] at Deadline 3.
LV 1.33	ES Appendix 13.6 – arboricultural impact assessment – TPOs Para 13.5.10 of ES Appendix 13.6 [APP-236] states 26 TPO trees are affected by the project and that schedule 14 provides details. Schedule 14 of the draft DCO only provides details of the trees and not the justification for their removal. Provide a table that shows the TPO trees/ groups of trees, their size and category, their location, whether their removal is proposed for construction	The Applicant's response is provided in Appendix J

Reference	Question	Applicant's Response
	only purposes (i.e. haul road locations) and the justification for their removal, given the Order limits and LoD.	
LV 1.34	ES Appendix 13.6 – arboricultural impact assessment – replacement planting Paragraph 13.5.13 of ES Appendix 13.6 [APP-236] states that National Grid has committed to a 3:1 tree replacement ratio for individual trees and small groups of trees. It further notes that you would prioritise such replanting within the Order limits, although offsite provision may be required. The outline LEMP [AS-046] states (paragraph 9.3.6) that discussion is ongoing with landowners and third parties regarding the provision of offsite tree planting and that an offsite planting delivery scheme will be provided to the relevant Local Planning Authorities for their information, which provides details of the offsite provision. Applicant - What constraints are there to replanting within the Order limits and under what circumstances may the need for offsite provision be triggered?	The constraints on tree planting within the Order Limits are primarily related to the restrictions on tree planting below the overhead line and directly on top of the underground cables. It is currently assumed and has been assessed within 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] and 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] that any trees present within the 56 m, wide swathe beneath the standard lattice pylon overhead line will be either removed or managed as set out in paragraph 4.8.53 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. This swathe is necessary for the construction and operation (and maintenance) of the overhead line (to include all physical infringements to conductor, including conductor swing (45° blown-out conductor), i.e. 20 m either side of each overhead line centreline). An additional up to 8 m of trees either side of the 40 m may then need to be managed during construction and operation (and maintenance) to allow for electrical clearance from the conductor to be maintained. 7.2 Outline Code of Construction Practice [REP2-014] includes a commitment that following detailed design and prior to construction (of relevant parts of the Project), relevant surveys would 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. The off-site provision (on-site deficit) can only be finalised following detailed design during which tree removal will be reduced as far as practicable in accordance with commitments (GG14, B08, B15, LV04) in 7.2 Outline Code of Construction Practice [REP2-014] and once final details of the on-site provision have been approved under the final Landscape and Ecological Management Plan through Requirement 4 or Reinstatement Planting Plan through Requirement 9 of 3.1 Draft DCO [REP2-004].

Reference	Question	Applicant's Response
	All local authorities – Is the provision of an offsite planting delivery scheme document acceptable to you? Do you have any comments on what it should contain and/or when it should be provided to be most useful to you? How could such details be secured?	
LV 1.35	Outline LEMP – replacement planting Whilst the commitment to 3:1 tree replanting is secured within the outline LEMP [AS-046], there are no outline details of the proposed planting, in terms of maturity of trees, types, mix etc in the outline LEMP or its Appendices. It is noted that requirement 9 of the draft DCO allows for the reinstatement plan to be agreed with the relevant planning authority prior to stages of the development being brought into operational use, however the ExA wishes to understand how the Year 15 visualisations can be considered to be accurate without an understanding of the maturity of replacement planting.	The Applicant has made the commitment to a 3:1 replacement planting for individual trees and small groups of individual trees within 7.4 Outline Landscape and Ecological Management Plan [REP2-018] which is secured by Requirement 4 within 3.1 Draft Development Consent Order [REP2-004]. Details of on-site tree planting will be provided in accordance with the final Landscape and Ecological Management Plan (LEMP) (if provided within Environmental Areas) or the Reinstatement Planting Plan secured under a separate requirement of 3.1 Draft Development Consent Order [REP2-004]. The final LEMP will be approved by the Local Planning Authorities. Indicative planting schedules for planting within the Environmental Areas are provided in 7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324]. Environmental Areas and photomontages The detail of construction stage planting plans (species, locations, sizes and specification) for the Environmental Areas is to be provided in the final LEMP in accordance with Requirement 4 of 3.1 Draft Development Consent Order [REP2-004]. The Applicant has committed to a 30-year aftercare period at the proposed Environmental Areas in line with the commitments made within 7.1 Biodiversity Net Gain Report [APP-299]. The photomontages at year 1 and year 15 in 7.12 Visualisations – Part 1 to 9 of 9 [APP-343 to APP-351] reflect the outline mitigation proposed in the Environmental Areas. The following indicative planting heights are proposed at year 15: - Native woodland: 6.4 m to 8 m tall - Scattered native trees: 8 m to 10 m tall

Reference	Question	Applicant's Response
		- Native scrub: 2 m to 5 m tall - Native hedgerows: Managed to 2 m tall. The Applicant is reviewing the year 15 visualisations for accuracy and will respond further on this at a later deadline. The 3:1 replacement planting and photomontages Details of on-site tree planting outside the Environmental Areas will be provided in accordance with the Reinstatement Planting Plan secured under Requirement 9 of 3.1 Draft Development Consent Order [REP2-004]. The photomontages do not show 3:1 replacement planting as it is not yet confirmed where this will be undertaken.
LV 1.36	Arboricultural issues raised by the LIRs - general Several LIRs raised general arboricultural issues that align with the ExA's concerns relating to this topic. These include, but are not limited to: - Inadequate detail within the Arboricultural Impact Assessment and associated plans. - Arboricultural Impact Assessment has not been produced in accordance with BS:5837:2012. - An underrated risk of loss to trees and hedgerows. - Requirement 8 needs strengthening to secure arboricultural method statements, tree protection plans and due diligence.	<i>Inadequate detail within the Arboricultural Impact Assessment and associated plans</i> 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] summarises the impacts based on a reasonable worst-case using the design information and working areas shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133] and 6.4.F2 Environmental Statement Figure 4.2 - Proposed Project Design - Permanent Features [APP-134]. The assessment is supported by extensive surveys undertaken between 2023 and 2025. The associated plans (6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]) show the Project and working areas merged together in order for there to be a focus on the trees rather than the design. <i>Arboricultural Impact Assessment has not been produced in accordance with BS:5837:2012</i> BS5837:2012 is a recommendation and guidance document only. The Arboricultural Impact Assessment has been produced based on the Arboriculture Strategy reported in Appendix J of 6.19 Scoping Report [APP-296]. The Applicant has applied the cascade chart for tree quality assessment shown in Table 1 of the British Standard and has assessed and reported trees based on the A, B, C and U categories. <i>An underrated risk of loss to trees and hedgerows</i>

Reference	Question	Applicant's Response
	- Proposed mitigation for loss of Veteran trees does not comply with NPS EN-1 (2023). - Draft Arboricultural method Statement should be provided to demonstrate that the proposed mitigation is appropriate. - Details of the proposed replacement of Veteran Trees should be provided to ensure these are appropriate. - Lack of clarity in the Arboricultural Impact Assessment as to why Veteran trees need to be removed. - The outline CoCP should include a Tree Protection Monitoring Plan with inspection intervals, reporting lines, and remedial protocols. The ExA expects these comments will be addressed in the applicant's responses to the LIRs but note that we require detailed responses to the issued raised in relation to arboriculture and veteran trees.	6.4 Environmental Statement Chapter 4 - Project Description [APP-130] paragraphs 4.8.37, 4.8.53 and 4.8.77 present the Applicant's approach to tree and hedgerow loss – including within the Limits of Deviation (LoDs). 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] does not include the impact of hedgerows and trees that would arise where the LoD would be used, as inclusion at this stage would represent an over estimation of impacts as loss / removals of trees would never comprise removal within the entire LoD. 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] is based on the alignment presented on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]. This includes all trees due to be removed and those considered to be affected / managed. While the numbers presented in Table A13.6.2 do not include those that would be affected as a result of a change to the alignment within the LoD, the individual trees and hedgerows that fall within this category (potentially affected) are visually represented on 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065]. Paragraph 13.1.16 of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] also states: <i>'Removals are shown on Figure A13.6.1: Arboricultural Impacts Plan in Annex D. Detailed design changes could alter the AIA results (likely to reduce) and overall impacts to trees, however, any changes would be picked up through the discharge of Requirement 7 in the draft DCO (document reference 3.1).'</i> Please note reference to Requirement 7 is incorrect and should now be read as Requirement 8 (Retention and removal of trees, woodland and hedgerows) within 3.1 Draft Development Consent Order [Revision C]. This will be included within the next iteration of the Errata List. Impacts on hedgerows are quantified in 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and visually presented on 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment (AIA) Figure A13.6.1 - Arboricultural Impact Assessment [REP1-065] Section 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan [REP2-018] confirms that following detailed design and prior to construction, surveys would be undertaken to seek to reduce removal of trees/hedgerows as far as practicable and this is recorded as commitment GG14 within 7.2 Outline Code of Construction

Reference	Question	Applicant's Response
		Practice [REP2-014]. The intention is therefore to seek to reduce the loss of trees and hedgerows; this commitment is also reflected within commitments LV04, H06 and B08 within 7.2 Outline Code of Construction Practice [REP2-014]. Therefore, the loss of trees and hedgerows as presented in the Environmental Statement is likely to be an overestimation of impacts rather than an underrated risk. <i>Requirement 8 needs strengthening to secure arboricultural method statements, tree protection plans and due diligence</i> Requirement 8 of Schedule 3 in 3.1 Draft Development Consent Order [Revision C] <u>requires</u> plans showing the trees, groups of trees, woodlands and hedgerows to be retained and/or removed during that stage <u>to be</u> submitted to and approved by the relevant planning authority, prior to that stage commencing, unless otherwise agreed with the relevant planning authority. These plans can be included as an appendix to an Arboricultural Method Statement (AMS), the submission of an AMS is secured through 7.4 Outline Landscape and Ecological Management Plan [REP2-018] and Requirement 4 of the Draft DCO. Paragraph 7.1.2 of 7.4 Outline Landscape and Ecological Management Plan (LEMP) [REP2-018] states that '<i>All construction elements likely to impact on retained trees will be addressed within an Arboricultural Method Statement (AMS) to be produced following detailed design and agreed with the relevant LPAs prior to construction activity commencing. The AMS will include protection measures including tree protection fencing as discussed in Section 7.3. and illustrated in a Tree Protection Plan</i>'. Therefore, whilst the AMS is not secured through Requirement 8, it is secured through Requirement 4 and full details will be provided within the Final LEMP(s) prior to the stage of works commencing. Under Requirement 1(4), the Applicant would also need to satisfy the relevant Local Planning Authorities that the proposed plan would not give rise to any materially new or materially different environmental effects from those identified in the Environmental Statement. <i>Proposed mitigation for loss of Veteran trees does not comply with NPS EN-1 (2023)</i> The Applicant disagrees with this statement and evidence of compliance with NPS EN-1 is provided below.

Reference	Question	Applicant's Response
		The Applicant has produced 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision B] to detail the environmental measures that would be implemented to avoid, minimise, mitigate and compensate the veteran tree features likely to be impacted during construction and operation in accordance with NPS EN-1. The Project has identified the loss of four veteran trees, paragraph 5.4.53 of NPS EN-1 (2024) states <i>'The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.'</i> Footnote 192 provides further clarity on the 'wholly exceptional reasons' stating, <i>'For example where the public benefits (including need) of the nationally significant energy infrastructure would clearly outweigh the loss or deterioration of the habitat'</i>. The public benefits of, and need for, the Project are set out in Chapter 3 of 5.6 Planning Statement [APP-085]. The Applicant considers that the public benefits and need case provide the wholly exceptional reasons to justify the loss or deterioration of irreplaceable habitat. These reasons have been summarised below: • 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 50GW 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 to low-carbon electricity

Reference	Question	Applicant's Response
		- 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 - The Clean Power 2030 Report (NESO 2024) states that 'Three projects have been identified as critical to delivering a network which supports the clean power pathways, but at present have delivery dates after 2030. Support is therefore needed to bring these projects forward for 2030 delivery. These are projects in East Anglia and in the southeast that are critical for connecting offshore wind in the North Sea and supporting the flow of clean power. Our assessment suggests that without these projects, the clean power objective would not be achieved, leaving the clean power target short by around 1.6% in 2030 (assuming a typical weather year) and consumers could face extra constraint costs of around £4.2 billion in 2030.' The Project is specified as one of those three projects. The critical and urgent nature of the Project is therefore also recognised in the strongest terms in a recent report in achieving Clean Power 2030 objectives. In addition to requiring wholly exceptional reasons, paragraph 5.4.53 of NPS EN-1 (2024) also requires '<i>a suitable compensation strategy exists</i>'. Table 5.1 in 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision B] details compensation measures for veteran trees. If the veteran trees cannot be retained during the detailed design stage, the compensation measures would be agreed on a case-by-case basis with landowners and detailed in the final LEMP(s) which is subject to the approval of the relevant Local Planning Authority. The measures proposed will be implementable and proportionate to the impacts attributed to the final detailed design. Commitments are in place to reduce the impact to trees during detailed design, these include commitments GG14, B08 and LV04 in 7.2 Outline Code of Construction Practice [Revision C]. Arboricultural Method Statements will be produced for the different stages of the Project, following detailed design. The principles for tree protection will follow guidance from BS5837:2012 with the method statements detailing the appropriate tree protection based on the operations being undertaken. <i>Draft Arboricultural Method Statement should be provided to demonstrate that the proposed mitigation is appropriate.</i>

Reference	Question	Applicant's Response
		The Applicant does not intend to submit a Draft Arboricultural Method Statement during the Examination. The submission of an AMS is secured through 7.4 Outline Landscape and Ecological Management Plan [Revision D] and Requirement 4 of 3.1 Draft Development Consent Order [Revision C]. Paragraph 7.1.2 of 7.4 Outline Landscape and Ecological Management Plan [Revision D] states that '<i>All construction elements likely to impact on retained trees will be addressed within an Arboricultural Method Statement (AMS) to be produced following detailed design and agreed with the relevant LPAs prior to construction activity commencing. The AMS will include protection measures including tree protection fencing as discussed in Section 7.3. and illustrated in a Tree Protection Plan</i>'. The AMS will include information relating to monitoring proformas, inspection intervals, reporting and remedial protocols, noting that construction activities can be dynamic and impact on inspection intervals and reporting mechanisms. <i>Details of the proposed replacement of Veteran Trees should be provided to ensure these are appropriate.</i> Table 5.1 of 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [Revision B] identifies different compensation options which are available. The specific compensation details for each veteran tree will be identified on a case-by-case basis by the Project Arboriculturist/Arboricultural Clerk of Works and agreed with the landowner. The final LEMP(s) will detail the proposed compensation measures for the loss of any veteran tree and are to be agreed with the relevant Local Planning Authority. <i>Lack of clarity in the Arboricultural Impact Assessment as to why Veteran trees need to be removed.</i> The following response was provided in relation to Written Question LV1.31 and provides further detail regarding the four veteran trees identified as being removed and the justification for this: • T296: Reported as removed due to its roadside location and position below the overhead lines. The design team are working to confirm if T296 can be retained by micro-siting noting that 5.15 Design Development Report [APP-122] summarises previous considerations of alternative alignments at paragraph 5.3.1 and that avoidance of this tree may impact another veteran tree.

Reference	Question	Applicant's Response
		• T328: Reported as removed due to its position below the overhead lines, noting that change to benefit this tree has potential to make the circumstances worse for T329 below. The design team are working to confirm if the tree can be managed without impacting on the 400 kV conductors. This is subject to the findings of detailed design and the ability to make small adjustment within the Limits of Deviation. Avoidance would introduce two additional angle pylons or move the alignment closer to residential property depending on the direction and may potentially increase the risk of removal of T329. • T329: Reported as removed due to its position below the overhead lines, noting that change to benefit this tree has potential to make the circumstances worse for T328. The design team are working to confirm if the tree can be managed without impacting on the 400 kV conductors. This is subject to the findings of detailed design and the ability to make small adjustment within the Limits of Deviation. Avoidance would introduce two additional angle pylons or move the alignment closer to residential property depending on the direction and may potentially increase the risk of removal of T328. • T566: Reported as removed due to its location within the working swathe for the underground cable works and an overlapping area for UK Power Networks' pole uplifting where the corridor is constrained by residential properties to each side. The Applicant, via its contractors is seeking through detailed design to reduce or offset the cable trenches from the tree but noting the restriction on westward movement due to residential property. The Applicant is also working with UK Power Networks to confirm if the working swathe can be reduced and the tree managed without impacting on conductors. <i>The outline CoCP should include a Tree Protection Monitoring Plan with inspection intervals, reporting lines, and remedial protocols.</i> A Tree Protection Monitoring Plan, site inspection intervals and reporting will be detailed within the AMS secured through 7.4 Outline Landscape and Ecological Management Plan [Revision D] and Requirement 4 of 3.1 Draft Development Consent Order [Revision C]. Therefore, the Applicant does not consider a separate tree protection monitoring plan to be required.

Reference	Question	Applicant's Response
LV 1.37	Arboricultural issues raised by the LIRs - specific Specific comments raised in the LIR that require addressing are: - Colchester CC [REP1-156] notes that the replanting strategy does not align with local plan policy. It requires a Colchester-specific canopy cover assessment in line with its local plan policy (paragraphs 12.275 to 12.278). - South Norfolk DC [REP1-176] notes that proposed changes to the route would result in a potential impact to a) a veteran oak with a trunk circumference of 5.22m, adjacent to RG33, and b) numerous veteran and ancient trees and woodland in the vicinity of pylons RG48 and RG49. Provide your response to these specific comments.	The Applicant acknowledges the local planning policies for Colchester City Council; however, 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment AIA [APP-236] is reporting as per the Project sections. Prior to committing to a 3:1 replanting ratio for individual trees and individual trees within small groups, the Applicant reviewed local policy requirements of the relevant Local Planning Authorities. There was no consensus across the various Local Plans for a replanting ratio. Following a review of replacement planting commitments for previous consented Nationally Significant Infrastructure Projects (NSIPs), National Grid's own projects, local and national planning policy and guidance from the Woodland Trust, the Applicant made the 3:1 commitment. Whilst there is no specific replanting ratio identified within National Policy Statement (NPS) EN-1 (2024) or NPS EN-5 (2024), the commitment is in line with the wider environmental gains advocated for in paragraph 4.6.13 and the requirements set out in paragraph 5.11.27 of NPS EN-1 (2024). The proposed alignment between RG32 and RG33 has been developed so that the overhead lines pass to the west of the veteran tree (T91). Currently, the buffer zone of T91 is encroached by the scaffolding towers and the stringing position, with recommendations that ground protection is used to mitigate against soil compaction. If the alignment is moved to the east, consideration will be given to targeted facilitation pruning and phased tree surgery in line with the hierarchy set out in Table 5.1 of 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323] thus ensuring changes do not give rise to any materially new or materially different environmental effects. The Applicant accepts that impacts to veteran trees in the Tas Valley are likely between RG48 and RG49. However, the current design alignment and individual veteran tree assessments report these trees as retained with the management options to be agreed on a case-by-case basis with the landowner and South Norfolk District Council as part of the approval of the final Landscape and Ecological Management Plan.

12. Minerals and Waste

Table 12.1 Minerals and Waste

Reference	Question	Applicant's Response
MW 1.2	Minerals safeguarding - 2 Following construction, please detail what minerals extraction would be able to be undertaken below operational power lines and in the immediate vicinity of pylons, detailing various scenarios and restrictions for differing pylon heights and types.	<u>Conductor Clearance</u> Where mineral extraction proposals are brought forward in proximity to operational overhead lines, the assessment process would typically involve the provision of a line profile illustrating the overhead line at its maximum sag and sway, taking account of conductor temperature and wind loading. From this worst-case position, a minimum vertical clearance of 5.3 metres would be required to be maintained between the conductors and plant, or excavation activity. This clearance would form a fundamental constraint on the depth and method of any mineral extraction beneath the line and would be required to be demonstrated for the full duration of the proposed works. <u>Excavation Clearance from Tower Foundations</u> Where mineral extraction is proposed in the vicinity of overhead line pylons, a non-blasting extraction method (such as sand and gravel working) would typically be assumed. As a standard principle, a minimum horizontal clearance of 30 metres from the edge of the pylon foundations would be required to safeguard access, maintenance, and structural integrity of the asset. For deep excavation, ground stability would need to be understood to prove that pylon foundation integrity would not be at risk. Where extraction is proposed within 30 metres of a pylon foundation, this would not be permitted as a matter of course. National Grid expects third parties to implement a safe system of work whenever they are near overhead lines. We recommend that guidance such as HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)⁸¹ is followed, which provides advice on how to avoid danger from all overhead lines, at all

⁸¹ Health and Safety Executive (HSE) (2013) *GS6 Avoiding Danger from Overhead Power Lines*

Reference	Question	Applicant's Response
		voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings. The above statements apply to all pylon heights and types across the scheme.
MW 1.3	Martells Quarry, Ardleigh The interrelationship report [REP1-134] refers to proposed extensions to the existing Martells Quarry (sand and gravel extraction). The LoD in this area of the Order limits have allowed for flexibility in the proposed development and to reduce sterilisation of the potential silica sands mineral site. The draft SoCG with Martells Mineral Site A85 & A86 [REP1-097] appears to indicate that discussions between the applicant and SRC Group are ongoing despite an initial meeting held in November 2023, and that SRC Group appear to be unaware of the “alternative scenario” that has been summarised in ES Chapter 4 [APP-130]. Provide a timeline for your future discussions with SRC Group and respond to its comments that minerals sterilisation has the potential to extend into the route of the OHLs and would also lead to void sterilisation, together with a full response to [RR-3333].	The Applicant has engaged with SRC Group on a number of occasions, with these dates set out in 8.3.28 Draft Statement of Common Ground - Martells Mineral Site A85 & A86 [REP1-097]. The Applicant is continuing to engage with SRC Group, however a date for the next meeting is not yet confirmed. Future discussions will include Martells Quarry; however, stakeholder discussions have largely focussed on the other quarry sites with a Project interface. In respect of the Alternative scenario, there may be a misunderstanding of the scenario in this case. The Project design is being progressed on the basis that the Overhead Line (and pylons TB5, TB6 and TB7) is routed to the south of Little Bromley Road with the underground cables to the north of Little Bromley Road. The alternative scenario would only apply to swap this arrangement, with cables to the south of the road and pylons to the north, should there be confirmation that the minerals sites were not being progressed (for example if the resource quality was not confirmed). This alternative formed a previous iteration of the project design prior to the identification of the Minerals Plan updates and the potential significance of the silica sand resource was identified. As noted it only comes into consideration if the minerals site is confirmed not to be progressing. The Applicant has communicated the proposed alternative scenario with SRC Group and directed the stakeholder to the relevant parts of the application. A response to SRC Group's comments is captured by 8.3.28 Draft Statement of Common Ground - Martells Mineral Site A85 & A86 [REP1-097]. Paragraphs 3.3.17 to 3.3.21 of the 8.4.3 Report on Interrelationships with Other Infrastructure Projects [REP1-134] set out the Applicant's position on the interface with the Martells Quarry site. The Applicant will continue to engage with SRC Group in relation to this site, as the detailed design develops, to understand the interface between the two sites. SRC's comments contained within the RR, concerning the Martells Quarry site, relate to access arrangements and joint use of the access. The Applicant will continue to

Reference	Question	Applicant's Response
		work with SRC Group, as the detailed design develops, over shared access arrangements and seek to agree a solution that benefits both parties.
MW 1.4	Use of on-site minerals - 1 In its LIR [REP1-178] at paragraph 15.41, Suffolk CC states that any minerals which are extracted on site during the course of construction should be used in the construction of the proposed development where possible. Please detail the anticipated percentage of material for construction which will be used from minerals won from within the order limits.	For the avoidance of doubt and as set out within 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] and consistent with National Policy Statement EN-1 (2024) paragraph 5.11.19, the Applicant has sought, where practicable, to safeguard minerals by avoiding direct interaction with existing mineral sites (see 6.9.A2 Environmental Statement Appendix 9.2 - Qualitative Minerals Resource and Infrastructure Assessment [APP-183]). While the Order Limits within Suffolk intersect several Mineral Consultation Areas for sand and gravel, the 5.6 Planning Statement [APP-085] confirms that any mineral sterilisation would be insignificant in the context of the extensive regional resource and the national need for the Project. The 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016] and the 7.2 Outline Code of Construction Practice [REP2-014] set out a clear commitment to the efficient use of materials and the application of the waste hierarchy, including the reuse of materials on-site wherever practicable. This includes consideration of the reuse of excavated materials and any minerals won within the Order Limits, subject to their suitability and compliance with relevant technical and environmental requirements. At the current stage of design, the precise quantities of minerals that may be extracted on-site, and the proportion that may be suitable for reuse in construction, have not been fixed. This is because the detailed design, construction methodology and ground conditions will be confirmed at a later stage by the appointed contractor. As a result, it is not possible at this stage to specify an anticipated percentage of construction materials that will be derived from on-site minerals. Notwithstanding this, the Project commits to maximising the reuse of suitable on-site materials where practicable, including through the use of materials management plans and, where appropriate, CL:AIRE compliant Materials Management Plans. Targets relevant to this aspect have been set which include: • Divert 100% of avoidable waste from landfill • Beneficially reuse 100% of clean excavated material, e.g. cut and fill of Tilbury North platform to avoid import / export

Reference	Question	Applicant's Response
		Achieve an overall recycling rate of 80% for construction materials. These measures are intended to minimise the need for imported materials and reduce waste arisings, consistent with the principles set out in the 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016].
MW 1.5	Use of on-site materials - 2 Please give full details of the expected treatment, disposal method and location for the haul road material once they are decommissioned. How can the ExA be confident that the principle of the waste hierarchy will be adhered to and imported material, and therefore waste, will be minimised.	The management of haul road materials following decommissioning will be undertaken in accordance with the waste hierarchy and the principles set out in the 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016] and 7.2 Outline Code of Construction Practice [REP2-014]. The 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016] establishes that materials will be prioritised for reuse on-site wherever practicable and permissible, followed by recycling or recovery at suitably permitted facilities, with disposal as a last resort. At this outline stage, the detailed treatment methods, disposal routes and final locations for haul road materials have not yet been defined. These details will be determined once the construction methodology and decommissioning sequence are confirmed by the contractor. However, 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016] commits to the segregation of materials, the identification of suitable reuse opportunities (either on-site or on other parts of the Project), and the use of appropriately licensed facilities for any materials that cannot be reused. Confidence that the waste hierarchy will be adhered to, and that imported material will be minimised, is provided through the requirement for a detailed, construction phase 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan [REP2-016] to be discharged in accordance with Requirement 4 of 3.1 Draft Development Consent Order [Revision C] and implemented prior to works commencing. This plan will provide information consistent with National Policy Statement EN-1 (2024) paragraphs 5.15.17 and 5.15.18 and will include waste forecasts, waste capacities, management procedures, monitoring and reporting arrangements, and will be subject to ongoing review throughout construction to ensure continual improvement in material efficiency and waste reduction.

Reference	Question	Applicant's Response
		Targets relevant to this aspect have been set which include: • Divert 100% of avoidable waste from landfill • Beneficially reuse 100% of clean excavated material • Achieve an overall recycling rate of 80% for construction materials.
MW 1.6	Minerals resource at Lowleys Farm Brett Aggregates Ltd in its Deadline 1 submission [REP1-210] has raised concerns about the potential impacts on its minerals prospect site at Lowleys Farm. As it currently stands, Brett Aggregates Ltd contends that the route for the proposed development would run through the middle of the mineral scheme and over its deepest point. The applicant and Essex CC are requested to respond to the concerns raised by Brett Aggregates Ltd. Furthermore, the applicant is also requested to clarify what, if any, scope exists for the route to be altered to mitigate the impacts on this minerals resource that have been raised by Brett Aggregates Ltd. The applicant should also explain the reasons for the order limits detail to the east and south of TB128 to TB133 which appears to extend towards the eastern limits of Lowleys Farm with no indication of the works which will be undertaken within the	The Applicant is proposing an alternative scenario to address the potential impacts on the Lions Hall minerals prospect site at Lowley's Farm. The alternative scenario provides an alignment that seeks to reduce effects to the extent possible. A summary of the alternative scenario has been included in the 5.15 Design Development Report [APP-122] (Figure 9.1 and Section 9.1). The alternative possible alignments allowed for within the widened Order Limits and Limits of Deviation are identified as Scenario 6 in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. In effect the alternative is a different alignment passing to the east, and either oversailing part way down the abstraction area or passing to the south of the proposed abstraction area. At present, the Applicant is investigating the realignment of the overhead line route and pylons TB128–133 to a location further towards the east and south of the Order Limits, to mitigate mineral extraction and to avoid any interaction with planned residential development to the west. The Limits of Deviation and Order Limits have been widened in this location to allow flexibility to change the alignment and seek to reduce effects on the minerals site, should it be progressed. The scenario was considered and assessed within the Environmental Statement. A proposed revision to the alignment within the Order Limits has been shared with the landowner and developers, and following discussion a further revision has been provided and is subject to ongoing discussion and refinement. The refined alignment seeks to align as closely as possible to the Order Limits and woodland to the east noting that part of this woodland is classed as ancient woodland. Whilst the pylon construction needs to take cognisance of this woodland status, the Applicant notes that this status may also increase the buffer to be left by the abstraction to prevent dewatering as a result of the adjacent excavations. The Applicant's position is that such change will either avoid or at least reduce the extent of interaction to at most a small area of restriction at the very edge of the abstraction area, around the pylon foundations, with the majority of the site's potential unaffected.

Reference	Question	Applicant's Response
	area between the proposed line of pylons and Lyonshall Wood.	National Grid could not agree a Statement of Common Ground with the stakeholder in time for the Deadline 1 submission but will continue to engage and seek to reach agreement.
MW 1.7	Recycling of waste materials In Table 2.1 of the outline Site Waste Management Plan [APP-302] you cite the use of a crushing machine to break up pylon foundations. Clarify how and where any recycling of inert materials would take place, for example are crushing and screening facilities proposed for any of the construction compounds. If so, how have the effects arising from these activities been accounted for in the relevant Chapters of the ES?	The use of a crushing machine to break up concrete foundations has been assessed where it is relevant within the Environmental Statement. 6.14 Environmental Statement Chapter 14 – Noise and Vibration [APP-256] assesses noise from breaking up concrete associated with overhead line removal. No significant residual effects are identified as a result of their use following the implementation of mitigation measures. Breaking up concrete using an excavated mounted pulveriser is referenced within Table A14.1.1 of 6.14.A1 Environmental Statement Appendix 14.1 - Construction Noise and Vibration Data [APP-257]. Noise outputs assume that machines would be on 50% of the time in locations where existing overhead line infrastructure is to be removed, not within construction compounds. Best practicable means / mitigation to reduce effects from construction noise would be adopted by the Main Works Contractor(s) during construction which will include localised screening where needed. Mitigation is secured by commitments in 7.2 Outline Code of Construction Practice [REP2-014] and 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306].

13. Noise and vibration

Table 13.1 Noise and vibration

Reference	Question	Applicant's Response
NV 1.1	Noise general ES Chapter 14 [APP-256] quotes NPS EN-5 (2023) paragraph 2.9.35, which states “Hum is only likely to occur during rain when rates of rainfall exceed 1 millimetre/ hour. Hum is a sound consisting of a single pure tone or tones. The ExA would ask the applicant to advise at what Hz the hum (single pure tone or tones) will resonate at (will this be in the audible range)? Whilst the ExA notes this matter was scoped out as part of the EIA Scoping Opinion [APP-297], based on predictions how often is a hum, consisting of a single pure tone or tones, likely to occur?	Although scoped out of the ES, as agreed within 6.20 Scoping Opinion [APP-297], information, including a noise assessment justifying the scoping out, is provided in 6.14.A5 Environmental Statement Appendix 14.5 – Operational Noise from Overhead Lines Informative [APP-261]. As stated in this Appendix, hum typically occurs with tones at 100 Hz and 200 Hz, which are in the audible range. The assessment has been undertaken in accordance with National Grid Technical Guidance Note TGN(E)322 ‘Operational Audible Noise Assessment Process for Overhead Lines (New Build, Reconductoring, Diversion, and Uprating)’ (TGN(E)322). The method is based on the noise assessment methodology described in BS 4142:2014+A12019 ‘Methods for rating and assessing industrial and commercial sound’ (BS 4142), with additional consideration of wet conditions which are unique and pertinent to overhead line noise, but outside the scope of BS 4142. The tonal character of ‘wet’ overhead line noise is considered in the assessment, and an acoustic character correction of 6dB is included in the assessment to account for this. This is in line with BS 4142. Even including this penalty for tonality, operational noise from overhead lines would be below the lowest observed adverse effect level (LOAEL), even directly underneath the overhead line. Noise levels and effects would reduce even further with increased distance.
NV 1.2	Operational noise of the EACN and Tilbury North Substations ES Chapter 14 [APP-256] paragraph 14.4.30 refers to the operational noise	The tables referenced in the question (Table A14.3.4 of 6.14.A3 Environmental Statement Appendix 14.3 – EACN Substation Operational Noise Assessment [APP-259] and Table A14.4.4 of 6.14.A4 Environmental Statement Appendix 14.4 - Tilbury North Substation Operational Noise Assessment [APP-260]) refer

Reference	Question	Applicant's Response
	of the EACN and Tilbury North Substations as being indicative based on current design information. This paragraph explains detailed assessment of operational noise from the proposed substations would be undertaken as part of the design phase, along with any specific mitigation measures that may be required at that time. The ExA is concerned regarding the applicant's choices in this regard, especially in relation to timings of when such work will be undertaken, based on the evidence currently before it contained in ES Chapter 14 (Noise and Vibration) [APP-256] (ie indicative BS4142 assessments (without mitigation) contained in Appendix 14.3 (EACN Substation Operational Noise Assessment) at table A14.3.5 and Appendix 14.4 (Tilbury North Substation Operational Noise Assessment) at table A14.4.5). The ExA seeks either: a) Further justification, including a timeline, as to why the detailed design of these substations, including the detailed assessment of operational noise from the proposed substations, should not be being undertaken now in order to provide informed mitigation and design choices with a view to reducing	to the unmitigated scenarios, which were included with the purpose of determining whether mitigation is required at the proposed new East Anglia Connection Node (EACN) and Tilbury North Substations to avoid significant adverse effects. This unmitigated assessment assumes that plant items (such as transformers) have noise emissions at the upper limit of the National Grid specification level for noise (i.e. noise from transformers must be no higher than this level). The unmitigated scenario therefore presents a worst case for normal operation and simply provides an indication that mitigation is required to avoid significant adverse effects. The Applicant would therefore refer the ExA to the results of the mitigated scenarios for the operational substation noise assessments shown in Table A14.3.8 of 6.14.A3 Environmental Statement Appendix 14.3 – EACN Substation Operational Noise Assessment [APP-259] and Table A14.4.8 of 6.14.A4 Environmental Statement Appendix 14.4 - Tilbury North Substation Operational Noise Assessment [APP-260]. These show the results of the assessments with standard, readily available and feasible mitigation. These assume the use of standard transformer noise enclosures and attenuation of cooling plant. No other mitigation is assumed, and the 'mitigated' scenario still assumes the highest specification noise level for transformers within the enclosure. The assessments show that with such standard mitigation, but still including worst-case assumptions, significant effects are comfortably avoided at both substation locations. As such, although the assessment is indicative, the assessment provides a robust indication and confidence that the predicted noise levels would not be exceeded at nearby noise sensitive receptors based on the worst-case assumptions used. The assessment is therefore wholly appropriate for this stage and does not require a fixed detailed design for confidence in its conclusions. Operational noise mitigation measures are secured through commitment NV21 of the 7.2 Outline Code of Construction Practice [REP2-014], which states '<i>The proposed new substations will include any required noise mitigation measures by design. This may include plant selection, siting, screening, and enclosures, as appropriate.</i>'

Reference	Question	Applicant's Response
	potential resultant noise impacts on noise sensitive receptors. or b) The provision of full design details of the EACN and Tilbury North Substations, including the detailed assessment of operational noise from the proposed substations.	Additionally, operational noise from the proposed EACN substation is controlled by Requirement 14 of Schedule 3 of 3.1 Draft DCO [REP2-004] which ensures that significant adverse effects are avoided.
NV 1.3	Noise general/ precision - 1 ES Chapter 14 [APP-256]. There are multiple examples of the use of terms like 'would' and 'shall' in relation to something being undertaken, to be done or provided (ie Section 14.4 (paragraphs 14.4.13, 14.4.30, 14.4.38 and 14.4.40); Section 14.6 (Paragraphs 14.6.4, 14.6.5, 14.6.6 NV11 to NV14 (inclusive) and NV14, 14.6.12 and 14.6.15) and Section 14.8 (this list is not exhaustive)). These terms should be replaced with the term 'shall' or a word of equivalent meaning in order to avoid any doubt.	The Applicant notes this. Any mitigation that is required to be undertaken is recorded within 7.2 Outline Code of Construction Practice [REP2-014] and its appendices which are further secured by Requirement 4 of 3.1 Draft Development Consent Order [Revision C]. Instances where 'would' or 'should' was used has been replaced with 'will' within relevant commitments in 7.2 Outline Code of Construction Practice [REP2-014].
NV 1.4	Noise general/ precision - 2 A number of County and Local Authorities raise concerns related to construction noise at Noise Sensitive Receptors (NSR). Braintree DC in its LIR [REP1-148] suggests a more precautionary, enforceable framework should be secured within in the draft DCO, including:	The Applicant is reviewing the provisions of the draft DCO as requested with these matters in mind. The ExA is requested to have regard to the following detailed matters. Please see response to DCO 1.S10 (noting correct question reference) regarding i) revised core working hours. Regarding ii), suitable construction noise thresholds are included in the ABC method described in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration

Reference	Question	Applicant's Response
	i) revised core working hours (See question DCO 1.S9) ii) a 50 dB limit during start-up and close-down at the nearest NSRs iii) restrictions on all piling activities (not percussive piling only) iv) targeted and defined temporal restrictions, where residual significant effects remain The ExA considers that in the absence of such measures there would be a clear risk that construction noise impacts at NSRs could give rise to significant adverse effects that have not been adequately mitigated. Please review the draft DCO accordingly or justify why such measures are not necessary to be included in the draft DCO.	control on construction and open sites – Part 1: Noise⁸² for all applicable time periods and the contractor will be required to apply these thresholds in their detailed assessments secured via commitment NV05 of 7.2 Outline Code of Construction Practice [REP2-014]. Regarding iii) and iv), the Applicant presently considers that blanket restrictions on works are unjustified. Any restrictions, where deemed appropriate, will be borne from assessment outcomes secured via commitment NV05 of 7.2 Outline Code of Construction Practice [REP2-014] and mitigation measures will be considered as appropriate to avoid significant adverse effects and reduce adverse effects. Such mitigation measures may include temporal restrictions as part of best practicable means secured via commitments NV01, NV02 and NV03 of 7.2 Outline Code of Construction Practice [REP2-014]. The Applicant will report back on these matters following the requested review.
NV 1.5	Use of use of triple Araucaria conductors or alternative technology Throughout ES Chapter 14 [APP-256] reference is made to the use of triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons). In the event of alternative technology being used, as opposed to the use of the use of triple Araucaria conductors	7.2 Outline Code of Construction Practice (CoCP) [REP2-014] which is secured by Requirement 4 in 3.1 Draft Development Consent Order [Revision C], includes commitment GG13 which states: <i>‘The Project would include triple Araucaria conductors (or alternative technology that performs to the same or better standard on standard lattice pylons)’</i> [Caveated: <i>‘Where modifications for existing transmission overhead lines are required, like-for-like conductors are proposed’</i>]. Therefore, there is already a mechanism to secure the alternative technology that performs to the same or better standard on standard lattice pylons.

⁸² British Standards Institution (2014) *BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise*

Reference	Question	Applicant's Response
	on part or all of the route, should a mechanism be included to ensure that alternative technology is of the same or better standard in relation to noise on standard lattice pylons. In the event a mechanism should be used, what form should the mechanism take (ie should it be a requirement within the DCO), should there be a need to agree to the alternative technology and should there be a discharging and appeal authority? In addition to the above, the ExA notes ES Chapter 7 paragraph 7.9.4 Refers to pylons TB140 to TB142 (inclusive) to the south of River Chelmer being low height pylons. However, this paragraph also refers to feedback that was received during consultation in 2025 and certain technical details being refined. This paragraph states " as a result, flexibility has been retained to allow for the installation of standard lattice pylons in this area instead." However, the ExA notes ES Chapter 14 (Noise and vibration) states a low noise conductor system will be used. Can the applicant confirm, should the design change in relation to pylons TB140 to TB142 (inclusive) to standard lattice pylons, or any other form of pylon, be necessary the low noise conductor system will be used as part of those pylons?	The Applicant must adhere to the commitments within the Final CoCP which will be approved by the relevant Local Planning Authority and which is to be substantially in accordance with the 7.2 Outline Code of Construction Practice [REP2-014]. If an alternative technology is proposed to be installed by the Main Works Contractor(s) the Applicant would satisfy itself of compliance with the CoCP, by requiring the Main Works Contractor(s) to provide evidence that the alternative conductors proposed would perform to the same or better standard on standard lattice pylons. The Applicant can confirm that the low noise triple Araucaria conductor (or alternative technology that performs to the same or better standard) is proposed on all pylon types for the new overhead line and is not affected by the flexibility in pylon type.

Reference	Question	Applicant's Response
NV 1.6	Construction of pylon foundations/ non-percussive piling methods ES Chapter 14 [APP-256] paragraph 14.6.6 at NV23 advises “For the construction of pylon foundations, non-percussive piling methods will be used where practicable”. The ExA is concerned about the use of the wording ‘where practicable’. It asks are there any locations near NSRs, where percussion is to be used in relation to construction techniques and how can it be certain the impact of noise sensitive receptors will be adequately mitigated during construction generally, but especially related to the construction of the pylon foundations?	The construction noise and vibration assessment presented in 6.14 Environmental Statement Chapter 6.14 - Noise and Vibration [APP-256] assumes all pylons are constructed using percussive piling as a worst-case assumption as this is the method that would produce the highest levels of noise and vibration. In practice, percussive piling would not be used at all locations, and in principle would not be used at any location where this can be avoided. This principle is secured via commitment NV23 of 7.2 Outline Code of Construction Practice [REP2-014] following detailed assessment secured by commitment NV05. As such, the assessment provides an indication of locations where percussive piling may lead to significant effects without mitigation, as well as identifies locations where there would be no constraints with regards to noise. Should percussive piling be unavoidable, a range of mitigation measures will be put in place via various commitments set out in 7.2 Outline Code of Construction Practice [REP2-014], principally NV01 to NV04, inclusive. With these measures in place, significant adverse effects will be avoided.
NV 1.7	Compaction activities and potential for damage due to construction vibration ES Chapter 14 [APP-256] paragraph 14.7.27 to 14.7.30 (inclusive) indicates there are five structures or buildings where there is potential for damage due to construction vibration from potential compaction activities. It also indicates: i) the identified locations will be reviewed by the main contractor in their specific detailed assessments, prior to the start of work with mitigation measures put in place, where required, to avoid potential significant effects; and ii)	The risk of damage at the identified locations is very low, and can be readily mitigated with standard mitigation measures. An existing mechanism is in place in the form of commitments in 7.2 Outline Code of Construction Practice [REP2-014] including NV01, NV02, NV03, NV04, NV05, NV13, NV15, NV16, NV17 and NV20 which are all pertinent and secured by Requirement 4 in 3.1 Draft Development Consent Order [Revision C]. Therefore, the Applicant does not consider a Development Consent Order requirement is required. The source of the vibration is potential vibratory compaction. This method has been assumed as a worst case during highways works (noting that this is a normal activity for road construction). A standard mitigation method is to use a non-vibratory method, such as dead rolling (i.e. turning the vibrator off). However, this would extend the duration of the works as more passes may be required to achieve the required compaction. As such, further assessment by the Main Works Contractor(s), as secured by NV05 of 7.2 Outline Code of Construction Practice [REP2-014],

Reference	Question	Applicant's Response
	will review all works locations to determine whether any other buildings or structures may be affected by vibration from construction activities. However, no further details are provided. The ExA is concerned in regard to the absence of the further details in regard to both i) and ii) above and seeks the views of both the applicant and Relevant County/ Local Authorities in this regard. Should there be a formal mechanism requiring the further details and mitigation to be submitted and approved. What form should such a mechanism take (ie should it be a requirement within the DCO)? Should there be a need to agree the additional mitigation measures to avoid potential significant effects.	will be undertaken to determine and understand the potential risks and determine the most appropriate mitigation to avoid significant adverse effects.
NV 1.8	Significant observed adverse effect level ES Chapter 14 [APP-256] paragraphs 14.7.31 to 14.7.36 (inclusive) indicates a large adverse magnitude of impact on link PAR 30 - Bentley Road, which has sixteen NSRs within 50 metres of the route and notes the effects at these noise sensitive receptors have the potential to be significant, in the absence of mitigation. Of these sixteen, one property, Jasmine Cottage, is noted as having a large magnitude of adverse impact and notes	The Applicant acknowledges the likely temporary residual significant effect at Jasmine Cottage due to construction traffic on Bentley Road and notes that it is the only likely residual significant effect for noise and vibration for the Project. The Applicant also acknowledges that due to the location of Jasmine Cottage in proximity to Bentley Road, noise mitigation options are limited. As such, it is considered at this stage that temporary significant adverse effect would likely occur, even with all practicable mitigation measures implemented. The following potential mitigation options have been considered: • Routeing (no viable alternatives) – the proposed construction traffic route has considered all potential options, with Bentley Road being the most viable option. Details of the alternative access options that were considered for the EACN

Reference	Question	Applicant's Response
	the absolute noise level would be above the construction noise Significant Observed Adverse Effect Level, principally due to the small distance between the property and carriage way. The ExA is concerned as to the lack of adequate proposed mitigation in regard to PAR 30 – Bentley Road and the sixteen noise sensitive receptors, especially Jasmine Cottage. The vague reference to the outline CTMP and the inclusion of temporary speed limits may serve to reduce construction traffic noise appears weak. In the light of these concerns, the ExA asks what the applicant is going to do in regard to this impact, as it considers being vague or silent on this matter to be unacceptable.	Access can be found in Table 3.19 of 6.3 Environmental Statement Chapter 3 Alternatives [APP-127] • Road widening (viable and proposed) – this is proposed and serves to move traffic further from the property, albeit slightly • Speed reductions (viable and proposed) – a reduced speed limit is proposed which will serve to reduce traffic noise levels • Screening (not viable) – Given the distance between the road and the property, and the potential to block windows, screening is not viable • Low noise road surface (not effective in this instance) – Low noise road surfaces work at relatively high speeds where the tire noise becomes dominant. Traffic would not be at a sufficient speed for this to materially reduce noise levels. With the above viable options, the Applicant considers that significant adverse effects would likely not be avoided. However, the Applicant will continue to explore alternative options as part of commitment NV05 of 7.2 Outline Code of Construction Practice [REP2-014].
NV 1.9	Construction traffic noise assessment ES Appendix 14.2 (Construction Traffic Noise Assessment) at Paragraph 14.4.7 advises "...the effects of noise can be adequately mitigated..." The ExA considers this should read 'will be'. Please review and amend as required.	The Applicant notes this point and it will be included within the next iteration of 8.1 Errata List .
NV 1.10	EACN Substation operational noise assessment - 1 ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259] at paragraph 14.6.1 refers to surveys conducted as part of the Five	The results of the baseline surveys undertaken by the Five Estuaries project are reproduced in Table A14.3.2 of 6.14.A3 Environmental Statement Appendix 14.3 – EACN Substation Operational Noise Assessment [APP-259]. The Five Estuaries project's baseline noise survey report is also available on the Planning Inspectorate's dedicated project webpage for Five Estuaries (see 6.6.9.1 Onshore Airborne Noise Baseline Noise Survey [APP-174]).

Reference	Question	Applicant's Response
	Estuaries and North Falls Substation noise assessment, as detailed in the Five Estuaries Resultant specific noise level at NSR Offshore Wind Farm ES (volume 6, part 6, annex 9.1 (Onshore Airborne Noise Based Noise Survey (Five Estuaries Offshore Wind Farm Limited, 2024). Paragraph 14.6.2 advises “Due to potential cumulative effects of the three projects, it has been agreed with Tendring DC that the projects would be assessed against the same baseline...” Signpost where in the submitted application documents the Five Estuaries Offshore Wind Farm ES (volume 6, part 6, annex 9.1 (Onshore Airborne Noise Based Noise Survey (Five Estuaries Offshore Wind Farm Limited, 2024) and the relevant surveys can be located or you provide this information.	
NV 1.11	EACN Substation operational noise assessment - 2 ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259] at table A14.3.7 (Potential mitigation options related to the EACN). The ExA is concerned you are only identifying indicative/ potential mitigation	Operational noise mitigation at the proposed new East Anglia Connection Node (EACN) Substation is secured via commitment NV21 of 7.2 Outline Code of Construction Practice [REP2-014], which states: <i>‘The proposed new substations will include any required noise mitigation measures by design. This may include plant selection, siting, screening, and enclosures, as appropriate.’</i> The Applicant can confirm that transformers can readily be installed within enclosures and this has been accounted for in the design. The assessment assumes worst-case transformer noise levels, based on the highest level allowed

Reference	Question	Applicant's Response
	options, especially in the light of the potential noise impact arising from the EACN. As such it seeks confirmation as to what mitigation options are to be selected (ie all mitigation identified or one or more mitigations, but not all); whether they are practicable and reasonable, meeting Best Available Technique. Please note the ExA is concerned in regard to the use of Best Practical Means in this instance.	under National Grid specification data, with the lowest level of mitigation achievable via standard acoustic enclosures. Based on these assumptions and the outcome of the assessment, the Applicant is confident that noise levels can be reduced to below both significant adverse, and adverse levels with standard readily available mitigation measures. Noise levels will further reduce once these assumptions are refined by the Main Works Contractor(s). However, the Applicant requires flexibility in design to allow for other potential solutions that achieve the same aims.
NV 1.12	EACN Substation operational noise assessment - 3 ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259], table A14.3.8 (Resultant Specific Noise Levels at NSR (With Mitigation). The ExA notes the findings within this table but would seek clarification as to how you have reached these conclusions. For example are you using all of the potential mitigation options identified or are you using one, such as specifically suggesting the use of acoustic enclosure, or more than one of the potential mitigation options but not all? Please clarify.	As per paragraph 14.8.15 of 6.14.A3 Environmental Statement Appendix 14.3 - EACN Substation Operational Noise Assessment [APP-259] , the mitigation scenario assessment assumes 20 dB attenuation from enclosures and 14 dB attenuation from cooling plant. These are both standard and readily achievable mitigation measures. Additionally, cooling plant would not be expected to operate during normal operation, and this is included to provide a worst case. The assessment does not include any other mitigation. As noted in the answer to NV 1.11, the assessment presents a reasonable worst case based on the highest allowable source level and the lowest feasible mitigation, and the assessment shows that significant adverse effects, and adverse effects can be avoided. As these assumptions are refined during the detailed design process, noise levels would reduce. Commitment NV21 of 7.2 Outline Code of Construction Practice [REP2-014] which is secured by Requirement 4 in 3.1 Draft Development Consent Order [Revision C] secures required noise mitigation measures in the design.
NV 1.13	EACN and Tilbury North Substations operational noise assessment ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259] and ES Appendix 14.4 (Tilbury	The Applicant can confirm that the principles are for noise from the operation of the proposed new East Anglia Connection Node (EACN) Substation and Tilbury North Substation to be controlled by any required noise mitigation measures by design. This is secured via commitment NV21 in 7.2 Outline Code of Construction Practice [REP2-014] . Noise mitigation measures are included in the current design

Reference	Question	Applicant's Response
	North Substation Operational Noise Assessment) [APP-260]. The ExA is concerned with the reference to 'reasonably practicable' (also referred to as Best Available Technique Not Entailing Excessive Cost (BATNEEC)) in both documents. This is due to 'reasonably practicable' and BATNEEC including an element of cost within the assessment. The ExA considers any mitigation used must achieve the outcome intended, as set out in tables a 14.3.8 and 14.4.8 respectively, and Best Available Technique (BAT), not BATNEEC, should be employed and secured within the DCO. The ExA seeks the views of both the applicant and local authorities in this regard. Should there be a formal mechanism requiring BAT? What form should such a mechanism take (ie should it be a requirement within the DCO) and, if so, who should the details be submitted to and who is responsible for discharging those conditions?	principles, and the Applicant has no concerns about the practicality of these measures to avoid both significant adverse, and adverse effects. Additionally, operational noise from the proposed EACN substation is controlled by Requirement 14 of Schedule 3 of 3.1 Draft DCO [REP2-004] which ensures that significant adverse effects are avoided.
NV 1.14	Tilbury North Substation operational noise assessment ES Appendix 14.4 (Tilbury North Substation Operational Noise Assessment) [APP-260]. Image A14.14.1 (Operational Noise Baseline Information) contains two noise sensitive receptors marked as R3,	The Applicant can confirm that the westernmost assessment location should be labelled 'R2' in Image A14.4.1 of 6.14.A4 Environmental Statement Appendix 14.4 - Tilbury North Substation Operational Noise Assessment [APP-260]; this will be corrected in 8.1 Errata List [Revision B]. The Applicant is happy to clarify the point regarding the noise monitoring location to avoid any confusion. The operational noise assessment is based on a comparison of two sound levels at the receptor locations:

Reference	Question	Applicant's Response
	please confirm this is an error and the noise sensitive receptor R3 located to the west should read R2 (High House Lane, Chadwell Saint Mary). In addition to the above, the ExA notes the noise monitoring locations P1 (Brentwood Road, Orsett) and P3 (Walton's Hall Road, Linford) are located further away than NSRs R1 (Brentwood Road, Orsett) and R3 (Buckingham Hill Road). As such we question whether those locations and their results are representative of the noise sensitive receptors at those locations. In the light of this, the ExA would question the validity of the documents conclusions in the absence of information explaining any calculations employed. More information is needed by way of explanation.	• The representative background sound level, which is derived via noise surveys, and • The noise rating level due to the source (in this case, the substation) which is derived via noise propagation modelling. The representative background sound level is the pre-existing environment in the absence of the substation. The important factor is that the location is representative of the receptor location, but these do not have to be located at the receptor location. The chosen survey locations are deemed to be representative of the receptor locations. There is therefore no problem with the survey location being located further from the substation than the receptor, if the location is representative. The noise rating level due to the source, however, is calculated at the location of the receptor, not the background survey location, and therefore reflects the impact at the receptor location.

14. Public Rights of Way

Table 14.1 Public Rights of Way

Reference	Question	Applicant's Response
PRoW 1.3	PRoW general - 3 The outline PRoW Management Plan [APP-039] details indicative durations of impact in table 8.3. How can the ExA be assured that these indicative durations are realistic and how will you and your main works contractor ensure that duration of impact is minimised.	The indicative durations presented in 7.6 Outline Public Rights of Way Management Plan [APP-329] have been developed by the Project's design and engineering teams, drawing on their experience of delivering comparable infrastructure schemes. The approach proposed is broadly comparable to that which the Secretary of State approved on the Bramford to Twinstead Reinforcement Development Consent Order. The durations reflect typical construction periods for the elements of work concerned, informed by standard rates of progress and professional judgment, and are understood to provide a reasonable worst case for each location. While the Applicant does not expect material changes to these durations, they will be refined as the Main Works Contractor develops the detailed design, construction sequencing and overall construction programme. Notwithstanding this, 7.6 Outline Public Rights of Way Management Plan [APP-329] states that all Public Rights of Way (PRoWs) temporarily affected by the works will be reinstated as soon as practicable. Requirement 4 of the 3.1 Draft Development Consent Order [Revision C] requires the production of a final PRoW Management Plan to be submitted to, and approved by, the relevant Local Highway Authority (LHA) prior to commencement of any stage of the authorised development, noting that any final PRoW Management Plan must be substantially in accordance with the 7.6 Outline Public Rights of Way Management Plan [APP-329]. Requirement 4 of the 3.1 Draft Development Consent Order [Revision C] Also requires that all construction works for each stage of the authorised development must be carried out in accordance with the approved plans referred to in paragraph (1), unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned.

Reference	Question	Applicant's Response
		The final PRow Management Plan approval process will therefore ensure that any refinement of durations are transparent and that the LHA has the opportunity to challenge any that appear disproportionate, or are not supported by the Project's construction requirements. In this context, the Applicant considers that Requirement 4 provides an appropriate and proportionate mechanism to ensure that the duration of impacts on PRow's are kept to the minimum reasonably practicable, recognising that final durations will reflect detailed engineering, safety and logistical considerations that emerge during later design stages.
PRoW 1.4	ES chapter 15 table 15.24 (residual construction effects on ProW within the local study area) - 1 The receptors listed on page 84 include PRow W-418/031/0 and W-418/058/0. However, these PRow are not listed under the heading residual construction effects. Review and amend as necessary.	The reference on page 84 is a typographical error and will be corrected in the next iteration of 8.1 Errata List at Deadline 4. The residual construction effects on W-418/031/0 and W-418/058/0 are detailed in page 85 of 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265].
PRoW 1.5	ES chapter 15 table 15.24 (residual construction effects on PRow within the local study area) - 2 The PRow listed in this section tend to provide a clear indication of the duration of the relevant works. However, there are a number of instances where the term "duration of works" is listed against a PRow within the table without any clarification. In those instances does duration of the works mean the entire works across the construction period or does it just refer to the works detailed in that section (for example W-392/046/0	The Applicant confirms that the term 'duration of works' has been used for activities associated with site access, haul roads and associated drainage. These are features that are established early in the construction programme to provide access to the working areas from Primary Access Routes and bellmouths, and are generally removed late in the programme once works are complete and commissioned. As such, their presence, and the resulting impacts on PRow, may extend for the duration of the main works construction activity in that section that they serve. More precise durations will be available once the Main Works Contractor(s) have developed the detailed construction programme post-consent.

Reference	Question	Applicant's Response
	specifies "...drainage system for the duration of the works.", whilst Great and Little Leighs 40 specifies "...to facilitate a temporary drainage system for the duration of the works."). Clarify and amend as required.	
PRoW 1.6	ES chapter 15 table 15.24 (residual construction effects on PRoW within the local study area) – 3 PRoW Little Bromley 13, 14 and 15 all note the permanent closure of a part of the PRoW, with the closures ranging from 5 to 10 metres in length. The ExA would ask for clarification in regard to these permanent closures and whether they are due to road alterations that reduce the amount of PRoW at these locations. Should this not be the case, please explain in more detail the permanent closure of the relevant parts of these PRoW.	As noted in the response to DCO 1.S21, the permanent stopping up of a short section of Little Bromley 15 is associated with the permanent widening of the existing highway. This results in a short length of footpath that extends into the widened highway becoming redundant. The short end section of Little Bromley 15 will therefore be permanently stopped up where the highway is widened over it, and a new termination point will be created. The permanent stopping up of short sections of Little Bromley 13 and Little Bromley 14 are associated with the construction of the proposed permanent private access road between Bentley Road and Ardleigh Road. Both PRoWs cross the proposed carriageway at an angle and are therefore proposed to be realigned to provide safer, perpendicular crossing points. As a result, the short lengths that would otherwise intersect the carriageway at an angle will be permanently stopped up, with the PRoWs realigned (diverted) accordingly. In all cases, only short redundant sections are proposed to be stopped up, and the functional PRoW routes will remain connected and available for public use.
PRoW 1.7	ES chapter 15 table 15.24 (Residual construction effects on PRoW within the local study area) - 4 Page 98 refers to 'The rest of the PRoW within the limits (Section A to Section H)' being temporarily closed with managed access and that safe passage will be allowed throughout for the PRoW users, with a very low magnitude of impact. However, no specific details of these PRoW have been provided.	The table in Appendix G provides a list of 'Other PRoW within the Order Limits' and the associated level of sensitivity and effects as it relates to 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265], table 15.24.

Reference	Question	Applicant's Response
	Provide a full list and relevant details as to the PRow affected by the temporary closures you are referring to under this heading.	
PRoW 1.8	ES chapter 15 table 15.25 (residual construction effects on promoted routes (circular walks, long distance walking and cycling routes) within the local study area). 'Receptor' 'Angles Way (Section A)' refers to the route being temporarily closed for the duration of works to facilitate the haul road access. It does not refer to that PRow being diverted. However, within the same paragraph in regard to the working area for the overhead conductor stringing works reference is made to the route being temporarily closed and diverted to facilitate those specific works. Clarify whether there will be any diversion of 'Angles Way (Section A)' related to facilitating the haul road access? In addition to the above, there are several other instances where the term 'duration of works' occurs in this table, albeit not all related to facilitating haul road access. These include in relation to the John Ray Walk (Section E); the White Notley Circular Walk (Section E), the Pleshys Castle – Great Waltham	The Applicant wishes to clarify that the information provided in Table 15.25 of 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Transport [APP-265] in relation to Angles Way is incorrect. Corrected text within this table for construction impacts on Angles Way is provided below and will be included within the next iteration of 8.1 Errata List: <i>'A short section of Angles Way near Roydon will be subject to temporary disruption for the duration of the works to facilitate haul road access. During this time, the route will remain open on its existing alignment under a managed regime. The Outline Public Rights of Way Management Plan (document reference 7.6) describes how short period closures such as this will be managed throughout the works to allow ongoing use of the PRow by the public.</i> <i>It is also noted that the same section of Angles Way will be subject to a temporary closure (with diversion) for a period of two months to accommodate overhead conductor stringing.</i> <i>With appropriate management measures in place, there is anticipated to be a very low magnitude of impact. The residual construction effect would be temporary, medium-term, negligible adverse and not significant.'</i> The Applicant has provided clarification regarding the term 'duration of works' in response to PRow 1.5.

Reference	Question	Applicant's Response
	loop from Little Waltham (Section F) (This list is not exhaustive). Clarify if you are referring to the duration of the entire works or just the works detailed under the heading of the specific 'Receptor'.	
PRoW 1.9	ES chapter 15 table 15.30 (residual operations (and maintenance) effects). Table 15.30 lists under the heading 'Receptor' 'Other PRoW within the Order Limits (Sections A to Section H)'. For clarity, provide a full list of these other PRoW and the level of sensitivity relevant to each PRoW.	The table in Appendix H provides a full list of 'Other PRoW within the Order Limits' and the associated level of sensitivity.
PRoW 1.11	Permanently stopping up and diversions of PRoW. Essex CC raises concern regarding proposals to include permanently stopping up and diversions of PRoW, albeit no specific details have been provided at this stage. It raises concerns around the impact on the PRoW network and seeks more surety on the design and protection of rights ([RR-1083], Paragraph 6.5.11). The applicant and Essex CC are asked for an update on these matters and any discussions taking place between them.	The permanent stopping up and diversion referred to is related to short sections of two Public Rights of Way (PRoWs), namely Little Bromley 13 and Little Bromley 14, and is associated with the construction of the proposed permanent, private access road between Bentley Road and Ardleigh Road. Both PRoWs cross the proposed carriageway at an angle and are therefore proposed to be realigned to provide new, safer, perpendicular crossing facilities. As a result, the short lengths that would otherwise intersect the carriageway at an angle will be permanently stopped up, with the PRoWs diverted accordingly. In both cases, only short redundant sections are proposed to be stopped up, and the functional PRoW routes will remain connected and available for public use. The above is set out in 7.6 Outline Public Rights of Way Management Plan [APP-329] and mapped out in 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section C [APP-035]. As detailed design progresses, the precise alignment, length and specification of the permanent diversions and crossing facilities will be developed in consultation with the Local Highway Authority PRoW Officer. Any resulting proposals would be in accordance with typical facilities and appropriate and relevant design standards.

Reference	Question	Applicant's Response
		With regard to discussions taking place, the aforementioned proposals were discussed at high level with Essex County Council PRow Officers in mid 2025 but did not touch on detailed design. However, broader engagement with Essex County Council is ongoing, including through the development of the Statement of Common Ground, which includes an item relating to the proposed highway mitigation design on Bentley Road and Ardleigh Road (ID 3.11.45 within 5.9.3 Draft Statement of Common Ground – Essex County Council (ECC) (incl. LLFA and Highways) [REP2-012]). This matter therefore remains under discussion, with the intention of reaching agreement where practicable.

15. Safety and security

Table 15.1 Safety and security

Reference	Question	Applicant’s Response
SS 1.1	Bramford substation Detailed resilience, security and continuity concerns have been raised by Burstall Parish Council [REP1-151] and Mr William Petersen [REP1-495] over the scale and size of the Bramford substation site given the concentration of nationally critical energy infrastructure at the site, which would be added to by the proposed development. Respond to such concerns in detail, including reference to EN-1 and EN-5 where relevant.	The Applicant notes the concerns raised regarding the scale of the infrastructure at Bramford Substation and the concentration of nationally significant energy assets. In response to such concerns, the Applicant has set out below the embedded design measures that are integral to Project development and provides a review of security considerations required under NPS EN-1 and EN-5. Security and resilience embedded in design Strategic network planning The assessment of the proposed development has not been undertaken in isolation, but as part of wider and coordinated network planning, using power system studies that consider a range of operating conditions, system behaviours and outage scenarios in line with established industry practices and regulatory oversight. Bramford has been designed as part of the wider transmission network and designed to operate as a robust node, with resilience embedded through compliance with the Security and Quality of Supply Standards (SQSS) and all other applicable engineering and operational standards. The SQSS is a critical framework that outlines the requirements for ensuring the reliability and quality of electricity supply across the National Electricity Transmission System (NETS). It is designed to guide transmission licensees in their planning and operational activities, ensuring that the electricity supply meets the demands of consumers while maintaining system security. At network level the siting of infrastructure at established nodes like Bramford forms part of a coordinated approach to transmission system development. The network has been designed so that Bramford does not represent a single point of failure. As a key node within the transmission network, its role and configuration are designed to ensure that the wider system remains operable and resilient including under fault

Reference	Question	Applicant's Response
		conditions. The design process ensures no single asset or location gives rise to unacceptable levels of system risk. • Design, construction and operation Existing National Grid processes are designed to identify potential safety risks 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 System resilience, security, and continuity of electricity supply are a fundamental part of network design principles. These are set out in the SQSS, which work in combination with the other applicable engineering and operational standards to provide a robust, resilient network from the outset. The SQSS is a critical framework that outlines the requirements for ensuring the reliability and quality of electricity supply across the National Electricity Transmission System (NETS). It is designed to guide transmission licensees in their planning and operational activities, ensuring that the electricity supply meets the demands of consumers while maintaining system security. The Applicant notes the concerns raised in relation to the application of Security and Quality of Supply. The suggestion that the SQSS represents only a minimum baseline for system design is incorrect. The SQSS forms part of a wider framework to ensure system resilience. The Project is compliant with the SQSS. • Physical and cyber security Bramford Substation along with all electricity substations across the National Energy Transmission System comply with the Electricity Safety, Quality and Continuity Regulations to ensure quality and continuity of supplies are maintained delivering safe, efficient and economic supplies for our customer. Bramford Substation is protected using the latest physical and cyber security technologies including, perimeter security, CCTV and access control as standard across National Grid. In summary the Applicant can confirm that:

Reference	Question	Applicant's Response
		• The proposed development has been assessed as part of the wider electricity transmission system to ensure that it does not create unacceptable system risks, including system instability or loss of supply. • Infrastructure is designed with appropriate redundancy, fault tolerances and operational flexibility, consistent with industry standards and regulatory requirements. • Resilience and security considerations are integrated throughout the design process and kept under review as legislation, policy or regulatory requirements may change or system needs evolve. Policy position Section 4.16 of EN-1 sets out NPS security policy relating to NSIPs. The design and development of the proposed Project has been undertaken in accordance with the requirements and principles set out in the relevant National Policy Statements (NPSs), including NPS EN-1 (2024) and NPS EN-5 (2024), with particular regard to system resilience, security and continuity of electricity supply. Paragraph 4.16.4 states that the Government's policy is to: <i>'ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. Where applications for development consent for infrastructure covered by this NPS relate to potentially 'critical' infrastructure, there may be national security considerations'</i>. NPS EN-5 (2024) section 2.8 supports the delivery of energy security as part of the strategic network planning process. As explained in the above section on security and resilience being embedded design, the Project has been subject to strategic network planning as part of the early stages in project development. Whilst Section 4.16 of NPS EN-1 does not expressly refer to Environmental Impact Assessment when considering/appraising security, the matters arising from major incidents including the security threat does form part of the EIA process. EN-1 does require the Applicant to provide information that is sufficient to meet the requirements of the EIA Regulations. The Applicant has considered the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 that requires the EIA process to identify, describe and assess, where relevant, the expected significant effects arising from the vulnerability of the proposed

Reference	Question	Applicant's Response
		development to major accidents and disasters (MAD) that are relevant to the development. The Applicant submitted an EIA Scoping Report to the Planning Inspectorate on 4 November 2022. The EIA Scoping Report [APP-296] identified and described potential MAD which could occur as a result of the Project, or arise from the surrounding environment and affect the Project including: • Physical accident • Electrical accident • Fire/explosion • Security threat • External interference With regards to MAD scenarios, these are already considered within the established regulatory and policy frameworks applicable to critical national infrastructure (CNI). These processes include appropriate and relevant risk assessments and operational processes to ensure an operable and resilient network. CNI assessments and requirements are also 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. A separate major accidents and disasters chapter in the Environmental Statement was not prepared, in accordance with 6.19 Scoping Report [APP-288-295] and 6.20 Scoping Opinion [APP-297]. This was because ‘...there are no likely significant effects (as described in the 6.19 Scoping Report - Appendix A [APP-288 – 296])....’, following the implementation of embedded mitigation measures that the Applicant adopts on all its projects. ES Chapter 4 [APP-130] captures the key embedded design mitigation measures relating to security and refers to National Grid processes that ensure the assets are protected. Table 4.2 confirms the Project will 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.

Reference	Question	Applicant's Response
		National Grid as a regulated business has extensive experience on providing security of supply with established regulatory and policy frameworks applicable to critical national infrastructure. The Applicant and the infrastructure proposed has a demonstrable track record of security and safety. We believe the ExA can be confident that there is no reasonable or evidenced basis to consider the infrastructure will not continue to be safe and secure nor to consider that there is any uncertainty that there is no risk to public safety from the Project. As explained above, the Applicant can demonstrate security measures are embedded in design and this is done at an early stage in the project development and therefore meet the requirements for security considerations set out in paragraph 4.16.4 of EN-1 (2024). Secretary of State decision making The Secretary of State's decision making will also take security issues into account in accordance with Paragraph 4.16.8 - 4.16.10 of NPS EN-1. The Applicant has provided sufficient information as is necessary to enable the Secretary of State to examine the development consent issues and make a properly informed decision on the application. In accordance with NPS EN-1, the approach taken ensures that this infrastructure is resilient and capable of maintaining continuity of supply. The proposed Project is compliant with the requirements of NPS EN-1 and EN-5, and is ready for consideration by the Secretary of State within paragraphs 4.16.8 - 4.6.10 of EN-1. Other wider considerations The Applicant is also aware of the UK Government's broader policy direction in relation to energy system resilience, including the forthcoming Energy Resilience Strategy of Department for Energy Security and Net Zero. The Project has been developed to meet wider policy objectives and is consistent with the wider objective of improving infrastructure robustness and reliability.
SS 1.2	Security risks A range of security issues have been highlighted as a possible risk by a number of IPs in relation to the OHLs and substations, including vulnerability	The Applicant notes the security concerns raised by interested parties, including those related to emerging threats such as unmanned aerial systems and the broader implications of infrastructure concentration within the East Anglia region. In line with Section 4.16 of National Policy Statement (NPS) EN-1 (2024) national security considerations have been an integral part of the design of the Project. A risk

Reference	Question	Applicant's Response
	to attack (for example by drones), and the resilience in areas where there is a concentration of energy infrastructure. NPS EN-1 (2023) section 4.16 recognises that there may be national security implications for critical energy infrastructure. Can the applicant respond to these points, clearly setting out the security considerations for the proposed development and which may result from the concentration of other UK energy infrastructure in the surrounding East Anglia area.	based and proportional approach to security has been adopted, consistent with government policy and guidance for critical national infrastructure. The approach to security and resilience is also consistent with the direction set out in emerging national resilience policy, including the Department for Energy Security and Net Zero Energy Resilience Strategy, which promotes a more proactive approach to infrastructure protection and recovery. Security considerations are addressed through a structural framework that includes: • Alignment with guidance issued by the National Protective Security Authority • Engagement with relevant Counter Terrorism Advisors and other relevant stakeholders • Application of established security design principles and approved technologies • Independent assurance processes at key stages, including design and commissioning. Security measures and arrangements are built into the design from the outset and are subject to verification and ongoing review to ensure they remain effective and up to date as threat profiles change and evolve. These design safety and security standards constitute an embedded mitigation measure as reported in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] 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 and system resilience considerations have been incorporated into the design and will continue to be reviewed during the lifecycle of the Project. With regards to the concentration of infrastructure, this is considered within the overall system and security planning framework. The presence of multiple assets within a region does not in itself give rise to unacceptable risk when appropriate,

Reference	Question	Applicant's Response
		coordinated security and resilience measures are in place to support a more consistent and integrated approach to infrastructure protection. For reasons of national security, detailed security arrangements are not disclosed. However, all measures are implemented in accordance with current government guidance, regulatory expectations and industry best practice. Paragraphs 4.16.8 - 4.16.10 of National Policy Statement (NPS) EN-1 (2024) ensure that these matters are considered and must be addressed satisfactorily before the Secretary of State can make a decision about any application.
SS 1.3	Emergency services – access and community safety Having regard to concerns raised by a number of IPs and from the emergency services (see for example [RR-1087], [RR-3519] and [AS-063]), can the applicant clearly explain what further mitigation measures would be taken to ensure emergency service access and community safety, including in relation to air ambulances, during all stages of development, and how these measures are proposed to be secured. This should include consideration of cumulative impacts with other projects, and whether any measures are proposed to be shared with other projects.	Mitigation – Broomfield Hospital - The Applicant has provided a specific response for access to Broomfield Hospital in 8.5.5 Applicant's Response to the Oral Submissions Made at the Open Floor Hearings [REP2-028]. This response sets out how access by road to Broomfield Hospital will be maintained during construction. The Applicant has provided a summary of Primary Access Routes in the area and the outcomes of the junction operational assessments at two junctions in the locality of the hospital. Mitigation – Abnormal loads and temporary traffic regulation - Section 5.10 of 7.3 Outline Construction Traffic Management Plan [APP-309], which is secured through Requirement 4 of 3.1 Draft Development Consent Order [REP2-004], sets out how the police, fire and ambulance services (referred to as 'blue light services') will be given written notice of any planned temporary lane or road closures and any Abnormal Indivisible Load (AIL) deliveries. Furthermore, when developing temporary traffic management layouts/schemes to be submitted to permit authorities as part of permit applications, the Main Works Contractor(s) will consider, where relevant, whether any further information and mitigation measures may be necessary to ensure emergency service access and community safety, including in relation to air ambulances. Regarding the AIL deliveries, the blue light services will in addition be kept fully informed throughout the delivery period through the Electronic Service Delivery for Abnormal Loads (ESDAL) system. This includes notifications to stakeholders and advising of timings, routes and any asset protection measures appropriate to the type of road. Section 5.3.9 of the 7.3 Outline Construction Traffic Management Plan [APP-309] sets out that where blue light services have a local embargo on AIL

Reference	Question	Applicant's Response
		movements; these hours will be adhered to for AIL movements associated with the Project, unless agreed otherwise. Section 4.3 of 7.3 Outline Construction Traffic Management Plan [APP-309] sets out how the Applicant has engaged with Local Highway Authorities and police forces on the proposed AIL movements and routes. As noted in Section 4.3 of 7.3 Outline Construction Traffic Management Plan [APP-309], their inputs have led to amending AIL routes and developing 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310]. The Applicant will continue to engage with Local Highway Authorities and police forces regarding the planning of AIL movements in order to manage impacts to the highway networks, traffic and localities. Mitigation – other - It is anticipated that the Main Works Contractor(s) will also develop an Incident Management Plan in agreement with the blue light services to develop a procedure for any incidents on the road network proposed to be utilised by the Project. Both measures noted above are contained within 7.3 Outline Construction Traffic Management Plan [APP-309], which is secured through Requirement 4 of 3.1 Draft Development Consent Order [REP2-004]. Cumulative Impacts - In relation to cumulative impacts, 7.3 Outline Construction Traffic Management Plan [APP-309] notes that the Main Works Contractor will liaise with the relevant highway authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. In addition, 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] states that the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate the coordination of works with other Nationally Significant Infrastructure Projects (NSIPs). The Applicant does not control the Agenda for the Forum, but expects the routing of construction vehicles, associated traffic management, traffic management and mitigation triggers, and any measures to be shared with other projects will be discussed within this forum. Engagement with Emergency Service: Operational Phase - During operation, emergency response and community safety are managed through National Grid's established operational incident response and liaison arrangements, aligned with

Reference	Question	Applicant's Response
		national and local emergency planning frameworks. As operation does not result in changes to traffic levels or access arrangements. National Grid has established and well defined emergency procedures for operational substations. Operational risks are considered low due to the robust security, monitoring, and control systems in place across the whole asset base. Fire Risk Assessments are undertaken on a biannual basis, or sooner where site circumstances have changed, in accordance with legislative requirements and National Grid standards. In addition, site specific emergency plans are maintained and reviewed annually. These reviews are carried out through formal site visits and include engagement with relevant emergency services. All potential hazards are systematically identified, recorded, and assessed, including any changes to equipment or site configuration since the previous review. Emergency arrangements are tested regularly through structured resilience exercises led by operational teams. Where appropriate and subject to availability, these exercises are conducted jointly with local emergency responders/services to ensure effective coordination. The exercises are designed to simulate realistic emergency scenarios, providing assurance that site personnel are fully trained, aware of their responsibilities, and able to respond safely and effectively in the event of an incident.
SS 1.6	ES Appendix 15.2 review of aviation impact Respond to the following queries on the review [APP-267]: - The review states that it “draws upon the findings of Alan Stratford and Associates Ltd”. Provide such findings or justification for not doing so. - Provide definitions for ‘Option A’, ‘Option B’, ‘IR04’, and ‘IR05’ in Table A15.2.1	– 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] presents the findings of technical impact assessments performed by Alan Stratford and Associates Limited, the Applicant’s appointed aviation consultant. Assessment has been undertaken throughout the development of the Project design, to inform stakeholder consultation and design-related decision-making processes. The detail of these interim assessments is reproduced as necessary, to illustrate the conclusions made. Items omitted from the review are no longer relevant, as the design has changed over time and their consideration is evidenced within the design development reports (see 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]).

Reference	Question	Applicant's Response
	Table A15.2.4 refers in the 'Assessment Summary' to various paragraphs for Brook Farm, Chase Farm, Priory Farm, Raydon Wings, Thurrock, and Tibenham. However, these paragraph references appear incorrect. Please check and confirm.	The General Aviation Awareness Council has notified the Applicant of the absence of definitions for acronyms used within Table A15.2.1 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267], as well as incorrect paragraph references within Table A15.2.4 of the same document. The Applicant considers these errors to be minor and non-material and has undertaken to ensure the necessary corrections via its Errata List for submission at Deadline 4. In the interim, the information is clarified as follows: Table A15.2.1 makes reference to distances from the closest point of aerodrome runways to the overhead line alignment (in metres). Three iterations of the alignment are shown to illustrate changes to the design, which are named IR04, IR05 and DCO in the document. The definitions of these are: - IR04 – The 2023 preferred draft alignment, subject to non-statutory consultation in 2023 - IR05 – The 2024 preferred draft alignment, subject to statutory consultation in 2024 - DCO – The proposed Development Consent Order overhead line alignment. Within the IR04 column of Table A15.2.1, Option A and Option B figures are shown. Option A relates to a provisional working draft alignment derived from the Preferred Route Corridor graduated swathe (that was subject to non-statutory consultation in 2022). It was an initial unpublished design (acting as a starting point) from which Option B was subsequently developed. Option B is the 2023 preferred draft alignment (in IR04), subject to non-statutory consultation in 2023. Differences between Option A and Option B illustrate changes made to the original route corridor in response to consultation feedback from the 2022 non-statutory consultation. For example, in the vicinity of Raydon Wings aerodrome, the changes from Option A to Option B respond to heritage and aviation effects, as well as consideration of the location of the Cable Sealing End (CSE) compound, as described within paragraphs 5.5.76 to 5.5.80 of 7.20 2023 – Design Development Report for the Project [APP-358]. To note, while the distance from the runway is decreased, the orientation of the Project relative to the runway reduces aviation impacts. Table A15.2.4 provides incorrect references to paragraphs later in the document. To confirm:

Reference	Question	Applicant's Response
		- Item 4 – Brook Farm – paragraph 4.2.1 should refer to paragraph 15.4.2 - Item 6 – Chase Farm – paragraph 4.2.3 should refer to paragraph 15.4.4 - Item 15 – Priory Farm – paragraph 4.2.7 should refer to paragraph 15.4.9 - Item 16 – Raydon Wings – paragraph 4.2.10 should refer to paragraph 15.4.12 - Item 18 – Thurrock – paragraph 4.2.17 should refer to paragraph 15.4.19 - Item 19 – Tibenham (Norfolk Gliding Club) – paragraph 4.2.20 should refer to paragraph 15.4.22.
SS 1.7	Wattisham Station Provide an update on the following issues: a) The effect of the proposed development upon the East 2 WAM Network Statutory Technical Safeguarding Zone, including both the disruption of the microwave link and the impact of any lateral tolerance changes to proposed pylons and OHLs. b) The results of the required recent assessments to consider the vertical and lateral limits of variation proposed in the siting and design of lattice towers as well as for craneage or temporal structures that may be used during construction in the statutory aerodrome safeguarding zone c) Confirmation of the mechanism/ how it will be secured in the DCO, or otherwise, to ensure that the proposed development will be submitted for inclusion on lower airspace chart, should consent be granted and how the	8.8.1 Applicant's Comments on Written Representations [REP2-029] in response to the Defence Infrastructure Organisation Written Representation [REP1-189] remains representative of the Applicant's position and understanding of Project impacts on Ministry of Defence (MoD) assets. The Applicant does not have an update on the MoD assessment of Project impacts on a) the East2WAM Network or b) Wattisham Station aerodrome. The Applicant's position is dependent on the outcome of technical assessments being undertaken by the MoD's subject matter experts. On 31 March 2026 the Defence Infrastructure Organisation (DIO) advised the Applicant its assessments were not complete and that it could not provide a timescale for their completion due to their complexity as well as DIO competing priorities. This is despite the Applicant's position that it provided the DIO with sufficient Project information to enable the completion of its assessments in April 2025. The Applicant has proposed urgent meetings to discuss progression of the assessments and associated mitigation requirements but DIO has advised it currently considers meetings to be premature and counterproductive without the necessary assessment conclusions. The applicant continues to liaise with the DIO and impress upon it the urgency of the requirement for further information to be provided by the DIO. a) East2WAM Network By way of interim update, the DIO has now provided safeguarding maps for both the East2WAM Network and Wattisham Station in pdf and GIS formats. As a result, the Applicant is able to visualise the proximity of these assets and their defined safeguarding zones to its proposed infrastructure. This includes potential interfaces with microwave links between East2WAM Network receivers and the proposed

Reference	Question	Applicant's Response
	Defence Infrastructure Organisation will be notified in advance of the deployment of cranes or temporal tall or narrow profile structures 50 metres or greater in height, including details of any aviation warning lighting with which they may be fitted.	overhead line, including in the location previously identified by the DIO as of concern. The Applicant has also noted potential interfaces between East2WAM microwave links and existing electricity transmission and distribution infrastructure in the vicinity including one 400 kV and two 132 kV overhead lines. We are seeking clarity on whether interactions between these existing assets and the East2WAM required mitigation, to inform our understanding of the nature and extent of the likely DIO requirement for mitigation measures for what appear to be comparable Project interactions. Whilst the East2WAM safeguarding map offers additional insight to the Applicant in terms of the geographical location of microwave links, we are awaiting the requested further information from the DIO regarding the parameters of the safeguarded Fresnel zone surrounding the microwave signal, including lateral and vertical clearances required (or tolerances accepted) between the signal and Project infrastructure (pylons and/or conductors). Once these parameters are known, the Applicant will be in a position to consider Project design-based mitigation options in respect of any infringement of safeguarded areas as appropriate, depending on assessed impacts in terms of signal disruption and resilience. b) Wattisham Station Recent provision of the Wattisham Station safeguarding map has enabled the Applicant to visualise the Project's infringement of defined zones, including where a section of the RG overhead line alignment is within a zone where MoD consultation is required for proposed development exceeding 45.7 m in height above ground level. The Applicant understands the safeguarding map includes Obstacles Limitation Surfaces (OLS) defined for purposes of the aviation operational safeguarding, as well as areas related to technical assets located at the site but has no further technical insight to MoD capabilities and safeguarding parameters. Once the MoD's assessed impacts on these assets are known and communicated by the DIO, the Applicant will be able to understand whether mitigation is required. General Impact Assessment Points The Applicant has not received an update from the DIO regarding the conclusions of its impact assessments relating to either the East2WAM Network or Wattisham Station, including its more recent consideration of potential effects of defined Project Limits of Deviation (LoD) as well as temporary structures such as cranes associated

Reference	Question	Applicant's Response
		with construction. The Applicant has explained that, whilst the LoD introduces (allowable) multiple variables in relation to the final positioning of permanent Project features, there is potential for LoD restrictions to be agreed, where appropriate, to minimise potential adverse effects. The Applicant has provided the DIO with GIS and CAD information for the proposed Project alignment to ensure the MoD has an accurate understanding of proposed Project infrastructure locations and attributes to further inform its assessments. The Applicant is unable to undertake impact assessments independently as we are not privy to MoD asset capabilities and parameters as this information is not publicly available and has not been shared by the DIO, so cannot provide an update to the Examining Authority. Further to our last meeting on 19 February 2026, the Applicant has requested assessment updates as well as proposed meetings to discuss outstanding matters and enable technical collaboration, but these offers have not been provided or accepted to date. c) Mitigation Commitment S06 within Table 6.1 of 7.2 Outline Code of Construction Practice [REP2-014] demonstrates the Applicant's commitment to ensuring permanent Project structures can be accurately charted to mitigate Project impacts on military low flying within safeguarded Low Flying Areas (LFA) 5 and 10. We have sought DIO confirmation that its requirements in relation to crane or temporal structure deployment notification and lighting would be in accordance with CAP1096⁸³, recognising this process differentiates between structures in the vicinity of aerodromes and en-route obstacles to aviation. Once we have received this confirmation we will be able to confirm the appropriate commitment route.
SS 1.8	Tibenham Aerodrome The submitted final SoCG [REP1-105] appears to still have many matters not agreed, with no matters showing as agreed. Furthermore, the applicant's deadline 2 response [REP2-029] to	The Applicant's response focuses specifically on the matter of the Tibenham aerodrome safeguarding zone, as requested by the Examining Authority. The Applicant has fully considered the Respondent's Norfolk Gliding Club Written Representation [REP1-256] and previously responded where relevant and substantiated points have been made by the Respondent. Furthermore, our Statement of Common Ground Update describes how we intend to progress detailed technical discussions to clarify and compare respective assumptions and

⁸³ Civil Aviation Authority (2021) *CAP 1096 Guidance to crane users in aviation lighting and notification*

Reference	Question	Applicant's Response
	Norfolk Gliding Club's WR [REP1-254] appears to not fully deal with the Gliding Club's concerns and provides more of a general response. To the applicant - Provide a more detailed response to [REP1-254] specifically responding to the issue of the Tibenham Aerodrome's 5km circular safeguarding zone and what this means in practice, both for the proposed development and for the operation of the Aerodrome with the proposed development in place. To the applicant and Norfolk Gliding Club - Provide any update to the previous SoCG [REP1-105] or when updates are likely to arise.	conclusions on key matters concerning safety and operational impacts, particularly in relation to gliding. Tibenham Safeguarding Zone In practice, while the Project meets CAP168 OLS standards with only a minor surface penetration, the 5km safeguarding zone triggers consultation to review the environment surrounding the aerodrome and assess the impact on the aerodrome's safe operation. While our technical assessments confirm that current operations can safely continue, the safeguarding process requires ongoing consultation with this Operator to specifically address gliding competition requirements, ensuring that high-speed finishes and gliding event logistics remain viable alongside the new infrastructure. Norfolk Gliding Club Written Representation [REP1-256] states their safeguarding plan was developed in 2022, approved by the Civil Aviation Authority (CAA) (in the absence of any further information from Norfolk Gliding Club, we presume this refers to consultation with the CAA's Airfield Advisory Team (AAT), which had no remit for the approval of safeguarding plans) at the end of 2022, and discussed with the Applicant in July 2023 during the 2023 non-statutory consultation. The Respondent does not confirm when the plan was agreed and deposited with the relevant Local Planning Authority (LPA). Notwithstanding the above, the development of the safeguarding plan is pre-dated by the Project 2022 non-statutory consultation on the Preferred Route Corridor graduated swathe (during which a newsletter was issued to the aerodrome, amongst other general engagement activities), and the General Aviation Awareness Council (GAAC) representation submitted on behalf of the Respondent. The primary purpose of defining a safeguarding zone being to ensure LPA or applicant awareness of the aerodrome and thereby prompt consultation to protect the aerodrome from possible adverse development (see paragraph 5.5.14 of National Policy Statement (NPS) EN-1 (2024), Annex 2 of DfT/ODPM Circular 01/2003⁸⁴ and paragraph 2.3 of CAP 738⁸⁵) was largely superfluous in this case, in view of the fact the Applicant was already aware of both the aerodrome and Operator concerns regarding proximity to the

⁸⁴ Department for Transport (2016) *The town and country planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002*

⁸⁵ Civil Aviation Authority (2020) *CAP 738 Safeguarding of Aerodromes*

Reference	Question	Applicant's Response
		Project. Affected aerodromes within 5km of the proposed Project were identified in 2022 and by 2023, we were directly consulting with the Operator to further inform its impact assessments and design proposals. The Applicant accepts the contents of the Respondent's safeguarding plan and agrees that the proposed Project alignment infringes the 5 km radius safeguarding zone, defined from the Aerodrome Reference Point (ARP). Indeed, the Applicant notes that the 5 km safeguarding zone radius parameter aligns with the 5 km study area applied to the Aviation Impact Assessment as described within paragraph 15.3.6 of 6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] and therefore agrees it defines an appropriate area within which aviation impacts may occur. What cannot be determined from analysis of the Respondent's safeguarding zone alone is the potential impact of this infringement on aviation safety and aerodrome operations. The safeguarding map does not stipulate the height of developments (above ground level) to be notified to the Operator (this is contrary to the advice in Annex 2 of DfT/ODPM Circular 01/2003 and paragraphs 1.4 and 4.5 of CAP 738 and British Gliding Association⁸⁶ guidance) and therefore likely to be of particular concern. It has therefore been incumbent upon the Applicant, in accordance with EN-1 requirements (see paragraphs 5.5.37 to 5.5.42), to assess this impact to inform the development of its proposals, which it has done. As already explained within 8.8.1 Applicant's Comments on Written Representations [REP2-029] to the Norfolk Gliding Club Written Representation [REP1-256] this undertaking, focused on obstacle clearance and consideration of the significance of Obstacle Limitation Surface (OLS) infringement amongst other factors, has a separate purpose to operator safeguarding map or plan definition. Figures 1 and 2 of CAP 738 illustrate this distinction within the safeguarding process, albeit with focus on applications for which the LPA and not the applicant is responsible for operator consultation. The Respondent consistently compares and conflates these activities, with the resulting implication that <i>any</i> above ground development within the safeguarded zone cannot be tolerated. This is not the case, a point reaffirmed by the CAA (see paragraph 3.4 of CAP 793⁸⁷).

⁸⁶ British Gliding Association (2013) *Protecting Assets - Safeguarding and Communicating*

⁸⁷ Civil Aviation Authority (2010) *CAP 793 Safe Operating Practices at Unlicensed Aerodromes*

Reference	Question	Applicant's Response
		The Respondent's requirement for the Project to be realigned beyond its safeguarding zone, or undergrounded within it, is not justified by the Applicant's impact assessment nor any assessment undertaken by or on behalf of the Respondent (of which we have been made aware). Within its appraisal of the Applicant's impact assessment and comment on the matter of safeguarding, the Respondent's appointed aviation consultant appears to set aside the Respondent's safeguarding plan and instead details its own safeguarding model to determine impacts (see Appendix 9 of the Eddowes Aviation Safety Limited consultant report within Norfolk Gliding Club Written Representation [REP1-256]). The Applicant welcomes the stated need for consideration of additional factors, including the nature of aviation operational activities (differentiating powered and gliding operations), obstacle clearance slopes (during take-off, landing and circuits), and consideration of fault conditions. Whilst often in broad agreement with the Applicant's methodology, the Respondent's consultant does not detail its preferred equivalent OLS. The Applicant wishes to make clear that Respondent references to National Grid's issuing of Guidance on Consideration of Aerodromes for Overhead Line Transmission Projects in July 2025 is incorrect. The draft guidance was shared with aviation stakeholders including the British Gliding Association and the GAAC for comment as part of a longer-term, wider-scope collaboration and remains under development. Assumptions based on its content should therefore be disregarded at this time as the guidance is still under development and yet to be finalised and adopted. In further reference to the Respondent's mitigation requirements for substantial re-design of the proposed Project routeing in relation to its safeguarding zone and as also stated within the Applicant's Response to ExQ1_SS1.11, the Applicant is unable to pursue unjustified alternative routeing options as this would be in conflict with the Applicant's statutory duties and obligations to balance alternatives with the need to be economical, efficient and to keep costs down in the interests of bill-paying consumers. In addition, mitigation via undergrounding would be against the government's strong starting presumption of overhead lines for electricity network development (see paragraph 2.9.20 of NPS EN-5 (2024)) as this is assessed to not be required on aviation impact grounds. Furthermore, the Applicant considered

Reference	Question	Applicant's Response
		paragraph 2.9.25 of EN-5 (2026) to be relevant as states the feasibility, cost, and any harm of undergrounding must be weighed against the adverse implications of the overhead line proposal. The Applicant's position is this cannot be justified on the basis of the potential adverse impacts to Tibenham aerodrome. Statement of Common Ground Update 8.8.1 Applicant's Comments on Written Representations [REP2-029] to the Norfolk Gliding Club Written Representation [REP1-256] noted that the Respondent's recent provision of detailed commentary offers opportunity to progress outstanding matters, having previously been stalled by the Respondent's high-level rejection of the Applicant's remit and approach. In response, on 27 March 2026 the Applicant proposed a meeting with the Respondent for either 16 or 17 April 2026 to focus on Tibenham's gliding operations and specifically the matters of aerotow take-offs, forced landings and competition finishes, noting these areas to be mutually recognised as lacking authoritative clarity on appropriate assessment and mitigation of risks. We have suggested the involvement of the Respondent's aviation consultant to enable detailed technical discussion, comparing respective assessment approaches and assumptions, with a view to agreeing reasonable mitigation. We have also invited the British Gliding Association (BGA) to join the meeting, recognising its responsibility for advising operators with regards to gliding safety, and its own representations in relation to the Project (see British Gliding Association Relevant Representation [RR-0412]). Nether the Respondent nor the BGA have accepted the meeting proposal to date. The Respondent has responded to state their confirmation is conditional on prior receipt of information it considers to be outstanding. As per 8.8.1 Applicant's Comments on Written Representations [REP2-029] to the Norfolk Gliding Club Written Representation [REP1-256] the Applicant does not agree that information has been withheld, and the Applicant position is that information sharing has been appropriate to the progression of discussions around the matters at hand. The Applicant will continue to make attempts to meaningfully engage with the Respondent and provide information requested by the Respondent as is appropriate and necessary to the Respondent's own appraisal of the Project's impacts on the aerodrome. The Applicant has re-drafted the current draft SoCG in advance of the meeting to focus on these key matters, affording opportunity for the Respondent to review

Reference	Question	Applicant's Response
		beforehand and update its own positions afterwards, in advance of Deadline 4. We anticipate the SoCG will remain in draft at this deadline, but with some matters substantially progressed, as well as clear confirmation of matters of difference. We anticipate then need for continued engagement to further progress outstanding matters prior to Deadline 7.
SS 1.9	ES Appendix 15.2 review of aviation impact and Raydon Wings The review [APP-267] states that the proposed development will result in a “minor penetration of the Inner Horizontal Surface (IHS)”. Table A15.2.9 notes that CAP168 compliance for take-off and landing is “partial” in both instances. a) Provide further information on the safety or otherwise of using an aerodrome with a minor penetration of the Inner Horizontal Surface. b) Is it possible to achieve ‘partial’ compliance of CAP168 and what does this mean in practice for the users of the aerodrome and their safety?	In response to (a), for licensed aerodromes, CAP 168⁸⁸ describes the IHS (one of the defined Obstacle Limitation Surfaces (OLS)) as being a horizontal plane, located 45 metres above the elevation of the lowest runway threshold, recognising the need to consider the control of new obstacles above this level, to ensure safe visual manoeuvring of aircraft in the vicinity of the aerodrome (see CAP 168, paragraph 4.45). For licensed, non-instrument runways, regulation requires safety assessment for new obstacles above any OLS, to determine that the object would not adversely affect the safety or significantly affect the regularity of operation of aeroplanes (see CAP 168, paragraph 4.78). For an unlicensed aerodrome, no OLS are defined. As an unlicensed, non-instrument runway, Raydon Wings is not bound by any regulation regarding obstacles in the environment but is recommended to follow the guidance given in CAP 793⁸⁹, Chapter 4, paragraphs 5.1 to 5.4, with respect to the presence of obstacles near the aerodrome, considering a range of mitigations from measures to enhance pilot awareness, to marking or removal of the obstacle. Paragraph 15.3.27 of 6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] explains that the Applicant’s impact assessment approach has nevertheless considered, for all civil aerodromes in scope, whether the Project alignment infringes OLS as defined within CAP 168. The Applicant views it as applying a standardised and objective measure, recognising this as best practice for obstacle assessment and treatment, albeit not a regulatory requirement for unlicensed aerodromes such as Raydon Wings aerodrome.

⁸⁸ Civil Aviation Authority (2025) *CAP 168 Licensing of Aerodromes*

⁸⁹ Civil Aviation Authority (2010) *CAP 793 Safe Operating Practices at Unlicensed Aerodromes*

Reference	Question	Applicant's Response
		CAP 168 states that when licensed aerodrome OLS are infringed, the Civil Aviation Authority (CAA) as the regulatory body would have regard to multiple factors when considering the need for safety measures. This includes the amount by which the surface is infringed, as well as other factors such as the nature of the obstacle and its location relative to the surface origin and the type of air traffic at the aerodrome. The regulation recognises safety measures could entail promulgation in the UK Aeronautical Information Publication (AIP) of appropriate information or marking and/or lighting of the obstacle, as well as more restrictive measures such as limitations to the use of the runway (see paragraph 4.5). As noted within 8.8.1 Applicant's Comments on Written Representations [REP2-029] in response to Raydon Wings Written Representation [REP1-268] this demonstrates the OLS should not be treated as an absolute exclusion zone, as mitigation of risks associated with infringement may be achievable, reasonable and acceptable. In the case of the unlicensed Raydon Wings aerodrome, the Applicant has identified and advised the Operator of the theoretical IHS 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]). This assessment reflects consideration that a 2 to 3 metre infringement would not be material for an aircraft in flight as the pilot would avoid obstacles by at least an order of magnitude more. Furthermore, 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 IHS, or operational changes in relation to aerobatic display aircraft practicing at low level. In response to (b), in applying CAP168 OLS requirements to the aerodromes in scope, the Applicant has considered relevant general requirements as well as the site-specific circumstances of each aerodrome. As previously referenced, paragraph 4.5 of CAP 168 notes that in ideal circumstances all surfaces would be free from obstacles, but when a surface is infringed, safety measures may be required by the CAA. Table A15.2.9 of 6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] therefore applies a high level summary on aerodrome compliance with CAP 168 OLS, in respect of the Applicant's impact

Reference	Question	Applicant's Response
		assessments for take-off and landing at Raydon Wings aerodrome. However, the Applicant is clear that the aerodrome need not achieve compliance with CAP 168, as it is not licensed and as such, no safety measures have been (or will be) required by the CAA. The determination of acceptability or imposition of additional safety measures as appropriate is the Operator's responsibility, as recognised within paragraph 5.5.16 of EN-1 (2024), and the Applicant's assessment is intended to help the Operator with this process.
SS1.10	General Aviation Awareness Council representation Provide a detailed response to the above representation [REP2-050].	8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [Revision A] provides the Applicant's detailed response to the General Aviation Awareness Council Written Representation [REP2-050] .
SS1.11	Priory Farm Provide a detailed response to the RR from Priory Farm Aviators, including any details or information on an updated SoCG.	The Applicant's Position within 8.3.36 Draft Statement of Common Ground - Priory Farm Airfield [REP1-104] responded to Priory Farm Aviators Relevant Representation [RR-2969]. A detailed consolidated response is presented below. 1. Operational Safety of Priory Farm Airfield Threatened <i>Respondent Position: The proposed pylon route passes directly adjacent to Priory Farm Airfield, compromising safe aircraft operations—particularly in relation to EFATO (Engine Failure After Take-Off) scenarios and general circuit flying. This presents a demonstrable and serious increase in risk to life.</i> Applicant Position: Paragraphs 15.4.9 to 15.4.11 and Table A15.2.8 of 6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] provide the Applicant's aviation impact assessment conclusions for Priory Farm aerodrome. Recognising the proposed overhead line generally runs parallel to the runway, a wide section is considered within the operational splay, taking published circuits into account. Due to distance from the runway ends, safe clearances of the overhead line can be achieved for take-off and landing. Whilst general circuit flying would require overflight of the overhead line, this is assessed to be from a safe height, in accordance with normal practice. Circuit patterns need not change as a result of the Project. Furthermore, it is assessed that the position of the Project would have minimal impact on aircraft responding to an emergency event, such as undertaking a forced landing. The conclusions do not support the Respondent's position that the Project as an obstacle presents a demonstrable and

Reference	Question	Applicant's Response
		serious increase in risk to life. The Respondent's position has not been corroborated through its own assessment, to our knowledge. As per 8.8.1 Applicant's Comments on Written Representations [REP2-029] in response to Norfolk Gliding Club Written Representation [REP1-256], the Applicant's general position is that operator management of risk of Engine Failure After Take Off (EFATO) will necessarily consider causes (such as mechanical issues) as well as effects (needing to undertake a forced landing). The Applicant is specifically concerned with the presence of the Project as a new obstacle in the vicinity of the aerodrome and its effect (including in an emergency, such as following EFATO). The Applicant's assessment considers the lateral and vertical clearance between aircraft and the overhead line, to judge the ability of aircraft to respond to the event by manoeuvring away from the line and landing safely, in a suitable area in front of or beyond it. A suitable area is considered to be a location of appropriate size and shape to land an aircraft and ideally flat - such as a field, surrounded by minimal hazards. The Applicant has provided details of the key assessment assumptions and parameters applied within its impact assessments, resulting in detailed and quantified assessment conclusions for Priory Farm. These are explained within 6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] (see paragraphs 15.3.26 to 15.3.29 for general assumptions, and paragraphs 15.3.39 to 15.3.42 regarding forced landing risk). As previously requested and recognised within 8.3.36 Draft Statement of Common Ground - Priory Farm Airfield [REP1-104], the Applicant would welcome the Respondent's feedback on these parameters as well as 'real world' flight data to test our findings. Key information sought includes typical climb angles during take-off from Priory Farm and acceptable obstacle clearance margins. Alternatively, the Applicant requests details of the assessment methodology that has been used to qualify the Project's aviation impacts in relation to Priory Farm as a serious risk to life. No further information has been provided by the Respondent. On 30 March 2026 the Applicant proposed these matters to be the focus of SoCG discussions during a meeting on 15, 16 or 17 April 2026, with the aim of seeking agreement or confirming areas of difference. The Respondent has not accepted the meeting proposal to date, and has stated this is conditional on prior receipt of information it considers to

Reference	Question	Applicant's Response
		be outstanding. As per 8.8.1 Applicant's Comments on Written Representations [REP2-029] to the Norfolk Gliding Club Written Representation [REP1-256] how have responded similarly the Applicant does not agree that information has been withheld. The Applicant has re-drafted the current draft SoCG in advance of the meeting to focus on these key matters, affording opportunity for the Respondent to review beforehand and update its own positions afterwards, in advance of Deadline 4. We anticipate the SoCG will remain in draft at this deadline, but with some matters substantially progressed, as well as clear confirmation of matters of difference. We anticipate then need for continued engagement to further progress outstanding matters prior to Deadline 7. 2. Inadequate Consideration of Authoritative Aviation Guidance <i>Respondent Position: National Grid has dismissed or ignored the views of key statutory and expert aviation bodies, including the Civil Aviation Authority (CAA), the British Gliding Association (BGA), and the General Aviation Awareness Council (GAAC), in favour of an assessment by ASA, which lacks equivalent aviation safeguarding expertise</i> Applicant Position: 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] addresses, in detail, the Applicant's consideration of advice from the Civil Aviation Authority Airfields Advisory Team (CAA AAT) including in relation to Priory Farm specifically (see paragraphs 3.17.10 to 3.17.12). This includes addressing the Priory Farm circuit overflight of the overhead line as per the impact assessment conclusions previously described, and the need for deconfliction of operations with neighbouring Tibenham, should circuit patterns need to change. We suggest this is a moot point as our assessment concludes that the existing circuits can remain. Paragraphs 15.3.16 and 15.3.17 of 6.15.A2 Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] reflect the Applicant's engagement with the BGA and the GAAC. We note BGA advice is less relevant to Priory Farm than Tibenham in view of the latter's gliding focus. 8.4.8 Applicant's Comments on any Further Information or Submissions Received by Deadline 2 [Revision A] responds in detail to the GAAC's Written Representation [REP2-050] which endorses the position of Priory Farm as a General Aviation aerodrome. Beyond

Reference	Question	Applicant's Response
		general criticism of the Applicant's approach to consultation and impact assessment, the GAAC has suggested the relationship between Priory Farm and Tibenham operations has not been considered. Our assessment conclusions referred to previously in relation to operational deconfliction between the aerodromes apply here also. 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]) has been to provide independent technical assessments of aviation safety, operational and capability impacts in support of the Applicant responsibilities, in accordance with National Policy Statement (NPS) EN-1 and NPS EN-5 (2024). In contrast to the advice of the aviation bodies listed, their methodology has enabled objective and quantified site-specific impact assessments to inform design development. 3.Lack of Effective or Proposed Mitigation <i>Respondent Position: Despite repeated requests over two years, National Grid has not provided meaningful mitigation proposals to reduce this elevated risk to aviation safety. No justification has been offered for rejecting safer routing options, including realignment or undergrounding within our 5km safeguarding zone.</i> Applicant Position: Within 8.3.36 Draft Statement of Common Ground - Priory Farm Airfield [REP1-104] the Applicant makes clear its responsibilities for mitigation in accordance with NPS EN-1 (2024), being to include appropriate mitigation measures as an integral part of the proposed development (see paragraph 5.5.43) and to design, where possible, to minimise adverse impacts on the operation and safety of aerodromes (see paragraph 5.5.50). In view of the assessment conclusions for Priory Farm, changes to the Project design have not been implemented as they are not considered to be appropriately justified by the minimal potential adverse impacts on the operation and safety of the aerodrome. Consideration of consultation feedback regarding Priory Farm (including operator concerns) as well as site-specific impact assessments is demonstrated throughout the Project's development. This is evidenced within 7.20 2023 - Design Development Report for the Project [APP-358] (see paragraph 5.5.21, and

Reference	Question	Applicant's Response
		paragraphs 6.4.13 to 6.4.17), 7.21 2024 – Design Development Report for the Project [APP-359] (see paragraphs 5.4.25 to 5.4.26 and 5.4.29) and 5.15 Design Development Report [APP-122] (see paragraph 4.5.1). Notwithstanding that the purpose of a safeguarding zone is to ensure developer awareness of an aerodrome and prompt operator consultation, not to preclude development (see 8.8.1 Applicant's Comments on Written Representations [REP2-029] in response to Norfolk Gliding Club Written Representation [REP1-256]), to pursue unjustified alternative routing options would be in conflict with the Applicant's statutory duties and obligations to balance alternatives with the need to be economical, efficient and to keep costs down in the interests of bill-paying consumers. In addition, mitigation via undergrounding would, from the Applicants perspective, not be justified. New transmission infrastructure development is guided by the government's strong starting presumption for the use of overhead lines for electricity network development (see paragraph 2.9.20 of NPS EN-5 (2024)). Consideration of other pylon types comes via application of the mitigation hierarchy, where the effects from the standard lattice pylon are considered unacceptable, and for undergrounding by passing through or within the setting if a nationally designated landscape or in line with other tests set out in NPS EN-5. The NPSs do not provide specific direction with regards to the consideration of undergrounding in the context of aviation. The Applicant has suggested the Respondent's consideration of reasonable operational measures to address the presence of the Project as an obstacle, such as enhancing pilot situational awareness. In particular, the Applicant has raised its willingness to discuss the potential integration of marker balls to Project infrastructure to address the operator's concerns about the visibility of the overhead line. 4. Failure to Meet 'Agent of Change' Responsibilities <i>Respondent Position: As the 'Agent of Change', National Grid is responsible for ensuring its infrastructure does not create new safety hazards for pre-existing airfields. To date, this principle has not been honoured in any meaningful way in NG's consultations or plans.</i> <i>Applicant Position: The Applicant recognises paragraph 200 of the National Planning Policy Framework (NPPF), in the context of ground conditions and pollution, states 'existing businesses and facilities should not have unreasonable</i>

Reference	Question	Applicant's Response
		<i>restrictions placed on them as a result of development permitted after they were established' and also 'the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed'. The Applicant considers this policy requirement to be relevant, but also strongly recognises paragraph 5.5.5 of NPS EN-1 (2024) as the primary determining policy for electricity networks infrastructure, which emphasises the need for collaboration and coexistence between aviation and energy stakeholders to ensure that aviation-related safety, operations and capabilities are not adversely impacted by new energy infrastructure, with the reciprocal need for aerodrome operators to work collaboratively with energy infrastructure developers essential for net zero.</i> The Applicant is not aware of an extant policy requirement for its avoidance of the creation of aviation hazards and considers this would be unrealistic and unreasonable. This view is taken because it cannot be the case that informally established aerodromes could prevent any new onshore connection. The Applicant has recognised that the presence of the proposed Project as a new obstacle in the vicinity of aerodromes is a hazard that should be subject to evaluation. 8.8.1 Applicant's Comments on Written Representations [REP2-029] in response to Norfolk Gliding Club Written Representation [REP1-256] further explains the Applicant's position regarding the need for determination of the significance of risk associated with the Project hazard, in agreement with the position of the operator of Tibenham aerodrome. 5. Consultation Has Not Been Meaningful <i>Respondent Position: The consultation process has involved little more than box-ticking. Repeated written submissions from Priory Farm and Norfolk Gliding Club have gone unanswered or been dismissed without substantive engagement. Critical documents (e.g. updated aerodrome assessments, Statement of Common Ground drafts) remain unavailable or out of date.</i> Applicant Position: The Applicant does not recognise this characterisation of its engagement with the Respondent. Section 4 of 8.3.36 Draft Statement of Common Ground - Priory Farm Airfield [REP1-104] provides a chronology of its engagement throughout the development of the Project design, and Item 6.2 of the SoCG provides the Applicant's position that it is confident the consultation

Reference	Question	Applicant's Response
		undertaken was fully compliant with the published Statement of Community Consultation and legislative requirements under the Planning Act 2008. The Applicant has not updated the Priory Farm impact assessment as we are yet to be provided with requested Operator information or alternative data to validate or challenge its assumptions or conclusions. The Draft SoCG has been duly updated and shared, with the Applicant having repeatedly sought to progress related discussion. Unfortunately, the Respondent has made this conditional on the Applicant's provision of material and statements which the Applicant does not consider to be missing or appropriate to the progression of discussion around the matters at hand. The Respondent may not accept the Applicant's impact assessment conclusions, or agree its positions as described, but we have proposed there is merit in our continued engagement focusing on the operational matters of circuit flying and forced landing risks, sharing and discussing respective technical assumptions and supporting data, as well as residual risk mitigation in the absence of justification for substantial changes to the Project design. We plan to update the SoCG with the outcomes of these discussions for Deadline 4. 6.Viable Alternatives Not Costed or Disclosed <i>Respondent Position: We have requested cost comparisons for alternative routing (outside the safeguarding zone) and undergrounding. These have not been provided. Without this information, stakeholders are unable to properly evaluate National Grid's claims of feasibility or cost justification. Relief Sought: - A re-alignment of the proposed route to avoid the safeguarding zone of Priory Farm Airfield. – Alternatively, undergrounding of the line in this segment. – A full safety-led review of the pylon placement, carried out with CAA and BGA input. – Updated aerodrome assessments, SoCG drafts, and mitigation proposals to be shared in advance of any future consultation. We request Interested Party status and the opportunity to contribute to hearings and written submissions.</i> <i>Applicant Position: The Applicant has considered alternative routes but has to be mindful that change needs to be justified and balance different perspectives. Other routes to east or west are not considered to be justified by the balance of changes given the Applicant's assessment of effects of the main alignment. In terms of alternative technology the Applicant's position is that there must be an unacceptable</i>

Reference	Question	Applicant's Response
		level of effect in policy-based terms to consider the adoption of alternative technologies further up the mitigation hierarchy such as undergrounding. Our position is that, potentially with reasonable adjustments by the operator, safe flight activity can continue based on the overhead lattice pylon design of the proposed route alignment. At our 7 August 2025 meeting with the Respondent, we signposted indicative costs for alternative connection technologies as provided by the Institute of Engineering and Technology (IET) independent report ⁹⁰ to illustrate the order of magnitude of costs. We do not consider it proportionate to develop or provide costs for multiple alternatives based on different technologies when they are not required to establish a scheme that is safe and in compliance with policy.
SS1.12	ES Appendix 15.2 review of aviation impact and Chase Farm The review states in paragraph 15.4.8 [APP-267] that engagement with Chase Farm is ongoing to assess possible solutions to the conflict between the proposed development and the Chase Farm aerodrome – or to agree closure. Provide an update on this matter, including any further discussions over a potential reorientated runway and OHL realignment and, in the alternative, what form or agreement could or could not be reached on closure of the aerodrome, and detail any socio-economic effects this may have.	As described within paragraphs 15.4.4. to 15.4.8 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] and in common with other aerodromes within 5km of the proposed line, the Applicant assessed the impact of the line orientation and height on aircraft operation at Chase Farm. The location is unique in this Application, in that both the operator of Chase Farm and the Applicant agree that the overhead line would prevent any safe aviation operations without change. During initial consultation with the aerodrome operator, both parties considered, at a preliminary level, whether a reorientation of the runway or localised alignment adjustments to the overhead line might offer a viable solution. In addition, the potential implications of closing the aerodrome were explored on a without prejudice basis. The Applicant examined both a re-orientation of the overhead line and also presented (in August 2024, see Section 4 of 8.3.33 Draft Statement of Common Ground - Chase Farm Airfield [REP1-101]) a suggestion for a re-orientated runway design, in the event that the overhead line could not be altered sufficiently to allow aviation operations. The Applicant's re-orientated runway design suggestion was rejected by the operator. In early January 2026, the operator's appointed land agent at Whirlledge and Nott informed the Applicant of their intention to undertake their own options study. The objective of this study was to assess possible locations for relocating or reorienting the airfield within the existing landholding. The completed study was subsequently delivered to the Applicant on 9 March 2026 and included options for the relocation or

⁹⁰ Mott MacDonald and the IET (2025) A Comparison of Electricity Transmission Technologies: Cost and Characteristics

Reference	Question	Applicant's Response
		reorientation of the airfield. Following an internal review, the Applicant acknowledged the study's findings, while requesting clarification on a few minor points i.e the length of the runway being assessed and the requirement for additional accommodation works in the form of access tracks and aircraft hanger. Furthermore, the Applicant has indicated that, upon confirmation from the operator regarding their preferred option from those presented in the study, a legal agreement to secure delivery of the preferred option would be issued. The Applicant remains committed to ongoing engagement with both the airfield operator and their appointed agent in order to progress the matter and both parties have agreed to a further meeting once the airfield operator has confirmed instruction to the appointed agent. The Applicant has reiterated its intention to provide firm commitment to reorientate the airstrip, once the airfield operator confirms the preferred option for the airfield's future. The Applicant remains positive regarding recent developments and the ongoing productive discussions and is confident that an agreement will be reached in the near future. A further update will be provided in accordance with the timeline outlined in 8.3.33 Draft Statement of Common Ground – Chase Farm Airfield [REP1-101], as well as any subsequent deadlines. In relation to the potential effects on Chase Farm as a recreational asset, 6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3 km Study Area [APP-266] concludes that a permanent, long-term, moderate adverse and significant effect is anticipated. This is due to the potential permanent closure as a result of the Project. As per Matter 6.4 within 8.3.33 Draft Statement of Common Ground – Chase Farm Airfield [REP1-101], the Applicant does not concur with the Respondent's position that the airfield's closure would result in a substantial loss to the regional general aviation network. In any event, with the recent findings in the operator's options study concurring with the Applicant's earlier design proposals, the Applicant will avoid the closure of this resource. Should the airstrip be maintained with no closure of recreational facility, the potential effects on Chase Farm could be reduced to not significant.

16. Socio-economics tourism and recreation

Table 16.1 Socio-economics tourism and recreation

Reference	Question	Applicant's Response
SET 1.1	English index of multiple deprivation The ExA notes ES Chapter 15 (Socio-economics, Recreation and Tourism) [APP-265] refers to the English IMD. Table 15.7 (Deprivation ranking by geographical area within the Wider Study Area) of the Chapter sets out the 'Average Rank in IMD 2019'. However, the ExA notes the IMD was updated in October 2025. Your response to updating the IMD, as set out in [REP1-132] is noted. However, the ExA would ask what evidence has been put forward to substantiate there is no need to update the document with the most up to date data. In the absence of adequate evidence, please revisits the Chapter of the ES and address any changes as a result of the IMD being updated. The reassessment should also seek to identify vulnerable and sensitive receptors and any implications this may have on the findings and conclusions set out in this Chapter. Additionally, the ExA request the	A review of the most recent Index of Multiple Deprivation (IMD) data for 2025 has been undertaken during the update of the Statement of Common Ground for Babergh and Mid Suffolk District in quarter one 2026. The majority of Local Planning Authorities (LPAs) exhibit rankings broadly consistent with the 2019 data. Notable exceptions are Mid Suffolk and Braintree, which show an increase of deprivation, with rankings of 191 and 164 respectively, out of 296 LPAs in 2025, representing increases of more than 35 places. This indicates that Mid Suffolk and Braintree are more deprived in 2025 compared with 2019. When comparing with baseline findings provided in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], Tendring remains the most deprived LPA within the Wider Study Area, a position that continues to suggest the area is most vulnerable and sensitive to change across the Wider Study Area. Norwich and Ipswich continue to exhibit notable deprivation, ranking second and third most deprived LPAs within the Wider Study Area. However, Ipswich no longer falls within the 25th percentile of the most deprived LPAs in England; it now falls within the 50th percentile. Further detail relating to changes in baseline deprivation data between 2019 and 2025 has also been provided in relation to Colchester (the Applicant's response to HW 1.9) and Essex (the Applicant's response to HW 1.10). Given the limited changes to the baseline IMD and the broadly similar IMD rankings for LPAs within the Wider Study Area when comparing 2019 and 2025 data, the assessment findings in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] would not be materially altered by the 2025 IMD data. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] does not provide an assessment of impacts by vulnerable group (the scope of the assessment is focused primarily on

Reference	Question	Applicant's Response
	inclusion of more granular LSOA information to reveal any localised deprivation, where health inequalities are most acute.	local economy, built and community assets in accordance with the scope agreed in 6.20 Scoping Opinion [APP-297]; reference is made to 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192], where vulnerable groups are described in more detail. Taking the above into account, no updates to 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] are considered to be necessary. The Applicant notes the ExA's request for the inclusion of more granular Lower Layer Super Output Areas (LSOAs) data to reveal localised deprivation, particularly in relation to health inequalities. The Applicant has responded to this matter as part of HW 1.10.
SET 1.2	Study commissioned by Scottish Renewables entitled 'house prices: impact of Beaully Denny grid infrastructure' (BiGGAR Economics, 2024). ES Chapter 15 [APP-265] at paragraph 15.3.7 refers to a study commissioned by Scottish Renewables in relation to the operation of the Beaully-Denny power line entitled 'house prices: impact of Beaully Denny grid infrastructure' (BiGGAR Economics, 2024). The ExA asks you to: a) signpost where this document has been provided in the application submission or provide this document. In either case provide a synopsis of the findings of the document; and b) advise whether any similar study has been undertaken in relation to the	a) A link to the referenced document is provided here: Report on the Impact of the Beaully-Denny Line Power Line on House Prices BiGGAR Economics Sept 2024 original (1).pdf b) There are no other known comparable similar studies conducted on non-residential property since the Beaully-Denny project. There have been very few new overhead line and pylon infrastructure projects commissioned since Beaully Denny. The Canterbury to Richborough project is too short a distance and there are not enough non-residential properties along the route to provide a justifiable study. The Hinkley Connection project of 54 km that was energised in 2024 has not been in operation for long enough to provide a viable study of the impact to non-residential property.

Reference	Question	Applicant's Response
	impact on non-residential properties, whether in relation to the Beaulieu-Denny power line or other similar development. If such a study or studies have been undertaken please signpost where that information has been submitted into the examination or provide that study, along with a synopsis of the findings.	
SET 1.3	Key parameters for assessment and assumptions ES chapter 15 [APP-265] at Paragraph 15.4.7 (Key Parameters for Assessment and Assumptions) indicates a number of assumptions based on National Grids previous experience of similar projects. For example construction workers who travel to the area (ie non local workers) the assumption is made that such workers would spend an average of £65 per day on accommodation, food and other local services. Furthermore, in terms of visitor accommodation bed space, the assumption is made that non local workers would use camping and caravan sites 50%; stay in short term let's 20%; would using hotels/ bed and breakfast facilities 20% and 10% would commute from home into the area. Please signpost where within the submitted documentation National Grids assumptions are evidenced (ie – what schemes constitute National	6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] makes reference to the Applicant's previous experience of similar projects. Further detail of the relevant projects and associated documentation are as follows: • Bramford to Twinstead Reinforcement – details can be found in relation to assumptions on construction worker travel and visitor accommodation bed space in Document 5.9 Socio Economics and Tourism Report [APP-066] on the Planning Inspectorate's project webpage for Bramford to Twinstead Reinforcement (EN020002-000492-5.9 Socio Economics and Tourism Report.pdf) • Yorkshire GREEN – similarly in Document 5.2.16 ES Chapter 16 Socio-economics [APP-088] located on the Planning Inspectorate's dedicated webpage for Yorkshire Green (EN020024-000265-5.2.16 ES Chapter 16 Socio economics.pdf).

Reference	Question	Applicant's Response
	Grids previous experience of similar projects and what is the evidence that demonstrates the assumptions made) or provide such documentary evidence.	
SET 1.4	Mitigation measures - 1 The ExA notes ES chapter 15 [APP-265] at paragraph 15.6.11 refers to mitigation measures detailed in other relevant chapters of the ES as may be appropriate to social economics, recreation and tourism. Please confirm all mitigation measures have been provided in one central location and that central location is contained in the outline CoCP at Table 6.1(mitigation measures/environmental commitments). Should this not be the case, please advise where a single list of all mitigation measures can be located within the existing application documentation or provide a comprehensive list of all mitigation measures.	The proposed mitigations for Socio-economics, Recreation and Tourism are detailed in one central location in 7.2 Outline Code of Construction Practice [REP2-014], Table 6.1. Detailed mitigation measures on traffic, recreational routes and recreational lands are also provided in 7.3 Outline Construction Traffic Management Plan [APP-309] and 7.6 Outline Public Rights of Way Management Plan [APP-329].
SET 1.5	Mitigation measures - 2 The ExA notes the use of the term 'where practicable' in relation to proposed mitigation and is concerned as to the vagueness of this term. Applicant - justify the use of this term in each instance or amend the proposed mitigations accordingly.	The Applicant has reviewed the documents where 'where practicable' has been used and has provided information on each term below. The Applicant notes that the definition of 'where practicable' was considered in the Sizewell C Project Examination. The definition provided to the examining authority by the applicant in that case was as follows: <i>"Where Practicable' means that the action should be done unless the degree of risk in a particular situation cannot be balanced against the time, trouble, cost and physical difficulty of taking measures to avoid the risk. In practice this means that</i>

Reference	Question	Applicant's Response										
	Relevant County and Local Authorities – The ExA seeks your views in regard to the use of this term and your suggestions in regard to any alternative forms of wording.	<i>something that would avoid a significant impact must be done in almost all circumstances. It would only be acceptable not to take the relevant step if there would not be a significant impact as a result, and therefore the risk would be low”.</i> This definition was accepted by the examining authority and the use of ‘where practicable’ was considered by the Secretary of State for Energy Security and Net Zero, following a consultation on the use of the term suggested by the examining authority, to be appropriate without any further amendments to the Order or further securing mechanisms. Further, use of the term ‘where practicable’ is common across many other consented DCO projects including the Bramford to Twinstead Project, the Lower Thames Crossing Project and the Gatwick Airport Northern Runway Project. Table 1: Justification for the use of ‘practicable’ <table><tr><th>Item</th><th>Justification of ‘Practicable’</th></tr><tr><td colspan="2">7.3 Outline Construction Traffic Management Plan [APP-309]</td></tr><tr><td>5.4.7</td><td>Whilst the Applicant has sought to provide generally continuous haul roads without sections with dead ends, the haul road is discontinuous at major obstructions along the alignment such as major roads, railways, areas of environmental or historical significance, and major watercourses. In these locations, the Applicant has concluded that a severance of the haul road is preferable, rather than continuing through these obstructions, avoiding mitigation requirements such as large span temporary bridges and potentially significant interfaces with complex and sensitive assets.</td></tr><tr><td>5.4.21</td><td>‘As far as practicable’ in this instance means that, where available, when the proposed route to the site access point is compromised, the Applicant will seek to establish an alternative route. The alternative route would ideally be in line with the blocked Primary Access Route (PAR) in terms of road suitability and standard. There may be instances where it is not appropriate or feasible to route construction traffic along a route that is consistent with the blocked PAR due to the length of diversion and impact on construction programme.</td></tr><tr><td>5.5.1</td><td>The Applicant is proposing a number of traffic management methods to manage the construction of the site access points. ‘Where safe and</td></tr></table>	Item	Justification of ‘Practicable’	7.3 Outline Construction Traffic Management Plan [APP-309]		5.4.7	Whilst the Applicant has sought to provide generally continuous haul roads without sections with dead ends, the haul road is discontinuous at major obstructions along the alignment such as major roads, railways, areas of environmental or historical significance, and major watercourses. In these locations, the Applicant has concluded that a severance of the haul road is preferable, rather than continuing through these obstructions, avoiding mitigation requirements such as large span temporary bridges and potentially significant interfaces with complex and sensitive assets.	5.4.21	‘As far as practicable’ in this instance means that, where available, when the proposed route to the site access point is compromised, the Applicant will seek to establish an alternative route. The alternative route would ideally be in line with the blocked Primary Access Route (PAR) in terms of road suitability and standard. There may be instances where it is not appropriate or feasible to route construction traffic along a route that is consistent with the blocked PAR due to the length of diversion and impact on construction programme.	5.5.1	The Applicant is proposing a number of traffic management methods to manage the construction of the site access points. ‘Where safe and
Item	Justification of ‘Practicable’											
7.3 Outline Construction Traffic Management Plan [APP-309]												
5.4.7	Whilst the Applicant has sought to provide generally continuous haul roads without sections with dead ends, the haul road is discontinuous at major obstructions along the alignment such as major roads, railways, areas of environmental or historical significance, and major watercourses. In these locations, the Applicant has concluded that a severance of the haul road is preferable, rather than continuing through these obstructions, avoiding mitigation requirements such as large span temporary bridges and potentially significant interfaces with complex and sensitive assets.											
5.4.21	‘As far as practicable’ in this instance means that, where available, when the proposed route to the site access point is compromised, the Applicant will seek to establish an alternative route. The alternative route would ideally be in line with the blocked Primary Access Route (PAR) in terms of road suitability and standard. There may be instances where it is not appropriate or feasible to route construction traffic along a route that is consistent with the blocked PAR due to the length of diversion and impact on construction programme.											
5.5.1	The Applicant is proposing a number of traffic management methods to manage the construction of the site access points. ‘Where safe and											

Reference	Question	Applicant's Response
		practicable' means in this instance, that appropriate traffic management will be reviewed to understand if it is safe and suitable to allow the continued use of active travel through the site. Practicable has also been applied where maintaining safe access for active travel users would have an impact on the safe completion of these activities. The Applicant may need to temporarily not allow active travel users to use the closed road for their safe operation and safe use.
5.6.4		The Applicant is proposing a construction routeing strategy in paragraphs 5.4.1 and 5.4.2 within 7.3 Outline Construction Traffic Management Plan [APP-309]. In this instance, 'as far as reasonably practicable' reflects the Applicant's preference to continue to use the proposed PARs to site, for as long as viable, without impacting Project delivery in the event of an incident on the road network or heavy disruptions. Where there is a known incident on the road network, the Applicant is proposing to use One Network and follow the diversion routes set out by National Highways and the Local Highway Authorities. HGVs not adhering to the proposed routes have been marked for additional investigation, where suitable and robust explanation will be required by the Main Works Contractor(s) to justify the use of an alternative route.
5.8.3		Code of Construction Practice – detailed below.
5.8.5		The Applicant's use of 'as far as reasonably practicable' in this instance relates to the duration of time that traffic management would be in place for. The Applicant acknowledges that the traffic management measures need to be kept in place for a minimum duration, to reduce the impact of the Project on local users and local roads. The Applicant anticipates that the highway mitigation will be kept in place for the length of time that it is required for the safe working and safe transport of materials. For example, the Applicant anticipates that where traffic management is required for a specific Abnormal Indivisible Load (AIL) movement, the measure will be removed within a suitable timeframe (agreed within the Permit Schemes process) following the completion of the AIL delivery.
5.8.6		The Applicant has proposed a number of roadworks which are applicable for the construction of a number of construction activities, through schedules detailed with 3.1 Draft Development Consent Order [Revision C]. There may be instances where these construction activities are not sequential, and

Reference	Question	Applicant's Response
		as a result the Applicant will look into the suitability of removing the traffic management. To confirm, as detailed within 7.3 Outline Construction Traffic Management Plan [APP-309], the Applicant is proposing to use the Permit Schemes operated and managed by the Local Highway Authorities to confirm the duration of traffic management.
5.8.8		'Where practicable' in this instance, means that the Applicant will endeavour to provide a diversion route of the same standard or higher, where these are available and where it is appropriate to do so. The Applicant acknowledges that the Project will require the temporary closure of small local roads to complete construction activities including installing crossover bellmouths, net stringing activities and others. In these instances, providing a diversion route is not always appropriate or necessary. While the overarching principle is to provide a diversion using a road of the same or higher standard, there may be instances where this is not feasible. For example, where a diversion along a road of same or higher standard would result in a disproportionately long diversion when shorter, more localised routes are available and suitable for short term traffic.
5.10.2		'As early as practicable' in this context means that the Applicant anticipates that the Main Works Contractor(s) will communicate the AIL delivery requirements as soon as they are known, following the development of the construction programme, and works progressing on-site. The Applicant cannot inform the police forces of the specific details until the detailed design and finalised construction programme has been developed.
6.5.3		'Wherever practicable' in this context, means the Applicant will, wherever possible, without significant impact on the construction of the Project, avoid local community events when scheduling construction activities and AIL deliveries, which could cause disruption. The Applicant acknowledges that not all community events may be avoided, with Project critical activities needing to take place. In these instances, the Community Liaison Officer, will inform the community, as soon as possible when it is confirmed an event cannot be avoided.
		7.6 Outline Public Rights of Way Management Plan [APP-329]
3.4.1		The Applicant confirms that the overall strategy for managing Public Rights of Way (PRoWs) is to minimise impacts on PRoW users and to maintain

Reference	Question	Applicant's Response
		access along PRowS wherever reasonably possible, regardless of how frequently, or infrequently they are used. Thus, in the first instance, the Project has, through routeing and siting of its elements, sought to avoid impacts on PRowS wherever possible. Where it has not been possible to avoid impacts the intention is to keep PRowS open on their existing alignment under a managed access regime and only resort to temporary closures and diversions where this is not possible. In the context of this paragraph 'practicable' therefore means the approach taken aims to keep PRowS open except where doing so would not be reasonably, or successfully, achievable without compromising safety, construction feasibility, environmental protection, landowner requirements, or the sequencing of, and access to, the works.
4.2.1		See response to 3.4.1.
5.1.1		See response to 3.4.1.
5.1.3		'As soon as practicable' in this context means that reinstatement will be carried out at the earliest point it is reasonably achievable to do so successfully, without compromising safety, construction feasibility, environmental protection, landowner requirements or the sequencing of, and access to, construction works and without the risk of having to reimpose any temporary management regimes. For clarity, the indicative durations set out in the 7.6 Outline Public Rights of Way Management Plan [APP-329] include the time required to reinstate each PRow, and therefore represent the full period during which a PRow is anticipated to be subject to temporary management regimes. Should construction finish earlier than anticipated, the PRow would be reinstated and reopened as soon as the aforementioned requirements are met.
5.2.26		'As far as practicable' in this context means that the Applicant will aim to minimise the duration of temporary closure and diversion of PRowS to the point where further reduction is not reasonably achievable without compromising user safety, construction feasibility, environmental protection, landowner requirements or the sequencing of, and access to, construction works. Where a PRow is no longer affected by construction activities it would be reopened at the earliest opportunity, as soon as the aforementioned requirements are met. For clarity, the indicative durations set out in the 7.6 Outline Public Rights of Way Management Plan [APP-

Reference	Question	Applicant's Response
		329] include the full period during which a PRow may be subject to temporary closure, diversion or managed access, including the time required to return the PRow to its original alignment and condition.
		7.2 Code of Construction Practice [REP2-014]
GG07		The use of 'where practicable' is used on this general commitment as it covers a lot of possible outcomes, including agricultural land, field access points, farm tracks, farmyards, etc. It may not be practicable to return some of these tracks and access points to a pre-construction condition.
GG08		The use of 'where practicable' is used in this instance as it will not be possible to maintain all features as a result of construction and operation (and maintenance) of the Project. The Applicant notes that the wording of this commitment should be changed to the following to aid understanding: <i>'Where features are to be retained, where practicable, (including veteran trees, ancient woodland, high, medium and low value trees, hedgerows, watercourses and archaeological/ heritage assets), an appropriate protective area or protection mechanisms will be established using appropriate equipment or fencing and signage and will be inspected, repaired, and replaced as necessary'.</i> This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C].
GG21		The use of 'where practicable' allows for flexibility during construction for the Main Works Contractor(s). Where fuels, oils, and chemicals cannot be stored more than 15 m from watercourses, ponds, and groundwater dependent terrestrial ecosystems (for example, due to topography, land use, access etc) additional mitigation will be identified by the Main Works Contractor(s) to avoid impacts.
AS02		The use of 'where practicable' is used on this general commitment as it covers a lot of possible outcomes, including agricultural land, field access points, farm tracks, farmyards, etc. It may not be practicable to return some of these to a pre-construction condition. In addition, the landowner may ask for land to be reinstated to something that is unreasonable.

Reference	Question	Applicant's Response
AS03		This use of 'where practicable' should be retained as the key aspect is Health and Safety (H&S). Access cannot be retained if it would lead to a H&S risk and therefore the use of 'where practicable' should be retained. The commitment requires signage, communication and alternatives to be provided; in other words, there is a commitment to do the best possible within the constraints posed by H&S requirements.
AS04		This use of 'where practicable' provides an allowance to not reinstate should there be some overriding engineering / logistical reason. For example, if to reinstate to a field would require a significant length of pipework on third-party land this might be deemed not practicable/not securable – in any such instances the mechanism for compensation would kick in.
AQ01		The use of 'where practicable' is used to allow for some flexibility for the Main Works Contractor(s) around what can be reasonably achieved without implementing overly onerous restrictions on the Main Works Contractor(s). The use of 'where possible' in relation to baseline monitoring is to be removed. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C].
B07		The use of 'where practicable' is used to allow for some flexibility for the Main Works Contractor(s). The Applicant confirms that the assessment assumes a worst-case scenario that this buffer will not be practicable for all priority habitats and instead has included all potential impacts within the assessment. See also response to ExA Written Question BIO 1.32.
B11		The use of 'where practicable' is used to allow for flexibility for the Main Works Contractor(s). Every effort will be undertaken to time in-channel works to avoid the fish spawning season where practicable. However, due to the scale of the Project, the number of watercourses and the overall constraints to the construction programme, this may not always be practicable. See also response to ExA Written Question BIO 1.19.
B15		The Applicant is content with the removal of 'where practicable' in this instance. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C].

Reference	Question	Applicant's Response
B17		The Applicant is content with the removal of 'where practicable' in this instance. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C] .
B25		The Applicant is content with the removal of 'where practicable' in this instance. The commitment allows for use of no-dig construction works for the haul road located within the 15 m buffer should avoidance not be possible. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C].
GH09		The use of 'where practicable' is used to allow for flexibility for the Main Works Contractor(s) to avoid restrictions during construction.
H06		The use of 'where practicable' is used in this instance as it will not be possible to maintain all elements of the landscape as a result of construction and operation (and maintenance) of the Project.
W02		The Applicant is content with the removal of 'where practicable' in this instance. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C] .
W04		The use of 'where practicable' is used in this instance as it will not be possible to avoid all irrigation pipes as a result of construction of the Project.
W07		The use of 'where practicable' is used in this instance to allow for flexibility for the Main Works Contractor(s). The Applicant proposes to update wording for this commitment. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C]. See also response to ExA Written Question WE 1.3.
W15		The Applicant is content with the removal of 'where practicable' in this instance. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C] .
LV03		The Applicant is content with the removal of 'where practicable' in this instance. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C] .

Reference	Question	Applicant's Response
	LV04	The use of 'where practicable' is used in this instance as it will not be possible to maintain all elements of the landscape as a result of construction and operation (and maintenance) of the Project.
	LV09	The Applicant is content with the removal of 'where practicable' in this instance. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C] .
	NV07	The Applicant is content with the removal of 'where practicable' in this instance. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C] .
	NV08	The Applicant is content with the removal of 'where practicable' in this instance. This commitment will be updated in the next iteration of 7.2 Outline Code of Construction Practice [Revision C] .
	NV11	The use of 'where practicable' is used in this instance as the detailed design has not occurred and therefore specific plant has not been identified.
	NV16	The use of 'where practicable' is used in this instance as the detailed design has not occurred and therefore specific plant has not been identified.
	NV23	The use of 'where practicable' is used in this instance as percussive piling would likely be required in some locations, subject to ground investigations and detailed design. See also response to ExA Written Question NV 1.6.
	S02	The use of 'where practicable' is used in this instance to allow for flexibility for the Main Works Contractor(s) as maintaining alternative access routes may not be possible at all times during construction.
	S03	The use of 'where practicable' is used in this instance to allow for flexibility for the Main Works Contractor(s) as maintaining access to affected assets may not be possible at all times during construction.
		7.4 Outline Landscape and Ecological Management Plan [REP2-018]
	2.1.1	The use of 'where practicable' is used to identify that, where it is possible through routeing, key environmental constraints have been avoided and/or impacts reduced.

Reference	Question	Applicant's Response
	2.2.7	The use of 'where practicable' is used to identify that, where it is possible, landscape planting will take account of constraints identified in the Environment Statement that could affect planting including protected species constraints.
	Table 5.4 (River Gipping)	The use of 'where practicable' is used to identify that tree planting will take place in locations where this is possible taking account of the constraints identified in this sentence.
	6.1.8	The use of 'where practicable' is used where trees with hibernation potential for bats will not be felled in the hibernation period. The rest of the paragraph explains what will happen if this is not possible.
	6.1.9	The use of 'where practicable' is used to identify that, where possible, trees with bat roosts are to be retained through careful routeing. The rest of the paragraph explains what will happen if this is not possible.
	6.1.12	The use of 'where practicable' is used to identify that, where possible, trees will be included in replacement planting taking account of the constraints identified in this sentence.
	7.4.1	The use of 'where practicable' is used to identify that, where possible, existing road pavement is to be retained. The rest of the paragraph explains what would happen if this was not possible.
	7.4.2, second bullet	The use of 'where practicable' is used to identify that, where possible, impacts to tree roots are to be avoided and the rest of the sentence explains what would happen if this was not possible.
	7.5.1	The use of 'where practicable' is used to identify that, where possible, a 15 m buffer has been accommodated. The paragraphs below reference the appendix that outlines the specific mitigation applied to each ancient woodland.
	7.6.3	The use of 'where practicable' is used to identify that, where possible, a 5 m buffer is to be applied to the hedgerows. Note: it is not possible to retain this buffer where there is a direct impact, i.e. the hedgerow is to be crossed.
	7.7.1	The use of 'where practicable' is used to identify that, where possible, a 10 m buffer is to be applied to the watercourses. Note: it is not possible to

Reference	Question	Applicant's Response
		retain this buffer where there is a direct impact, i.e. the watercourse is to be crossed.
8.1.2		The use of 'where practicable' is used to identify that, where possible, vegetation clearance will be scheduled to avoid the bird nesting season. The rest of the paragraph identifies what will happen if this is not possible.
8.1.5		The use of 'where practicable' is used to identify that, where possible, ground works close to trees are to be avoided. The rest of the paragraph identifies the measures to be employed where this is not possible.
8.2.2		The use of 'where practicable' is used to identify that, where possible, trees are to be retained. The rest of this section explains how impacts have been assessed and the routeing decisions that have been taken to avoid impacts to woodlands and trees.
8.3.2		The use of 'where practicable' is used to identify that, where possible, existing gaps in hedgerows will be used when micro siting the haul roads.
9.1.2		The use of 'where practicable' is used to identify that, where possible, habitats are to be restored to their pre-construction condition and land use. The rest of the paragraph identifies the situation where this may not be possible.
9.3.1, first bullet		The use of 'where practicable' is used to identify that, where possible, trees are to be planted in their pre-construction location. The rest of the paragraph identifies the situation where this may not be possible and the steps that would be taken.
9.3.1, third bullet		The use of 'where practicable' is used to identify that, where possible, woodland and trees are to be planted in their pre-construction location. The first bullet identifies the situation where this may not be possible and the steps that would be taken.
9.3.3, second bullet		The use of 'where practicable' is used to identify that, where possible, trees will be replanted in the same, or close to, the location from which they were removed. The third, fourth and fifth bullet in this paragraph identify what would occur if this was not possible.

Reference	Question	Applicant's Response
	9.7.10, first bullet	The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.
	9.7.13, first bullet	The use of 'where practicable' is used to identify that, where possible, ancient woodland has been retained, because although the Project does not remove ancient woodland in this location, ancient woodland is to be removed by Lower Thames Crossing.
	9.7.18, first bullet	The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.
	9.7.21, first bullet	The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.
	9.7.24, first bullet	The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.
	9.7.27, first bullet	The use of 'where practicable' is used to identify that, where possible, habitat has been retained or enhanced and identifies a location where this has been included in the landscape proposals.
	7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]	
	Table 2.1 (1.5 Control of plant movement)	The use of 'where practicable' here is to allow for flexibility where the placement of physical control measures may not be possible due to space, environmental or safety constraints or where physical control measures may not be the most appropriate measure to avoid damage to buried archaeological remains.
	4.4.1, fourth bullet	The use of 'where practicable' here has been utilised in acknowledgement that it may not always be possible to combine temporary and permanent access points, but this will be done when it is possible.
	4.8.7	The use of 'where practicable' here has been utilised in acknowledgement that on occasion vegetation removed during construction may not be

Reference	Question	Applicant's Response
		reinstated, for example where the removed vegetation was invasive or the intended and agreed land use following construction did not support the reinstatement of removed vegetation.
	4.8.9	The use of 'where practical' here acknowledges that physical restrictions on-site may mean that avoidance is not possible; in these instances preservation by record would be employed.
	4.8.11	The use of 'where practicable' here allows for occasions where existing gaps within hedgerows are not of sufficient size or in the right location to facilitate routeing of the cable diversion
	4.8.12	The use of 'where practicable' here allows for occasions where existing gaps within hedgerows are not of sufficient size or in the right location to facilitate access for work vehicles.
	4.8.14	The use of 'where practical' here acknowledges that physical restrictions on site may mean that avoidance is not possible; in these instances preservation by record would be employed.
	5.3.3	The use of 'where practicable' here allows for instances where there is not sufficient space around the identified assets to create a 10 m buffer area or where essential, pre-agreed, activities are required to take place within the 10 m buffer area.
	5.3.22	The use of 'where practicable' here allows for instances where it may be unsafe for a geoarchaeologist to be present on-site or it is not archaeologically advantageous for a geoarchaeologist to be present on-site to inspect buried soils and sediment sequences.
	5.3.24, fourth bullet	The use of 'where practicable' here acknowledges that in some instances it may not be physically possible to retrieve samples of waterlogged organic deposits or it may be determined through appropriate consultation that the taking of samples is not archaeologically advantageous.
	5.3.32	The use of 'where practicable' here acknowledges that in some instances the final destination of spoil removed from site may not be known at the time the grey literature report is produced.
SET 1.6	Key parameters for assessment and assumptions	6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] makes reference to the Applicant's previous experience of

Reference	Question	Applicant's Response
	ES chapter 15 [APP-265] at paragraph 15.7.3 (Local economy) indicates assumptions related to Project Costs based on National Grids previous experience of similar projects. For example National Grid is assuming 65% would be spent on civil engineering works, with the remainder spent on plant and equipment. Signpost where within the submitted documentation National Grids assumptions are evidenced. (ie – what schemes and what is the evidence that demonstrated the assumptions made).	similar projects. Further detail of the relevant projects and associated documentation are as follows: • Bramford to Twinstead Reinforcement – details can be found in relation to assumptions relating to Project Costs in Document 5.9 Socio Economics and Tourism Report [APP-066] on the Planning Inspectorate's project webpage for Bramford to Twinstead Reinforcement (EN020002-000492-5.9 Socio Economics and Tourism Report.pdf); see paragraphs 4.3.8 - 4.3.13 • Yorkshire GREEN – similarly in Document 5.2.16 ES Chapter 16 Socio-economics [APP-088] located on the Planning Inspectorate's project webpage for Yorkshire Green (EN020024-000265-5.2.16 ES Chapter 16 Socio economics.pdf); see paragraphs 16.8.34 - 16.8.38. – The same assumptions informed the development of and decisions made on Bramford to Twinstead Reinforcement and Yorkshire GREEN. The data for these assumptions came from previous construction projects including Hinkley C Connection Project and Richborough Connection Project.
SET 1.7	Potential residual construction effects on built and other assets - 1 ES chapter 15 [APP-265] at table 15.22 (potential residual construction effects on built and other assets) makes a number of assumptions in relation to 'Residual Construction Effects'. For example statements such as "business is not anticipated to be fully affected during construction"; and "Access to the business would be maintained during construction, air quality and noise affects would be mitigated". Signpost to the evidence justifying these assumptions or provide evidence.	The proposed mitigation is set out in Table 6.1 of 7.2 Outline Code of Construction Practice [REP2-014] and provides evidence justifying these assumptions. These include general mitigation measures (GG23, GG29 and GG30), air quality (AQ01 and AQ02), noise and vibration (NV01, NV02, NV03, NV04, NV05, NV06, NV07, NV08, NV09, NV10, NV11, NV12, NV13, NV14, NV15, NV16, NV17, NV18, NV19, NV20, NV21, NV22 and NV23), socio-economics, recreation and tourism (S01, S03, S04, S05 and S06), and traffic and transport (T01, T03 and T08).

Reference	Question	Applicant's Response
SET 1.8	Potential residual construction effects on built and other assets - 2 ES chapter 15 [APP-265] at table 15.22 (Potential Residual Construction Effects on Built and Other Assets) and table 15.23 (Residual Construction Effects on Recreational Land) indicate individual discussions with land owners are to be undertaken or are under separate discussion. Provide updates in regard to each instance where you have advised separate discussions are ongoing and provide evidence of those discussions, including matters being discussed; whether agreement has/ has not been reached and how such agreements have been or intended to be secured.	In regard to the request on the 'individual discussions with landowners to be undertaken' or 'under separate discussion' stated within 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], this is in relation to potential compensation. Potential compensation is not an Environmental Impact Assessment matter. However, below is an update and a summary of the matters discussed for the relevant receptors. - Fishing lake north-west of Ardleigh: The Applicant has engaged with the operator/landowner of the fishing lake north-west of Ardleigh to understand the nature of the recreational use and any concerns regarding potential effects of the Project. Discussions have focused on understanding the operation of the lake and identifying any potential temporary or permanent impacts. Matters relating to access, disruption or loss, where applicable, are understood to be matters for land negotiations and compensation, rather than matters giving rise to significant socio-economic effects within the Environmental Statement assessment. At present it is understood the proposed overhead line alignment will cross the lake and result in restriction to fishing activities on safety grounds. Alternative alignment and the use of underground cable have all been considered and have potential to reduce the extent of oversail of the lake. Localised diversions either side of the lake introduce multiple additional angle pylons, are less consistent with Holford Rule 3 and increase community effects. More southern routeing to the south of Ardleigh crosses a scheduled monument but amongst other challenges is not considered to be able to be routed across the various water bodies. Cable cannot be justified. Further details of alternative alignments are in the 5.15 Design Development Report [APP-122] at paragraph 6.5.43; all are less preferred. Discussions continue with the affected operator/landowner to agree whether the fishing lake is sustainable with reduced activity or fishing activities will no longer take place. In both circumstances the operator/landowner will be compensated for any losses in line with Compensation Code - Essex International Jamboree: The Applicant has responded to this matter as part of SET 1.14.2. Engagement with representatives of the Jamboree has been ongoing since non-statutory consultation in spring 2022 and has included multiple meetings, a site visit during the 2024 event attended by the Applicant's Land Rights Project Manager and design engineers, and continued dialogue

Reference	Question	Applicant's Response
		regarding the operational requirements of hosting a large international youth event. The Applicant remains committed to continued engagement with the Essex International Scouts and Guides Jamboree with the aim of resolving outstanding matters where reasonably practicable and progressing the Statement of Common Ground (8.3.7 Draft Statement of Common Ground - Essex International Jamboree [REP1-078]) as discussions continue • Angling Lake West of Basildon: Engagement has taken place with the relevant land interest in respect of the angling lake west of Basildon to understand its use and any concerns regarding the Project. Discussions to date have focused on identifying the nature of the activity and any potential interaction with the proposed works. Any issues relating to loss, disturbance or access are matters for separate land and compensation discussions and do not alter the conclusions of the socio-economic assessment. The current proposed overhead line alignment crosses the lake and would likely result in restrictions or decreasing fishing activities at the lake. The Applicant has considered other alignments to avoid this location and the adjacent Dunton Hills Garden Village. Wider deviations are, however, constrained by existing urban areas with the route following the safety zone to the gas pipeline the preferred alternative. Localised alignment changes to avoid oversail would have to be from pylons further north and would directly restrict the full build out of the housing. As such routeing over the fishing lake was identified as the preferred solution. The Applicant is looking to engage further with the operator/ landowner and reach agreement on the future viability of the lake and associated compensation in line with the Compensation Code • Chase Farm: The Applicant has responded to this matter as part of the response to SS 1.12. A 8.3.33 Draft Statement of Common Ground – Chase Farm Airfield [REP1-101] has also been prepared. The Applicant remains committed to ongoing engagement with both the airfield operator and their appointed agent in order to progress the matter and both parties have agreed to a further meeting once the airfield operator has confirmed instruction to the appointed agent.
SET 1.9	Potential construction effects on planning and development - 1	The area of Common Land that falls within the Order Limits comprises a section of road verge. It is noted in 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] that ‘...road verges are not

Reference	Question	Applicant's Response
	ES chapter 15 [APP-265] at table 15.23 (Residual Construction Effects on Recreational Land) in relation to 'Receptor' 'Mellis Common (Section B)' states "...road verges are not considered to have a functional recreational purpose; no direct impact is anticipated on recreational use." Direct to the legislation/ case law that confirms your statement.	<i>considered to have functional recreational purposes, no direct impact is anticipated on recreational use.'</i> It is acknowledged that there is a public right of passage which extends over the verge. The Applicant will update the text in Table 15.23 of 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [APP-265] in 8.1 Errata List to state: <i>'There is the potential for temporary acquisition of less than 1 ha of land from Mellis Common to enable access for pylon construction, overhead line construction, construction access and temporary third-party works (i.e. UKPN dismantle and underground cabling works). The area of Mellis Common which falls within the Order Limits is a roadside verge and therefore not likely to have a regular recreational function. No direct impact is anticipated on recreational use.'</i>
SET 1.10	Potential construction effects on planning and development – 2 ES Chapter 15 [APP-265] at table 15.26 (potential construction effects on planning and development) contains multiple examples of sensitivity expressed as 'ranging from low to high or' ...low to medium'. However, the ExA is unable to tell which planning application/ development falls within which sensitivity category. Please review and amend clearly marking the sensitivity against each individual development.	Below is a full list of planning applications with the associated sensitivities set out in 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]. • South Norfolk Council (Section A): – 2021/2573 (High sensitivity) – 2024/1336 (Medium sensitivity) – 2022/1991 (High sensitivity) – 2024/3750 (Medium sensitivity) – 2021/2495 (Medium sensitivity) – 2023/0617 and 2023/3858 (Medium sensitivity) – 2023/1055 (Low sensitivity). • Mid Suffolk District Council (Section B): – DC/23/05426 (Low sensitivity) – DC/22/02667 (Medium sensitivity) – DC/24/01357 (Low sensitivity) – DC/24/04421 (Low sensitivity) – DC/21/01320 (Low sensitivity)

Reference	Question	Applicant's Response
		– DC/23/02118 (Low sensitivity) – DC/23/04729 (Medium sensitivity) – EN010056 (Medium sensitivity) – EN020002 (Medium sensitivity) – DC/24/05090 (Low sensitivity) – DC/21/05468 (Low sensitivity) – DC/19/03008 (Low sensitivity) – DC/23/03630 (Low sensitivity) – DC/22/01861 (Low sensitivity) – DC/22/06309 (Medium sensitivity) – Pre-application of a solar farm from Eco Power Suffolk Limited (Medium sensitivity). • Babergh District Council (Section C): – DC/23/05073 (Low sensitivity) – DC/24/03965 (Low sensitivity). • Colchester City Council (Section C): – 223183 (Medium sensitivity). • Tendring District Council (Section C): – 22/00393/AGRIC (Low sensitivity) – EN010115 (High sensitivity) – EN010119 (High sensitivity) – 21/02070/FUL (Low sensitivity) – 20/00594/FUL (Low sensitivity) – ESS/07/20/TEN (Medium sensitivity) – 23/01033/DETAIL (Medium sensitivity). • Colchester City Council (Section D): – 240279 (Low sensitivity).

Reference	Question	Applicant's Response
		• Braintree District Council (Section E): – 24/02658/FUL (Low sensitivity) – 21/03579/OUT (Low sensitivity) – ESS/12/20/BTE (Medium sensitivity) – 21/03735/FUL (Medium sensitivity) – 22/00860/FUL (Low sensitivity) – 24/02673/FUL (Medium sensitivity) – 19/02226/FUL (Low sensitivity). • Chelmsford City Council (Section F): – EN010118 (High sensitivity) – CC/CHL/85/21 (Low sensitivity) – 18/00073/CM (Medium sensitivity) – 18/00254/FUL (Low sensitivity). • Brentwood Borough Council (Section G): – 23/00453/FUL, 23/00454/GUL, 23/00455/FUL and 23/00456/FUL (Low sensitivity) – 24/00373/OUT (Low sensitivity) – 21/00834/FUL (Medium sensitivity) – 21/01525/OUT (Low sensitivity). • Basildon Borough Council (Section G): – 24/01263/FUL (Medium sensitivity) – 24/00729/FULL (Low sensitivity). • Thurrock Council (Section H): – 24/01069/FUL (Medium sensitivity) – 20/01491/FUL (Medium sensitivity) – 13/00543/FUL and 18/00269/NMA (Medium sensitivity) – 22/01636/FUL (Medium sensitivity)

Reference	Question	Applicant's Response
		– 22/00948/FUL (Medium sensitivity) – 20/01297/CV (Low sensitivity) – Lower Thames Crossing (High sensitivity) – 19/01709/FUL (Medium sensitivity) – 23/00897/SCO (Low sensitivity) – 25/00333/SCO (Medium sensitivity).
SET 1.11	Potential construction effects on planning and development - 3 ES Chapter 15 [APP-265] at table 15.26 (potential construction effects on planning and development) makes several references under the heading of residual construction effects to potential severance being anticipated to be mitigated during construction. However it provides no detail other than vague reference to the outline CoCP in regard to how the applicant intends to mitigate such severance. Provide a clear explanation of the applicants intention in this regard or sign post where the specific detail in the application documentation can be located.	The relevant proposed mitigation is set out in 7.2 Outline Code of Construction Practice [REP2-014], commitment reference S04, where it states '<i>Engagement will take place between National Grid, its Main Works Contractor(s) and developers of other planning applications within the Order Limits. Engagement will occur throughout the pre-construction and construction phase of the Project to understand the construction programme of relevant planning applications where available. Access to land where construction is proposed for planning applications that fall within the Order Limits will be maintained</i>'. The detailed commentary for each planning application is also set out in 5.6 Planning Statement [APP-085].
SET 1.12	Potential construction effects on planning and development - 4 ES Chapter 15 [APP-265] at table 15.26 (potential construction effects on planning and development) under the heading 'Receptor' 'Planning Applications	This is a typographical error, where the sentence should read as '<i>There are 16 planning applications have been identified within the Order Limits, ~~two~~ three of which are not likely to overlap with the Project's construction programme. The 44 13 planning applications with the potential to overlap with the Project's construction programme are as follows...</i>'. This will be reflected in the next iteration of 8.1 Errata List [Revision B].

Reference	Question	Applicant's Response
	within Mid Suffolk (Section B) refers to 14 planning applications with potential to overlap the project construction programme. However in the penultimate paragraph for this 'Receptor' it refers to the magnitude of impact on the remaining 13 planning applications. Clarify this discrepancy.	
SET 1.13	Potential construction effects on planning and development - 5 ES Chapter 15 [APP-265] at table 15.26 (potential construction effects on planning and development) under the heading 'Receptor' 'Planning Applications within Thurrock (Section H) refers to and lists 10 planning applications with potential to overlap the project construction programme. However, applicant at table 15.31 (Potential Operational (and Maintenance) effects on planning and development) lists planning application 20/01297/CV as having a potential physical overlap with the order limits, but this planning application is not detailed in table 15.26. There are several instances within the table as a whole where planning applications are listed in table 15.31 but not listed in	The planning application 20/01297/CV has not been included in Table 15.26 of 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265] as the construction programme of the planning application is not likely to overlap with the Project. 6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265], Table 15.26, sets out that '<i>Ten planning applications have been identified within the Order Limits, one of which is not likely to overlap with the Project's construction programme.</i>' for the planning applications within Thurrock. The other instances referred to in the question are attributable to the same cause.

Reference	Question	Applicant's Response
	table 15.26. Review, clarify and amend as necessary.	
SET 1.14.1	Concerns of ARU Writtle, Anglia Ruskin University and Writtle College Limited At Deadline 1 ARU Writtle, Anglia Ruskin University and Writtle College Limited [REP1-200] highlighted concerns regarding the statutory safeguarding of children and physical collision risks between horses and construction vehicles and between pedestrians and construction vehicles. This issue was raised under the heading of socio economic effects, but could be attributed to other headings, such as Transport and Traffic for example. The ExA seeks written submissions, supported by evidence, from all IPs in regard to these matters that sets out their concerns/ position in regard to these matters. The ExA would especially request submissions from the above named educational establishments, Essex CC and the applicant.	Please refer to the Applicant's written response to the ARU Writtle Written Representation [REP1-200] in 8.8.1 Applicant's Comments on Written Representations [REP2-029]. This document contains a comprehensive and detailed reply addressing the issues and points raised in the written representation. The Applicant's response includes an addendum (8.8.1.1 Addendum to Applicant's Comments on Written Representations [Revision A]), which provides further clarification and comments regarding the written representations received. This addendum is intended to supplement the Applicant's original submission, ensuring that all concerns outlined in the representation are addressed in full. Following further engagement with the affected parties' appointed land agent, the Applicant is planning a meeting with representatives of ARU Writtle and their appointed advisors during the week commencing 13 April 2026. Key members from the Lands, Traffic and Transport, and Engineering teams will attend on behalf of the Applicant. The Applicant intends to have the meeting to discuss ARU's Writtle's concerns and seek to understand how these can be addressed.
SET 1.14.2	Concerns of the Essex International Scouts and Guides Jamboree The ExA notes the draft SoCG related to the Essex International Jamboree [REP1-078] and the submissions made	The Applicant acknowledges the representations made on behalf of Essex Scouts and Guides in relation to the Essex International Scouts and Guides Jamboree and recognises the scale, longevity and charitable significance of the event, together with the substantial investment of volunteer time and resources associated with its delivery.

Reference	Question	Applicant's Response
	by Essex Scouts and Guides [RR-1089], [REP1-233], [REP1-234] and [REP2-045]. It especially notes the concerns regarding the impact of the proposed development on the Essex International Scouts and Guide Jamboree and the fact the SoCG submission to date is not considered to "... reflect verbal discussions and is not agreed by the Essex International Scouts and Guide Jamboree." The ExA is concerned with these allegations, especially the allegations: i) National Grid has failed to substantively address the specific concerns raised in regard to the Jamboree, especially the operational implications of placing transmission infrastructure within the centre of the event site not being addressed; ii) National Grids failing to recognise the true impact of their scheme; and iii) the proposed development "... threatens the future of this significant international youth event." This list of concerns is not exhaustive. The ExA requires a full and considered response to all the concerns raised in regard to the Essex International Jamboree and asks how you intend to resolve the matters being raised.	The Applicant does not accept that it has failed to substantively engage with or address the concerns raised. Engagement with representatives of the Jamboree has been ongoing since non-statutory consultation in spring 2022 and has included multiple meetings, a site visit during the 2024 event attended by the Applicant's Land Rights Project Manager and design engineers, and continued dialogue regarding the operational requirements of hosting a large international youth event. The Applicant recognises that the concerns raised extend beyond technical safety matters and include practical operational considerations such as safeguarding, licensing and parental confidence. These matters have been discussed with the organisers and are considered capable of being addressed through continued engagement, established event management practices, construction planning and, where appropriate, proportionate mitigation measures developed as the Project progresses. The Applicant acknowledges that the 2028 Jamboree is unlikely to take place on the existing site due to construction activity occurring at the same time. Concerns have also been raised regarding the perception of future events due to the presence of overhead transmission infrastructure. In response, the Applicant has supported the organisers in exploring alternative options, including identifying a potential alternative site and assessing whether other areas within the existing site could accommodate the event. Funding has been provided to support initial site searches and early feasibility work. The Applicant confirms its willingness to continue progressing discussions towards a legal agreement, alongside the 8.3.7 Draft Statement of Common Ground - Essex International Jamboree [REP1-078], with the objective of providing an appropriate degree of financial certainty. The 8.3.7 Draft Statement of Common Ground - Essex International Jamboree [REP1-078] is not yet agreed and remains a working document intended to reflect ongoing discussions. The Applicant, in collaboration with representatives of the Essex International Scouts and Guides Jamboree, is currently working towards establishing a mutually agreed timeframe, targeting mid 2026 as the date by which an agreement will be reached. This timeline is considered essential to allow for the necessary planning activities in advance of the 2028 event. The Applicant is confident that this

Reference	Question	Applicant's Response
		timeframe is realistic and is making efforts to provide a positive progress update by Deadline 4. The Applicant notes that mitigation options, including routeing alternatives, have been raised, but considers that the selected alignment represents a balanced solution when assessed against technical, environmental and deliverability considerations. The Applicant does not consider that the absence of a detailed event-specific operational assessment demonstrates a failure to consider the matters raised, but recognises that further clarification and discussion would be beneficial. The Applicant remains committed to continued engagement with the Essex International Scouts and Guides Jamboree with the aim of resolving outstanding matters where reasonably practicable and progressing the 8.3.7 Draft Statement of Common Ground - Essex International Jamboree [REP1-078] as discussions continue.
SET 1.15	Social value opportunities Essex CC in its RR [RR-1083] and LIR [REP1-161], as well as other local authorities, are seeking the proposed development to deliver significant beneficial socio-economic effects to host communities, including in relation to social value and community benefits. Concerns relate to associated social value opportunities around skills, training, and future employment not being fully assessed by the applicant. The applicant is asked to signpost where in the submitted application documentation it expressly details the social value and community benefits it	The Applicant provided a response to Essex County Council and other local authorities on community benefits and social value at Deadline 2 (see Section 3.15: Socio-economics, Recreation and Tourism - Community Benefits and Section 3.16: Socio-economics, Recreation and Tourism - Employment, Skills, Training and Local Supply Chain of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]). The 5.6 Planning Statement [APP-085] confirms that in response to National Policy Statement (NPS) EN-1 (2024) paragraph 5.13.12, any local community investment including training opportunities would be captured under the National Grid Community Grant Scheme and dealt with separately to the Environmental Impact Assessment with the application for development consent as per the Guidance: Community funds for transmission infrastructure⁹¹ – see extract below: <i>‘The community funds outlined within this guidance document are separate from and not a material consideration for planning authorities in England, Wales and Scotland. They will not be a consideration in the planning process or in the decision to approve or reject a proposed project. Community funds are not a means of mitigating</i>

⁹¹ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure*

Reference	Question	Applicant's Response
	is proposing, which accords with the 2025 government guidance, or provide such evidence. Clarification is also sought as to how such benefits arising from the proposed development would be secured, should the DCO be made.	<i>environmental or social impacts of infrastructure projects, which the project developer should address through the planning process. The community can continue to raise issues or concerns about the project through the consultation and planning process, without fear that this will disrupt or derail community funds. However, it should be noted that, if a development does not proceed to construction, community funds will not be delivered.'</i> Since community benefits are not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order, the Applicant has not provided any details in the submitted application documentation. However, to provide wider assistance on understanding the context behind community benefits the Applicant has sought to explain how National Grid is accountable for the delivery of community benefit initiatives through its existing regulatory and funding arrangements. Community benefit funding is allocated to National Grid for this purpose and is subject to oversight by Ofgem, in accordance with government guidance on community funds. This will include requirements to account for expenditure and demonstrate that funds are used in accordance with agreed regulatory objectives. As a result, while community benefits are not secured through the Development Consent Order or relied upon as mitigation, their delivery is subject to external scrutiny through established regulatory reporting mechanisms. This provides transparency and accountability for the use of community benefit funding, independently of the planning regime. In spring 2026, the Applicant will shortly begin consulting on how the community benefit funding should be used for Norwich to Tilbury subject to the Project receiving consent. To provide an illustration of the material to be presented the Applicant refers to Appendix I that shows the community benefit survey used for a proposed new 60 km electricity transmission line between Weston Marsh and East Leicestershire. 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

Reference	Question	Applicant's Response
		setting out how these matters would be approached in practice. In response, 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, 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. In preparing the Employment and Skills Plan, the Applicant will engage with Host Planning Authorities and relevant stakeholders on its scope (via Statements of Common Ground where relevant) to ensure that the scope and status of the Employment and Skills Plan are clearly understood and appropriately reflected in the Examination record. The Applicant considers the decision to put forward the Employment and Skills Plan into Examination will respond to NPS EN-1 (2024) paragraph 5.13.12 where <i>'the Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted'</i>. The Applicant has also made the decision to prepare an Employment and Skills Plan now so that it can be secured via a standalone requirement as a final document not requiring the subsequent approval of Local Authorities. An update to 3.1 Draft Development Consent Order [Revision C] will be made when the Employment and Skills Plan is submitted at Deadline 5.

17. Traffic and transport

Table 17.1 Traffic and transport

Reference	Question	Applicant's Response
TT 1.1	Baseline data - 1 What assumptions were made in the Transport Assessment (TA) [APP-333] about the sourcing of construction materials and what are the most likely sources of materials for construction. What impact would the choice of supply sources have on the delivery routes if they were to be different from the assumptions made and how can the ExA be confident that the final sources of construction materials and use of associated routes would not lead to traffic and transport effects greater than or different from those assessed in the ES.	Within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] Table 4.5 presents the key materials anticipated for the Project and likely quantities. From this it can be seen that a large quantity of stone would be required for the construction of the haul roads associated with the Project, which would be sourced from quarries. Paragraph 4.7.31 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] states, '<i>Although materials would be resourced from within the region where practicable, it is recognised that certain temporary materials, such as hardcore for the haul roads and temporary construction compounds, may need to be resourced from outside the region</i>'. The Main Works Contractor(s) will be responsible for the procurement of these materials to use in the permanent and temporary works depending on material cost and availability at that time. Consideration will be given to the locality of materials sources to allow the works to be completed in the most efficient and sustainable way. As the source of materials was not identified prior to DCO submission, an assumption was made to use the information gathered on potential material sources within 7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340]. This identified a number of quarries with suitable materials that could be used for the construction of the Project, of which the majority were located to the north/north-west of the Project. Therefore, for the 'road only' strategy assessed in 7.11 Transport Assessment [APP-333], the Applicant has made the reasonable assumption that certain temporary materials will be delivered to the Project by vehicles from these quarries. The temporary impact of the Project construction traffic on the Strategic Road Network (SRN)/Major Road Network (MRN) has therefore been assessed based on the location of material sources as considered in Section 7.6 within 7.11 Transport Assessment [APP-333] for the 'road only' and multi-modal strategy. This

Reference	Question	Applicant's Response
		assessment has considered the most suitable and reasonable routes that the Main Works Contractor(s) would select from the identified quarries utilising the wider SRN/MRN that would connect to the Project construction Primary Access Routes (PARs). The approach to the PARs from the SRN/MRN will be common to all routes regardless of the location of the quarry selected. Therefore, the differences in construction vehicle movements between the routes are only relevant on the extended wider SRN outside of the Study Area identified within 7.11 Transport Assessment [APP-333]. Heavy Goods Vehicles (HGVs) will follow the construction routing strategy outlined in Section 5.4 of 7.3 Outline Construction Traffic Management Plan [APP-309]. The Applicant is committed to monitoring and managing the Project's impact on the road network, as stated in the 7.3 Outline Construction Traffic Management Plan [APP-309], paragraph 6.2.6: <i>'The Main Works Contractor(s) will also be expected to monitor the number of construction vehicles using the PARs between the sites and the SRN/MRN'</i>. HGV drivers not adhering to the agreed routes will be identified as an act of non-compliance within Section 6.3. The procurement strategy will be undertaken by the Main Works Contractor(s) and will include an assessment of the availability of more local sources for the high volume materials, such as stone. The aim of this would be to reduce the distance travelled between the source of the materials and the Project, but would not change the approach from the SRN/MRN connecting to the PARs, or the estimated construction traffic movements. This is because a worst case (peak day) for vehicle traffic movements for each construction activity has been provided to inform the trip generation calculation. The Applicant is therefore confident that the final sources of materials would not lead to an increase in construction traffic along the PAR and the traffic and transport effects would be no greater than those identified within 7.11 Transport Assessment [APP-333]. 7.11 Transport Assessment - Appendix G - Multi-Modal Transport Report [APP-340] provides detail of the sensitivity assessment undertaken by the Applicant, to reduce the amount of distance travelled on road by freight vehicles. Ports and railway sidings in the vicinity of the Project alignment were identified and sifted to determine options which would be suitable for use. Suitable sites were investigated further, and the existing operators engaged to determine a credible throughput in

Reference	Question	Applicant's Response
		each location. These credible throughputs have been used to derive trip generation data for the most appropriate route made by road to the Project from either the port or railhead locations. The Applicant and the Main Works Contractor(s) are continuing discussions with the operators of multi-modal sites, with the intention of transporting source materials by more sustainable modes of transport, where possible, in compliance with NPS EN-1 (Department for Energy Security and Net Zero, 2024a)
TT 1.2	Baseline data - 2 What assumptions were made in the TA [APP-333] about the disposal of materials at the end of the construction and dismantling process, especially with regard to stone from access tracks and haul roads. How can the ExA be confident that the agreed disposal points and the use of associated construction routes would not lead to traffic and transport effects greater than those assessed in the ES.	The Applicant is committed to the construction routeing strategy detailed within Section 5.4 of 7.3 Outline Construction Traffic Management Plan [APP-309]. Primary Access Routes (PARs) have been identified for use by construction vehicles to travel from the Strategic Road Network/Major Road Network to the Project site access points (SAPs). Within 7.11 Transport Assessment [APP-333] it has been assumed that all materials brought to site and used temporarily for construction activities would be removed post construction using the prescribed PARs and SAPs to dispose of materials. These movements have been considered within the trip generation for the Project. Details on the disposal of materials is presented in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. Although the dismantling activities have been assumed to need the same number of vehicles as installation, these activities would not occur within the peak week construction activity. Therefore, no greater traffic and transport effects are expected than those presented in the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333] and the ExA can be confident that the transport and traffic effects will not be greater than those tested. At this outline stage, the detailed treatment methods, disposal routes and final locations for haul road materials have not yet been defined. These details will be determined once the construction methodology and decommissioning sequence are confirmed by the contractor. However, 7.2 Outline Code of Construction Practice Appendix B - Outline Site Waste Management Plan (Tracked) (Final Issue B) [REP2-015] commits to the segregation of materials, the identification of suitable reuse opportunities (either on site or on other parts of the Project), and the use of appropriately licensed facilities for any materials that cannot be reused.

Reference	Question	Applicant's Response
		The Applicant has developed 7.3 Outline Construction Traffic Management Plan [APP-309] which details that it is expected that the Main Works Contractor(s) will monitor and manage the number of construction vehicles accessing the site (by a proposed booking system), with the potential for the data collected to be used for auditing. The monitoring of the construction PARs throughout the construction phase will ensure that any change in traffic volumes which could cause material effect can be identified and discussed with the relevant Local Highway Authority when appropriate.
TT 1.3	Baseline data - 3 Confirm that the baseline traffic flow data, growth factors and trip generation data has been accepted and agreed as appropriate by all highway authorities. If not, please explain what matters are not agreed and how it is proposed to conclude on these outstanding matters and by when.	Baseline Traffic Flow Data: The use of 2019 baseline traffic data obtained from Department for Transport (DfT) counts was agreed with the Local Highway Authorities and National Highways during the Thematic Group meetings held in September and October 2023. However, as DfT provided more updated traffic data for 2023 it was later agreed that the latest DfT counts would be used for the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333]. Details of this engagement can be found within 6.16.A1 Environmental Statement Appendix 16.1 - Engagement Undertaken Relevant to Traffic and Transport [APP-272]. Baseline traffic data was collected on the Primary Access Routes (PARs) and at junctions along the PARs where no recent DfT data was available following standard methodology. The methodology for data collection was shared with Local Highway Authorities and National Highways at Thematic Group meetings. This included automatic traffic count (ATC) surveys on PARs and manual classified count (MCC) surveys at junctions. Additionally, user surveys were undertaken on Public Rights of Way (PRoWs). The list of PRoWs was shared with the Local Highway Authorities and PRoW officers and additional sites identified through engagement with the Local Highway Authorities and PRoW officers. Those PRoWs assessed by the Project are presented within Section 4.9 of 7.11 Transport Assessment [APP-333]. The Applicant is still under discussion with all Local Highway Authorities and National Highways on the baseline traffic flows used within the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333].

Reference	Question	Applicant's Response
		Trip Generation: The Applicant has undertaken a robust trip generation and assessment exercise for both the Overhead Lines and Cables and Substation construction activities. This has been calculated as a worst-case assessment, to be transparent in the expected trips along each construction route. This has been based on the maximum number of construction vehicles associated with each activity, factoring the number of vehicles that can be accepted into site each day. The trip generation has been agreed by Norfolk County Council (5.9.1 Draft Statement of Common Ground - Norfolk County Council (NCC) (incl LLFA and Highways) [REP1-010]). Agreement to trip generation is ongoing with all other Local Highway Authorities and National Highways and will be progressed as part discussions held on Statements of Common Ground. Growth Factors: The estimation of the future baseline flows used within 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333] has followed standard methodology and relevant guidelines including Transport Analysis Guidance⁹² and IEMA Guidelines: Environmental Assessment of Traffic and Movement⁹³. The future baseline traffic volumes were estimated by applying an appropriate growth factor derived from TEMPro National Trip End Model (NTEM) dataset v7.2. In line with standard practice, for committed developments that were not already considered within the TEMPro growth factor, the anticipated construction/operation flows were included within the future baseline when the development construction programme overlapped with the Project, and construction/operation traffic shared the same roads on the PARs. Details for committed developments were sourced from using publicly available information from a search of planning applications on LPA websites and the Planning Inspectorate's Programme of Projects (available at the time of undertaking the assessment).

⁹² Department for Transport (2024) *Transport Analysis Guidance*

⁹³ Institute of Environmental Management and Assessment (IEMA) (2023) *IEMA Guidelines: Environmental Assessment of Traffic and Movement*.

Reference	Question	Applicant's Response
		The use of the previous version of TEMPro (version 7.2c) was proposed and agreed by the Local Highway Authorities at thematic group meetings and a draft of the 7.11 Transport Assessment [APP-333] using this growth factor was submitted to all Local Highway Authorities and National Highways for review and comment in February 2025. The growth factors used within the assessments have been agreed by Norfolk County Council, Essex County Council and National Highways (5.9.1 Draft Statement of Common Ground - Norfolk County Council (NCC) (incl LLFA and Highways) [REP1-010], 5.9.3 Draft Statement of Common Ground - Essex County Council (ECC) (incl LLFA and Highways) [REP2-012] and 5.9.20 Draft Statement of Common Ground - National Highways – Letter [REP1-048]). Suffolk County Council and Thurrock Council have not agreed to the growth factors (5.9.2 Draft Statement of Common Ground - Suffolk County Council (SCC) (incl LLFA and Highways) [REP1-012] and 5.9.4 Draft Statement of Common Ground - Thurrock Council (TC) (incl LLFA and Highways) [REP1-016]). However, both Local Highway Authorities did not challenge the use of TEMPro (version 7.2c) when discussed at thematic group meetings. The Applicant has and will continue to engage with Suffolk County Council and Thurrock Council on this matter as part of discussions held on Statements of Common Ground.
TT 1.4	Baseline data - 4 Both Norfolk CC in its LIR [REP1-173] and National Highways in its RR [RR-2657] state that personal injury collision data has been used from 2019 and 2021-2023 which includes periods of Covid-19 restrictions and lockdowns. Please provide an update to this data with a full 5 year period excluding data between March 2020 and September 2021. National Highways in paragraph 4.2.13 of their RR also request that causation factors of the road layout should be detailed when assessing the	The Applicant confirmed with National Highways in February 2026 that personal injury collisions at Strategic Road Network and Major Road Network junctions would be analysed for a full 60-month period excluding the period between March 2020 and September 2021. The data then comprises all collisions recorded between January 2019 and June 2025 excluding the months between March 2020 to September 2021 from available from STATS19 data. As requested by National Highways and Norfolk County Council, an analysis of the latest five-year collision data on the Strategic Road Network and Major Road Network junctions has been carried out post DCO submission to identify any changes to the collision clusters identified within 7.11 Transport Assessment [APP-333]. A new collision cluster has been identified in Essex at Site 56 - A120/A131 Great Notley Bypass with six slight collisions recorded. No other changes to the findings presented within 7.11 Transport Assessment [APP-333] have been identified.

Reference	Question	Applicant's Response
	personal injury collision data, the application are asked to provide this.	Analysis of the latest available three-year period for personal injury collisions on the Local Road Network has been carried out. The analysed period comprises July 2022 to June 2025 and therefore excludes the Covid-19 period. The following changes to the collision analysis reported within 7.11 Transport Assessment [APP-333] have been identified: • B1018 Witham Road (PAR 41). There are no collision clusters on this Primary Access Route. To the south of the junction with Temple Lane there is only one slight accident registered and therefore it does not classify as a collision cluster. • Site 68 - A1016 Waterhouse Lane / A1060 Rainsford Road. The number of collisions recorded at the junction has been reduced to five (two serious and three slight) and therefore no longer classifies as a collision cluster site. The Applicant has analysed STATS19 personal injury collision data which is publicly available from the Department of Transport⁹⁴ and a review of the updated assessment will be provided to Norfolk County Council and National Highways during the examination at deadline 4. This STATS19 data provides details of recorded collisions, such as location (grid refs), date/time, casualties (age, severity), vehicles involved, impact of vehicle, and road type, but not specific causation factors. Where collision clusters have been identified, the Applicant has assessed the location of the collisions, the recorded impact to vehicles (or riders/pedestrians), and reviewed the layout of the junction or road link to understand the cause of collisions using professional judgement and human behaviours based on a safe system approach. Baseline conditions along Primary Access Routes can be found within Section 16.5 of 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271] and Section 4.7 of 7.11 Transport Assessment [APP-333]
TT 1.5	Baseline data - 5 a) Explain how the geographic extent of traffic assessment has been determined.	In response to a), the Study Area defined within the 7.11 Transport Assessment [APP-333] includes: • Roads forming the Primary Access Routes (PARs) from the Project site access points (SAPs) up to the connection to the Strategic Road Network (SRN)/Major Road Network (MRN)

⁹⁴ Department for Transport, *Road Safety Data*. Available at: <https://www.data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-accidents-safety-data>

Reference	Question	Applicant's Response
	b) Explain what roads have been excluded which may potentially be used.	• SRN/MRN junctions connecting to PARs and that are subject to higher traffic increases as they are likely to be used by one or more PARs • Public Rights of Way and walking, cycling and horse-riding routes that interact with PARs and haul roads within the order limits. The Study Area is presented in Figure 1 - Transport Assessment - Traffic and Transport Study Area within 7.11 Transport Assessment - Appendix I – Figures [APP-342]. The definition of the Study Area is based on standard practice, such as Travel Plans, Transport Assessments and Statements⁹⁵ and Design Manual for Roads and Bridges (DMRB) LA 104 Environmental Assessment and Monitoring⁹⁶, and professional judgement which has been used on other Nationally Significant Infrastructure Projects. The Study Area for the transport assessment was presented to the Local Highway Authorities and National Highways at Thematic Group Meetings in March and April 2024 and their feedback taken on board for the definition of the Study Area. Suffolk County Council requested the inclusion of the A140 in Suffolk between the A143 Old Bury Road and A14 J51 Beacon Hill Interchange with special interest on the A140 Stoke Ash junction (April 2024) and the A140 between Dunston and Long Stratton (March 2024). Thurrock Council requested that the M25 J30, A13 Orsett Cock Interchange and A1013 Stanford Road / Buckingham Hill Road junctions (March 2024) were included within the Study Area. No other SRN/MRN roads were requested to be included within the Study Area. Details of the engagement is included within 7.11 Transport Assessment - Appendix B - Consultation on the Scope of the Assessment [APP-335]. In response to b), the assessment in 7.11 Transport Assessment [APP-333] has considered the most suitable and reasonable routes that the Main Works Contractor(s) would select from the identified material sources utilising the wider SRN/MRN that would connect to the PARs. Beyond the immediate vicinity of the SRN/MRN that accesses the PARs, construction traffic is expected to disperse

⁹⁵ Department for Communities and Local Government (2014) *Travel Plans, Transport Assessments and Statements*

⁹⁶ National Highways (2020a) *Design Manual for Roads and Bridges (DMRB) LA 104 Environmental Assessment and Monitoring*

Reference	Question	Applicant's Response
		across the wider network resulting in lower localised impacts. The SRN/MRN within the wider network is expected to be capable of absorbing small increases in traffic without experiencing significant operational effects. In addition, the construction traffic is expected to use the mainline carriageway along the SRN/MRN rather than at-grade junctions, therefore they are not expected to be adversely impacted by the Project construction flows or cause delay and congestion. Through engagement with the Local Highway Authority and National Highways there were junctions on the SRN/MRN that were requested to be included within the modelling assessment as they would potentially be sensitive to the proposed increase in traffic as a result of the Project. Therefore, the Study Area was expanded to include Site 35 A140 Stoke Ash at the request of Suffolk County Council, and Site 89 A1089 Asda Roundabout and Site 90 M25 J30 at the request of Thurrock Council. Details of the assessment are presented within Section 7.7 of 7.11 Transport Assessment [APP-333]. Construction vehicles may also use roads that are not designated as PARs, however these instances would be limited and localised to activities such as environmental surveys, temporary construction of site access points and erection of scaffolding. Traffic flows associated with these temporary activities would be low and would occur over a short duration. Therefore, these roads have not been assessed within the 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333] which provides an assessment of the worst-case peak week construction activities. An update to 7.3 Outline Construction Traffic Management Plan [APP-309] will be submitted during examination, identifying these construction activities and routing within Table 5.2.
TT 1.6	Baseline data - 6 In their LIR Suffolk CC [REP1-178] at paragraph 12.137 question if predicted peak HGV movements are one way or two way. Confirm which this is.	The Applicant confirms that the daily (07:00-19:00) construction traffic flows presented in Image A16.4.20 in the 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] are two-way movements, that is arrivals and departures. To calculate HGV flows into site, divide the number by two.
TT 1.7	Baseline data - 7	The Applicant has developed a trip generation based on the realistic 'worst-case' week (known as the peak week). In developing the trip generation, the Applicant

Reference	Question	Applicant's Response
	It is being suggested by Local Authorities that working times on Saturday afternoon, Sundays and Bank Holidays should not be part of the core working hours. If this change were to be made in the draft DCO, detail the impact this would have on the forecast traffic modelling.	calculated the worst-case daily vehicles expected for each construction activity and these were used within the assessment. This value is based on the number of vehicles that can be accepted to site and would be needed per activity (including any start-up Heavy Goods Vehicles (HGVs) and non-material deliveries). As a result, the peak week values will not change with the adjustment of the working hours. The Applicant has assessed the proposed reduction in working hours suggested by Local Authorities in question DCO 1.S10. These working hours would result in the works required to deliver the Available for Commercial Load (ACL) milestone being completed 14 weeks after the current planned energisation date of December 2030 shown in Image 4.1 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. 7.11 Transport Assessment [APP-333] provides an assessment of the worst-case peak week for the Project at each particular location, and proposes mitigation based on the traffic modelling results. The construction traffic flows used within the forecast traffic modelling have been derived from the Project trip generation that estimates the maximum possible number of traffic movements for each activity within the day. Based on this, the worst-case peak construction activity at each junction is not expected to change. Should the working hours be adjusted at the weekend and bank holidays, the potential extension of the peak week duration is not likely to result in any changes to the mitigation proposed at the junctions assessed. Therefore, the Applicant considers that no additional impacts on network operation would occur other than those presented within 7.11 Transport Assessment [APP-333] and that the proposed mitigation detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan [APP-309] would remain valid.
TT 1.8	Baseline data - 8 The applicant's response to RRs [REP1-132] confirms that it will provide additional information to National Highways to support assessment of the proposals and the impact on the strategic road network.	The Applicant confirms that the information requested by National Highways is being prepared as an addendum to 7.11 Transport Assessment [APP-333]. The Applicant has and will continue to supply this information to National Highways in advance of submission at Deadline 4. This includes a summary of additional modelling undertaken post DCO submission, trip generation, traffic profiles and flow diagrams at junctions on the Strategic Road Network impacted by the Project. The Applicant has and will continue to liaise with National Highways on the findings of the Transport Assessment and will engage in follow-up discussions.

Reference	Question	Applicant's Response
	The applicant is asked to confirm: That these will be provided through the examination in addition to being supplied to National Highways. Specify when this information will be supplied to allow National Highways and the ExA to consider them with sufficient time within the examination.	
TT 1.10	Baseline data - 10 In the applicants response to RRs [REP1-132] it details in response to National Highways RR paragraph 4.3 that the main works contractor is aware of the trip generation figures assumed for the traffic modelling and does not anticipate they will increase. What assurances can you give the ExA that this will not change and if it does, how does the draft DCO allow for reassessment and approval from highway authorities. Also explain what measure are in place to monitor this during the construction phase and what measures will be used if traffic is in excess of that forecast.	As noted in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023], 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 assessments submitted as part of the Development Consent Order (DCO) application 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(s) 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 Management Plan [APP-309]. The Main Works Contractor(s) is expected to monitor the number of Heavy Goods Vehicles (HGVs) arriving to and departing from site from/to Primary Access Routes with the proposed implementation of a delivery management/scheduling system. The proposed delivery management system would provide sufficient detail on the vehicle numbers/movements and allow for review of compliance against the trip generation forecast and modelling. It is expected that this will be suitable to carry out checks/audits as required to provide evidence for compliance. The Main Works Contractor(s) will develop the Final CTMP(s) and agree these 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

Reference	Question	Applicant's Response
		the relevant Local Highway Authority and/or community members prior to implementation. 7.3 Outline Construction Traffic Management Plan [APP-309] is secured through Requirement 4 of 3.1 Draft Development Consent Order [REP2-004]. 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 forecast 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 signage, and potential restrictions in peak hours (where required and agreed with the Local Highway Authority). As stated above, the Applicant's proposal to use a delivery management/scheduling system will capture any increases in the proposed traffic volumes and therefore the need to undertake re-assessment is not detailed within the 7.3 Outline Construction Traffic Management Plan [APP-309].
TT 1.11	Baseline data - 11 What percentage of HGV movements are related to the import and removal of haul road material. Explain what measures you are taking to reduce the haul road construction depth or use of alternatives and what further options you are considering to further reduce imported material and in doing so reduce the number of HVG movements.	The Applicant has developed a trip generation based on the realistic 'worst-case' week (known as the peak week) within the construction programme. As a result, the trips associated with importing and removal of the haul road are not necessarily within the week assessed in 7.11 Transport Assessment [APP-333] and 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]. The Applicant has reviewed the Primary Access Routes (PARs) and the construction activities proposed to take place within the peak week, and haul road installation or removal occurs within the peak week on 23 PARs. Where haul road installation falls within the peak week, on average, the activity accounts for 12% of the Heavy Goods Vehicle (HGV) movements on the PARs. The highest percentage of trips associated with haul road installation is 43%, with the minimum being 10%. Many of the haul road removal HGV trips occur outside of the peak week. In these circumstances, the highest percentage of trips associated with haul road removal is

Reference	Question	Applicant's Response
		53% of trips on the PAR surrounding the Great Horkesley Cables and Substations construction activities, due to several haul roads being removed simultaneously. Haul Road Design Principles The temporary haul roads are proposed to typically be routed in parallel to sections of underground cable corridor and adjacent to the overhead lines rather than, for example, around the edges of fields, to reduce their length and therefore the required volume of haul road materials. There are also constructability benefits in remaining as close as reasonably possible to the works they are servicing. Furthermore, where feasible, existing field accesses, culverts and gaps in hedgerows are used. Residential properties, trees, woodlands and other sensitive environmental receptors were avoided or offset as far as practicable. The ground investigation survey data was not available at the time of production of DCO designs and impact assessments. It was therefore not possible for ground investigation to be used to inform the DCO application assessments. The application applies a reasonable worst-case assumption for haul road construction requirements, and applies established industry methodology and materials, including the use of stone aggregate. The designs and assessments presented within the DCO application assumed a temporary haul road depth of 400 mm thickness. To reduce the material required to construct the haul road, the width of the haul road has been reduced for overhead line construction from 8 m wide with two-way traffic flows throughout, to typically 6 m wide, with passing places (localised widening to 8 m) provided at typical intervals of 200 m. The frequency of passing places is to be determined by site-specific conditions at the detailed design stage and the forward visibility along the haul roads. Further Options Options to reduce the volumes of stone, including the use of geogrids, soil stabilisation, or alternative haul road constructions such as track matting, may be identified in some instances. The process of determining this will be carried out by the Main Works Contractor(s) at the detailed design stage to refine the temporary haul road designs and identify opportunities to reduce material volumes required where site-specific conditions are suitable and practicable to do so.

Reference	Question	Applicant's Response
TT 1.12	Junction and link capacity - 1 There are a number of junctions which are predicted to be overcapacity and for which mitigation has not been agreed with the local highway authority. Please detail which junctions remain with mitigation to be agreed and the status of negotiations in this regard.	Junction modelling has been undertaken as presented within Section 7 in 7.11 Transport Assessment [APP-333], with proposed mitigation identified for all junctions presented in Section 7.12. Within Table 7.121 it is identified that there are two junctions on the Strategic Road Network / Major Road Network where the future baseline with committed developments is predicted to operate over capacity with notable queues. With the introduction of the Project, these junctions would continue to operate over capacity, with an increase in queue lengths and delay. The Applicant has had meetings with but is yet to agree with Essex County Council and National Highways mitigation to reduce any residual impacts at the following junctions: • Site 38 - A120 Ardleigh Crown Interchange (Essex/National Highways) • Site 47 - A120 Coggeshall Road / Great Tey Road (Essex/National Highways) The Applicant has and will continue to engage with Essex County Council and National Highways to discuss and agree the requirement for mitigation at these junctions. The Applicant's position is that a proportionate approach to mitigation should be taken, noting that junction impacts will be temporary and that peak construction activity for the Project is over a one-week period. The Applicant also notes that these junctions would already operate over capacity in the future scenario with committed developments. In addition, mitigation at the following junctions is also currently under discussion with Local Highway Authorities and National Highways, as per their latest position set out within the submitted Local Impact Reports. Norfolk: The Applicant is currently proposing to route 100% of Heavy Goods Vehicles through Thetford along the A1066 (through junctions Site 12 to Site 15) in the network peak periods (07:00-10:00 and 15:00-19:00), and 50% of vehicles through Diss (through junctions Site 5 to Site 11) and 50% of vehicles through Thetford outside of these hours as mitigation detailed within Section 5.9 of 7.3 Outline Construction Traffic Management Plan [APP-309]. The Applicant is committed to continuing the ongoing discussions with Norfolk County Council, with the intention of agreeing a suitable distribution of construction traffic on the A1066 between routes via Thetford and Diss as detailed in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030].

Reference	Question	Applicant's Response
		Suffolk: The Applicant has engaged with Suffolk County Council to discuss their existing road safety and driver frustration concerns at Site 35 - A140 Stoke Ash and potential solutions. The Applicant considers that the level of mitigation required at the junction to resolve the existing (historic) safety issues goes beyond what is reasonable and proportionate to mitigate for a temporary Project with short-term effects, which would have limited impact on driver delay as the duration of the peak is expected to be of one week. The Applicant has and will continue to engage with Suffolk County Council on this matter. At Site 16 - A140 Ipswich Rd / A143 Old Bury Road roundabout, the Applicant has not proposed mitigation due to the small increase in Ratio of Flow to Capacity (RFC) values in the AM peak hour as a result of the Project traffic and as the impact would be temporary over a short duration. The Ratio of Flow to Capacity (RFC) value on the A143 (E) arm increases from 0.93 to 0.99 when compared to the future base with committed development over a one-week period. The Applicant has and will continue to engage with Suffolk County Council on this matter. At Site 29 - A1214 / A14 Copdock Interchange, the modelling indicated that the junction would operate over capacity during the worst-case peak construction period (one-week duration) and when tested with the 85th percentile of Project traffic (approximately a six-month duration). Mitigation at the junction is currently being progressed and includes signal and cycle time optimisation, a change to lane and destination arrow markings on the A1214 and A12 approaches to the roundabout, and on the circulatory carriageway as indicated in Section 5.9 of 7.3 Outline Construction Traffic Management Plan [APP-309]. With mitigation, there is an improvement in the performance of the junction with the junction still predicted to operate above practical capacity but within theoretical capacity with all DoS values on all approaches under 100%. Under the 85th percentile scenario this improvement is more noticeable. A stage 1 Road Safety Audit is currently being undertaken on the highway mitigation proposals. The Applicant has and will continue to engage with Suffolk County Council and National Highways on this matter. Essex: At both Site 58 - A131 Great Notley Bypass / Main Road roundabout and Site 63 - A414 Three Mile Hill / A1114 London Road roundabout, there would be an increase

Reference	Question	Applicant's Response
		to queue lengths at these junctions in the AM peak hour. However, the impact upon capacity is considered marginal when compared with the 'Future Base plus Committed Development' scenario. This is because there is no predicted step change in junction performance as a result of the Project with a change of RFC from 1.01 to 1.09 (Site 58) and 1.05 to 1.10 (Site 63), and the predicted queues are not expected to impact any upstream junctions during the peak construction activity (one-week). For this reason, the Applicant is proposing to monitor the junctions' performance in case any further mitigation is required, as indicated in Section 5.9 of 7.3 Outline Construction Traffic Management Plan [APP-309]. The Applicant has and will continue to engage with Essex County Council on this matter. Thurrock: Following further engagement with the Lower Thames Crossing (LTC) Transport Team, additional junction modelling has been undertaken at the Orsett Cock Roundabout post DCO submission. The Applicant has and will continue to engage with LTC and Thurrock Council to agree mitigation required as a result of the updated modelling at this junction. Any subsequent follow-up meetings arising from feedback received and agreements reached between parties will be formally documented within the relevant Statements of Common Ground. National Highways: Through continued engagement with National Highways, the Applicant is aware of their latest position within the National Highways Relevant Representation [RR-2657]. The junction modelling undertaken for Site 48 - A120 Braintree Bypass / B1018 Braintree Road (known as Galley's Corner) shows the junction would operate over capacity in the future baseline, and continues to operate over capacity with committed development and Project construction flows. The junction was subject to further modelling with updated traffic flows (Sep 2025), and the findings and mitigation presented within Section 7.7 in 7.11 Transport Assessment [APP-333] remain valid. National Highways have requested that the Applicant prepares a micro-simulation model for this junction and connecting highway to understand the wider impact. The Applicant is currently engaging with National Highways on this matter. Additionally, the Applicant is aware of a proposed highway scheme for this junction identified through engagement with Essex County Council.

Reference	Question	Applicant's Response
TT 1.13	Junction and link capacity - 2 In their LIR [REP1-161] Essex CC state at paragraph 4.5.68 that they consider junction mitigation for two sites should be mitigated by AM peak traffic restrictions. Provide details and modelling to show how this would reduce the predicted increased queue lengths, or update the ExA on further discussions held with Essex CC.	The avoidance of construction traffic during peak hours has not been applied as a general mitigation measure at these junctions (Site 58 - A131 Great Notley Bypass / Main Road roundabout and Site 63 - A414 Three Mile Hill / A1114 London Rd roundabout) as they are both used by four Primary Access Routes, and it would not be practical to coordinate all construction vehicle movements outside peak periods. The results of the modelling of Site 58 and Site 63 within Section 7.11 of 7.11 Transport Assessment [APP-333] show that both junctions will already operate over capacity during the AM peak in the future baseline scenarios. The scenario without the Project construction flows in the AM peak hour correspond to the results for the 'Future Base plus Committed Developments' scenario presented in Table 7.91 for Site 58 and Table 7.96 for Site 63. For Site 58, the predicted queues are of 21 Passenger Car Units (PCUs) on the A131 (N) and would increase by 36 PCUs with the addition of Project construction flows. For Site 63 the predicted queues are of 44 PCUs on the A414 London Road (S) and of 28 PCUs on the A414 Greenbury Way (W), with an increase of 26 PCUs and 22 PCUs, respectively, with the addition of Project construction flows. Whilst the modelling predicts an increase in queue lengths at these junctions, the impact upon capacity is considered marginal when compared with the 'Future Base plus Committed Development' scenario. This is because there is no predicted step change in junction performance as a result of the Project with a change of Ratio of Flow to Capacity (RFC) from 1.01 to 1.09 (Site 58) and 1.05 to 1.10 (Site 63). In addition, the predicted queue lengths are not expected to impact any upstream junctions and the duration of the worse-case construction period is short-term, i.e. one week, for both junctions. For this reason, the Applicant is proposing to monitor the junctions' performance in case any further mitigation is required, as indicated in Section 5.9 of 7.3 Outline Construction Traffic Management Plan [APP-309]. The Applicant is undertaking further analysis to understand whether there are any opportunities to phase work activities differently to reduce peak hour traffic impacts. During the worst-case construction period, the maximum number of construction vehicles from the Project that would use Site 58 - A131 Great Notley Bypass / Main Road is 23 Heavy Goods Vehicle (HGV) movements and 104 Light Goods Vehicle (LGV) movements in the AM peak hour, that is 1 HGV movement every 2-3 minutes and 1-2 LGV movements every minute. At Site 63 - A414 Three Mile Hill / A1114

Reference	Question	Applicant's Response
		London Road, the maximum number of construction vehicles from the Project is 13-14 HGVs in the AM peak hour, that is 1 HGV every 4-5 minutes. It should be noted that the number of construction vehicles associated with the main and satellite compound staff could be reduced by the measures detailed within 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] to reduce the number of single occupancy private car trips or flexible working practices. Therefore, the number of LGVs at the junction could be reduced during the peak hours. Restricting HGV movements through this key junction during the AM peak period might have an impact on the construction programme and on the trips generated across the remainder of the working day. The Applicant has discussed this matter with Essex County Council at meetings presenting the junction modelling results, and will continue to liaise with Essex County Council on this matter.
TT 1.14	Junction and link capacity – 3 In their LIR [REP1-173] Norfolk CC state that there are a number of junctions and links on Primary Access Route (PAR) 8 which cause concern about the suitability of this as an access route when PAR9 is an alternative. Please explain the need for both PAR8 and PAR9 and whether PAR8 could be removed or usage reduced.	<u>Reasoning behind PAR 8 (Heavy Goods Vehicles (HGVs))</u> This section of the construction corridor (Section A and northern part of Section B) effectively follows the alignment of the A140, so access off the A140 formed the starting point for the routeing strategy and identification of the Primary Access Routes (PARs) for these sections, rather than the A11 to the west. The neighbouring PARs are also routed from the A140. In line with this routeing strategy, PAR 8 from the A140 along the A1066 through Diss was identified. This route from the A140 through Diss to the site access point is 6.2 km in length, with an average journey time of 10-15 minutes. PAR 9, from the A11 through Thetford, does not align with the above construction routeing strategy for the area, and was originally proposed for the use of Cable Drum Abnormal Indivisible Load movements only, due to the height restriction on the A1066 through Diss. It was not initially considered for general construction traffic due to the additional journey distance and time. PAR 9 is approximately 25.1 km in length from the A11 to the site access point and has an average journey time of 25-30 minutes. However, this does not consider any length of diversion that construction vehicles may need to undertake to access PAR 9 compared to accessing PAR 8. The Applicant anticipates that there may be vehicles who will be delivering materials to both north and south of the River Waveney. The route through Thetford (PAR 9) has an approximate journey time of between 1 hour 20

Reference	Question	Applicant's Response
		minutes and 2 hours to access the PAR on Lion Road (RG-B062 and RG-B063), and the construction activities south of the River Waveney. The route from Diss to Lion Road, utilising the A140 (PAR 8) has an average journey time of 20-25 minutes. If PAR 8 were removed, routeing through Thetford (PAR 9) has an impact of over an hour additional travel time. The Applicant has discussed the request to remove construction traffic from PAR 8 with the appointed Main Works Contractor(s) and solely use the PAR 9 from Thetford. If deliveries of materials are having to route via Thetford and undertake the diversion, there may be implications on the number of required vehicles, and the ability to undertake the construction activities as per the indicative programme. This is due to the increase in journey length associated with the route via Thetford. It is noted that the specific routeing of vehicles on the Strategic Road Network has not been completed, and end-to-end journey times cannot be established at this stage. <u>Requirement for PAR 8 (Light Goods Vehicles (LGVs))</u> The Applicant is proposing an Overhead Lines Main Compound (Old Bury Road, near RG96 (RG-Main) located off A143 Old Bury Road and Lion Road (Link PAR 10 and PAR 11) to the south of the River Waveney. The indicative worker assignment has staff who are travelling on PAR 8 (travel through Diss using the A1066) who are assigned to the main compound to the south of the River Waveney. The construction trip generation methodology (detailed in Section 6.4 7.11 Transport Assessment [APP-333]) calculated overhead line construction worker trips based on the following movements: • Travel from accommodation to temporary construction compound (sign in at temporary construction compound, vehicle occupancy of 2) • Travel from temporary construction compound to site access point (assumed to be in construction vehicles with an occupancy of 6) • Travel from site to the temporary construction compound at the end of the working day • Travel from the temporary construction compound to accommodation.

Reference	Question	Applicant's Response
		In the scenario where PAR 8 is removed, the construction workers could be travelling an additional 4 hours within their working day, reducing the time on site and potentially increasing the construction programme. These vehicles would also be travelling in the peak hours, due to the length of diversion. <u>Proposals to reduce usage on PAR 8</u> The Applicant's preferred construction routeing strategy along PAR 8 was initially discussed with Norfolk County Council through the non-statutory and statutory consultations. Through ongoing liaison in monthly Traffic and Transport Working Groups, Norfolk County Council raised the concern with routeing traffic through Diss and proposed an option of routeing a proportion of traffic via Thetford (PAR 9), to reduce the demand on the A1066 (PAR 8). In response to this, the Applicant incorporated PAR 9 as a construction vehicle route for HGVs, with a proposed split of 100% of HGVs accessing the site from Thetford in the peak times, and 50/50 split outside of those times. Through discussions with Norfolk County Council, these non-peak times have been defined as 10:00-15:00. LGVs were to remain on PAR 8. The Applicant undertook an assessment in partnership with the Main Works Contractor(s) to understand the impact and feasibility of routeing all construction traffic via Thetford. The route from Thetford to the Site Access Points is suitable for HGV movements, with minor traffic management required. The source of material for the deliveries for Site Access Points in Diss is anticipated to be to the East of Diss; with access restricted the construction vehicles would be undertaking an approximate 103 km diversion (up to Norwich on the A140, A47 and A11), which would route vehicles on busy parts of the network inappropriately, resulting in longer journeys and increased carbon emissions. Paragraph 5.14.12 of EN-1 (January 2024) states that any mitigation (including re-routeing traffic) is only appropriate if it is feasible and operationally reasonable, therefore the Applicant considers that this option, would not comply with policy EN-1. To present a realistic worst-case scenario, 7.11 Transport Assessment [APP-333] details the potential impacts through Diss, if all construction traffic was routed via Diss throughout the working day. The Applicant recognises that there are existing capacity issues though Diss and proposed that construction traffic be routed through Thetford during peak hours to avoid exacerbating these capacity issues through Diss during these time periods. The Applicant undertook an assessment on the

Reference	Question	Applicant's Response												
		Thetford junctions, which demonstrate a lower RFC (Ratio of Flow to Capacity) and indicates the potential capacity to operate with 100% of the peak construction traffic. The Applicant's proposal for restricting HGV movements through Diss results in the below anticipated HGV movements across each construction period. Through proposing a 50/50 split in the inter-peak hours, and 100% of HGVs through Thetford in the localised AM and PM peaks (07:00-10:00 and 15:00-19:00), the Applicant has removed 295 daily HGV movements through Diss in the peak construction period. <table> <tr> <th>Indicative duration (indicative programme dates)</th><th>100% through Diss (PAR 8) (HGVs per hour)</th><th>50% through Diss during inter-peak (2-way) current proposals (HGVs per hour)</th></tr> <tr> <td>3 weeks (peak) (Q1 2028)</td><td>31</td><td>14/15</td></tr> <tr> <td>5 months (secondary peak) (Q3 2027 to Q1 2028)</td><td>25-31</td><td>13/15</td></tr> <tr> <td>18 months (Q3 2029 to Q2 2031)</td><td>15</td><td>7/8</td></tr> </table> The Applicant's current proposals to route construction HGVs through Thetford in the peak hours, and 50/50 in the interpeak is captured within 7.3 Outline Construction Traffic Management Plan [APP-309] and is secured through Requirement 4 of Schedule 3 of the 3.1 draft DCO [REP2-004]. As stated in the reasons above, the Applicant proposes to retain the use of PAR 8 for LGVs and HGV movements (during the interpeak), as presented within the 7.3 Outline Construction Traffic Management Plan [App-309] and presented to Norfolk County Council in the Transport and Traffic Working Groups. The proposal was developed to reduce the impact on PAR8 during the peak periods.	Indicative duration (indicative programme dates)	100% through Diss (PAR 8) (HGVs per hour)	50% through Diss during inter-peak (2-way) current proposals (HGVs per hour)	3 weeks (peak) (Q1 2028)	31	14/15	5 months (secondary peak) (Q3 2027 to Q1 2028)	25-31	13/15	18 months (Q3 2029 to Q2 2031)	15	7/8
Indicative duration (indicative programme dates)	100% through Diss (PAR 8) (HGVs per hour)	50% through Diss during inter-peak (2-way) current proposals (HGVs per hour)												
3 weeks (peak) (Q1 2028)	31	14/15												
5 months (secondary peak) (Q3 2027 to Q1 2028)	25-31	13/15												
18 months (Q3 2029 to Q2 2031)	15	7/8												
TT 1.15	Abnormal indivisible loads - 1 Please confirm if all AIL routes have been agreed with NH and the LHAs to ensure the suitability of highway infrastructure, including assets such as structures, drainage, horizontal and	Currently the Abnormal Indivisible Load (AIL) routes have been agreed in principle with National Highways and the Local Highway Authorities (LHAs). However, this is conditional on structural assessment of bridges and other drainage features, which is currently ongoing. Ultimately, the AIL routes will be secured through the Electronic Service Delivery for Abnormal Loads (ESDAL) process. The Applicant has also been												

Reference	Question	Applicant's Response
	vertical alignment. Please detail any routes and matters which are not agreed and the process for resolving these matters within the examination period.	engaging with the relevant constabularies regarding details of anticipated AIL movements. Swept path analysis for all anticipated AIL movements has been completed as part of our assessment. This utilised high density LiDAR data and OS Mastermap data, to verify vertical and horizontal constraints, and where identified, the Order Limits have been refined to accommodate potential works to mitigate constraints. For instance, the Applicant has identified carriageway widening along certain roads where the Transformer Delivery AIL is proposed to be routed. The intention is to complete these structural assessments within the examination period. However, this is dependent on National Highways and LHAs providing accurate and timely information for each of the assets. To date this has been a slow process and asset record data is not available for a number of structures, resulting in additional and further inspections being required. Some additional information provided within the written submissions through the examination process to date has informed the Applicant of some potential concerns with bridges which will require appropriate mitigations. These are being considered by the Main Works Contractor. If any physical mitigation is required, this will be agreed with the LHA or National Highways prior to ESDAL applications. A detailed list of the current status is provided on the attached TT1.15 - Structural assessment register in Appendix K.
TT 1.16	Abnormal indivisible loads - 2 Please explain if there is likely to be change to, or additional AIL routes during or after the examination. Please also detail if AIL routes and assumption on plant and vehicle types will be subject to change from your construction partners or not. In all cases of a potential change to AIL routes, please detail how these will be agreed with relevant authorities for	Abnormal Indivisible Load (AIL) vehicles and routes have been agreed in principle with National Highways and the Local Highway Authorities. However, this is conditional on structural assessment of bridges and other drainage features, which is currently ongoing. As a result, there is a potential that routes identified could be subject to change. Section 5.3 of 7.3 Outline Construction Traffic Management Plan [APP-309] sets out how all AIL movements will be secured with all stakeholders through the Electronic Service Delivery for Abnormal Loads (ESDAL) process. This will capture and assess any changes to routeing or vehicles. For the purpose of the DCO application, the Applicant used the reasonable worst-case AIL specification, relevant to the vehicles associated with each Primary Access Route. This ensures the Order Limits and any associated mitigation works are sufficient to accommodate the swept path of these vehicles. The Main Works

Reference	Question	Applicant's Response
	approval and how this is secured in the draft DCO.	Contractor will explore opportunities to reduce the overall size and weight of potential AILs, which would provide betterment to the details currently within the DCO. Changes to AIL routes would be subject to the ESDAL process, and therefore are not a matter to be secured through the draft DCO.
TT 1.17	Abnormal indivisible loads – 3 Please confirm the status of negotiations regarding the resourcing of police support for AIL matters. This may be referenced to our question SS 1.5.	Negotiations are ongoing between National Grid and the police forces regarding the resourcing of police support for AIL matters. National Grid is seeking to reach agreement on this matter in advance of Deadline 7.
TT 1.18	Cumulative impacts In their LIR [REP1-178], Suffolk CC raise concerns about the potential for overlapping construction times for the Bramford to Twinstead project and the proposed development. Please explain what assumptions have been made in considering the cumulative effects of these two construction projects and how the ExA can be assured that no overlap and cumulative impact will be seen.	The Primary Access Routes (PARs) from the Project that will overlap with Bramford to Twinstead are Link PAR 20 - B1113 Bramford Road/B1113 Loraine Way, PAR 21 – Bullen Lane, PAR 22 - A1214 London Road and PAR 23 - A1071. The locations of these PARs can be found on Pages 14 and 15 of 6.16.F1 Environmental Statement Figure 16.1 - Primary Access Routes [AS-020]. In 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], the committed developments combined with the Project flows contribute to the cumulative assessment for daily traffic increases against future baseline. The Bramford to Twinstead Project has been included in the assessment of the above PARs as indicated in 6.16.A3 Environmental Statement Appendix 16.3 - Future Baseline [APP-274]. Sensitive junctions along these PARs were subject to AM and PM peak hour modelling as presented within 7.11 Transport Assessment [APP-333]. These assessments considered the cumulative effects on the highway network of the combined Project and other committed developments including Bramford to Twinstead and mitigation provided where required. The traffic data used for the assessment in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333] has been estimated combining the combined worst-case peak Project construction traffic flow (tending to occur over a short duration e.g. one week) with the worst-case traffic flows from committed development obtained from Local Planning Authority websites and the Planning Inspectorate's Programme of Projects.

Reference	Question	Applicant's Response
		The trip generation for the AM and PM peak hours for all committed developments included within the assessment is presented within 7.11 Transport Assessment - Appendix D - Committed Developments [APP-337] for affected PARs. Table D.12 within 7.11 Transport Assessment - Appendix D - Committed Developments [APP-337] provides a summary for anticipated traffic flows on PARs associated with the Bramford to Twinstead Project. The Applicant is confident that the scenario assessed is robust, and worst-case, as the likelihood of Project construction peaks occurring at the same time is relatively low. Therefore, an over estimation of total combined cumulative traffic volumes may have been assessed, and any impact identified at junctions or along PARs may be lower than reported. Therefore, there would be no additional effects to those identified presented in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333]. It is therefore considered that the assessments undertaken in 7.11 Transport Assessment [APP-333] and 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271], represent a reasonable worst case, given that the peak construction activities for both the Project and the Bramford to Twinstead Project may not occur at the same time. Where required, mitigation measures have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments to avoid severe residual cumulative impacts on shared PARs. Within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] it was identified that PAR 20 - B1113 Bramford Road/B1113 Loraine Way, PAR 21 – Bullen Lane and PAR 22 - A1214 London Road would have slight or neutral significance of effects (not significant) on driver / public transport passenger delay and pedestrian, cyclists and horse-rider delay, severance, amenity, and fear and intimidation when taking into account the mitigation and controls detailed within 7.3 Outline Construction Traffic Management Plan [APP-309]. For PAR 23 - A1071 moderate significant effects are identified for driver / public transport passenger delay with is deemed significant. Modelling at junctions on this PAR was undertaken to understand the impact on capacity and driver delay as

Reference	Question	Applicant's Response
		detailed within Section 7 of 7.11 Transport Assessment [APP-333]. The modelling identified that Site 31 - A1214 London Rd/A1071 and Site 32 - A1071/B1113 Swan Hill would both already operate above capacity in the future baseline scenario with committed development traffic flows, and therefore would continue to operate over capacity with the Project. At Site 31 A1214 London Rd / A1071 proposed mitigation to reduce the impact of the Project includes the rationalising intergreens, adding phase delays and signal optimisation at junction. At Site 32 - A1071/B1113 Swan Hill the Project would have a marginal impact on the junction operation when compared to the future baseline with committed development scenario. Although there would be additional delay at the junction, the predicted queues would not block back to nearby junctions. Mitigation was therefore not proposed at the junction. Details of the mitigation proposed is outlined within 7.3 Outline Construction Traffic Management Plan [APP-309]. The Applicant understands that both junctions are to be upgraded as part of the approved planning application Land north of the A101 (DC/21/02671), although a construction date has not been agreed. As such the Applicant is currently in the process of modelling the upgraded junction to assess the impact of the Project on capacity, and will continue to engage with Suffolk County Council of the results of the latest assessment. Additional modelling undertaken post DCO will be submitted during the examination at Deadline 4 as an addendum to 7.11 Transport Assessment [APP-333].
TT 1.19	Cumulative impacts How is it proposed to practically manage cumulative impacts with other projects with regard to issues such as peak time construction traffic on similar or nearby routes.	The traffic flow data used for the cumulative assessment presented in the 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333] has been estimated combining the Project worst case peak construction traffic with traffic flows from committed developments, where construction programmes are likely to overlap and vehicles would use the same roads. Where required, mitigation measures have been provided and considered when assessing the cumulative impacts arising from both the Project and all other committed developments including Nationally Significant Infrastructure Projects to avoid severe residual cumulative impacts. Section 6.6 of 7.3 Outline Construction Traffic Management Plan [APP-309] details that National Grid will ensure liaison takes place by the Main Works Contractor(s) with Local Highway Authorities and National Highways and other developments, such as North Falls Offshore Wind Farm and Lower Thames

Reference	Question	Applicant's Response
		Crossing, to ensure a coordinated approach to construction traffic management. Additionally, this liaison with the Main Works Contractor(s) should occur for significant local events within the area of the Project, such as the Tendring Show. The Applicant has committed to joining and engaging with the Developer's Forum to be set up by Essex County Council [RR-1083]. Whilst Essex County Council would set the agenda of meetings, the Applicant envisages that the routing of construction vehicles, associated traffic management, traffic management and mitigation triggers will be discussed within this forum. The cumulative impact associated with Abnormal Indivisible Loads (AILs) will be mitigated by the use of the Electronic Service Delivery for Abnormal Loads (ESDAL) system to manage any impact on the operation of the network. As a general rule, to minimise disruption, AIL movements will be scheduled outside of peak traffic times, and in line with embargo times. As detailed in 7.3 Outline Construction Traffic Management Plan Appendix A - AIL Access Strategy [APP-310] notifications will be sent to the Local Highway Authorities and police, advising them of the routes, timings and any appropriate measures required, to minimise disruption where possible. It is expected that the Main Works Contractor(s) will continue liaison with the Local Highway Authorities and key stakeholders on AIL management.
TT 1.21	Traffic regulation orders and other agreements - 1 National Highways in their RR [RR-2657] state that they require agreements for both overhead and underground crossings. Please explain the current status of these agreements and how the completion of them is secured in the draft DCO.	As set out in 5.9.20 Draft Statement of Common Ground - National Highways [REP1-048], the Applicant has committed to engage with National Highways as part of the preparation of Section 169 Agreements and Approvals in Principle for the proposed overhead and underground crossings of the Strategic Road Network (SRN). Section 169 agreements and Approvals in Principle are secured by protective provisions contained within Schedule 16 Part 5 (For the Protection of National Highways Limited) of 3.1 Draft Development Consent Order [REP2-004]. The Applicant has started engaging with National Highways regarding the information that will be required for these agreements.
TT 1.22	Traffic regulation orders and other agreements - 2	The Applicant has engaged with National Highways, through the regular Traffic and Transport Working Group meetings held between February 2025 and October 2025, on the need for Traffic Regulation Orders (TROs) and the general approach being

Reference	Question	Applicant's Response
	National Highways in their RR [RR-2657] state that the need for a number of Temporary Traffic Regulation Orders (TTROs) were not known to them. Please confirm if this has been addressed and if not, what is outstanding to be discussed.	taken. However, specifics such as the anticipated reason for each TRO and expected durations have yet to be discussed in detail or agreed. The Applicant is arranging a meeting with National Highways to discuss the TROs in detail, and the outcome of these discussions will be captured in the Statement of Common Ground between National Grid and National Highways.
TT 1.23	Traffic regulation orders and other agreements - 3 In their LIR [REP1-161] Essex CC state that they have not agreed to the TTROs listed in schedule 13 of the draft DCO. Please explain the status of agreement of the TTROs with the relevant local highway authorities.	The Applicant has previously engaged with Essex County Council (ECC) on the need for Traffic Regulation Orders (TROs) and the general approach being taken, however specific details have yet to be agreed. A meeting with representatives from ECC was held on 17 March 2026 to discuss the TROs in further detail. This included a request from ECC for further details on each TRO, including supporting data, the reason for each TRO, and their expected durations. The Applicant is currently reviewing this data request and will continue to engage with ECC on this matter.
TT 1.24	Road safety There are a number of railway level crossings within or in the vicinity of the PAR, please detail the status of approvals from Network Rail in regard to capacity and safety at these and what further mitigation measures may be required for any crossing where approval may be outstanding.	The assessment of suitability of the Local Road Network (LRN) to be used as Primary Access Routes (PARs) included level crossings as a constraint. The significance of the constraint considered the posted vertical clearance, limited by Overhead Line Equipment (OLE), as well as the vertical carriageway geometry, due to the risk of long or low vehicles grounding. This process identified one PAR – PAR 7 – that features one single level crossing: the B1134 Station Road. We have carried out engagement with Network Rail regarding this crossing. Network Rail have provided the following confirmation: <i>'The track will have no limitations up to 250kN wheel load on each rail, assuming the track bed and track components are in good condition. This load model is as per the abnormal loading for track mounted KIROW KRC1200UK crane with axle spacings: 1100 1200 1100 5600 1100 1200 1100 mm.</i> <i>For the track panels at the crossing which are design for vehicular wheel loading, we will have to identify the type and condition of the panels and then establish their capacity for loading. A more specific vehicle load model will be required from the project team on this and they will have to demonstrate that no damage would be caused to the track panels owing to overloading.</i>

Reference	Question	Applicant's Response
		<i>The LX B1134 Heath Road/Station Road, Sneath Common will also have a height restriction owing to the OLE equipment. A topographical survey would be required to determine this restriction. The project team would be responsible for carrying out this survey and then agreeing with us any movements of loads based on the nominal required offsets to the OLE.'</i> <u>Track Panels</u> The crossing is located on a two-lane local road which is well used by agricultural vehicles. Therefore, it is assumed that the panels that Network Rail has referenced within the above information shall be suitable for trafficking by construction Heavy Goods Vehicles. PAR 7 is also proposed to be used for access by the mobile crane, which is categorised as an Abnormal Indivisible Load. In this case, the Main Works Contractor shall develop a specific vehicle load model to confirm the suitability of the track panels for this specific movement. Should any concerns be raised through this assessment, the Main Works Contractor will explore mitigation options with Network Rail. Alternatively, if suitable mitigation is not identified and PAR 7 cannot be used by the mobile crane, this vehicle can gain access to this works area from the temporary haul road, using either PAR 6 or PAR 8, which do not feature level crossings. <u>OLE</u> The tallest vehicle proposed to use the level cross is the mobile crane which has an overall height of 4.0 m. This is below the posted height restriction of 16'-6" (5.0 m). In addition, the Applicant has undertaken and provided to Network Rail an assessment of the risk of arcing or clash with the OLE using as-built records. The assessment concluded that this was not a concern. To resolve the OLE point raised by Network Rail, the Main Works Contractor will be required to undertake a topographical survey as part of their detailed design to verify the preliminary assessment.
TT 1.25	Highway layout and design - 1 In its LIR [REP1-178] Suffolk CC state that they are not able to fully assess the suitability of new highway access points to be as there are no vertical	Preliminary designs of each of the proposed site access points and crossover points have been developed and represent adapted versions of the indicative 2.6.3 Design and Layout Plans – Traffic and Transport [APP-043]. The design of each of the proposed site access points and crossover points is based on site-specific data and considerations which consider both Design Manual for Roads and Bridges design

Reference	Question	Applicant's Response
	alignment details provided. Please detail the progress with vertical alignment design and confirm if the order limits and other measures required at new access points fully account for the vertical alignment requirements at all access locations from the public highway.	standards, and the anticipated design vehicles using these access and crossover points. Site-specific requirements have utilised high density LiDAR data to verify vertical constraints to the junctions and their visibility splays, and where identified, the Order Limits have been refined to accommodate potential works to mitigate 3D constraints. This includes allowance for earthworks and drainage. This level of design is considered appropriate for preliminary designs, and sufficient to fully account for potential measures to manage vertical constraints in these locations. Topographic survey will be used by the Main Works Contractor to inform the detailed design. Detailed designs will also show the highway boundary and any land proposed to be adopted by the Local Highway Authority. Whilst this will provide the level of detail appropriate to suitably develop the proposals for detailed design, the proposals and associated Order Limits presented for DCO, utilising LiDAR data, already account for vertical constraints. This process has also included the completion of Stage 1 Road Safety Audits, which considered vertical constraints and captured associated actions to take through into detailed design where appropriate. No Stage 1 Road Safety Audit actions identified increases to Order Limits as a result of vertical constraints. The detailed design topographic data I anticipated to represent a design refinement within the current design parameters.
TT 1.26	Highway layout and design - 2 Please detail your haul road design and options strategy and detail how the ExA can be assured that the use of public highway for construction traffic has been minimised. The applicant should highlight any PARs which it considers are sub optimal but believes there are no alternatives to that which has been proposed.	The Applicant's response has been prepared on the basis that this question relates to the relationship between the proposed Primary Access Route (PAR) and the haul road strategy, and how the strategy for these proposals has been used to reduce construction traffic on the public highway. Details regarding the design of the haul road and proposed material choices are detailed within the Applicant's response to question TT 1.11. The strategy for access and use of haul roads to construct the Project has been developed in accordance with the requirements set out in National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024). This has included consultation with National Highways and Local Highway Authorities, consideration of inland transport infrastructure, and the deployment of a series of mitigation measures set out in 7.3 Outline Construction Traffic Management Plan [APP-309].

Reference	Question	Applicant's Response
		The haul road strategy is considered to provide a favourable solution for access as it offers the following benefits: • The strategy reduces the total number of construction routes (PARs) from the Major Road Network (MRN) and Strategic Road Network (SRN) to the construction corridor, and therefore the number of local, rural roads impacted by the Project. • Longer sections of haul road enable a high percentage of construction traffic to be routed to the site predominantly via 'A' and 'B' roads, with reduced distances travelled via minor roads. • Haul roads enable materials and the workforce to be moved along the overhead line and underground cable construction corridor, minimising the use of public highways and avoiding, where possible, sensitive areas such as villages, schools, and minor roads. • The strategy reduces the number of site access points on the public highway network, and therefore the number of temporary junctions with the public highway. • The haul road generally reduces journey distances for site staff travelling between construction areas, accommodation, and compounds. The proposed haul roads are only discontinuous at major obstructions along the underground cable and overhead line corridor, such as major roads, railways, areas of environmental or historical significance, and major watercourses. Each obstruction has been assessed on a case-by-case basis. The use of PARs to gain access to haul roads, and haul roads to access working areas along the haul road between PARs, is controlled through the measures set out in 7.3 Outline Construction Traffic Management Plan [APP-309]. This approach mitigates the need to use less suitable local roads between PARs, and the scale of highway mitigation required to make suitable the roads used for access by the Project. The PARs have been developed through a thorough and holistic investigation of their suitability. This process considered all public highway crossings of the transmission line infrastructure, and identification of potential connections to the MRN and SRN. These options have been assessed

Reference	Question	Applicant's Response
		to identify the most suitable roads on the Local Road Network (LRN) for use as PARs. The assessments utilised the Applicant's specialist team's judgement to consider a broad range of contributing factors, including: - Physical highway geometry and constraints along PARs to determine whether design vehicles can use the routes to gain access to site. - The anticipated scale of highway mitigation required to overcome identified constraints. - The length of each PAR between the transmission infrastructure and MRN or SRN. - Availability of other PAR options for each continuous section of haul road. This sought to identify at least one PAR for each continuous section of haul road, and ideally two PARs located at the northern and southern end of each haul road. This approach was utilised as it provides safety, environmental, logistical, and resilience benefits. - Site investigations, used to verify and develop proposals. - Feedback through engagement with Local Highway Authorities and National Highways on constraints and opportunities to improve the proposed PARs. - Peer reviews of proposed routes to verify conclusions. - Environmental constraints and mitigation along the proposed routes. - Public consultation feedback, which resulted in PAR changes. The Applicant has not previously used the categorisation of 'optimum' or 'sub-optimum' to define PARs. However, for the purposes of answering the Examining Authority's question, the Applicant has considered a sub-optimal PAR to constitute a PAR which, following the implementation of the proposed mitigation measures, is considered to be unsuitable for use as a temporary construction access. On this basis, the Applicant considers that all PARs represent the optimal solution for provision of access to the haul roads, and that once mitigation is implemented, no PARs are sub-optimal for the anticipated vehicle movements. Whilst the Applicant acknowledges there remain some residual constraints, these are all considered to be capable of being appropriately managed through specific

Reference	Question	Applicant's Response
		mitigation, an indicative form of which is detailed in 7.3 Outline Construction Traffic Management Plan Appendix C – Indicative Highway Mitigation Plans [APP-312 to APP-320] .
TT 1.27	Highway layout and design - 3 A number of people in their RRs detailed concerns regarding access to private drives and property. Please confirm that all access to private property will be maintained during the construction and operation phases, or if this is not the case, explain what properties will be affected and what measures there will be to mitigate this.	Access to residential properties shall be maintained at all times throughout construction and operation. This is secured in Article 16(3) of 3.1 Draft Development Consent Order [APP-056] which states <i>"The undertaker must provide reasonable access for pedestrians going to or from premises abutting a street or public right of way affected by the temporary closure, alteration or diversion under this article if there would otherwise be no reasonable access."</i> It is anticipated that roads would only be temporarily closed where this is required for safe working. In accordance with commitment AS03 in 7.2 Outline Code of Construction Practice [REP2-014], where practicable and safe to do so, existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. This may require signed diversions or temporary restrictions to access. Where this is not achievable, alternative arrangements will be made with the affected parties through the land agreements, such as instances of no through route single track roads where works are required. Paragraph 5.8.3 of 7.3 Outline Construction Traffic Management Plan [APP-309] details the intention, where safe and possible, that cyclists and pedestrians will be able to continue to use the closed roads.
TT 1.29	Walking, cycling and horse-riding - 2 In their RRs [RR-1190] ; [RR-1205] ; and [RR-1189] students at Chelmer Valley High School state that due to the closure of local roads and paths, walking and cycling access to Chelmer Valley School will be compromised and more hazardous alternatives will be needed. This concern is repeated by a number of other RRs. Please explain if	Chelmer Valley High School, located in Broomfield, can be accessed on foot or cycle via Woodhouse Lane/Northouse Road and B1008 Main Road. The Project construction traffic will be routed along Primary Access Routes (PARs) from the Strategic Road Network (SRN)/Main Road Network (MRN) to the site access points. Woodhouse Lane/Northouse Road and B1008 Main Road are not identified as PARs and therefore they are not intended to be used by construction Heavy Goods Vehicles. The closest PARs are located north of the school on the B1008 Braintree Road/B1008 Main Road (PAR 46 - between Chelmsford Road and the A131) and Chelmsford Road (PAR 48 – between B1008 and B1008 with the site access points to pylon TB140 and to pylons TB141 to TB150) as indicated in Page 25 within

Reference	Question	Applicant's Response
	this location is covered in a walking, cycling, riding assessment report and if not, whether it should be; also give consideration and explain if a strategy is required for this school and other similar locations.	6.16.F1 Environmental Statement Figure 16.1 - Primary Access Routes [AS-020]. There are planned short-term temporary closures for Chelmsford Road and Lark's Lane, as detailed within 2.5 Access, Rights of Way and Public Rights of Navigation Plans - Section F [APP-038]. The short-term temporary road closures are proposed for an indicative duration of maximum 4 weeks, and diversions are proposed as detailed in Schedule 8 of 3.1 Draft Development Consent Order [REP2-004]. In accordance with commitment AS03 in the 7.2 Outline Code of Construction Practice [REP2-014], where practicable and safe to do so, existing access to and from residential, commercial, community and agricultural land uses will be maintained throughout the construction phase, or as agreed through landowner discussions. This may require signed diversions or temporary restrictions to access. Where this is not practicable, alternative arrangements will be made with the affected parties through the land agreements, such as instances of no through route single track roads where works are required. Where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads. Furthermore, as indicated in Section 5.12 of 7.3 Outline Construction Traffic Management Plan [APP-309], there will be mitigation measures to manage the impact on pedestrians and other road users throughout construction, such as signage to advise of alternative footways and cycleways that can be used during construction (as far as is practical). The school can be accessed as well via various Public Rights of Way (PRoWs). As set out in the 7.6 Outline Public Rights of Way Management Plan [APP 329], all PRoWs affected by the Project would remain accessible throughout construction either through managed access on their existing alignment or through appropriate temporary diversions. No PRoW would be closed without a diversion in place, and no severance of the overall network is anticipated. A Walking, Cycling and Horse-riding assessment is not considered necessary for the Project due to the temporary nature of the impact. There are no proposed changes to the existing highway layout that would impact the current infrastructure provision for pedestrians and cyclists on their route. Furthermore, while some temporary diversions to PRoWs and road closures are proposed, connectivity for pedestrians

Reference	Question	Applicant's Response
		and cyclists accessing Chelmer Valley High School will be maintained. These measures are applied throughout the Project and therefore a Walking, Cycling and Horse-riding assessment, as set out in Design Manual for Roads and Bridges GG 142 Walking, cycling and horse-riding assessment and review ⁹⁷ , would not provide additional value proportional to the scale and nature of the impacts in this or other similar locations.
TT 1.30	Walking, cycling and horse-riding – 3 In the TA [APP-333] the applicant lists the various routes on the national cycle network which will be impacted, please explain, or signpost the ExA to the mitigation measures proposed to ensure these national routes remain available and safe for users.	Details on National Cycle Network (NCN) or Regional Cycle Network (RCN) located on Primary Access Routes (PARs) are presented within Section 4.9 of 7.11 Transport Assessment [APP-333]. An assessment on pedestrian, cyclist and horse-rider delay, severance, amenity and fear and intimidation is presented in 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275] and summarised within Section of 6.16 Environmental Statement Chapter 16 – Traffic and Transport [APP-271]. The proposed mitigation measures identified to be required for those PARs where a National Cycle Network (NCN) or Regional Cycle Network (RCN) based on the assessment on amenity are as follows: • RCN South Suffolk Route B on PAR 25 - B1070 Hadleigh Road: the driver information pack will identify locations where cyclists cross the carriageway or could be cycling on carriageway. • NCN Route 1 on PAR 28 - Wick Road / Grove Hill: the driver information pack will identify NCN locations where higher number of cyclists may be on the carriageway. • NCN Route 13 on PAR 38 - Mill Road: the driver information pack will identify NCN locations where higher number of cyclists may be on the carriageway. The Applicant is also proposing a speed limit reduction on Mill Road (from national speed limit 60mph to 40mph), between points TR-A-032 and TR-A-033 as shown on Sheet 8 of 2.4 Traffic Regulation Order Plans – Section A [APP-025]. Details of these mitigation measures can be found within Table 5.7 in 7.3 Outline Construction Traffic Management Plan [APP-309].

⁹⁷ Highways England (2019) *Design Manual for Roads and Bridges, GG 142 Walking, cycling and horse-riding assessment and review*

Reference	Question	Applicant's Response
		Where a NCN route has been identified in a road subject to closure, in accordance with Section 5.8 of 7.3 Outline Construction Traffic Management Plan [APP-309], where practicable and safe to do so, cyclists and pedestrians will be able to continue to use the closed roads. Furthermore, as indicated in Section 5.12 of 7.3 Outline Construction Traffic Management Plan [APP-309], there will be mitigation measures to manage the impact on pedestrians and other road users throughout construction, such as signage to advise of alternative footways and cycleways that can be used during construction (as far as is practical).
TT 1.31	Walking, cycling and horse-riding - 4 What is the mitigation approach to safety of pedestrians, cyclists and horse riders on the public highway on PARs, please detail how this will ensure the safety of these users and how is it secured in the draft DCO.	The safety of pedestrians, cyclists and horse riders on the public highway has been considered along all Primary Access Routes and at junctions within the assessment presented in 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] and 7.11 Transport Assessment [APP-333]. This includes and assessment of effects on delay, severance, amenity and fear and intimidation which is summarised within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. Considering the temporary nature of the Project construction works, a proportionate approach has been adopted to ensure safety of pedestrians, cyclists and horse riders on the Primary Access Routes. This includes the following additional mitigation measures have been identified based on the findings of this assessment: • Driver awareness: All construction vehicle drivers associated with the Project will be issued a comprehensive driver information pack. This will include information on footways, cycleways and bridleways and warnings of routes which could have a higher volume of pedestrians, cyclists and equestrians, information on local pedestrian/cycle crossings and pedestrian safety precautions, and information of locations with safety sensitivities such as hospitals, care homes and schools. Additionally, every construction vehicle driver will receive a brief indicating expected behaviours when travelling through the local highway network. • Vegetation management: Vegetation along footways and verges will be regularly maintained to ensure that the full width is available for pedestrians and cyclists (where applicable), ensuring as well adequate visibility at those locations

Reference	Question	Applicant's Response
		where the Public Rights of Way (PRoWs) connect to the public highway reducing the risk of conflict between drivers and PRoW users accessing the road. • Warning signage: Temporary warning signage where appropriate to alert drivers of the presence of pedestrians, cyclists and horse riders, particularly in locations where users may need to cross the carriageway. These measures are intended to help raise driver awareness, improve visibility, and minimise potential conflicts between vehicles and pedestrians, cyclists and horse riders. Details of all proposed measures can be found within Table 5.6 and Table 5.7 of 7.3 Outline Construction Traffic Management Plan [APP-309]. The final Construction Traffic Management Plan, to be prepared by the Main Works Contractor(s), is secured by Requirement 4 in Schedule 3 to 3.1 Draft Development Consent Order [REP2-004].
TT 1.32	Mitigation - 1 Chapter 16 of the ES [APP-271] states that vehicle movements during peak hours will be minimised through car sharing and ensuring movements for certain worker types are restricted. Please explain how this will be secured contractually with your construction partners and how this will be monitored, enforced and reported and issues rectified.	7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] provides the framework and principles that are proposed for the management of construction worker travel to mitigate potential impacts. Commitment T10 in 7.2 Outline Code of Construction Practice [REP2-014] sets out how a Construction Worker Travel Plan will be prepared by the Main Works Contractor(s) prior to construction commencing with the aim of proactively managing trips to and from the site, to minimise local effects by reducing the number of single occupancy vehicle trips and encouraging the uptake of sustainable modes of travel. The final Construction Worker Travel Plan will set out the management measures, procedures and best practices that will be implemented to manage and reduce the impact of construction worker travel on the local and strategic road networks during the construction phase. This is secured by Requirement 4 of 3.1 Draft Development Consent Order [REP2-004]. As set out in 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311], the assessment of the impact on the road network has assumed different vehicle occupancies depending on the type of worker: • Office-based staff (National Grid and Contractor staff) have an assumed vehicle occupancy of one.

Reference	Question	Applicant's Response
		- Overhead line construction workers to compounds have a vehicle occupancy of two, with the movement from compound to site having a vehicle occupancy of six (assumed to be a crew van vehicle). The Main Works Contractor(s) will encourage the use of a crew vehicle for the overhead line workers travelling from compounds to sites, to reflect the vehicle occupancy of six. - Cables and substation construction staff have an assumed vehicle occupancy of two. Worker movements will be designed and managed around shift patterns and commuting times. It is anticipated that construction worker Light Goods Vehicles would arrive before 07:00 and leave after 19:00 each day outside the traditional peak periods. It is assumed that office-based workers would work on site within the traditional hours, with vehicles travelling within the peak hours. The Main Works Contractor(s) will be responsible for managing how their workers travel to and from the Project in order to manage the demand for car parking spaces. The Main Works Contractor's (Contractors') responsibilities are detailed in paragraph 6.3.1 of 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311], which includes the development of an action plan for delivery of the travel plan measures. The Applicant would also note that the Main Works Contractor is contractually required to carry out the authorised development in compliance with the Development Consent Order, including all approved management plans. Compliance with the DCO is therefore an embedded obligation within the delivery of the works. Section 7 in 7.3 Outline Construction Traffic Management Plan - Appendix B - Outline Construction Worker Travel Plan [APP-311] provides detail of various additional measures to encourage sustainable travel over single occupancy vehicle trips, including awareness initiatives, promotion of car sharing, provision of cycle parking on site and providing construction staff with personal travel planning information. For car sharing in particular, the Travel Plan Coordinator will act as a mediator for anyone interested in car sharing. The Travel Plan Coordinator will be responsible for monitoring the Construction Worker Travel Plan and will report to the Applicant and Main Works Contractor(s) quarterly. This report will form part of the monitoring report required by the Local

Reference	Question	Applicant's Response
		Highway Authorities. Mode-share information will be collected on a regular basis at site check-in. The Travel Plan Coordinator will maintain a record of progress against the Travel Plan targets based on the results of the mode split data. The quarterly monitoring will include an assessment of car sharing take up. The Travel Plan Coordinator will be responsible for undertaking site inspections to check compliance with the Construction Worker Travel Plan. All incidents associated with the construction of the Project, including non-conformance with the Construction Worker Travel Plan, will be reported and investigated. Where the Main Works Contractor(s), suppliers or sub-contractors are not delivering the requirements, the Applicant will review performance and will conduct further training and issue formal warnings as appropriate. Where appropriate, discussions would also be held with the relevant Local Highway Authorities to explore further measures that may increase compliance with targets.
TT 1.33	Mitigation - 2 Chapter 16 of the ES [APP-271] states that for a number of links and junctions that will potentially have capacity issues, monitoring of these will take place during the works. Please explain how this monitoring will be reviewed and by who and who will decide if and what further mitigation will be required and in what timeframe. Please also comment on what remediation measures are likely to be used if junctions or links are seen to require intervention. How is this secured in the draft DCO.	As mentioned in Section 5.9 of 7.3 Outline Construction Traffic Management Plan [APP-309], it is anticipated that the Main Works Contractor(s), in partnership with the Local Highway Authority, will monitor the key junctions on the highway network where temporary or permanent mitigation has not been suggested due to the anticipated limited impact of the Project construction traffic. The junctions where monitoring is proposed are identified in Table 5.9 of 7.3 Outline Construction Traffic Management Plan [APP-309]. Details of the modelling assessments undertaken at these junctions are presented within Section 7 of 7.11 Transport Assessment [APP-333]. As part of ongoing engagement between National Grid, the Main Works Contractor and the relevant Local Highway Authorities and National Highways, the full scope of the monitoring of key junctions will be agreed as part of the discharge of Requirement 4 of 3.1 Draft Development Consent Order [REP2-004]. The Applicant envisages that the detailed Construction Traffic Management Plan, to be secured through Requirement 4 of 3.1 Draft Development Consent Order [REP2-004], will include a monitoring framework that sets out the following: • The key junctions subject to monitoring;

Reference	Question	Applicant's Response
		• Clear roles and responsibilities for the implementation and oversight of the monitoring process; • Monitoring periods and data inputs. These are anticipated to include the Main Works Contractor's (Contractors') forecast and actual (recorded) construction vehicle movements at monitored junctions, to be reported on a quarterly basis or at another frequency agreed with the relevant Local Highway Authority and/or National Highways; • Mitigation measures to be agreed with the relevant Local Highway Authority and/or National Highways. These are anticipated to include, but are not limited to, traffic signal timing adjustments, the provision of additional signage (including Variable Message Signs), and the retiming of construction vehicle movements outside of specific time periods; and • Defined trigger thresholds for the implementation of mitigation measures and the duration for which such measures would remain in place, to be agreed with the relevant Local Highway Authority and/or National Highways. The Main Works Contractor(s) are proposing to use a delivery management / scheduling system utilising Global Positioning System (GPS) technology. This will allow the Project's Transport Coordinator(s) to record and monitor the number of vehicles passing through junctions and arriving at site. In addition, the Applicant has committed to joining and engaging with the Developer's Forum to be set up by Essex County Council [RR-1083]. Whilst Essex County Council will set the agenda of meetings, the Applicant envisages that the routeing of construction vehicles, associated traffic management, traffic management and mitigation triggers will be discussed within this forum. The Applicant would be willing to engage with other Local Highway Authorities and National Highways should similar forums be proposed. Section 6.8 of 7.3 Outline Construction Traffic Management Plan [APP-309] details the change process that will be undertaken where the Construction Traffic Management Plan needs to be amended based on engagement following the

Reference	Question	Applicant's Response
		approval of the Construction Traffic Management Plan. It is anticipated, that where an additional junction mitigation is required, this will be captured within the change process, and is therefore secured through Requirement 4 of 3.1 Draft Development Consent Order [REP2-004].
TT 1.34	Mitigation -3 NPS EN-1 (2023) states that sufficient HGV parking, layup and driver facilities should be made available to avoid overspill and damage to the public highway from improper use. Please detail how it is expected that HGV management will ensure that there is limited impact on the local highways and environment and how this will be managed, monitored and corrective action taken if necessary during construction.	As detailed in 6.4 Environmental Statement Chapter 4 - Project Description [APP-130], the Applicant is proposing several 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. A detailed Construction Traffic Management Plan (CTMP) will be developed post DCO consent under Requirement 4 of Schedule 3 to 3.1 Draft Development Consent Order [REP2-004]. 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 the Project's 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 [APP-309], 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.

Reference	Question	Applicant's Response
		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 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. Section 6.4 of 7.3 Outline Construction Traffic Management Plan [APP-309] defines matters to be monitored to ensure compliance with the CTMP. 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.
TT 1.35	Outline construction traffic management plan - 1 The outline Construction Traffic Management Plan (CTMP) [APP-309] states that a significant mitigation measure will be a driver information pack. Please provide information on what the pack will contain and explain how this will be presented to drivers and how you can be assured that all construction drivers will have seen, read and understood the details to ensure the desired mitigation effects will be seen. Will this pack also be	In accordance with commitments GG05 and T08 in 7.2 Outline Code of Construction Practice [REP2-014], all staff and operatives working on the Project will undergo a site-specific induction. Section 3.2 of 7.3 Outline Construction Traffic Management Plan [APP-309] states how this is expected to include the provision of a Driver Information Pack. Commitment T09 in 7.2 Outline Code of Construction Practice [REP2-014] states how Main Works Contractor(s) will prepare a Driver Information Pack prior to construction commencing covering a variety of topics and providing information on the requirements of working on the Project, to form part of the CTMP. The Driver Information Pack will be issued to each driver before travelling to site, and, as noted in paragraph 6.2.10 of 7.3 Outline Construction Traffic Management Plan [APP-309], is expected to contain: Clarification of approved Heavy Goods Vehicle (HGV) routes, including a plan showing the delivery routes, the location of the site access and areas with road safety concerns

Reference	Question	Applicant's Response
	provided to all delivery drivers prior to driving to the sites, if so how will this be managed in practice taking account of the potential number of different drivers and companies. How is this matter secured in the draft DCO.	• Speed limit requirements • Details of reporting accidents and near misses • Details of the types of locations where it would not be acceptable to park on the local highway network • Details of appropriate lorry parks, services and other designated overnight parking where drivers are permitted to stop, which should be used to ensure deliveries arrive on site after 07:00 • Details of any restrictions on delivery hours • Details of HGV safety standards • Details of disciplinary measures for non-compliance • Information on footways, cycleways and bridleways and warnings of routes which could have a higher volume of pedestrians, cyclists and equestrians • Information on collision cluster locations • Information on local pedestrian crossings and pedestrian safety precautions • Information on sensitive locations in the local area such as hospitals, care homes and schools • A copy of the identifier to display in the vehicle window. The Main Works Contractor(s) would be responsible for briefing all operatives on the specific details within the CTMP prior to the commencement of works. The Main Works Contractor(s) will maintain a 'read and understood' record for those that have been sent the Driver Information Pack, to ensure that all construction drivers have seen, read, understood the details and have been briefed on process and procedures for delivery to ensure the desired mitigation effects will be seen. The Driver Information Park is noted as a mitigation measure within 7.3 Outline Construction Traffic Management Plan [APP-309], which is secured through Requirement 4 of 3.1 Draft Development Consent Order [REP2-004].
TT 1.37	Bus services The TA [APP-333] states that there are no expected changes to bus services on the 22 PARS which have been identified as having one or more buses	The Applicant has considered the impact on public transport passenger delay as a result of the increase in daily traffic volumes (07:00-19:00) resulting from the Project worst-case peak week construction activity combined with committed developments on all Primary Access Routes (PARs). This assessment is summarised within Section 16.7 of 6.16 Environmental Statement Chapter 16 - Traffic and

Reference	Question	Applicant's Response
	operating on them and that there will be minimal delays to any bus service. How can the ExA be assured that construction work and any forecast increase in traffic volumes will not have an impact on service provision and how is the need to mitigate impact on bus services secured in the draft DCO.	Transport [APP-271] and Table A16.4.2 of 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]. It was identified that there would be temporary moderate or large significance of effects on bus passenger delay on the following PARs: • PAR 23 – A1071 • PAR 35 - A1341 Via Urbis Romanae • PAR 36 - A134 Northern Approach Road/A134 Wildeve Avenue/A134 Nayland Rd/A134 The Causeway • PAR 37 - A1124 Halsted Road • PAR 49 - A414 Three Mile Hill/A1114 London Road • PAR 50 - A1016 Waterhouse Lane/A1016 Rainsford Lane • PAR 51 - A1060 Rainsford Road/A1060 Roxwell Road • PAR 59 - A129 Sun Street/A129 London Road/A129 Rayleigh Road • PAR 64 - A1013 Stanford Road (east of Orsett Cock Roundabout) • PAR 65 - Buckingham Hill Road • PAR 66 - Brentwood Road • PAR 67 - A1013 Stanford Road (west of Orsett Cock Roundabout). The duration of peak construction activity along these PARs is expected to occur over a one week period, accept for PAR 23 (11 weeks), PAR 59 (seven weeks), PAR 64 and PAR 65 (four weeks), and PAR 67 (two weeks). To support the assessment of public transport passenger delay, included within 6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275], detailed junction modelling of key junctions along the PARs has been carried out to estimate key junction performance indicators such as queue lengths, average delays and levels of capacity. These assessments considered the cumulative effects on the highway network of the combined Project and other committed developments and are summarised in Section 7 of 7.11 Transport Assessment [APP-333]. Where required, mitigation to minimise impacts at the junctions is proposed as outlined within 7.3 Outline Construction Traffic Management Plan [APP-309]. This includes the following mitigation measures:

Reference	Question	Applicant's Response
		• Rationalising Intergreens, add phase delays and signal optimisation to improve the operation of the junction • Temporary signage to warn general traffic of peak hour congestion and availability of alternative routes. • Monitoring of the operation of junctions that will be over capacity in the future baseline and where a negligible impact is predicted as a result of the Project 7.11 Transport Assessment [APP-333] details that any expected short-term impacts (less than four-week duration) on bus networks will be mitigated on a case-by-case basis, through liaison with bus operators and the Local Highway Authority. Indicative short term road closures associated with the cable swathe are presented in Table 5.4 of 7.3 Outline Construction Traffic Management Plan [APP-309]. Furthermore, 7.3 Outline Construction Traffic Management Plan [APP-309] sets out mitigation measures to minimise potential impacts on public bus services. The Applicant will make effort to work with local bus operators, including school bus operators to ensure disruption is minimised. If a bus stop is located on a road proposed for temporary closure, a temporary stop would be provided, following agreement with the Local Highway Authorities and the bus operators. The Applicant anticipates this detail will be coordinated by the Main Works Contractor(s) in their development of the final Construction Traffic Management Plan. The final Construction Traffic Management Plan, to be prepared by the Main Works Contractor(s), is secured by Requirement 4 in Schedule 3 to 3.1 Draft Development Consent Order [REP2-004].

18. Water environment: flood risk hydrology and drainage

Table 18.1 – Water environment: flood risk hydrology and drainage

Reference	Question	Applicant's Response
WE 1.1	Norfolk CC LIR In its LIR [REP1-173] Norfolk CC note several concerns and outstanding objections to hydrology, land drainage and flood risk. In particular, it raises questions relating to the following: • Gaps in the ES and Flood Risk Assessment (FRA) (paragraphs 10.1 and 10.2) • Construction near watercourses (paragraph 10.8) • Insufficient definition of temporary construction works (paragraph 10.9) Please ensure you provide responses that directly answer these queries.	First bullet point (paragraphs 10.1 and 10.2): The key concerns set out in the LIR related to an absence of key drainage information and consideration of surface water flood risk during construction of the Project. The Applicant has provided further information on both those matters in 8.2 Drainage Strategy DCO [REP1-072]. This supplements the information provided in Appendix C of 7.9 Flood Risk Assessment [APP-331]. The Applicant is engaging with the Lead Local Flood Authorities (LLFAs) to review and address the comments provided on the Drainage Strategy, which will be updated and submitted at a future examination deadline. The assessment of effects on Hydrology, Land Drainage and Flood Risk (6.12 Environmental Statement Chapter 12 - Hydrology, Land Drainage and Flood Risk [APP-221]) was undertaken in accordance with 6.19 Scoping Report [APP-288 – APP-296] and 6.20 Scoping Opinion [APP-297] and in line with the requirements of national and local policy and guidance. Further, 7.9 Flood Risk Assessment [APP-331] and 7.10 Water Framework Directive Assessment [APP-332] were reviewed by the Environment Agency and the LLFAs prior to submission and their feedback was incorporated into the documents. Second bullet point (paragraph 10.8 – soil stabilisation in the cleared swathe to prevent the silt pollution of watercourses): Commitment GG24 within 7.2 Outline Code of Construction Practice [REP2-014] would ensure that earthwork mounds and stockpiled soil would be protected and stabilised in line with 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303], for example by covering, or seeding, with appropriate methods to be adopted according to the soil type and the likely storage duration. Further, 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan [APP-303] describes that a soil scientist would

Reference	Question	Applicant's Response
		develop an appropriate testing schedule to confirm the suitability of any soil stabilisation approach. These controls, in combination with measures secured by commitments GG22 and B03 in 7.2 Outline Code of Construction Practice [REP2-014], would prevent silting up of drainage systems and local watercourses. Third bullet point (paragraph 10.9): Details of the temporary construction features and temporary construction access/haul roads are provided in Section 4.8 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and shown on 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]. A Drainage Strategy has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). The strategy provides additional information as to how negative effects on the land drainage regime and rainfall infiltration and runoff would be managed and controlled during construction and also covers proposals for foul water management. The strategy report appends a summary of the calculations to quantify runoff rates/discharge limits and the sizing of drainage storage and attenuation features. The drainage mitigation measures described in this strategy are secured by commitments in the 7.2 Outline Code of Construction Practice [REP2-014]. In line with Commitment GG22 in 7.2 Outline Code of Construction Practice [REP2-014], a Surface Water Management Plan will be developed that is substantially in accordance with the drainage mitigation measures described in 8.2 Drainage Strategy.
WE 1.2	Flood risk assessment - 1 In Appendix B of the FRA [APP-331], floodplain storage loss has been calculated for pylons located within floodplains. However, the same calculation does not appear to have been carried out for the underground trenchless crossings (north and south) of the River Stour. Please explain why this calculation has not been made or is not required.	As detailed in item 3.2.24 in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP1-038], it was agreed with the Environment Agency that flood compensation storage for any temporary works is not required. Works in the floodplain associated with the underground trenchless crossings of the River Stour largely constitute temporary works. The exception is the construction of link boxes at the cable joint bays, which are permanent features, with a very small above ground footprint. Furthermore, a suite of mitigation measures would be in place to manage flood risk during construction of the Stour crossings, secured by commitment W07 in 7.2 Outline Code of Construction Practice [REP2-014].

Reference	Question	Applicant's Response
WE 1.3	Flood risk assessment - 2 In its RR [RR-2973] Pylons East Anglia provided an independent technical examination of Flood Risk Validity and the ES chapter 12 [APP-221]. This report raised several questions, which do not appear to have been answered in your Deadline 1 documents, that relate to: 1. Scour Assessment: Provide confirmation that pylon foundations in Flood Zone 3 have been designed to withstand local scour during the 1% AEP + CC event, given the lack of velocity modelling. 2. Haul Road Transparency: Provide a "blockage scenario" assessment for temporary culverts on ordinary watercourses to ensure haul roads do not increase flood risk to third parties if culverts become occluded. 3. Tilbury North Routing: Provide hydraulic calculations proving that the box culvert at Tilbury North Substation will not accelerate flow conveyance to the detriment of downstream receptors. 4. CoCP Tightening: Remove the phrase "where practicable" from Commitment W07 regarding the storage of materials in Flood Zone 3, replacing it with a strict prohibition on storing loose	The assessment of flood risk from fluvial sources presented in 7.9 Flood Risk Assessment [APP-331] has been scoped through detailed engagement with the Environment Agency, the risk management authority for this form of flooding. As documented in 5.9.15 Draft Statement of Common Ground - Environment Agency [REP1-038], item 3.2.20, the Environment Agency agree that the scope, methodology, assessment and conclusions drawn in the Flood Risk Assessment are appropriate and proportionate. In response to the specific points raised: 1. Velocity modelling and scour assessments are not proportionate as the small number of pylons within Flood Zone 3 would be constructed with suitable foundations, the design of which would be informed by ground investigation data and in accordance with a Foundation Works Risk Assessment (secured by commitment GH02 within 7.2 Outline Code of Construction Practice [REP2-014]). Their designs would withstand local scour forces during the 1% plus climate change event. 2. Neither the Environment Agency nor any of the Lead Local Flood Authorities have requested blockage modelling for temporary haul road culverts. The measures secured by commitments (GG22, GG32, B03, W02) within 7.2 Outline Code of Construction Practice [REP2-014] to manage silted runoff would reduce the risk of these culverts becoming occluded, and modelling of the culverts is not proportionate. 3. Commitment W08 in 7.2 Outline Code of Construction Practice [REP2-014] secures the appropriate design of the box culvert at Tilbury North Substation. Calculations with respect to the sizing of the culverts would be undertaken at future design stages and provided to the Lead Local Flood Authority for approval under the conditions of the protective provisions for drainage authorities that are being agreed between the Applicant and these parties. The designs presented for approval would be suitable to prevent accelerated flow conveyance and any negative impacts on downstream receptors. 4. Commitment W07 will be redrafted for inclusion within the next iteration of 7.2 Outline Code of Construction Practice [REP2-014]. The following update is proposed:

Reference	Question	Applicant's Response
	or hazardous materials in the functional floodplain. 5. River Tas and River Wid require detailed modelling. Respond to the points above, either through signposting existing submissions if this information has been provided, or updated reports.	Where construction activities take place in Flood Zone 3, temporary construction compounds, laydown areas and other work sites will be laid out in accordance with the Sequential Test and incorporate flood resilience measures where necessary. Material storage areas will be located in Flood Zone 1. In proximity to the River Stour, which has an extensive floodplain, additional land has been included within the construction swathe that is outside the flood zone to provide space for materials storage, and no hazardous materials or materials vulnerable to moving in a flood would be stored in Flood Zone 3 of the Stour. 5. Modelling of the River Tas and River Wid has not been undertaken at this stage of the Project, as agreed with the Environment Agency. However, to inform the detailed design of the Project modelling of these watercourses would be carried out, in accordance with a scope to be agreed with the Environment Agency.
WE 1.4	Flood risk assessment - 3 In its LIR [REP1-161] at paragraph 4.7.21, Essex CC state that Essex has a rain fall climate change allowance of 45% and request the applicant confirm parameters with the Environment Agency. Please confirm if this allowance is part of your FRA considerations and if not, why not.	It is confirmed that this allowance is part of the FRA considerations. Section 2.3 of 7.9 Flood Risk Assessment [APP-331] states that the allowance applied within the surface water drainage designs is a 45% uplift. This was agreed as suitable through engagement with the Lead Local Flood Authority and sharing a pre-submission draft of the Flood Risk Assessment with Essex County Council. This is also confirmed in 8.2 Drainage Strategy DCO [REP1-072], submitted at Deadline 1.
WE 1.5	Flooding concerns A number of individual RRs from property owners highlight a concern regarding increased risk of flooding, some citing known issues that could see an increased risk of localised flooding to property. Please explain how you are addressing these individual concerns and provide a schedule of specific location-by-location responses to all RRs and consultation responders who	The Applicant has sought to identify and review all RRs that include representations on hydrology, land drainage and flood risk, and where these identify specific properties and / or very localised concerns, site-specific responses have been provided within the table below. The Applicant notes however, that some RRs do not provide enough information on location to enable a very specifically tailored response to be provided.

Reference	Question	Applicant's Response				
		PINS RR-ID	Location (Waterbody)	Issue Raised	Mitigation	Where Secured in the DCO
	have raised property flooding as a concern, stating the communication status and how mitigation is secured in the draft DCO.	RR-1518 RR-0703 RR-1171 RR-2846 RR-3621 RR-0739 RR-1151 RR-2833 RR-2629 RR-0497 RR-1147 RR-1587 RR-1680 RR-2994 RR-2541	Buckwyns Chase (River Wid / Mountnessing Brook)	The area is already prone to flooding. The introduction of heavy machinery, soil compaction, extensive hardstanding, concrete bases, and access tracks will exacerbate surface water runoff and worsen local drainage issues.	Commitments within the 7.2 Outline Code of Construction Practice (Commitments GG22, W08, W09, W10, W11, W13, W14, AS05).	Requirement 4
		RR-0029 RR-1834 RR-2693 RR-1054 RR-3024 RR-0627	Buttsbury (River Wid)	Buttsbury is a major flood area. The construction and associated trunk roads will exacerbate flooding due to the increase in impermeable surfaces and disruption of natural drainage patterns.	The proposals to manage surface water runoff from impermeable surfaces and manage interfaces with land drainage features are secured through commitments within the 7.2 Outline Code of Construction Practice (Revision B) (Commitments GG22, AS05 W07, W09, W13 and W14).	Requirement 4
		RR-2057	East Cotton (River Dove)	We have been affected by flooding in this area of Cotton in recent history. With the	The proposals to manage surface water runoff from the construction swathe are secured through	Requirement 4

Reference	Question	Applicant's Response			
			removal of hedgerows and trees, the risk of flooding will increase.	commitments within the 7.2 Outline Code of Construction Practice (Revision B) (Commitments GG22, AS05) W07, W09, W13 and W14).	
RR-0882	Stratford St Mary / Langham / Dedham Vale (River Stour / Black Brook)	The trenching and horizontal boring could create havoc unless a very careful and detailed plan is put into operation, with contingencies for heavy rainfall. There is also significant risk of damage to the river (Silt up) due to planned works on the floodplains (Trenching and tunnelling) with no obvious mitigations.	Mitigations to prevent siltation of watercourses are secured by commitments B03, W02, GG22 and GG32 and controls on HDD activities, including a contingency plan via B26 within the 7.2 Outline Code of Construction Practice .	Requirement 4	
RR-0762					
RR-1388					
RR-0485					
RR-2975					
RR-0945					
RR-0892					
RR-0894					
RR-3487					
RR-3087					
RR-0522					
RR-3846					
RR-2795					
RR-0476					
RR-3331					
RR-0777					
RR-2069					
RR-3532					
RR-3828					
RR-2593					
RR-3844					
RR-2072					
RR-2835					
RR-0301					
RR-2989					

Reference	Question	Applicant's Response			
RR-3703 RR-1000 RR-2233	Gun Hill / Ipswich Road (River Stour / Black Brook)	There is a significant concern relating to increased flood risk to the village. There is significant risk of damage to the river (Silted up) due to planned works on the floodplains (Trenching and tunnelling) with no obvious mitigations.	Mitigations to prevent siltation of watercourses are secured by commitments B03, W02, GG22 and GG32 and controls on HDD activities, including a contingency plan via B26 within the 7.2 Outline Code of Construction Practice .	Requirement 4	
RR-2155 RR-0614 RR-1744 RR-1397 RR-1271	Gislingham / Finningham(Tributary of the River Dove)	If National Grid take over agricultural land and build several haul roads, it will be guaranteed that we will see a significantly quicker run off during prolonged spells of wet weather, resulting in higher river and ditch levels and more flooding in the village.	The proposals to manage surface water runoff from haul roads are secured through commitments W10 and W13 within the 7.2 Outline Code of Construction Practice (Revision B) .	Requirement 4	
RR-2947	B1070 (River Brett)	The compaction of the soil makes flooding highly likely.	The proposals to manage soils and prevent increased flood risk due to runoff from the construction swathe are secured by commitments GG28 and AS01 and GG22, W08, W09, W10, W11, W13, W14 within the 7.2 Outline Code of Construction Practice (Revision B) .	Requirement 4	
RR-1294	Strickmere (River Stour)	The trenching will upset the water table and result in flooding	Controls on HDD activities, including a contingency plan are	Requirement 4	

Reference	Question	Applicant's Response			
			especially to Strickmere and the surrounding roads and houses.	secured via commitment B26 within the 7.2 Outline Code of Construction Practice	
RR-2517	Holton St Mary (River Brett)	Risks of flooding in this very flat landscape due to damage of existing water courses etc, etc	Watercourses would be safeguarded via B03, B07, W01 and W02 within the 7.2 Outline Code of Construction Practice	Requirement 4	
RR-1027 RR-2408 RR-1495 RR-0354	Ivy Barn Lane (Tributary of the River Wid)	National Grid proposed to place a construction laydown area and haul road here which will inevitably exacerbate the flooding. The introduction of hardcore, haul roads, and heavy machinery will worsen flooding.	The proposals to manage surface water runoff from haul roads are secured through commitments W10 and W13 within the 7.2 Outline Code of Construction Practice (Revision B) . Runoff from laydown areas will be managed in accordance with W13 and W07.	Requirement 4	
RR-0015 RR-1439	Houchins Lane (Roman River)	The impact of the haul road on the underlying soils, in addition to the tower sites, will be significant and potentially harmful to the field drains.	The proposals to manage soils and prevent increased flood risk due to runoff from the construction swathe are secured by commitments GG28 and AS01 and GG22, W08, W09, W10, W11, W13, W14 within the 7.2 Outline Code of Construction Practice (Revision B) .	Requirement 4	
RR-0918 RR-2129 RR-3856 RR-3856	Burgate Little Green / Wortham (Little Ouse River)	Flood risk will increase significantly as a result of disruption to the natural drainage of surrounding farmland.	The proposals to manage surface water runoff from impermeable surfaces and manage interfaces with existing land drainage features are	Requirement 4	

Reference	Question	Applicant's Response			
					secured through commitments within the 7.2 Outline Code of Construction Practice (Revision B) (Commitments GG22, AS05 W07, W09, W13 and W14).
RR-0907 RR-0619 RR-3091	Little Waltham (River Chelmer)	The pylons with their large concrete bases, large haul roads and nearby storage compounds will increase flood risk from surface run-off. Increased sediment washed into the river will increase the risk of blockage by deposited sediment.	Mitigations to prevent siltation of watercourses are secured by commitments B03, W02, GG22 and GG32 and surface water runoff from the construction swathe will be managed in accordance with commitments GG22, W08, W09, W10, W11, W13, W14 within the 7.2 Outline Code of Construction Practice (Revision B) .	Requirement 4	
RR-1751 RR-1511	Fossets Lane (Tributary of River Colne)	We have asked NG repeatedly to assess whether there is a risk that the run off from the adjoining land where the pylons will be sited will increase the volume or velocity of the run off and worsen the impact and present the risk that we would not be able to access our property.	Mitigations to prevent surface water runoff from the construction swathe contributing to local surface water flood risk are secured within commitments GG22, W08, W09, W10, W11, W13, W14 within the 7.2 Outline Code of Construction Practice (Revision B) .	Requirement 4	
RR-0050 RR-3039	Mellis Common (Tributary of	The planned burying of cables and haul roads will undoubtedly affect	Controls are secured via GG22, W08, W09, W10, W11, W13, W14 in 7.2	Requirement 4	

Reference	Question	Applicant's Response			
		River Waveney)	how water drains into the ditch network and will increase the risk of flooding.	Outline Code of Construction Practice	
RR-1937	Long Stratton Road / Tabernacle Lane (Tributary of River Tas)	Pylon RG40 sits at the head of a small stream on heavy clay soil, with deep steel footings and concrete bases likely to disturb natural drainage and exacerbate the flooding risk.	The proposals to manage surface water runoff from impermeable surfaces and manage interfaces with land drainage features are secured through commitments within the 7.2 Outline Code of Construction Practice (Revision B) (Commitments GG22, AS05 W07, W09, W13 and W14).	Requirement 4	
RR-2616 RR-3106	Roxwell Brook	Increased flooding risk from Roxwell Brook caused by the development is a serious concern.	Watercourses, including Roxwell Brook, would be safeguarded via B03, B07, W01 and W02 within the 7.2 Outline Code of Construction Practice	Requirement 4	
RR-1368	Fordham (River Colne)	The construction of large concrete bases for the pylons poses significant flooding risks in affected areas, disrupting natural drainage and exacerbating flood hazards.	The proposals to manage surface water runoff from impermeable surfaces and manage interfaces with land drainage features are secured through commitments within the 7.2 Outline Code of Construction Practice (Revision B) (Commitments GG22, AS05 W07, W09, W13 and W14).	Requirement 4	
RR-3573 RR-1078	Writtle (Tributaries of	The area between Writtle and	The proposals to manage soil compaction and	Requirement 4	

Reference	Question	Applicant's Response		
		River Can / River Wid / Roxwell Brook)	Margaretting already suffers flooding from brooks and small rivers crossing agricultural land. Heavy works risk: Soil compaction, Blockage of water channels, Increased surface water runoff, Highway flooding	prevent increased flood risk due to runoff from the construction swathe are secured by commitments GG28 and AS01 and GG22, W08, W09, W10, W11, W13, W14 within the 7.2 Outline Code of Construction Practice (Revision B) .
RR-2169		Billericay (River Wid)	The Wid floods at various points in the area and large scale construction work along with concrete pilings and increased construction/HGV traffic is likely to compact the soil in the area and compound the flooding issues	The proposals to manage soils are secured by commitments GG28 and AS01 within the 7.2 Outline Code of Construction Practice (Revision B) . Requirement 4
RR-1959		Wimble Lane (Tributary of the River Dove)	There will be a hard surface rather than fields to soak up rainfall and hedgerows and trees which soak up ground water will have been removed.	The proposals to manage surface water runoff from impermeable surfaces and manage interfaces with land drainage features are secured through commitments within the 7.2 Outline Code of Construction Practice (Revision B) (Commitments GG22, AS05 W07, W09, W13 and W14). Requirement 4
RR-2699		Tas Valley	Along with pylon construction and the new access roads, there will be disruption	The proposals to manage surface water runoff from impermeable surfaces and manage interfaces with land drainage Requirement 4

Reference	Question	Applicant's Response		
		to the natural water drainage into the valley	features are secured through commitments within the 7.2 Outline Code of Construction Practice (Revision B) (Commitments GG22, AS05 W07, W09, W13 and W14).	
RR-2181 RR-2767	Offton (The Channel)	Heavy machinery will compact the soil, reducing its ability to retain nutrients and increasing the risk of waterlogging. The disruption to natural drainage systems will exacerbate these issues, causing further soil erosion and heightening flooding risks.	The proposals to manage soil compaction and prevent increased flood risk due to runoff from the construction swathe are secured by commitments GG28 and AS01 and GG22, W08, W09, W10, W11, W13, W14 within the 7.2 Outline Code of Construction Practice (Revision B) .	Requirement 4
RR-3663	Bullen Wood (Balstead Brook / River Gipping)	Haul roads will intersect a ditch near Bullen Wood. No surface water management plan exists and there is a risk of waterlogging and crop loss.	Development of a detailed surface water management plan is secured by commitment GG22 within the 7.2 Outline Code of Construction Practice (Revision B) .	Requirement 4

As noted in the table, mitigation to address the potential for the Project to contribute to increasing localised flood risk and drainage issues are described in **7.9 Flood Risk Assessment [APP-331]** and **8.2 Drainage Strategy [REP1-072]** and is secured through inclusion of a range of commitments within **7.2 Outline Code of Construction Practice [REP2-014]**, secured by Requirement 4 of the DCO.

Reference	Question	Applicant's Response
WE 1.6	Surface water - 1 In their LIRs, the Lead Local Flood Authorities (LLFA) request the production and implementation of a construction surface water drainage strategy to be secured in the draft DCO, which Norfolk CC states has precedent in DCOs. Please explain your consideration of this suggestion.	The Applicant confirms that the production of a construction surface water drainage strategy and its subsequent implementation is secured by commitment GG22 of 7.2 Outline Code of Construction Practice [REP2-014], which states: <i>'The Main Works Contractor(s) will prepare a Surface Water Management Plan to inform discharge of the DCO Requirement. The Surface Water Management Plan will be substantially in accordance with the Drainage Strategy (document reference 8.2) and will 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. A variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding, shall be adopted as specified in the Surface Water Management Plan, and where identified as necessary during inspections, audits and in response to incidents. Construction drainage measures will be developed liaising with the Lead Local Flood Authorities (LLFAs) and statutory undertakers including Anglian Water (where relevant), with ongoing dialogue during implementation of the measures. There will be no intentional discharge of site runoff to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority' (except in the case of an emergency)</i>
WE 1.7	Surface water - 2 Please confirm if all surface water runoff from construction sites and permanent works will be managed in line with Sustainable Drainage Systems guidance and will be designed to ensure there is no impact on third party land and down-stream catchment. State how this is secured in the draft DCO.	It is confirmed that all surface water runoff from construction sites and permanent works will be managed in line with guidance from the National Standards for Sustainable Drainage Systems (DEFRA, 2025) and relevant Lead Local Flood Authority guidance, and will be designed to ensure there is no impact on third party land and downstream catchments. The Applicant submitted 8.2 Drainage Strategy DCO [REP1-072] at Deadline 1. The Drainage Strategy sets out a high-level strategy to mitigate the impacts on the existing surface water flow paths and the existing field drainage networks. A further iteration of the strategy will be published at a future deadline to incorporate comments from the Lead Local Flood Authorities and to include a series of drainage layout figures for the Project to illustrate overland flow routes. Further, to discharge Requirement 4 of the DCO, commitment GG22 in 7.2 Outline Code of Construction Practice [REP2-014] secures that the Main Works Contractor(s) will further develop the Project drainage designs to produce a Surface

Reference	Question	Applicant's Response
		Water Management Plan in liaison with the Lead Local Flood Authorities and statutory undertakers.
WE 1.8	Surface water - 3 A number of LLFAs have commented that they have residual concerns about the management of surface water, for example in its LIR [REP1-161] at paragraph 4.7.25, Essex CC state that the LLFA '...retains certain concerns that have not been addressed from previous discussions and that have been set out in consultation responses, without feedback or discussion from the Applicant. This uncertainty gives cause for concern for the project'. Explain how the ExA can be assured that the concerns of LLFAs regarding surface water are being adequately addressed and will be resolved by the close of the examination.	The Applicant has been, and continues to be, committed to collaborative working with the relevant Lead Local Flood Authorities (LLFAs). The Applicant engaged with all relevant LLFAs throughout the pre-application period, including through sharing technical notes, as evidenced in 5.1 Consultation Report [APP-066] (e.g. reference 9-2.103; 9-2.146; 9-2.1305). The Applicant is continuing to engage with Essex County Council and the other LLFAs, with a series of meetings having been arranged during April 2026 to discuss their comments on 8.2 Drainage Strategy DCO [REP1-072] that was submitted at Deadline 1. An updated version of 8.2 Drainage Strategy DCO [REP1-072] will be submitted at a future deadline, providing updates to address the feedback from the LLFAs based on their review of the original document. Progress made will be documented in the Statements of Common Ground between the Applicant and the LLFAs and the Applicant is confident that drainage matters will be resolved by the close of the examination.
WE 1.9	Surface water - 4 In its RR [RR-792] the Water Management Alliance note that any surface water to be discharged into watercourses they are responsible for will need consent. Please confirm how this is secured in the draft DCO and if agreement has been reached on the consenting process.	The Project is proposing to disapply s23 of the Land Drainage Act 1991 through agreement of Protective Provisions with the relevant drainage authorities including the Water Management Alliance (WMA). This consenting approach has been discussed and agreed with the drainage authorities. Protective Provisions are currently being negotiated, progressing towards an agreed position. The Applicant has shared draft Protective Provisions with the WMA and updates/amendments have recently been received from the WMA for the Applicant to consider their inclusion. The Applicant will continue to engage with the WMA to agree these provisions.
WE 1.10	Certified documents In its LIR [REP1-161] at paragraph 4.7.26, Essex CC state they are	The flood risk and drainage mitigation measures and controls set out in 7.9 Flood Risk Assessment [APP-331] and 8.2 Drainage Strategy DCO [REP1-072] (the latter of which includes an outline Surface Water Drainage Strategy) are all secured

Reference	Question	Applicant's Response
	concerned that the draft DCO, draft schedule of requirements and EM do not highlight the existing flood risk, the need for managing this risk and/ or the presence of overland flows. They continue to suggest that the FRA and the Surface Water Management Strategy documents should be listed as 'certified document' of the draft DCO and that a Construction Environmental Management Plan is drafted to control works that affect ordinary watercourses/drainage channels, surface water drainage, and the control of pollutants. Please comment on this proposal.	through the inclusion of a range of commitments within 7.2 Outline Code of Construction Practice [REP2-014]. In turn, the 7.2 Outline Code of Construction Practice [REP2-014] is secured by Requirement 4 of Schedule 3 to the 3.1 Draft Development Consent Order [REP2-004]. The Applicant therefore does not consider it necessary to add any further controls in relation to flood risk or overland flows. As noted in the 8.4.1 Applicant's Response to Relevant Representations [REP1-132] (for example, Page E21) and the 8.8.2 Applicant's Response to Local Impact Reports [REP2-030], the 7.2 Outline Code of Construction Practice [REP2-014] includes all information that would typically be found within a Construction Environmental Management Plan (CEMP), therefore a separate CEMP is not required. The Applicant is content to list the 8.2 Drainage Strategy [REP1-072] as a certified document should the Examining Authority consider it appropriate to do so, however, the Applicant would reiterate that the certification of documents does not mean they have any greater level of control than documents that are not certified.
WE 1.11	Outline CoCP - 1 In the outline CoCP [APP-300] commitment W07 states that in flood zone 3 work will be laid out in accordance with the sequential test. The ExA and certain LLFAs believe this does not provide sufficient clarity on what is intended. Please explain what this means and provide a reworded commitment to ensure clarity.	The Applicant confirms that the Sequential Test has been applied and wishes to clarify that, where it has not been possible to wholly avoid works in areas at risk of flooding, the intention of commitment W07 in 7.2 Outline Code of Construction Practice [REP2-014] is to ensure that construction work sites in these areas are laid out in accordance with the sequential approach. This means that where there is a varying degree of flood risk across a work site, the most vulnerable components would be placed in the areas at lowest risk. The following amendment to commitment W07 will be included in the next iteration of the Outline Code of Construction Practice: <i>'Where construction activities take place in Flood Zone 3, temporary construction compounds, laydown areas and other work sites will be laid out in accordance with the sequential approach, ensuring the most vulnerable components are placed in the areas at lowest risk, and incorporate flood resilience measures where necessary. Material storage areas will be located in Flood Zone 1. In proximity to the River Stour, which has an extensive floodplain, additional land has been included within the construction swathe that is outside the flood zone to provide space for</i>

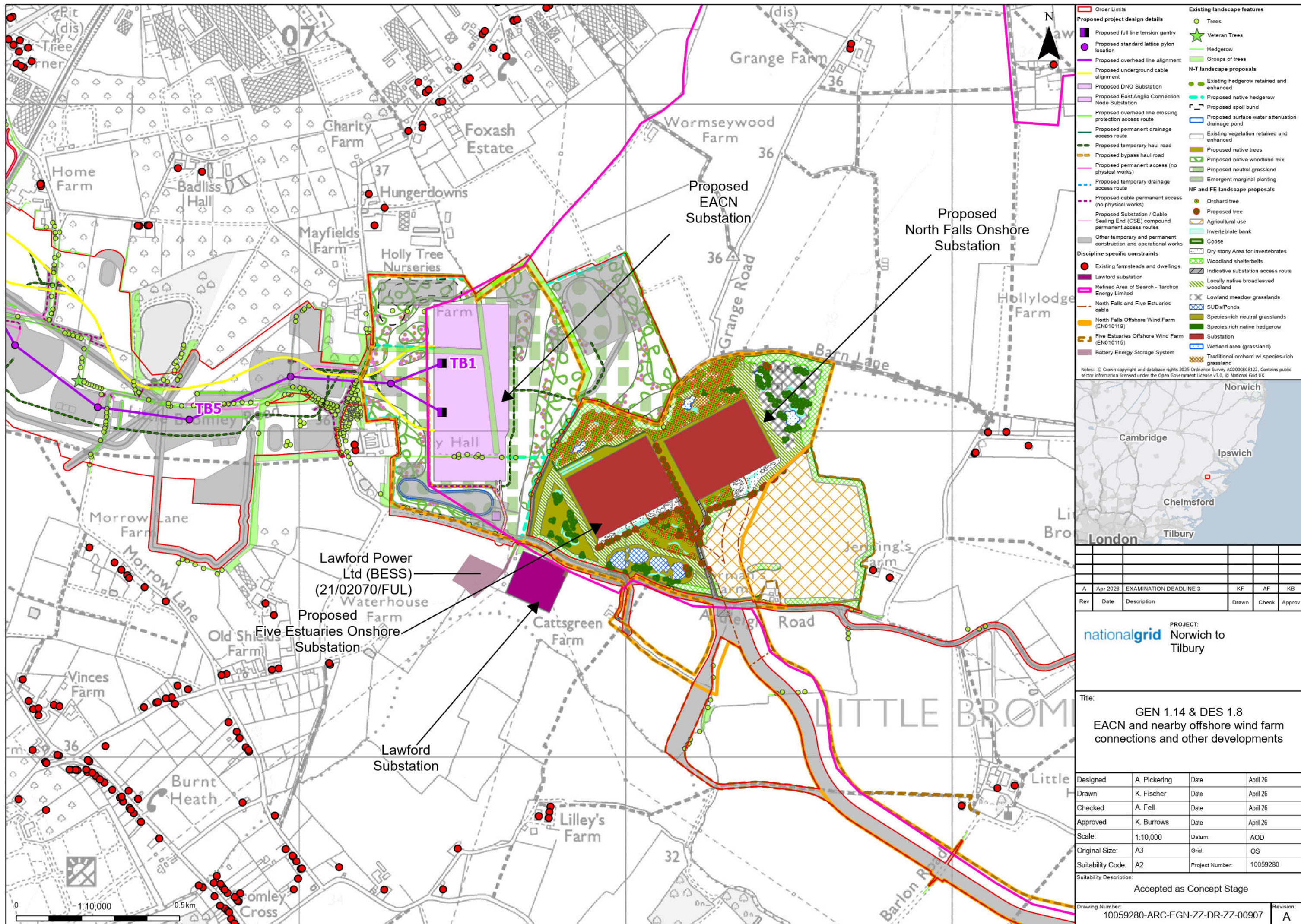
Reference	Question	Applicant's Response
		<i>materials storage, and no hazardous materials or materials vulnerable to moving in a flood would be stored in Flood Zone 3 of the Stour.</i>
WE 1.12	Outline CoCP - 2 In the outline CoCP [APP-300] commitment W04 states that active private water supplies will be identified through landowner discussions and appropriate measure will be considered during construction to protect these. To the applicant: • Do you consider that you have identified all private water supplies • If not, how do you propose to do such • Is there an agreed action plan for private water supplies with owners once they have been identified, and what is the process for agreement to the plan if so • The ExA consider that it not sufficiently robust to state that measures will be 'considered'. Please propose a reworded commitment that gives greater assurance of intervention and protection of private water supplies. To affected persons: • Please state if you have a private water supply which has not been detailed to the applicant or if you	Section 9.2 of 6.9.A3 Environmental Statement Appendix 9.3 - Groundwater Baseline and Qualitative Groundwater Risk Assessment [APP-184] includes information on private water supplies and provides an assessment of the potential for impacts related to the Project on the identified private water supplies. The Applicant has taken all reasonable steps to identify private water supplies, collecting information from each of the councils covering the different Project sections. The locations of the private water supplies identified are presented on 6.9.F5 Environmental Statement Figure 9.5 - Hydrogeology and Hydrogeological Receptors [APP-190] with the exception of the South Norfolk data. South Norfolk Council's General Data Protection Regulation (GDPR) rules prevented the locations being shown, but the locations are included in the assessment. The assessment identifies where impacts on the individual private water supplies are considered unlikely, and where further investigation and assessment should be undertaken following detailed design. Where it has been concluded that further investigation and assessment is required, a Hydrogeological Risk Assessment in accordance with commitment GH11 in 7.2 Outline Code of Construction Practice [REP2-014] will be undertaken to assess the specific risks to the private water supplies and identify any additional mitigation or remediation that may be required, which will be agreed with the Environment Agency or other stakeholders as appropriate.

Reference	Question	Applicant's Response
	have given details but not received a response regarding this.	
WE 1.13	Holton St Mary Parish Council comments In its WR, Holton St Mary PC [REP1-168] notes that drainage works are planned from the haul road into a stream on the west of Sandpits Lane, just to the north of Dewlands Farm. Its notes that the area is rich in wildlife habitat and that otters have been recorded in the area and that the stream proposed for the run-off is prime otter habitat. The PC note that it has not seen any documentation of the ecological impacts of this run-off; or the impacts on river health. Provide an ecological impact analysis of the proposal for this area and, if there are no reasonable alternatives, propose forms of mitigation that might be employed, such as water capture and/or filtration. Holton St Mary PC – Please provide evidence regarding the stream on the west of Sandpits Lane, just to the north of Dewlands Farm, and your statement that the area is rich in wildlife habitat and the stream, where the run-off is proposed, is prime otter habitat where otters have been recorded.	A Drainage Strategy has been produced and submitted at Deadline 1 (8.2 Drainage Strategy DCO [REP1-072]). As stated in the Drainage Strategy, drainage systems will be designed to meet the water quality design criteria and good practice pollution control measures outlined in the CIRIA SuDS Manual. Paragraph 5.4.33 of 8.2 Drainage Strategy [REP1-072] describes the measures that will be in place for haul roads to provide treatment of runoff prior to discharge into watercourses. There is a proposed temporary attenuation pond adjacent to Sandpits Lane that will provide this treatment prior to runoff being discharged to the stream to the west of Sandpits Lane. This attenuation pond is shown on Page 30 of 6.4.F1 Environmental Statement Figure 4.1 - Proposed Project Design [APP-133]. The impact from runoff during construction on watercourses is addressed in Section 12.8 of 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221]. Mitigation measures will be in place to reduce the risk of negative impacts on watercourses such that there would be no significant effects. The measures that will be in place are described and secured through commitments W13, GG22, GG23 and AS05 in 7.2 Outline Code of Construction Practice [REP2-014]. A full ecological impact assessment of all watercourses, including the stream of Sandpits Lane, has already been undertaken within 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]. With the standard mitigation measures in place as detailed above and already included within 7.2 Outline Code of Construction Practice [REP2-014] there will be no significant residual effects on the stream off Sandpits Lane. Otter surveys of the stream were undertaken by the Applicant and has been referenced as watercourse 145 within the submitted documentation. The details and results of these surveys are included within 6.8.A13 ES Appendix 8.13: Otter and Water Vole Report [AS-039]. No confirmed otter holts, resting sites or other field signs were found along the stream off Sandpits Lane. Whilst, no field signs of otter were identified in this location during surveys, the habitat was assessed as having sub-optimal suitability to support otter and has been assessed within 6.8 Environmental Statement Chapter 8: Ecology and Biodiversity [AS-026]

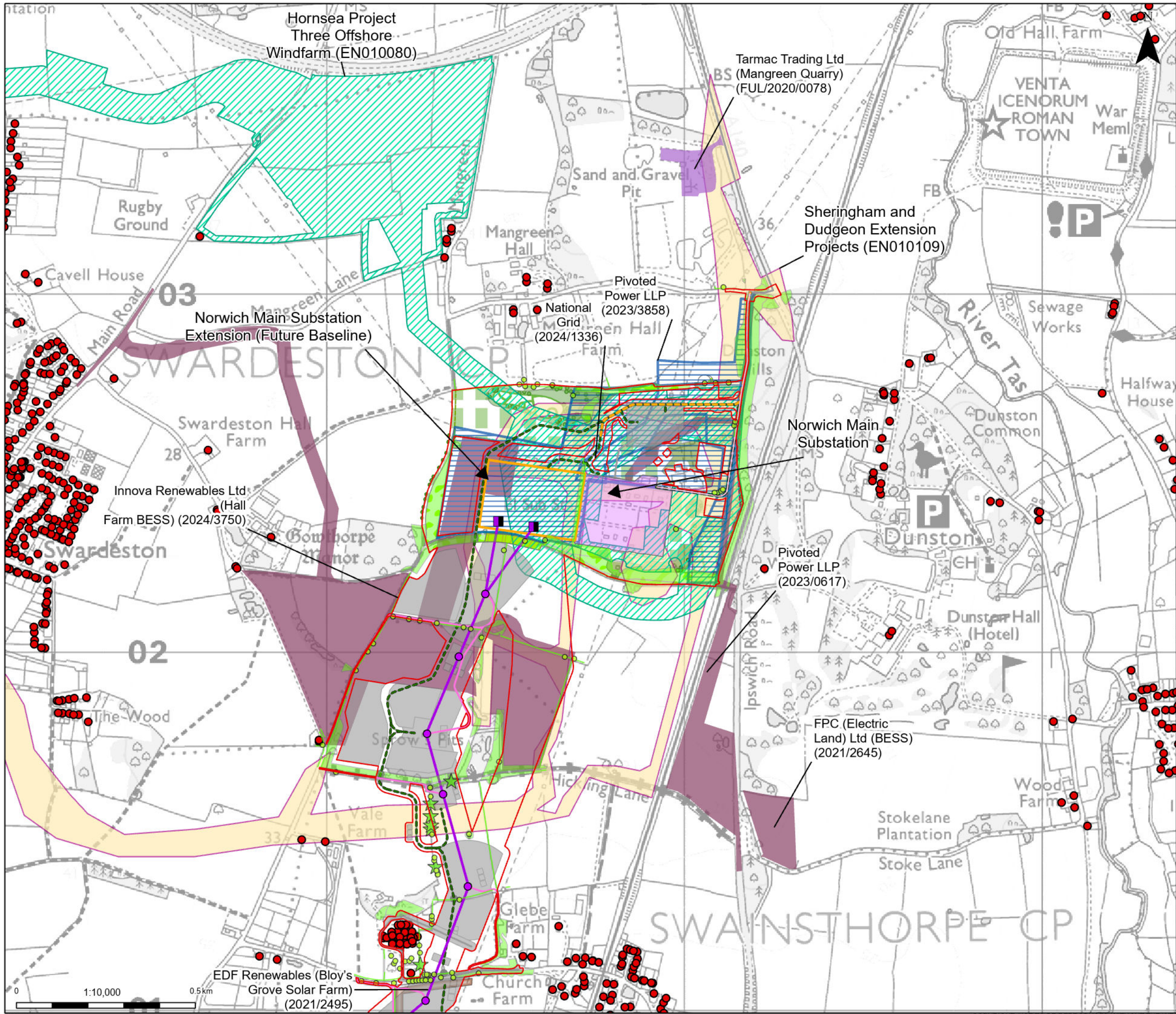
Reference	Question	Applicant's Response
		accordingly. The drainage outflow proposed in this location would have no significant residual impact on otter, as it will not impact the riparian corridor or change the suitability of the watercourse for foraging/ commuting otter. Mitigation measures for otter are included within 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. Pre-construction otter surveys will be undertaken a maximum of four months prior to the start of the construction works, including on the stream off Sandpits Lane. Pre-construction surveys will inspect for natal dens, holts, couches and resting places. In the event that otter holts or other resting sites are found during pre-construction checks, works within 30 m will cease, Natural England will be consulted and a licence sought to allow works to continue.
WE 1.14	Anglian Water In its WR, Anglian Water [REP1-199] indicate that a Water Resource Assessment template is with the applicant for completion. Please advise if this has been completed and/or at which deadline it will be submitted.	The Applicant has submitted a draft Water Resource Assessment (WRA) to Anglian Water for feedback prior to the submission of all WRA's requested by Anglian Water for each temporary and permanent connection to proposed infrastructure where the WRA threshold is met. The Applicant intends to further define the connection requirement and complete submission of all required WRAs by Deadline 6.
WE 1.15	Waterways and navigation In its RR [RR-3637] the Maritime and Coastguard Agency request the applicant confirms whether any of rivers within the order limits or affected by the proposed development fall within the jurisdiction of a statutory harbour authority or local navigation authority. Confirm if this is the case. If so, please provide the ExA a full response to the questions raised and statements made by the Maritime and Coastguard Agency in their RR.	The Project is situated entirely within the Thames and East England Maritime and Coastguard Agency Marine Office authority area, however, no Ports or Marine Offices within this MCA authority area are situated within the Order Limits. None of the rivers within the Order Limits have been identified as falling within the jurisdiction of a Statutory Harbour Authority or Local Navigation Authority (e.g. Canal & River Trust).
WE 1.16	Affinity Water	Affinity Water have highlighted further detailed design engagement regarding proposed interactions between the Applicant and Affinity Water assets, cost

Reference	Question	Applicant's Response
	In its RR [REP1-197] Affinity Water state that they own and operate Ardleigh reservoir. What are the remaining issues which are giving rise to Affinity Water maintaining their objection and what progress is being made to resolve these matters.	recovery mechanisms and the agreement of a set of bespoke protective provisions as issues currently preventing Affinity Water from withdrawing their objection to the draft DCO. Further details of the outstanding items under discussion between Affinity Water and the Applicant can be found in 8.3.5 Draft Statement of Common Ground - Affinity Water [REP1-076]. The Applicant is engaged with Affinity Water across all of the above items seeking to bring them to an agreed state.

Appendix A. Supplement 1 - GEN1.14 & DES1.8 – EACN and customer connection proposals with Landscape proposals



Appendix B. Supplement 2 & 3 - GEN 1.15 Norwich Main and Bramford substations and Tilbury North site – other developments



Order Limits

Proposed project design details

Proposed full line tension gantry

Proposed standard lattice pylon location

Proposed overhead line alignment

Norwich Main Substation

Norwich Main Substation Extension (future baseline)

Proposed temporary haul road

Proposed bypass haul road

Proposed permanent access (no physical works)

Proposed Substation / Cable Sealing End (CSE) compound permanent access routes

Other temporary and permanent construction and operational works

Discipline specific constraints

Existing farmsteads and dwellings

Battery Energy Storage System

Transmission and Distribution Infrastructure

Waste Recycling Facility and Waste/Materials Storage

Generating Stations

Sheringham and Dudgeon Extension Projects (EN010109)

Hornsea Project Three Offshore Wind Farm (EN010080)

Existing landscape features

Trees

Veteran Trees

Hedgerow

Groups of trees

Landscape proposals

Existing Hedgerow retained and enhanced

Proposed native hedgerow

Existing Vegetation retained and enhanced

Retained and enhanced scrub

Proposed Native Woodland Mix

Proposed Native Trees

Proposed Neutral Grassland

Existing Vegetation to be managed under overhead line

Proposed Native Scrub Mix

Notes: © Crown copyright and database rights 2025 Ordnance Survey AC000080122. Contains public sector information licensed under the Open Government Licence v3.0. © National Grid UK

Norwich

Cambridge

Ipswich

Chelmsford

Tilbury

London

A	April 2026	EXAMINATION DEADLINE 3	KF	AF	KB
Rev	Date	Description	Drawn	Check	Approv

PROJECT:
nationalgrid Norwich to Tilbury

Title:
GEN1.15 - Norwich Main and Bramford substations and Tilbury North site Norwich Main

Designed	A. Pickering	Date	April 26
Drawn	K. Fischer	Date	April 26
Checked	A. Fell	Date	April 26
Approved	K. Burrows	Date	April 26
Scale:	1:10,000	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

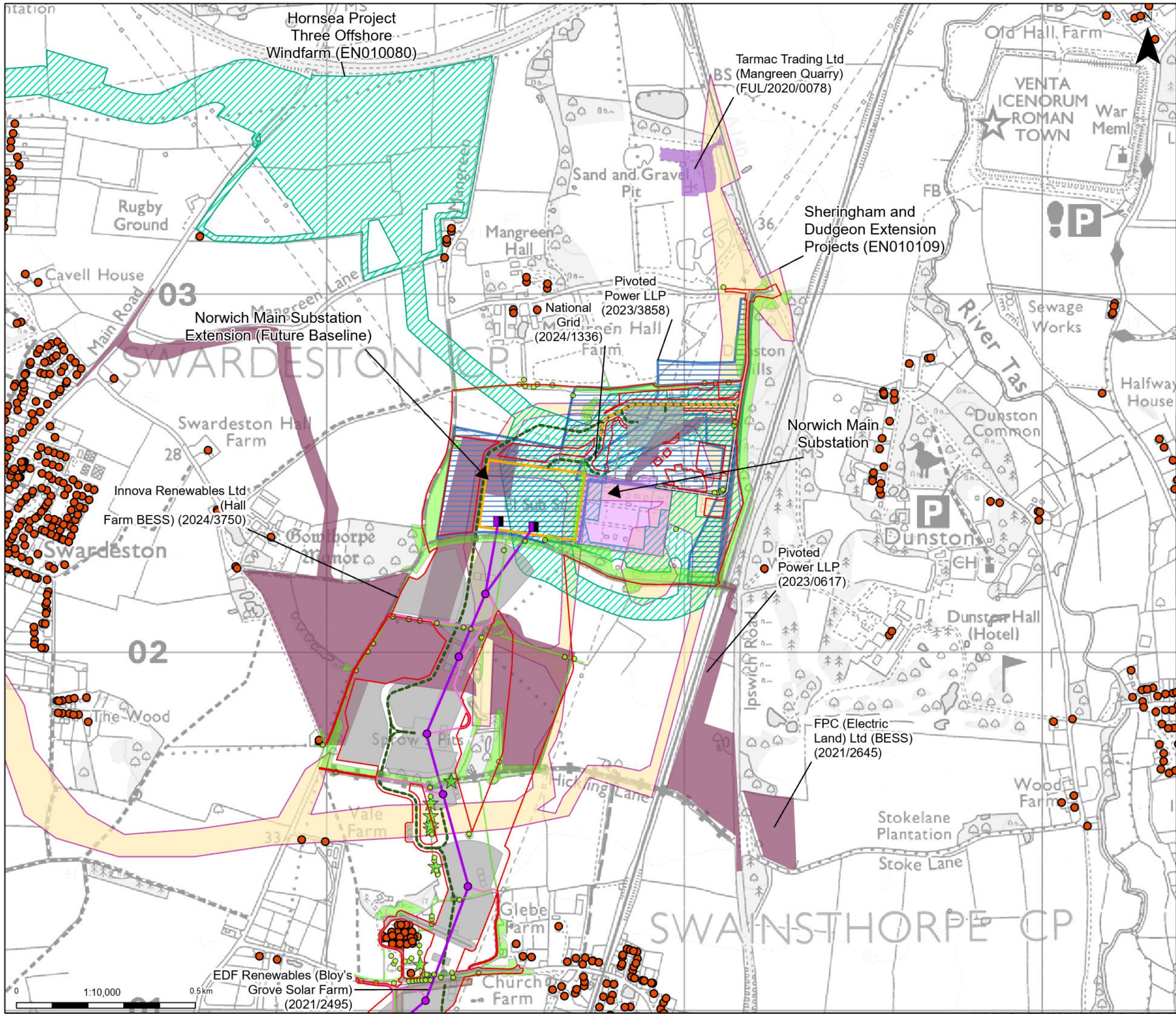
Suitability Description:
Accepted as Concept Stage

Drawing Number:
10059280-ARC-EGN-ZZ-DR-ZZ-00908

Revision:
A

Print Date: 04-07-26 16:21:39

COPYRIGHT: NOT TO BE REPRODUCED WITHOUT THE WRITTEN PERMISSION OF NATIONAL GRID ELECTRICITY TRANSMISSION PLC



Order Limits

Proposed project design details

Discipline specific constraints

Existing landscape features

Proposed full line tension gantry

Proposed standard lattice pylon location

Proposed overhead line alignment

Norwich Main Substation

Norwich Main Substation Extension (future baseline)

Proposed temporary haul road

Proposed bypass haul road

Proposed permanent access (no physical works)

Proposed Substation / Cable Sealing End (CSE) compound permanent access routes

Other temporary and permanent construction and operational works

Existing farmsteads and dwellings

Battery Energy Storage System

Transmission and Distribution Infrastructure

Waste Recycling Facility and Waste/Materials Storage

Generating Stations

Sheringham and Dudgeon Extension Projects (EN010109)

Hornsea Project Three Offshore Wind Farm (EN010080)

Trees

Veteran Trees

Hedgerow

Groups of trees

Notes: © Crown copyright and database rights 2025 Ordnance Survey AC000080122, Contains public sector information licensed under the Open Government Licence v3.0, © National Grid UK

Norwich

Cambridge

Ipswich

Chelmsford

Tilbury

London

A	Apr 26	EXAMINATION DEADLINE 3	KF	AF	KB
Rev	Date	Description	Drawn	Check	Approv

PROJECT:

nationalgrid Norwich to Tilbury

Title:

GEN1.15 - Norwich Main and Bramford substations and Tilbury North site Norwich Main

Designed	A. Pickering	Date	April 26
Drawn	K. Fischer	Date	April 26
Checked	A. Fell	Date	April 26
Approved	K. Burrows	Date	April 26
Scale:	1:10,000	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description:

Accepted as Concept Stage

Drawing Number:

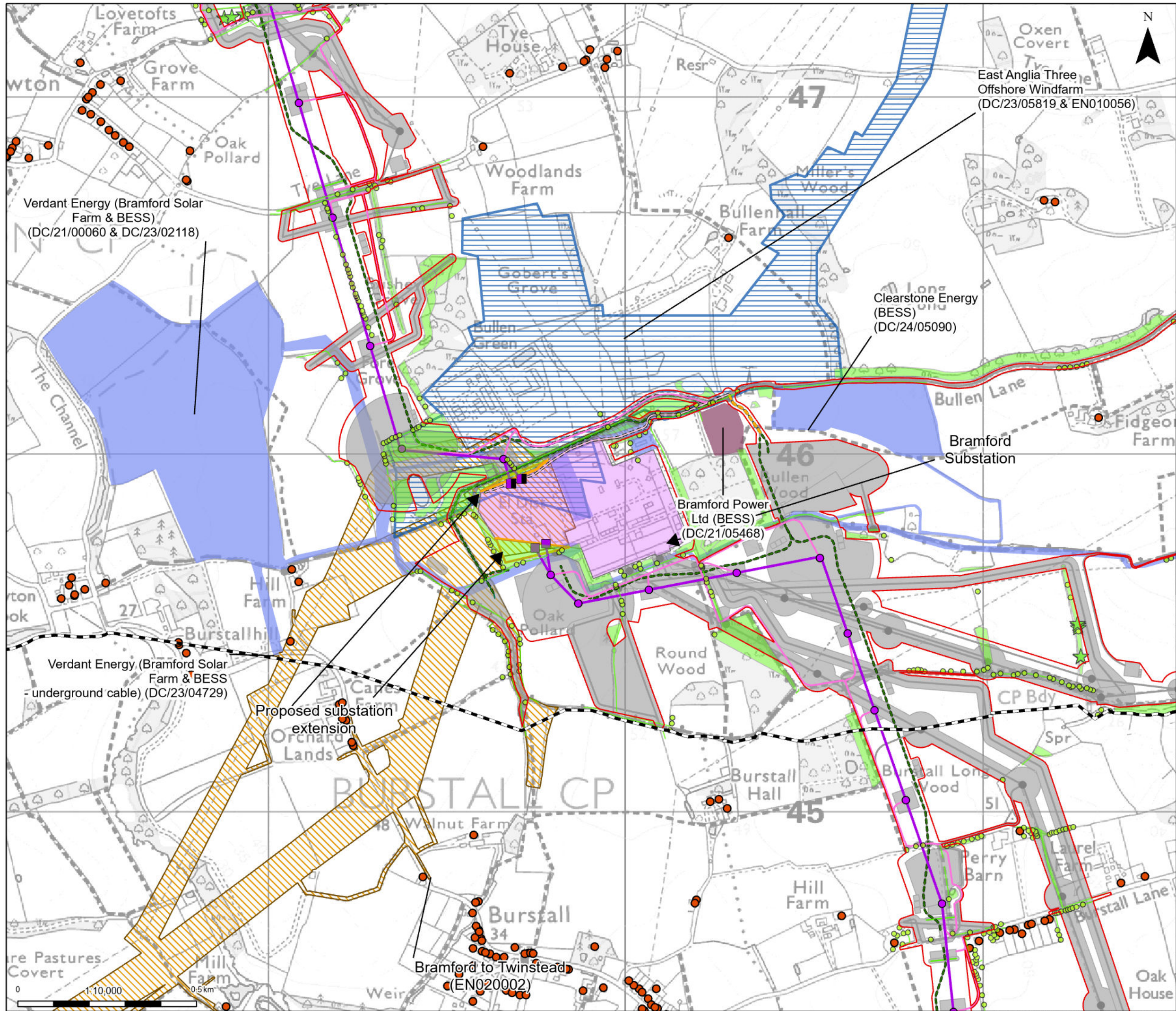
10059280-ARC-EGN-ZZ-DR-ZZ-00908

Revision:

A

Print Date: 04-07-26 15:40:53

COPYRIGHT: NOT TO BE REPRODUCED WITHOUT THE WRITTEN PERMISSION OF NATIONAL GRID ELECTRICITY TRANSMISSION PLC



- Order Limits**
- Project section line
- Proposed project design details**
- Proposed full line tension gantry
 - Proposed low duty gantry
 - Proposed standard lattice pylon location
 - Proposed overhead line alignment
 - Bramford Substation
 - Bramford Substation Extension
 - Proposed overhead line crossing protection access route
 - Proposed permanent drainage access route
 - Proposed temporary haul road
 - Proposed bypass haul road
 - Proposed permanent access (no physical works)
- Proposed Substation / Cable**
- Sealing End (CSE) compound
 - permanent access routes
 - Other temporary and permanent construction and operational works
- Discipline specific constraints**
- Existing farmsteads and dwellings
 - Battery Energy Storage System
 - Generating Stations and Battery Energy Storage System
 - Transmission and Distribution Infrastructure
 - Bramford to Twinstead (EN020002)
- Existing landscape features**
- Trees
 - Veteran Trees
 - Hedgerow
 - Groups of trees

Notes: © Crown copyright and database rights 2025 Ordnance Survey AC0000808122. Contains public sector information licensed under the Open Government Licence v3.0. © National Grid UK



Rev	Date	Description	Drawn	Check	Approv
A	Apr 26	EXAMINATION DEADLINE 3	KF	AF	KB

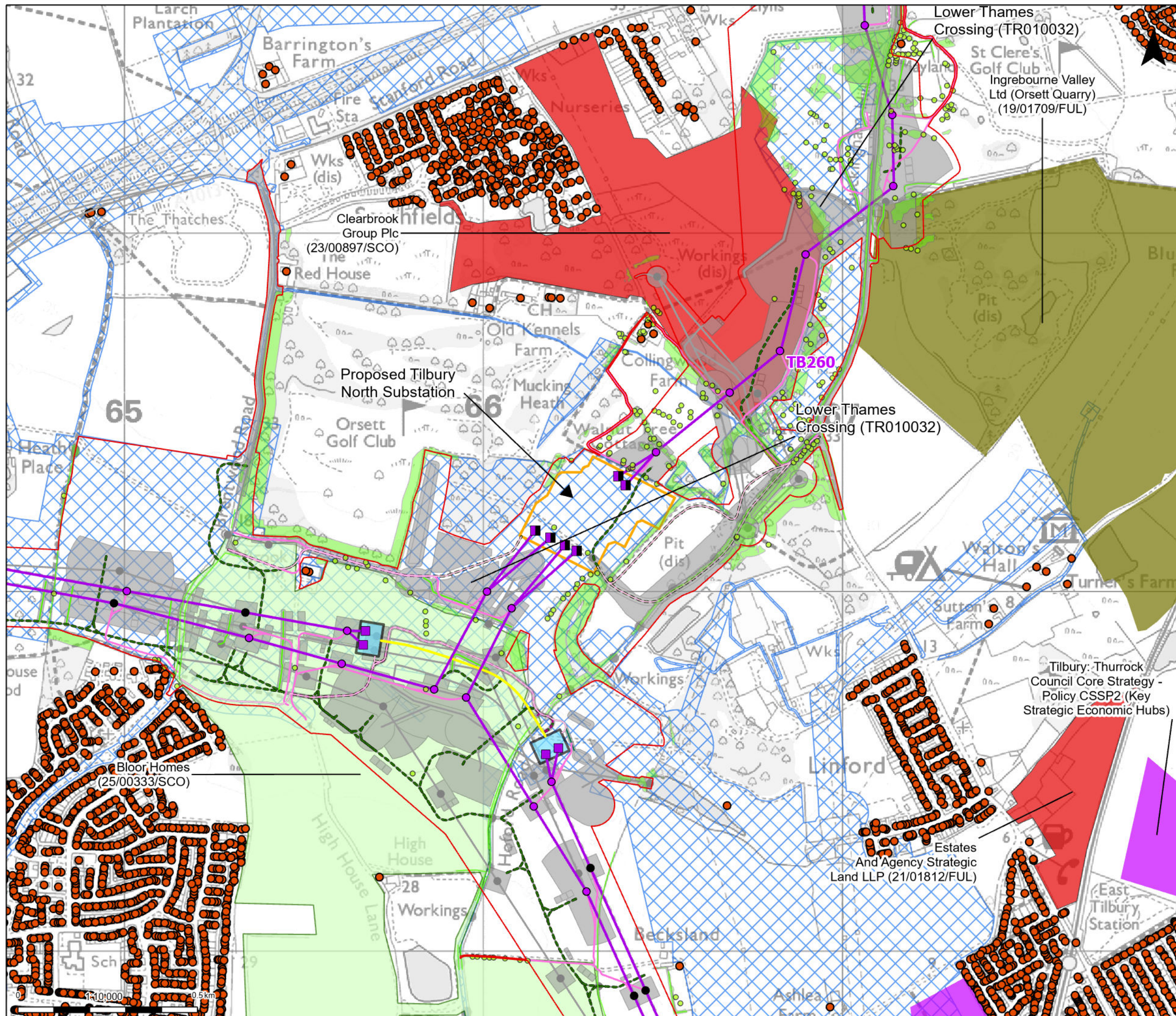
PROJECT:
nationalgrid Norwich to
Tilbury

Title:
GEN1.15 - Norwich Main and
Bramford substations and Tilbury North site
Bramford

Designed	A. Pickering	Date	April 26
Drawn	K. Fischer	Date	April 26
Checked	A. Fell	Date	April 26
Approved	K. Burrows	Date	April 26
Scale:	1:10,000	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

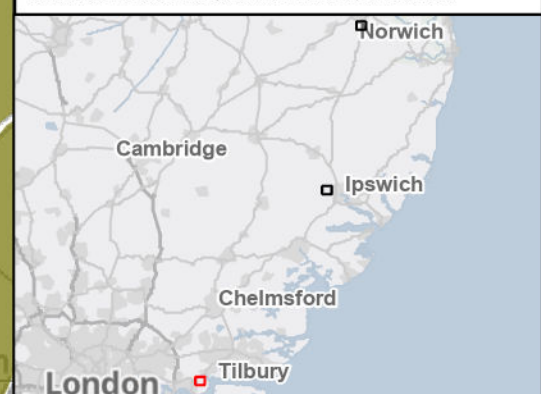
Suitability Description:
Accepted as Concept Stage

Drawing Number:
10059280-ARC-EGN-ZZ-DR-ZZ-00908
Revision:
A



- Proposed project design details**
- Order Limits
 - Proposed full line tension gantry
 - Proposed low duty gantry
 - Existing pylon (modify)
 - Proposed standard lattice pylon location
 - Proposed overhead line alignment
 - Proposed underground cable alignment
 - Proposed Tilbury North Substation
 - Proposed cable sealing end compound
 - Proposed overhead line crossing protection access route
 - Proposed permanent drainage access route
 - Proposed temporary haul road
 - Proposed permanent access (no physical works)
- Discipline specific constraints**
- Proposed cable permanent access (no physical works)
 - Proposed Substation / Cable Sealing End (CSE) compound permanent access routes
 - Other temporary and permanent construction and operational works
 - Existing farmsteads and dwellings
 - Residential Development
 - Employment Allocation
 - Residential and Commercial Development
 - Mineral Quarrying
 - Lower Thames Crossing (TR010032)
 - Existing landscape features
 - Trees
 - Hedgerow
 - Groups of trees

Notes: © Crown copyright and database rights 2025 Ordnance Survey AC000086122. Contains public sector information licensed under the Open Government Licence v3.0. © National Grid UK



Rev	Date	Description	Drawn	Check	Approv
A	Apr 26	EXAMINATION DEADLINE 3	KF	AF	KB

PROJECT:
nationalgrid Norwich to Tilbury

Title:
GEN1.15 - Norwich Main and Bramford substations and Tilbury North site Tilbury North

Designed	A. Pickering	Date	April 26
Drawn	K. Fischer	Date	April 26
Checked	A. Fell	Date	April 26
Approved	K. Burrows	Date	April 26
Scale:	1:10,000	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description:
Accepted as Concept Stage

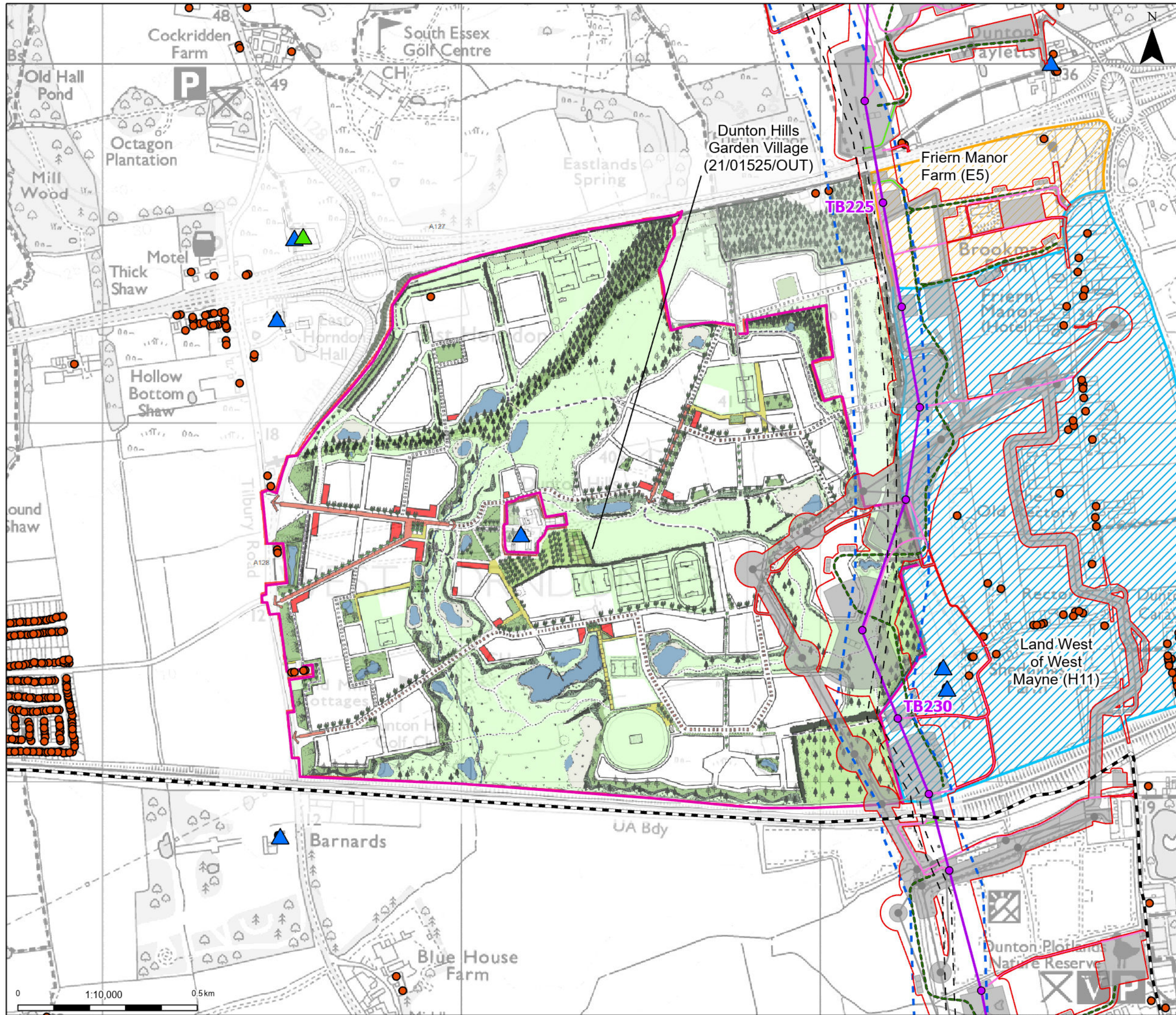
Drawing Number: 10059280-ARC-EGN-ZZ-DR-ZZ-00908	Revision: A

Appendix C.

Supplement 4 - GEN

1.23 Dunton Hills

Garden Village



Order Limits

Project section line

Proposed project design details

Proposed standard lattice pylon location

Proposed overhead line alignment

Environmental mitigation

Proposed overhead line crossing protection access route

Proposed temporary haul road

Proposed permanent access (no physical works)

Other temporary and permanent construction and operational works

Discipline specific constraints

Existing farmsteads and dwellings

Listed buildings

II*

II

National Grid Gas Pipe Buffer 12.2m

Build Protect Design corridor

Dunton Hills Garden Village (21/01525/OUT)

Friern Manor Farm (E5)

Land West of West Mayne (H11)

Notes: © Crown copyright and database rights 2025 Ordnance Survey AC0000808122. Contains public sector information licensed under the Open Government Licence v3.0. © National Grid UK

Herongate

Warley

West Horndon

A	Apr 2026	EXAMINATION DEADLINE 3	KF	AF	KB
Rev	Date	Description	Drawn	Check	Approv

PROJECT:

Norwich to Tilbury

Title:

GEN1.23 - Dunton Hills Garden Village

Designed	A. Pickering	Date	April 26
Drawn	K. Fischer	Date	April 26
Checked	A. Fell	Date	April 26
Approved	K. Burrows	Date	April 26
Scale:	1:10,000	Datum:	AOD
Original Size:	A3	Grid:	OS
Suitability Code:	A2	Project Number:	10059280

Suitability Description:

Accepted as Concept Stage

Drawing Number:

10059280-ARC-EGN-ZZ-DR-ZZ-00909

Revision:

A

Print Date: 04-07-26 15:55:01 COPYRIGHT: NOT TO BE REPRODUCED WITHOUT THE WRITTEN PERMISSION OF NATIONAL GRID ELECTRICITY TRANSMISSION PLC

Appendix D.

Supplement 5 - ALT

1.8 - CA 1.21

Additional Detailed Design Requests

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 1	Consultation Feedback	Alignment	RG14	Restrict as far as practicable south-westerly movement to not encroach into existing solar farm boundary.
ADDR - 2	Consultation Feedback	Haul road	RG15- RG16	Seek to agree position of haul road via voluntary agreements at the time of construction.
ADDR - 3	Consultation Feedback	Alignment	RG18	Restrict as far as practicable southerly movement to minimise encroachment onto the proposed solar proposal.
ADDR - 4	Consultation Feedback	Vegetation	RG28	In proximity to Elm Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 5	Consultation Feedback	Vegetation	RG38	In proximity to Northfield Road, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 6	Consultation Feedback	Alignment	RG43- RG44	Restrict south and north movements as far as practicable to maintain benefit of screening by woodland.
ADDR - 7	Consultation Feedback	Alignment	RG45	Restrict southern movement as far as practicable to maintain benefit of screening by treelined road to retain RG45 to east of road with restriction of movement to the north and east of RG46 to avoid knock on positional changes.
ADDR - 8	Consultation Feedback	Permanent access route	RG53	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 9	Consultation Feedback	Alignment	RG74	Restrict movement to the northeast as far as practicable to avoid pylon in ecological sensitive site.
ADDR - 10	Consultation Feedback	Alignment, access, working space	RG86- RG88	The detailed design of RG86-RG88 will take into account the river restoration works and any potential change in river alignment associated with the Waveney and Little Ouse Recovery (WaLOR) project and will avoid impacts on areas of high ecological value resulting from the WaLOR project where practicable.
ADDR - 11	Consultation Feedback	Vegetation, Traffic management	RG106- RG107	In proximity to Furze Way, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 12	Consultation Feedback	Permanent access route	RG106- RG109	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 13	Consultation Feedback	Construction Laydown Area	RG124- RG125	Seek to agree laydown area location with landowners to minimise impact
ADDR - 14	Consultation Feedback	Permanent access route	RG127- RG130	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 15	Consultation Feedback	Permanent access route	RG134- RG136	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 16	Consultation Feedback	Vegetation	RG144	In proximity to Palgrave Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 17	Consultation Feedback	Alignment	RG144- RG145	Following detailed design, seek to ensure the alignment crosses the driveway mid-span unless following detailed design it is determined to not be practicable.
ADDR - 18	Consultation Feedback	Vegetation	RG148	In proximity to Owls Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 19	Consultation Feedback	Alignment	RG151	Restrict north and south movements of pylon to reduce agricultural impacts, unless following detailed design it is determined to not be practicable.
ADDR - 20	Consultation Feedback	Hedgerow	RG163	As far as practicable avoid removal of hedgerow to the west of RG163.
ADDR - 21	Consultation Feedback	Historic environment	UKPN ECPK12	The applicant is aware of particular sensitivity of works around existing UKPN pylon ECPK12, close liaison necessary with landowner to ensure no impact to the sensitive location.
ADDR - 22	Consultation Feedback	Alignment	UKPN ECPK14 / RG77	UKPN to keep ECPK14 as close to the previous pylon as far as practicable.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 23	Consultation Feedback	CSE platform	PI35	Ensure following detailed design the position CSE platform is located as close to the concrete pad as possible unless following detailed design it is determined to not be practical.
ADDR - 24	Consultation Feedback	Permanent access route	RG194	Permanent access to OHL pylon location to be agreed via voluntarily agreements at the time of operational survey and maintenance access required, subject there being a suitable point of access into the field.
ADDR - 25	Consultation Feedback	Alignment, Haul road	RG195	Restrict easterly movement as far as practicable to remain to the west of Offton Road.
ADDR - 26	Consultation Feedback	Permanent access route	RG196- RG200	Seek to agree permanent access to OHL pylon locations to via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 27	Consultation Feedback	Alignment	JC1-JC7	As far as practical keep OHL north to avoid areas of ancient woodland and increase distance from residential properties and village to the south.
ADDR - 28	Consultation Feedback	Alignment	JC16	Restrict northern movement as far as practicable to maintain benefit of screening by treeline.
ADDR - 29	Consultation Feedback	Alignment	JC18	Restrict southerly movement as far as practicable to remain to the north of Washbrook Street.
ADDR - 30	Consultation Feedback	Permanent access route	JC27-JC35	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 31	Consultation Feedback	Hedgerow	JC Cable Chainage 5000-5100	As far as practicable avoid damage to the boundary feature / hedge to the east of the cable construction swathe.
ADDR - 32	Consultation Feedback	Trees	JC Cable Chainage 13100-13200	In proximity to Hunters Chase, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 33	Consultation Feedback	Construction in proximity to property	Holton St Marys - Lark Hall	Seek to maximise the distance between construction and the property and be sensitive in construction and timeframe impacting property.
ADDR - 34	Consultation Feedback	Trees	JC Cable Chainage 16456-16500 (TB3-TB4)	In proximity to Bounds Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 35	Consultation Feedback	Trees	TB10-TB11	In proximity to Foxash Estate, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 36	Consultation Feedback	Trees	TB15-TB16	In proximity to Fountain Farm, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 37	Consultation Feedback	Haul road	TB18-TB19	Construction contractor to liaise with landowner regarding presence of livestock in the field and the appropriate management.
ADDR - 38	Consultation Feedback	Historic environment	TB21	Commitment not to damage Grade II listed milestone TB21
ADDR - 39	Consultation Feedback	Alignment	TB28-TB29	Restrict southern movement of OHL and avoid works in garden where practicable.
ADDR - 40	Consultation Feedback	Haul road	TB30	Liaise with landowner during detailed design and construction to minimise impact where practicable and informed by outcome of final pylon siting
ADDR - 41	Consultation Feedback	Alignment	TB46-TB47	Liaise with owner of adjacent reservoir during detailed design and construction to avoid impact to reservoir, keep works to south where practicable.
ADDR - 42	Consultation Feedback	Haul road	TB49-TB50	Aspiration for landowner to retain sections of the haul road. Subject to landowner gaining relevant permissions prior NG/GGP commencing the reinstatement works.
ADDR - 43	Consultation Feedback	Alignment	TB67-TB68	Avoid or reduce works within residential gardens as far as practicable for the UKPN low voltage works west of TB67-TB68.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 44	Consultation Feedback	Alignment	TB69	Move TB69 beyond east or west as far as practicable to maintain benefit of screening by trees
ADDR - 45	Consultation Feedback	Compound area	TB69	Compound location to be discussed with landowners to minimise impact
ADDR - 46	Consultation Feedback	Storage area	TB72	Seek to utilise the land within the OHL LoD alignment for the stone storage area to enable release of the area to the west of the proposed OHL back to landowner for continued agricultural use
ADDR - 47	Consultation Feedback	Haul road	TB75-TB76	Aspiration for landowner to retain bellmouth and / or sections of the haul road. Subject to landowner gaining relevant permissions prior to NG/GGP commencing the reinstatement works.
ADDR - 48	Consultation Feedback	Permanent access route	TB93-TB94	Seek to not use the permanent access between TB93 and TB94
ADDR - 49	Consultation Feedback	Alignment	TB94	As far practicable keep TB94 as close to the southwest boundary to minimise encroachment onto the solar proposal
ADDR - 50	Consultation Feedback	Alignment	TB98	Avoid positioning pylon in the horse paddocks to the east where practicable
ADDR - 51	Consultation Feedback	Alignment	TB99	Avoid movement of TB99 to the west as far as practicable to maintain benefit of screening by treeline.
ADDR - 52	Consultation Feedback	Alignment	TB103	Restrict movement to maintain the avoidance of oversail of the football goals as far as practicable
ADDR - 53	Consultation Feedback	Ecology	TB121-TB122	Seek to change watercourse crossing method to a clear span bridge to allow otter dispersal
ADDR - 54	Consultation Feedback	Alignment	TB124	Avoid movement of TB124 to the west as far as practicable to maintain benefit of screening by treeline.
ADDR - 55	Consultation Feedback	Permanent access route	TB137 & TB142-TB143	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 56	Consultation Feedback	Haul road	TB159-TB160	Aspiration to restrict haul road route through Scout Jamboree site if the festival has not moved to a new location in 2028.
ADDR - 57	Consultation Feedback	Construction works scheduling, haul road	TB159-TB161	Work with the landowner and the Scouts to minimise any impact to the 2028 Scout Jamboree.
ADDR - 58	Consultation Feedback	Alignment, traffic management	TB165-TB166	Seek to agree road closure of Newney Green for OHL stringing works
ADDR - 59	Consultation Feedback	Trees	TB168-TB171	In proximity to Ongar Road, ensure, as far as practicable, Outline Code of Construction Practice Commitment Reference B08 [REP2-014] is adhered to.
ADDR - 60	Consultation Feedback	Haul Road, hedgerow	TB181-TB184	Liaise with landowner during detailed design and construction to minimise impact where practicable.
ADDR - 61	Consultation Feedback	Historic environment	TB183	Commitment not to damage Grade II listed milestone
ADDR - 62	Consultation Feedback	Permanent access route	TB192	Seek to agree permanent access to OHL pylon location via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 63	Consultation Feedback	Haul road	TB192-TB193	Aspiration for landowner to retain sections of the haul road. Subject to landowner gaining relevant permissions prior NG/GGP commencing the reinstatement works.
ADDR - 64	Consultation Feedback	Alignment	TB203 & TB204	Avoid movement to minimise encroachment onto the solar proposal unless following detailed design it is determined to not be practicable
ADDR - 65	Consultation Feedback	Ecology	TB204	Seek to change watercourse crossing method to a clear span bridge to allow otter dispersal
ADDR - 66	Consultation Feedback	Construction works	TB243-TB245	Liaise with owner adjacent to works during detailed design and construction to minimise impact where practicable.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 67	Consultation Feedback	Alignment, Construction works	TB257-TB258	Liaise with landowner during detailed design and construction to minimise impact where practicable.
ADDR - 68	Consultation Feedback	Alignment	TB258	Restrict movement to the south to minimise encroachment onto the aggregates facility unless following detailed design it is determined to not be practicable
ADDR - 69	Consultation Feedback	Alignment	TB259-TB260	Restrict movement to maintain the maintain minimum separation from the high-pressure gas pipeline as far as practicable
ADDR - 70	Consultation Feedback	Alignment	YYJ and ZB overhead lines	The applicant has taken the decision to progress Scenario B for Design Scenario 18, as stated in the letter to the Examining Authority dated 9th February 2026 [AS-084], and will continue to liaise with the developer accordingly during detailed design and shall seek to avoid impact on their programme of construction.
ADDR - 71	Consultation Feedback	Permanent access route	YYJ119	Permanent access to OHL pylon locations to be agreed via voluntarily agreements at the time of operational survey and maintenance access required.
ADDR - 72	Examination Submission [REP2-028]	Haul road	Farm in Wenham	Aspiration to agree location of crossing points for landowner to cross work areas during construction to provide continued farm operations, as per Outline Code of Construction Practice Commitment Reference AS03 [REP2-014].
ADDR - 73	Examination Submission [REP2-028, REP1-456]	Construction works	JC Cable Chainage 4100	Construction would not need to extend into the garden at Lark Hall.
ADDR - 74	Examination Submission [REP2-028]	Permanent access route	The new permanent access road for the EACN	Commitment for access to be maintained for the applicant and landowners with adequate means of security

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 75	Examination Submission [REP2-028, REP1-394]	Construction works	TB96 - TB98	Seek to restrict eastward pylon movement and if unavoidable consider potential for offsetting the construction area. Seek to avoid breaking hedge line to the east if possible.
ADDR - 76	Examination Submission [REP2-028, REP1-306]	Construction works	Salmons Lane	A short-term road closure is anticipated to be required to carry out this work. This will be confirmed during detailed design, and include further engagement with the landowner. Any closures would be planned and agreed with affected residences and business owners to ensure the minimal amount of disruption. Some work from the private access track is anticipated to be required in order to facilitate this crossing. However, access to the farm will be maintained at all times, and the majority of the work will be done from the fields and timings will be communicated to the relevant parties. Short closures of the private access track will be required for netting activities however the Contractor will liaise directly with the landowner to coordinate these works. Given the narrow characteristics of the private access it is likely that the netting activities could be managed with stop/go banksman controls.
ADDR - 77	Examination Submission [REP2-028, REP1-245]	Haul road, Construction works	TB67 - TB68	Aspiration to agree location of crossing points for landowner to cross work areas during construction to provide continued farm operations and engagement to investigate current extent of land drainage, as per Outline Code of Construction Practice Commitment References AS03 & AS05 [REP2-014].
ADDR - 78	Examination Submission [REP2-028, REP1-434]	Mitigation measures	TB227	Liaise with landowner during detailed design and construction to maintain necessary biosecurity.
ADDR - 79	Examination Submission [REP2-028, REP1-427]	Permanent access route	RG53	Seek to agree permanent access to OHL pylon locations via voluntarily agreements at the time of operational survey and maintenance access required.

Reference	Source	Design Aspect	Location	Aspirational Commitment
ADDR - 80	Relevant Representation [RR-0406]	Alignment	RG14	Move RG14 north as far as practicable to be outside the solar farm site perimeter.
ADDR - 81	Relevant Representation [RR-1490]	Alignment	TB94	Move TB94 as far as practicable to avoid or reduce interface with consented solar farm proposals.
ADDR - 82	Relevant Representation [RR-1392, RR-2117, RR-3478]	Alignment	TB141	Seek to move TB141 as far as practicable along the alignment to southwest, to increase separation from property.
ADDR - 83	Relevant Representation [RR-1447]	Alignment	TB233	Move TB233 closer to the hedge unless following detailed design it is determined to not be practicable. Also liaise with landowner during detailed design and construction to minimise agricultural operations where practicable.
ADDR - 84	Relevant Representation [RR-0463, RR-2143]	Alignment	TB47	Seek to move TB47 within LoD as far south as far as practicable.

Appendix E.

Supplement 6 - GEN

1.21 Full Answer

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Landscape and visual					
Tree replanting	Norfolk County Council – 6.4, 6.22, 6.25 Suffolk County Council and Babergh and Mid-Suffolk District Councils – 13.229 Chelmsford City Council – 9.26 Thurrock Council - p5	Multi-authority planning obligation – s106 or similar	To secure offsite tree planting	The Applicant has proposed a s106 unilateral undertaking to secure its commitment to delivering 3:1 tree replanting for individual trees and individual trees in small groups. A unilateral undertaking is seen as a more pragmatic approach to securing the Applicant's 3:1 commitment, due to the high volume of Local Planning Authorities who would otherwise be required to agree and enter into a bilateral agreement. There are no obligations on the Local Planning Authorities as a result of the agreement which would more readily suit a bilateral agreement. The Local Planning Authorities still have the same level of enforcement methods under s106 of the Town and Country Planning Act 1990, as they would with a bilateral s106 agreement, in the event that the Applicant does not deliver on the commitment or does not comply with the requirements of the unilateral undertaking. Therefore, the proposed s106 unilateral undertaking is in no way deficient or inferior to a bilateral s106 agreement.	Yes – all

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Biodiversity Net Gain (BNG)	Norfolk County Council – 6.4, 6.22, 6.25	Multi-authority planning obligation – type of agreement not specified	To secure BNG	The Applicant has proposed a s106 unilateral undertaking to secure its commitment to delivering at least 10% BNG. This BNG will be provided through a mix of on-site and off-site habitat enhancement. The off-site BNG will be secured through legal agreements (either s106 agreements or conservation covenant agreements) between the appropriate landowner and the relevant Local Planning Authority or responsible body (as applicable). The Applicant shall then acquire biodiversity units from these landowners. The s106 unilateral undertaking intended to be given by the Applicant to the Local Planning Authorities will not itself secure the management and maintenance of any off-site BNG. A unilateral undertaking is seen as a more pragmatic approach to securing the Applicant's BNG commitment, due to the high volume of Local Planning Authorities who would otherwise be required to agree and enter into a bilateral agreement. As BNG is being provided as a voluntary commitment, there is no need to place any obligations on the Local Planning Authorities. The Local Planning Authorities still have the same level of enforcement methods under s106 of the Town and	Yes – all

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				Country Planning Act 1990, as they would with a bilateral s106 agreement, in the event that the Applicant does not deliver a 10% BNG or does not comply with the requirements of the unilateral undertaking. Therefore, the proposed s106 unilateral undertaking is in no way deficient or inferior to a bilateral s106 agreement.	
Landscape enhancements	Norfolk County Council – 6.4, 6.22, 6.25, 11.2, 11.31 Suffolk County Council and Babergh and Mid Suffolk District Councils – 13.159 Essex County Council – 4.10.43	Multi-authority planning obligation – type of agreement not specified	To secure funding contributions to landscape scale restoration/enhancement projects	The Applicant has set out its position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] . Notwithstanding the Applicant's position, the request is limited in detail; therefore, the Applicant is seeking to understand the request in more detail and their justification for it. At present, given the Applicant's position on the requirement for landscape compensation, it is considered that such an obligation would not meet the legal tests by virtue of not being necessary to make the development acceptable. Without further detail on the request, it is not possible at this stage to state whether the obligation would meet the other legal tests.	No – ask should be justified on a case-by-case basis

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Landscape and visual compensation	Essex County Council – 4.10.43, 4.4.64 Colchester City Council – 12.116 Chelmsford City Council – 8.441, 8.544, 9.22, 11.39 Brentwood Borough Council – 6.64	Not specified	To secure a substantial funded landscape and visual compensation scheme	The Applicant has set out its position on the requirement for landscape compensation in paragraphs 3.10.21 to 3.10.31 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]. Notwithstanding the Applicant's position, the request is limited in detail; therefore the Applicant is seeking to understand the request in more detail and their justification for it. At present, given the Applicant's position on the requirement for landscape compensation, it is considered that such an obligation would not meet the legal tests by virtue of not being necessary to make the development acceptable. Without further detail on the request, it is not possible at this stage to state whether the obligation would meet the other legal tests.	No – request should be justified on a case-by-case basis
Compensation	Norfolk County Council – 11.31	Not specified	To secure funding for the Waveney and Little Ouse Recovery Project	The Applicant is currently engaging with Suffolk Wildlife Trust on the Waveney and Little Ouse Recovery (WaLOR) project on the potential delivery of biodiversity units within the WaLOR project. The commitment to and delivery of BNG is to be secured by a unilateral legal agreement (see the second row in this table on BNG). Through delivery of BNG, suppliers will be asked to confirm that they can deliver a	No – geographically and project specific request

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				range of biodiversity gains, that deliver wider environmental and societal benefits. It is therefore considered that the purchase of biodiversity units from the site, in line with the Applicant's ambition, will yield stacked benefits which will benefit the locality and wider scheme.	
Socio-economics, recreation and tourism					
Skills and Employment Plan	Suffolk County Council and Babergh and Mid-Suffolk District Councils – 10.7, 10.40	Requirement or s106	To secure a Skills and Employment Plan to deliver: - Phase-by-phase workforce modelling - Apprenticeship targets - Social value measures	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. No legal agreement through a s106 is required.	Yes
Workforce skills training	Suffolk County Council and Babergh and Mid Suffolk District Councils	s111 agreement	To secure workforce skills training	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. No legal agreement through s111 is required.	Yes

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Employment, Skills, Education and Supply Chain Strategy	Essex County Council – 2.5.12, 4.8.28, 4.8.29, Colchester City Council – p150-152 Braintree District Council – 17.1.7	s106	To secure an employment, education, skills and supply chain strategy and appropriate funding	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. The Employment and Skills Plan would be implemented by the Main Work Contractors and is unlikely to require funding for delivery. Supporting employment, education and skills development will also be considered separately outside the development consent process through community benefits. No legal agreement through s106 is required.	Yes
Support for existing projects and programmes	Essex County Council – 4.8.31	Not specified	To secure support for: • Sustainable Skills Innovation Centre • Destination Renewables Programme or similar • Skills Bootcamps • Connect to Work	The Applicant will consider the applicability of engaging with these projects/programmes when developing the Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO.	Depends on programme/project

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			- Essex Levy Transfer Service - Grid for Good Programme - Tendring Future Skills Programme - Technical Excellence College Status bid for energy - Apprenticeship Grant Programme - Harwich Innovation Centre/Hub - Supply Chain Portal to be launched March 2026 - Employment brokerage service to be launched in 2026	Supporting existing projects/programmes relating to employment, education and skills development will also be considered separately outside the development consent process through community benefits. No legal agreement through s106 is required.	
Skills, education and employment	Colchester City Council – page 153	Not specified	To secure the following: Work with local further education providers to invest in and support the development of training and skills programmes.	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. The Employment and Skills Plan would be implemented by the Main Work Contractors	Yes

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			- Contractual targets to create local jobs. - Apprenticeship target, shaped to reflect local economic strategy. - A financial contribution to enable local authorities to target those furthest from employment. - Contractual targets to create local jobs'	and is unlikely to require funding for delivery. No legal agreement through s106 required. The Applicant emphasises that such a response to social value is presented as part of a broader commitment to responsible project delivery rather than as mitigation for adverse effects. Supporting employment, education and skills development will also be considered separately outside the development consent process through community benefits.	
Skills, education and employment	Tendring District Council – 21.4	Not Specified	To secure - Local Apprenticeships & Traineeships: time-bound, numbered places (including priority for NEETs and disadvantaged groups), tied to construction phases and contractors, with audited outputs. - Local Labour & Procurement: percentage targets	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. The Employment and Skills Plan would be implemented by the Main Work Contractors and is unlikely to require funding for delivery. The Applicant emphasises that such a response to social value is presented as part of a broader commitment to responsible project delivery rather than as mitigation for adverse effects.	Yes

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			and £ value for Tendring-based SMEs and VCSEs, broken down by package, with quarterly publication and independent verification. • Education & Provider Partnerships: binding arrangements (e.g., with Colchester Institute, schools/FE providers) that deliver accredited pre-employment training, site-ready cards and guaranteed interviews, again quantified and reported. • Monitoring & Enforcement: a DCO Requirement (and/or S.106-style obligation) with KPIs, baselines, milestones, and sanctions/withholds	No legal agreement through s106 required. Supporting employment, education and skills development will also be considered separately outside the development consent process through community benefits.	

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			for non-performance. (The Examination Library currently contains no such secured mechanism for N2T)		
Skills	Braintree District Council – 17.1.6 Chelmsford City Council – 8.493	Not specified	To secure a skills fund to be used to: - Invest in local further education facilities and provision - Sport employment and skills programmes relevant to the construction and energy sectors - Enhance careers education and school engagement - Fund local authority officer resource required for engagement, monitoring and oversight of the employment and skills strategy’.	The Applicant has agreed to develop and submit an Employment and Skills Plan at Deadline 5. The commitment to implementing the Project in accordance with an Employment and Skills Plan will be secured by way of a DCO Requirement to be added into the Draft DCO. The Employment and Skills Plan would be implemented by the Main Work Contractors and is unlikely to require funding for delivery. The Applicant emphasises that such a response to social value is presented as part of a broader commitment to responsible project delivery rather than as mitigation for adverse effects. Supporting employment, education and skills development will also be considered separately outside the development consent process through community benefits.	Yes

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Local Business Coordinator	Colchester City Council – 14.24		To fund a local business coordinator role	Members of the community, local businesses and local stakeholders will be kept informed regularly of the works through active community liaison see commitment GG30 in the 7.2 Outline Code of Construction Practice [REP2-014] to be secured via DCO Requirement 4. As such, the Applicant does not consider a planning obligation to fund a Local Business Coordinator is fairly or reasonably related in scale and kind to the development. Any planning obligation must be in accordance with the legal tests in regulation 122 of the Community Infrastructure Levy Regulations 2010.	No
Traffic and Transport					
Highway Authority resource	Suffolk County Council – 12.148	Planning Performance Agreement (PPA)	To secure funding for Highway Authority resourcing	The Applicant has begun discussions with the host local highway authorities and National Highways on the recovery of appropriate costs through a PPA.	All host local highway authorities and National Highways

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Police resource	Suffolk County Council – 12.148 Colchester City Council – 14.18, 14.19	Not specified	To secure funding for the Police resource in relation to AILs	The Applicant has held regular meetings with Essex Police and Suffolk Constabulary and will continue to engage to agree on the most appropriate and effective way to address the anticipated demand for Abnormal Indivisible Load (AIL) escorts.	Yes – Essex Police
Framework Highways Agreement	Essex County Council – 5.1.8 Colchester City Council – p168, p189 Thurrock – p4 (DCO comments table)	A section 278 agreement under the Highways Act 1980	To manage the design approvals	It is the Applicant's understanding that the highway authorities are seeking a joint highways framework agreement (a section 278 agreement under the Highways Act 1980) in lieu of protective provisions, which the Applicant will seek to negotiate with the relevant authorities, provided it can be concluded before the end of the Examination.	All host Local Highway Authorities
Road Condition Surveys	Tendring District Council – 12.16	Not specified	To secure a contribution to road condition surveys and post construction repairs on all affected rural lanes and A-routes in Tendring	Paragraph 13 of Part 4 of Schedule 16 to 3.1 Draft Development Consent Order [Revision C] outlines the Applicant's approach to extraordinary traffic with regards to condition surveys and reimbursement of expenses. This specifies that the repair of any damage that is directly attributable to the Applicant's use of the highways by extraordinary traffic will constitute an extraordinary expense. Whilst the Applicant has the discretion to reimburse the relevant highway authorities for all or part of the amount of any	Yes

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				extraordinary expense, the relevant highway authority may have recourse to Section 59 of the Highways Act 1980 in the usual way. In relation to road condition surveys, 7.3 Outline Construction Traffic Management Plan [Revision B] to be secured via DCO Requirement 4, sets out that the Applicant proposes to undertake pre- and post-construction condition surveys of the existing highway network on AIL and Heavy Goods Vehicle (HGV) routes.	
Construction traffic and noise controls	Tendring District Council 14.16	Not specified	To secure construction traffic/noise controls for Bentley Road and adjacent lanes including: • Capped daily HGV flows, time-of-day restrictions, no evening/night HGVs, and advance works black-outs during sensitive periods (e.g., school runs). • Mandatory low-noise surfacing, temporary traffic calming, and on-plot acoustic protection (temporary or permanent) where	The Applicant is committing to employing best practicable means (BPM) to reduce the effects of construction noise and vibration. Specific mitigation measures will be determined following detailed construction and noise and vibration assessments by the Main Works Contractor(s), as per commitment NV05 of 7.2 Outline Code of Construction Practice [REP2-014] be secured via DCO Requirement 4. Mitigation in the form of BPM will be identified and employed to avoid potential significant adverse effects and reduce potential adverse effects as per the range of commitments in 7.2 Outline Code of Construction Practice [REP2-014] and 7.2 Outline Code of Construction Practice Appendix F – Outline Noise and	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			modelled/monitored triggers are exceeded. Real-time noise and vibration monitoring at agreed receptors with publication dashboards and automatic stand-down/escalation protocols tied to numeric thresholds.	Vibration Management Plan [APP-306] to be secured via DCO Requirement 4.	
Health and wellbeing					
Local community assets	Suffolk County Council and Babergh and Mid Suffolk District Councils – 17.90	Not specified	To secure investment in local community assets (public spaces, village halls or community organisation)	In line with government guidance (Community Funds for Transmission Infrastructure: Guidance ¹), the Applicant expects to invest in community benefits 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 and where community benefits could deliver	Yes

¹ Department for Energy Security and Net Zero (2025) Community Funds for Transmission Infrastructure: Guidance

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				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. While community benefits are not secured through the Development Consent Order or relied upon as mitigation, their delivery is subject to external scrutiny through established regulatory reporting mechanisms. This provides transparency and accountability for the use of community benefit funding, independently of the planning regime. In terms of how a community benefit fund would operate, we will outline an application process for funding following the consultation process. For the avoidance of doubt, community benefits funding is not a material consideration and is separate to the development consent process. No legal agreement required as part of development consent.	

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Mental Health	Suffolk County Council and Babergh and Mid Suffolk District Councils – 17.90	Not specified	To fund local mental health organisations providing Mental Health First Aid training for community members and promoting resources such as East Suffolk Council's WellMinds.	There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified. Table 10.14 of 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] contains the findings from the assessment of potential impacts on mental health and wellbeing during the construction phase and includes opportunities for mitigation such as appropriate communication and awareness-raising of construction activities.	
Health and wellbeing monitoring framework	Tendring District Council – 14.17	Not specified	To secure a health and wellbeing framework which includes: A co-designed baseline and monitoring programme (with TDC, ICS/Public Health, local practices and community reps) covering sleep disturbance, stress/anxiety indicators, complaint analytics, PRow usage and access to	In regard to comments made relating to a Health and Wellbeing Monitoring Framework, there is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. As such the Applicant does not consider a planning obligation to secure a health and wellbeing framework meets the legal tests.	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			services, with quarterly public reporting and mitigation "triggers".		
Safe movement package	Tendring District Council – 14.18	Not specified	To secure a PRoW, NMU and safe movement package including: - Mapped, fully segregated NMU routes where HGVs intersect with everyday pedestrian/horse-rider movements; short, signed diversions with quality surfaces/lighting where appropriate, and continuity of rural leisure routes. - Micro-grants for community route guardianship, wayfinding, and rural wellbeing walks	The Applicant responded, on pages 744-745 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], to Tendering District Council's request for a safe movement package including mapped, fully segregated NMU routes; short, signed diversions with quality surfaces/lighting where appropriate, and continuity of rural leisure routes; and micro-grants. The Applicant is not proposing, as part of the development consent process, to enter into an agreement regarding these matters. The Applicant considers micro-grants for community route guardianship, wayfinding and rural wellbeing walks during construction could be considered through community benefits. Community benefits are separate from and not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order. We are currently developing our approach to community benefits, and in spring 2026,	

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			during construction phases.	we plan to begin consulting on how the community benefit funds should be used.	
Psychosocial support and EMF communications	Tendring District Council – 14.19	Not specified	To secure targeted Psychosocial Support & EMF Communications which include: Independent, clinician-led drop-ins and fast-tracked signposting for construction stress and sleep problems; evidence-based EMF engagement with accessible materials, local Q&A sessions, and named liaison for Tendring residents	The Applicant's approach to engagement for the construction phase is currently outlined in 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305], which confirms that the Project website will be maintained and managed by a community relations team to enable up-to-date information to be provided to stakeholders, including provision of Project updates, information relating to a free Project hotline, Project email and freepost address, publication of Project contact details in newsletters, and provision of the same details on boards around the perimeter of construction sites in locations where they would be visible to the public. The Applicant suggests the following wording will be added to the Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] in relation to EMFs:	Yes

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				• The Applicant is committed to ensuring that all activities related to the Project are conducted with full transparency and respect for the health and concerns of local communities. A detailed Communication Strategy, including the approach to community liaison, will be developed as part of the final Code of Construction Practice • With regard to EMFs specifically, and in recognition of the importance of clear communication and scientific evidence, the Applicant will provide accessible, clear, and up-to-date information about EMFs, their nature, and the scientific consensus that EMFs at levels associated with the Project do not pose a health risk, in the following ways: – Hosting the latest information and FAQs on the Project website, also signposting to www.emfs.info as well as links to trusted health authorities (such as the World Health Organisation) and scientific bodies – Preparing and sharing an up-to-date information factsheet (alternative formats would be prepared upon requests) with key contacts along the route to facilitate access	

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				Responding to queries via our usual channels of communication (hotline, email address, freepost) The above approach is considered to be proportionate and appropriate, taking into account the communication needs of local communities and setting out a range of methods of communication to support hard-to-reach groups. The Applicant will review their approach regularly in light of evolving needs and consider if any other methods of communication could also be beneficial in addition to the above.	
Community Liaison and Complaints Resolution	Tendring District Council – 14.20	Not specified	To secure a single, visible Tendring liaison team, minimum service standards (response times, case tracking), and binding escalation to pause activities if agreed noise/traffic limits are breached pending remedial action.	In relation to community liaison, 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] confirms that a community relations team will be appointed to engage with local residents and provide dedicated community relations and external communications support. The Applicant considers the approach for engagement with the community and stakeholders during construction as set out in commitment GG30 in the 7.2 Outline Code of Construction Practice [REP2-014] is precise, enforceable and reasonable in all other respects to be secured via DCO Requirement 4.	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
PRoW promotion	Thurrock – 6.8.36	Not specified	To secure funding to be coordinated with a Recreation and Leisure Management Plan to engage local communities in the use of PRoWs and green/open spaces	The Applicant considers that the request for PRoW promotion falls outside the development consent process and is not a material consideration in the decision on the proposed Project or a matter to be secured as part of the DCO. The Applicant suggests that this matter be discussed outside of the development consent process and with reference to the Community Funds for Transmission Infrastructure guidance ² .	No
Noise and vibration					
Noise and vibration liaison officer	Tendring District Council – 13.24	Not specified	To secure funding for a named and dedicated Tendring noise and vibration liaison officer	The Applicant does not consider this necessary. 7.2 Outline Code of Construction Practice Appendix F - Outline Noise and Vibration Management Plan [APP-306] to be secured via DCO Requirement 4 explains that community liaison, including notification of noisy works and/or activities anticipated to be conducted outside of core working hours, and construction-related complaints will be the responsibility of the Applicant and Main Works Contractor(s). A contact number will be provided which members of the public can use to raise any concerns or complaints about the Project and all construction-related complaints will be logged by the	No

² Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				Main Works Contractor(s) in a complaints register, together with a record of the responses given and actions taken. Furthermore, the Applicant confirmed in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], that 7.2 Outline Code of Construction Practice (Revision C) to be secured via DCO Requirement 4, establishes that responsibility for construction management, compliance and day-to-day control rests with the Applicant and its contractors, supported through approved management plans, monitoring and reporting mechanisms secured by the DCO Requirements. The Outline Code of Construction Practice requires monitoring data to be recorded and retained by the Applicant and its contractors as part of the project's environmental management system. Where relevant, this information is to be made available to the local planning authority on request, rather than through routine reporting, enabling authorities to review compliance, investigate issues or follow up complaints as necessary. This approach provides transparency and oversight while maintaining applicant responsibility for monitoring and record-keeping enforcement, however, is a	

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				statutory function exercised independently by local authorities in the public interest and on a discretionary basis, and it is not appropriate for this to be funded by an applicant. 7.2 Outline Code of Construction Practice (Revision C) does not assume that local authorities will undertake routine monitoring on behalf of the Applicant, nor that they will absorb a significant resource burden associated with enforcement. Instead, it provides a proportionate framework intended to minimise the risk of non-compliance through applicant-led controls, with enforcement retained as a regulatory backstop consistent with established NSIP practice. The funding of a noise and vibration liaison officer is therefore not necessary or reasonable to secure through a Section 106 legal agreement and would fail the tests.	
Legacy enhancements	Thurrock – 6.14.25	Not specified	To secure a fund to provide legacy enhancements targeted at Green Grid links and wayfinding to connect South Ockendon, Tilbury and Chadwell St Mary to parks and riverside;	The Applicant considers a fund to provide legacy enhancements could be considered through community benefits. Community benefits are separate from and not a material consideration in the decision on the proposed Project or a matter to be secured as part of the Development Consent Order.	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?

small grants for community activation when routes reopen.

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.

Historic Environment

Compensation	Tendring District Council – 12.20	Not specified	To secure a Tendring heritage compensation package comprising: - Targeted undergrounding of short spans at the worst-affected Ardleigh views (if re-route is not secured); and/or - A ring-fenced Historic Environment Fund for conservation projects in Tendring District (e.g., fabric repairs, setting enhancements, public realm in Ardleigh CA), heritage interpretation, and	None of the policies on heritage in EN-1 and EN-5 expressly mention compensation. Furthermore, the National Planning Policy Framework (2025) does not make reference to a requirement for compensation for any harm to heritage assets. Targeted undergrounding of short spans at the worst-affected Ardleigh views is a design matter that would require a design change and could not be secured through a legal agreement as part of a wider compensation package. It is considered that a ring-fenced Historic Environment Fund for conservation projects in Tendering District would fail to meet the tests for a section 106 Agreement on the basis that such a financial package is not necessary to make the development acceptable in planning terms. The provision of an Historic Environment Fund for conservation projects in Tendering	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			condition surveys, prioritised by TDC'	District would not reduce or remove harm and therefore does not materially inform the planning balance. The provision of a compensation package which is not tied to a specific heritage asset would fail to meet a test on demonstrating that it is directly related to the Project.	
Compensation	Chelmsford City Council – 8.69, 9.27	Not specified	To secure heritage compensation to include repair of listed buildings and/or associated built and landscape features to offset harm to setting.	None of the policies on heritage in EN-1 and EN-5 expressly mention compensation. Furthermore, the National Planning Policy Framework (2025) does not make reference to a requirement for compensation for any harm to heritage assets. The provision of heritage compensation as described would not reduce or remove harm and therefore does not materially inform the planning balance. The provision of a general package which is not tied to a specific heritage asset would fail to meet the legal tests under regulation 122 of the Community Infrastructure Levy Regulations 2010 on demonstrating that it is directly related to the project. It is considered that the provision of heritage compensation repairs would fail to meet the tests for a section 106 Agreement.	No
Cumulative effects					

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Energy Infrastructure Plan	South Norfolk Council – 8.5.1	Not specified	Energy Infrastructure Plan to deliver: • a share understanding of the connection capacity • a coordination of construction periods • coordinated access tracks and construction compounds • locally shared ecological mitigation sites • local cumulative compensation and community mitigation fund	As stated in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] page 158, the Applicant does not consider it appropriate to have a commitment in its draft Development Consent Order that binds the Project with Five Estuaries, North Falls and Tarchon Interconnector on construction timetables, maintenance and mitigation strategies. These are separate schemes at different stages. However, the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination on highways matters. 7.3 Outline Construction Traffic Management Plan [Revision B] further notes that the Main Works Contractor will liaise with the relevant highway authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. This is to be secured and made enforceable under Requirement 4 of 3.1 Draft Development Consent Order [Revision C].	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Essex Developer Forum	Essex County Council – 4.4.31	Not specified	To secure funding to resource Essex County Council Developer Forum meetings	As stated in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] page 158, the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination. The Applicant has begun discussions with Essex County Council on the recovery of appropriate costs through a PPA	No
Resourcing officer time post consent	Essex County Council – 4.4.31, 4.5.109		To secure funding to resource Essex County Council officer time post consent	The Applicant has begun discussion with host authorities, including Essex County Council, regarding the potential use of PPAs to support the resourcing of officer time following the grant of development consent. Any such arrangements would be progressed separately from the Development Consent Order and would be subject to agreement between the Applicant and the relevant authority.	All host authorities.
Cumulative impact mitigation fund	Essex County Council – 4.4.60	Not specified	To secure funding for • PRoW enhancements • Local mental health support • Green infrastructure improvements	There is no requirement for monitoring measures for health and wellbeing because no significant effects have been identified in the assessment undertaken in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192] . The Applicant considers that these matters fall outside the development consent process and are not a material consideration in the decision on the	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				proposed Project or a matter to be secured as part of the DCO. The Applicant suggests that this matter be discussed outside of the development consent process and with reference to the Community Funds for Transmission Infrastructure guidance³.	
Community Impact Mitigation	Tendring District Council – 12.16	Not specified	To secure a community impact mitigation or resilience fund	The Applicant suggests that this matter be discussed outside of the development consent process and with reference to the Community Funds for Transmission Infrastructure guidance ⁴ .	No
Project Coordinated	Tendring – 12.10	Not specified	To secure a legally binding project coordination framework (minimum between NF, FE and N2T) to require: • Shared construction timetables • Joint planning of peak-impact phases • Formal reporting to ECC Highways &	Matters relating to binding coordination mechanisms between the Five Estuaries, North Falls and Norwich to Tilbury projects raised in Tendring District Council Local Impact Report [REP1-182]. The Applicant responded to these matters at Deadline 2 in 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], page 804. The below extract provides the position:	No

³ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

⁴ Department for Energy Security and Net Zero (2025) *Community Funds for Transmission Infrastructure: Guidance*

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			TDC or any subsequent newly formed combined authority A requirement for quarterly joint coordination boards chaired by ECC or TDC	<i>'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.'</i>	
District Wide CTMP	Tendring District Council – 12.11	Not specified	To secure a single multi-project CTMP requiring: - Jointly agreed HGV routing - Restrictions on peak-time movements - Prohibition of simultaneous closures on key links - Shared traffic monitoring - Mitigation triggers (e.g., when HGV volumes exceed thresholds)	The Applicant responded, on page 741 of 8.8.2 Applicant's Comments on Local Impact Reports [REP2-030], to Tendring District Council's request for a single multi-project CTMP. The Applicant's response referred to its commitment to joining and engaging with the Developer's Forum to be set up by Essex County Council and other measures set out in 7.3 Outline Construction Traffic Management Plan [Revision B]. The Applicant is not proposing, as part of the development consent process, to enter into an agreement regarding this matter.	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
			Coordination with Essex Police, emergency services, parish councils, freight operators and local bus providers		
Shared use of infrastructure	Tendring District Council – 12.12	Not specified	To secure an agreement requiring: - Share haul roads - Coordinate temporary compounds - Co-use cable corridors where feasible - Restore land jointly to avoid repeated disturbance	The Applicant does not consider it necessary or appropriate to secure a separate agreement requiring the measures listed with other schemes in Tendring District Council's area including North Falls and Five Estuaries, as these are separate schemes at different stages. However, the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination on highways matters. 7.3 Outline Construction Traffic Management Plan [Revision B] further notes that the Main Works Contractor will liaise with the relevant highway authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. This is to be secured and made enforceable under Requirement 4 of 3.1 Draft Development Consent Order [Revision C].	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Community Communications	Tendring District Council – 12.13	Not specified	To secure a single coordinated communications plan across projects including: • One “front door” for construction queries so that affected communities are not send pillar to post to have their concerns heard • Integrated public notices with useful information and up to date contact numbers and details • Predictive and accurate information on upcoming traffic impacts allowing affected residents and businesses to plan ahead • A Tendring-specific community liaison officer empowered across all projects	The Applicant considers the approach for engagement with the community and stakeholders during construction as set out in commitment GG30 in the 7.2 Outline Code of Construction Practice [REP2-014] is precise, enforceable and reasonable in all other respects to be secured via DCO Requirement 4. The funding of a Tendering specific community liaison officer is therefore not necessary or reasonable to secure through a Section 106 legal agreement. It would also not be fairly related in scale or kind to fund a Tendering specific officer only.	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Monitoring and adaptive management	Tendring District Council – 12.15	Not specified	To secure a multi-project monitoring with: • Real-time data sharing • Joint incident response • Requirements to change construction methods or timings where cumulative harm emerges	In relation to cumulative impact management, we note the suggestion for a Tendring Construction Coordination Plan aligning programmes across Nationally Significant Infrastructure Projects (NSIPs). The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements. The Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination on highways matters. 7.3 Outline Construction Traffic Management Plan [Revision B] further notes that the Main Works Contractor will liaise with the relevant highway authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. This is to be secured and made enforceable under Requirement 4 of 3.1 Draft Development Consent Order [Revision C]. The Applicant considers that a separate, commitment relating to multi-project monitoring is not required.	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
Coordination Board	Tendring District Council – 12.16	Not specified	To secure a Tendring NSIP coordination board with the power to require justified phasing adjustments and additional monitoring/monitoring equipment to be installed.	The Applicant does not consider it necessary or appropriate to establish a Tendring NSIP coordination board with powers to require justified phasing adjustments and additional monitoring/monitoring equipment to be installed, as the Project will be delivered in accordance with the controls and approvals set out in the draft Development Consent Order (including the relevant requirements for construction management plans) and the Contractor will retain responsibility for construction methodology and programming. Notwithstanding this, the Applicant recognises the importance of coordination to minimise cumulative impacts and the Applicant has committed to joining and engaging in the Developer's Forum proposed by Essex County Council to help facilitate coordination. 7.3 Outline Construction Traffic Management Plan [APP-309] further notes that the Main Works Contractor will liaise with the relevant highways authorities, National Highways and other major infrastructure developers to ensure a coordinated approach to construction traffic management. The Applicant does not consider that the need for additional monitoring/monitoring equipment. 7.2 Outline Code of	No

Topic Matter	Local Planning Authority - LIR paragraph	Mechanism of Agreement	Purpose of Agreement	Applicant's Response	Application to any other Local Planning Authorities?
				Construction Practice [REP2-014] includes mitigation and monitoring as part of the commitment's framework, the final scope of which will be agreed through the discharge of Requirement 4.	
Emergency Access Protocol	Tendring District Council – 12.16	Not specified	To secure a multi-project emergency access protocol to safeguard ambulance and fire coverage	The Applicant acknowledges the importance of safeguarding ambulance and fire coverage. However, the Applicant considers that a separate, bespoke multi-project emergency access protocol is neither necessary nor appropriate, as the matter can be addressed through existing proposed controls in 7.3 Outline Construction Traffic Management Plan [Revision B] (see section 6.6 coordination with other developments/events) and secured through Requirement 4 of 3.1 Draft Development Consent Order [REP2-004] .	Yes
Cumulative Impact Management	Tendring District Council – 14.21	Not specified	To secure a Tendring Construction Coordination Plan aligning programmes across NSIPs (traffic windows, noisy works), with joint dashboards and cross-promoter escalation to protect community health and wellbeing	In relation to cumulative impact management, we note the suggestion for a Tendring Construction Coordination Plan aligning programmes across NSIPs. The Applicant has engaged with other developers who are proposing development in proximity of the Project to understand their requirements.	No

Appendix F.

Supplement 7 - LV

1.24 - Supplementary table

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
Tendring District Council			
1.1 to 1.2	The Local Planning Authority (LPA) considers that there would be effects on the Suffolk & Essex Coast and Heaths National Landscape	Table 4.20, 2.12	N/A
1.3 to 1.6	The LPA considers that there would be effects on landscape character	Table 4.20, 4.10.19	N/A
1.5	The LPA considers that the accumulation of non-significant effects would change character and views over a wider area	Table 4.20, 13.148	N/A
1.7 to 1.8	LCA 6A Stour Valley System: The LPA considers that there would be cumulative effects with North Falls and Five Estuaries during construction	Table 4.20, 10.7 – 10.8	N/A
1.9 to 1.13	LCA 7A Bromley Heaths: a) The LPA disagrees with the Applicant's assessment in relation to landscape value, landscape susceptibility and overall effect b) The LPA considers that there would be cumulative effects with North Falls and Five Estuaries during construction	(a) Table 4.20, 12.6 (b) Table 4.20, 10.7 – 10.8	N/A
1.14 to 1.17	LCA 6B: Ardleigh Valley System: The LPA disagrees with the Applicant's assessment in relation to landscape susceptibility and overall effect.	No	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
1.18	LCA 6C Alresford Valley System The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
1.19	LCA 6D Holland Valley System The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
5.13.1	The LPA considers that the ZTV indicates widespread landscape and visual effects	No	As set out in paragraph 13.6.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] , the ZTV accounts for woodland blocks but does not consider the additional screening and filtering by hedgerows and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area.
5.13.2	The LPA disagrees with the Applicant's approach to identifying the value of the view.	Table 4.20, Annex C, 1.12, 1.19, 1.22, 1.29, 1.35, 1.40, 1.45, 1.47, 1.50, 1.54, 1.61, 1.66, 1.71, 1.76, 1.83, 1.87, 1.90, 1.93,	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
		1.96	
5.13.3 to 5.13.8	VRA C10 Dedham Heath: a) The LPA is concerned that Viewpoint 3.20 Fenbridge Lane was not included in the ES. b) The LPA disagrees with the assessment of effects on visual receptors in relation to TB005 to TB020. c) The LPA has requested additional viewpoints closer to the EACN. d) The LPA considers that major effects would extend up to 1 km from the Project. e) The LPA considers that there would be cumulative effects resulting from multiple pylons combined with North Falls and Five Estuaries.	(b) and (d) Table 4.20, 4.10.18 and 4.10.20 (c) Table 4.20, Annex C, 1.14 (in response to Suffolk) (e) Table 4.20, 10.7 –10.8	(a) An assessment of effects at Viewpoint 3.20 Fenbridge Lane is provided on PDF pages 132 to 134 of 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230] . Minor and not significant (adverse) effects are identified.

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.9 to 5.13.15	VRA C12 Ardleigh: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be cumulative effects resulting from multiple pylons combined with North Falls and Five Estuaries. c) The LPA is concerned over the accuracy of visualisations at Viewpoint 3.14 and 3.23. d) The LPA has queried the lack of viewpoints from the PRoW network south-east of Ardleigh (e.g. public footpath north of Green Island Gardens or south of Frating Road).	a) Table 4.20, 4.10.18 and 4.10.20 (b) Table 4.20, 10.7 –10.8 (d) Table 4.20, 4.10.23	(c) A photomontage from Viewpoint 3.14: Lodge Lane, Ardleigh Reservoir is provided on PDF pages 135 to 139 of 7.12 Visualisations - Part 3 of 9 [APP-345]. Trees around the reservoir would filter views towards the Project. The Applicant has reviewed the photomontage and corrected a minor error. The updated photomontage is provided at Deadline 3. A photomontage from Viewpoint 3.23: Crown Lane North, near Ardleigh Reservoir is provided on PDF pages 2 to 6 of 7.12 Visualisations - Part 4 of 9 [APP-346]. The Applicant has reviewed the photomontage and corrected a minor error. The updated photomontage is provided at Deadline 3.
5.13.16 to 5.13.23	VRA C13 Little Bromley: a) The LPA has queried the amount of vegetation removal necessary within the VRA. b) The LPA considers that major effects would extend up to 1 km from the Project. c) The LPA considers that significant effects would extend up to 2 km during construction and operation.	(b) and (c) Table 4.20, 4.10.18 and 4.10.20 (e) Table 4.20, 10.7 –10.8	(a) The assessment of effects on visual receptors during construction recognises that some vegetation removal would occur within VRA C13 Little Bromley. The Environmental Statement is based on an assumed worst-

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
	d) The LPA considers that Viewpoint 3.21 is not well placed. e) The LPA considers that there would be cumulative effects resulting from multiple pylons combined with North Falls and Five Estuaries.		case tree and hedgerow removal, as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated in 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan [REP2-018] confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice [REP2-014]. Measures to avoid/mitigate impacts to all trees (including veterans) is also a Project commitment (commitment LV05) in 7.2 Outline Code of Construction Practice [REP2-014]. Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan [REP2-018] outlines the commitment to reinstate hedgerow field

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
			boundaries. The Applicant has made the commitment to 3:1 replacement planting for individual trees and small groups of individual trees within 7.4 Outline Landscape and Ecological Management Plan [REP2-018]. This is secured by Requirement 4 within 3.1 Draft Development Consent Order [APP-056]. (d) The baseline photography for Viewpoint 3.21 Barn Lane, Little Bromley will be re-taken and an updated photomontage will be provided at Deadline 4.
Colchester City Council			
2.1	The LPA has queried the Applicant's use of the old Landscape Character Assessment for Colchester	No	The Applicant notes that a response to this point was provided in 8.4.1 Applicant's Comments on Relevant Representations [REP2-023] on pages 246 and 320.
2.2 to 2.3	The LPA considers that there would be effects on landscape character.	Table 4.20, 4.10.19	N/A
2.4 to 2.5	The LPA considers that the accumulation of non-significant effects would change character and views over a wider area	Table 4.20, 13.148	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
2.6 to 2.12	LCA B7: Langham Farmland Plateau: The LPA disagrees with the Applicant's assessment in relation to landscape sensitivity and overall effect.	Table 4.20, 12.43 - 12.44, 12.161	N/A
2.13 to 2.15	LCA A8: Stour River Valley Floor: - The LPA agrees with the Applicant's assessment. - The LPA refers to the Applicant's duty to seek to further the purposes of the National Landscape.	(a) Table 4.20, 12.167 (b) Section 3.11 (Furthering the Purposes)	N/A
2.16 to 2.18	LCA A7: Stour River Valley Slopes: - The LPA agrees with the Applicant's assessment of the underground cable but requests an assessment of the overhead line on the LCA. - The LPA references the Applicant's duty to seek to further the purposes of the National Landscape.	(a) Table 4.20, 12.173, 12.85 (b) Section 3.11 (Furthering the Purposes)	N/A
2.19 to 2.20	LCA Sub Area A7a Stour River Valley Slopes: The LPA agrees with the Applicant's assessment subject to effects on the Special Qualities of the National Landscape.	Table 4.20, 12.72	N/A
2.21 to 2.22	LCA Sub Area A7b Stour River Valley Slopes: The LPA sought clarification on if there would be significant residual adverse effects on the National Landscape.	Table 4.20, 12.72	N/A
2.23	LCA Sub Area A7c: Stour River Valley Slopes: - The LPA agrees with the Applicant's assessment. - The LPA considers there would be cumulative effects during construction.	Table 4.20, 12.72	N/A
2.24	LCA B5: Rochfords Farmland Plateau: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
2.25	LCA B6: Great Horkesley Farmland Plateau: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
2.26 to 2.27	LCA A5: Colne River Valley Slopes: - The LPA disagrees with the Applicant's assessment in relation to effects on landscape character. - The LPA expresses concerns over routeing and requests an alternative alignment north and west of the Open Access Land, or undergrounding.	Table 4.20, 12.50	N/A
2.28	LCA A4: Colne River Valley Floor: a) The LPA disagrees with the Applicant's assessment in relation to effects on landscape character. b) The LPA expresses concerns over routeing and requests an alternative alignment north and west of the Open Access Land, or undergrounding.	(a) Table 4.20, 12.180, 12.50 (b) Table 4.20, 12.180	N/A
2.29	LCA B4: Great Tey Farmland Plateau: a) The LPA disagrees with the Applicant's assessment in relation to effects on landscape character. b) The LPA requests an assessment and visualisation from Viewpoint 4.15 or 4.22, or from a PRow between 1-1.5 km from the Project.	(a) Table 4.20, 12.57, 12.181 (b) 12.94, 12.181	N/A
2.30	LCA B2: Easthorpe Farmland Plateau: The LPA disagrees with the Applicant's assessment in relation to effects on landscape character.	Table 4.20, 12.57	N/A
2.31	LCA A2: Wooded Roman River Valley: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
2.32	LCA B3: Southern Colchester Farmland Plateau: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
2.33	LCA F1: Messing Wooded Farmland: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
5.13.24	The LPA disagrees with the Applicant's approach to identifying the value of the view.	Table 4.20, Annex C, 1.12, 1.19, 1.22, 1.29, 1.35, 1.40, 1.45, 1.47, 1.50, 1.54, 1.61, 1.66, 1.71, 1.76, 1.83, 1.87, 1.90, 1.93, 1.96	N/A
5.13.25 to 5.13.26	The LPA considers that the ZTV indicates widespread landscape and visual effects	No	As set out in paragraph 13.6.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] , the ZTV accounts for woodland blocks but does not consider the additional screening and filtering by hedgerows and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area.

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.27 to 5.13.30	VRA C11 Langham: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that effects at Viewpoint 4.16 would be significant. c) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) and (b) Table 4.20, 12.73 (c) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	N/A
5.13.31 to 5.13.33	VRA D1 Tye Green and Boxted: • The LPA request an additional viewpoint between 1 km and 1.5 km.	Table 4.20, 12.78, 12.109, 12.203	N/A
5.13.34 to 5.13.39	VRA D2 Little Horkesley and Wormingford: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that significant effects would extend up to 2 km e.g. at Viewpoint 4.13. c) The LPA considers that further undergrounding is needed and the CSE compound should be moved south-west. d) The LPA considers that additional viewpoints are needed to demonstrate effects between 1 km and 2 km. e) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) and (b) Table 4.20, 12.46 - 12.47, 12.81 (c) Table 4.20, 12.80 (d) Table 4.20, 12.81, 12.109 (e) Table 4.20 12.81	N/A
5.13.40 to 5.13.46	VRA D3 Great Horkesley: a) The LPA considers that major effects would extend up to 1 km from the Project.	(a) Table 4.20, 12.213, 12.215 (b) Table 4.20, 12.213	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
	b) The LPA considers that Viewpoint 4.17 needs to be a photomontage. c) The LPA considers that there is a lack of viewpoints beyond 0.5 km. d) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(c) Table 4.20, 12.109, 12.186, 12.215 (d) Table 4.20 12.81	
5.13.47 to 5.13.48	VRA D4 North Colchester: a) The LPA agrees with the Applicant's assessment. b) The LPA considers that an additional viewpoint is needed within the VRA (e.g. where Severall's Lane crosses the A12).	Table 4.20, 12.217, 12.218	N/A
5.13.49 to 5.13.58	VRA D5 Fordham: a) The LPA considers that Viewpoint 4.08 needs a photomontage. b) The LPA considers that the assessment is misleading to suggest views would be filtered from Fordham. c) The LPA expresses concern over effects on open access land / publicly accessible greenspace and consultation with the community. d) The LPA considers that the Project should be diverted or undergrounded within the valley. e) The LPA considers that major effects would extend up to 1 km from the Project. f) The LPA considers that significant effects would extend beyond 1.5 km. g) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 12.87, 12.109 (b) Table 4.20, 12.87 (c) Table 4.20, 12.87 (d) Table 4.20, 12.225 (e) Table 4.20, 12.227 (f) Table 4.20, 12.225 (g) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.59 to 5.13.64	VRA D6 Fordham Heath and Eight Ash Green: a) The LPA considers that Viewpoint 4.28 needs at least a wireframe. b) The LPA considers that major effects would extend up to 1 km from the Project. c) The LPA considers that significant effects would extend up to 2 km. d) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 12.109, 12.230 (b) Table 4.20, 12.234 (c) Table 4.20, 12.234 (d) Table 4.20, 12.234	N/A
5.13.65 to 5.13.68	VRA D7 Fordstreet and Aldham: a) The LPA considers that the alignment is unacceptable at Aldham and needs to be undergrounded or set back. b) The LPA considers that major effects would extend up to 1 km from the Project. c) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 12.91 (b) Table 4.20, 12.237, 12.91 (c) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	N/A
5.13.69 to 5.13.73	VRA D8 Great Tey: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that a visualisation is needed from Viewpoint 4.22. c) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 12.242, 12.244 (b) Table 4.20, 12.243 (c) Table 4.20, 12.244	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.74 to 5.13.78	VRA D9 Marks Tey: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant ‘cumulative’ effect resulting from multiple pylons.	(b) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	(a) The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
5.13.79 to 5.13.81	VRA D10 Copford: The LPA agrees with the Applicant’s assessment.	No	The Applicant notes this is agreed.
Braintree District Council			
3.1 to 3.2	The LPA considers that there would be significant effects on landscape character up to 2 km from the Project.	Table 4.20, 4.10.19	N/A
3.3 to 3.4	The LPA considers that the accumulation of non-significant effects would change character and views over a wider area	Table 4.20, 13.148	N/A
3.5 to 3.6	LCA B1: Central Essex Farmlands: The LPA agrees with the Applicant’s assessment.	No	The Applicant notes this is agreed.
3.7	LCA B4: Gosfield Wooded Farmland: The LPA agrees with the Applicant’s assessment.	No	The Applicant notes this is agreed.
3.8 to 3.9	LCA C6: Blackwater and Brain Valley: The LPA disagrees with the Applicant’s assessment in relation to landscape value and effects on landscape character	Table 4.20, 12.182	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.82 to 5.13.84	The LPA considers that the ZTV indicates widespread landscape and visual effects	No	As set out in paragraph 13.6.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] , the ZTV accounts for woodland blocks but does not consider the additional screening and filtering by hedgerows and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area.
5.13.85	The LPA disagrees with the Applicant's approach to identifying the value of the view.	Table 4.20, Annex C, 1.12, 1.19, 1.22, 1.29, 1.35, 1.40, 1.45, 1.47, 1.50, 1.54, 1.61, 1.66, 1.71, 1.76, 1.83, 1.87, 1.90, 1.93, 1.96	N/A
5.13.86 to 5.13.89	VRA E1 Coggeshall: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(b) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	(a) The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.90 to 5.13.93	VRA E2 Feering: a) The LPA considers that a wireline or photomontage is needed from Viewpoint 5.10. b) The LPA considers that major effects would extend up to 1 km from the Project. c) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(c) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	(a) A photomontage will be provided from Viewpoint 5.10 PRow near Coggeshall Hall. (b) The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
5.13.94 to 5.13.97	VRA E3 Kelvedon: a) The LPA agrees with the Applicant's assessment. b) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(b) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	(a) The Applicant notes this is agreed.
5.13.98 to 5.13.101	VRA E4 Silver End: a) The LCA requests a visualisation from Viewpoint 5.03. b) The LPA considers that major effects would extend up to 1 km from the Project. c) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(c) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	(a) A photomontage will be provided from Viewpoint 5.03 Rivenhall Place, Silver End. (b) The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.102 to 5.13.105	VRA E5 Black Notley & White Notley: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(b) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	(a) The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
5.13.106 to 5.13.108	VRA E6 Terling & Witham: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(b) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	(a) Table 4.20 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249
Chelmsford City Council			
4.1 to 4.2	The LPA considers that there would be effects on landscape character up to 2 km from the Project.	Table 4.20, 4.10.19	N/A
4.3	The LPA considers that the accumulation of non-significant effects would change character and views over a wider area	Table 4.20, 13.148	N/A
4.4 to 4.5	LCA B1: Central Essex Farmlands: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
4.6 to 4.7	LCA C5: Chelmer Valley: a) The LPA agrees with the Applicant's assessment. b) The LPA notes a discrepancy between the table and para 13.3.707.	(b) Table 4.20, 8.333 and 8.334	(a) The Applicant notes this is agreed.
4.8	LCA D2: Brentwood Hills: • The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
4.9	LCA G2: Chelmsford and Environs: • The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
5.13.109	• The LPA considers that the ZTV indicates widespread landscape and visual effects	No	As set out in paragraph 13.6.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] , the ZTV accounts for woodland blocks but does not consider the additional screening and filtering by hedgerows and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area.
5.13.110	• The LPA disagrees with the Applicant's approach to identifying the value of the view.	Table 4.20, Annex C, 1.12, 1.19, 1.22, 1.29, 1.35, 1.40, 1.45, 1.47, 1.50, 1.54,	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
		1.61, 1.66, 1.71, 1.76, 1.83, 1.87, 1.90, 1.93, 1.96	
5.13.111 to 5.13.114	VRA F1 Great Leighs: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant ‘cumulative’ effect resulting from multiple pylons.	(a) Table 4.20, 8.355 – 8.361 (b) Table 4.20, 8.53 8.337 8.362 8.369 8.378 8.392 8.397 8.402 8.408 8.416 8.425 8.435 11.38	N/A
5.13.115 to 5.13.117	VRA F2 Peverel’s Farm: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant ‘cumulative’ effect resulting from multiple pylons.	(a) Table 4.20, 8.363 – 8.369 (b) Table 4.20, 8.53 8.337 8.362 8.369	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
		8.378 8.392 8.397 8.402 8.408 8.416 8.425 8.435 11.38	
5.13.118 to 5.13.123	VRA F3 Great Waltham: a) The LPA is concerned that low height pylons haven't been presented on a widespread basis. b) The LPA is concerned about the effect on the setting of Langleys Mansion. c) The LPA considers that major effects would extend up to 1 km from the Project. d) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons. e) The LPA considers that there are opportunities for mitigation e.g. enhancement of the historic landscape.	(a) See paragraphs 2.5.13 (c) and (d), 3.7.3 to 3.7.5 (b) See paragraphs 3.7.3 to 3.7.5, 3.7.11, Table 4.16 8.199, Table 4.20 8.375 – 8.378 (c) Table 4.20, 8.375 – 8.378 (d) Table 4.20, 8.53 8.337 8.362 8.369 8.378 8.392 8.397 8.402 8.408 8.416 8.425 8.435 11.38	(e) 7.4 Outline Landscape and Ecological Management Plan [REP2-018] includes measures to retain 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 [REP2-014] .

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.124 to 5.13.128	VRA F4 Little Waltham: a) The LPA is concerned that low height pylons haven't been presented on a widespread basis. b) The LPA requests a visualisation of T-pylons. c) The LPA is concerned regarding the lack of viewpoints beyond 0.5 km. d) The LPA has concerns regarding vegetation loss. e) The LPA considers that major effects would extend up to 1 km from the Project. f) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) See paragraphs 2.5.13 (c) and (d), 3.7.3 to 3.7.5 (b) See paragraphs 2.5.13 (c) and (d), B.6.21 to B.6.24 (c) Table 4.20, 8.385 – 8.392 (d) Table 4.20, 8.385 – 8.392 (e) Table 4.20, 8.385 – 8.392 (f) Table 4.20, 8.53 8.337 8.362 8.369 8.378 8.392 8.397 8.402 8.408 8.416 8.425 8.435 11.38	N/A
5.13.129 to 5.13.132	VRA F5 Chignall Smealy: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 8.395 – 8.397 (b) Table 4.20, 8.53 8.337	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
		8.362	
		8.369	
		8.378	
		8.392	
		8.397	
		8.402	
		8.408	
		8.416	
		8.425	
		8.435	
		11.38	
5.13.133 to 5.13.136	VRA F6 Chelmsford North-West: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 8.401 – 8.402 (b) Table 4.20, 8.53 8.337 8.362 8.369 8.378 8.392 8.397 8.402 8.408 8.416 8.425 8.435 11.38	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.137 to 5.13.140	VRA F7 Roxwell: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 8.405 – 8.407 (b) Table 4.20, 8.53 8.337 8.362 8.369 8.378 8.392 8.397 8.402 8.408 8.416 8.425 8.435 11.38	N/A
5.13.141 to 5.13.145	VRA F8 Writtle and Chelmsford West: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 8.410 – 8.415 (b) Table 4.20, 8.53 8.337 8.362 8.369 8.378 8.392 8.397 8.402 8.408 8.416 8.425 8.435 11.38	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.13.146 to 5.13.150	VRA F9 Edney Common: a) The LPA considers that further viewpoints are needed including west of Edney Common and around footpath Highwood 7. b) The LPA considers that major effects would extend up to 1 km from the Project. c) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 8.418 – 8.425 (b) Table 4.20, 8.418 – 8.425 (c) Table 4.20, 8.53 8.337 8.362 8.369 8.378 8.392 8.397 8.402 8.408 8.416 8.425 8.435 11.38	N/A
5.13.151 to 5.13.155	VRA F10 Hylands Park: a) The LPA is concerned over the effect on the setting of the Registered Park and Garden. b) The LPA considers that major effects would extend up to 1 km from the Project. c) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, 8.432 – 8.435 (b) Table 4.20, 8.432 – 8.435 (c) Table 4.20, 8.53 8.337 8.362 8.369 8.378 8.392	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
		8.397 8.402 8.408 8.416 8.425 8.435 11.38	
5.13.156 to 5.13.158	VRA F11 Margaretting and Stock: a) The LPA has queried the location of Viewpoint 7.10. b) The LPA requests a photomontage from Viewpoint 7.12.	Table 4.20, 8.437 – 8.438	N/A
Brentwood and Basildon District Council			
5.1 to 5.2	The LPA considers that there would be effects on landscape character up to 2 km from the Project.	Table 4.20, 4.10.19	N/A
5.3	The LPA considers that the accumulation of non-significant effects would change character and views over a wider area	Table 4.20, 13.148	N/A
5.4	LCA D2: Brentwood Hills: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
5.5	LCA 9: Upper Crouch Valley Farmlands: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
5.6	LCA 10: East Billericay Wooded Hills and Ridges: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
5.7	LCA 11: West Billericay Wooded Farmlands: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
5.8	LCA 12: Burstead Sloping Farmland: The LPA agrees with the Applicant's assessment.	No	The Applicant notes this is agreed.
5.9 to 5.11	LCA 13: Dunton Settled Claylands: The LPA disagrees with the Applicant's assessment in relation to effects during construction and operation.	Table 4.20, 6.59	N/A
5.12	LCA 14: Langdon Hills: The LPA disagrees with the Applicant's assessment in relation to effects during construction.	No	The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
5.14.1 to 5.14.2	Concern that the ZTV indicates widespread landscape and visual effects	No	As set out in paragraph 13.6.6 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227] , the ZTV accounts for woodland blocks but does not consider the additional screening and filtering by hedgerows and field trees, small copses or more recently planted trees, woodland and hedgerows which are found in many places throughout the Study Area.
5.15.1	The LPA disagrees with the Applicant's approach to identifying Visual Receptor Areas (VRA)	No	The visual assessment has been undertaken based on consideration of views experienced from a number of Visual Receptor Areas (VRAs). This is cross referenced to and

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
			supplemented by 206 viewpoint assessments in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment [APP-229 to APP-232]. Many of the viewpoint assessments are supported by photomontages and wirelines 7.12 Visualisations - Part 1 to Part 7 of 9 [APP-343 to APP-349]. In addition, there are a further 47 viewpoints and accompanying visualisations that support the historic environment assessment. These are presented in 7.12 Visualisations - Part 8 and Part 9 of 9 [APP-350 to APP-351]. The approach to the identification of VRAs is set out in paragraph 13.4.48 of 6.13.A1 Environmental Statement Appendix 13.1 - Landscape and Visual Methodology [APP-227]. The assessment of visual effects on each VRA is presented in 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment - Part 1 of 4 [APP-229].
5.15.2	The LPA disagrees with the Applicant's approach to identifying the value of the view.	Table 4.20, Annex C, 1.12, 1.19, 1.22, 1.29, 1.35, 1.40,	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
		1.45, 1.47, 1.50, 1.54, 1.61, 1.66, 1.71, 1.76, 1.83, 1.87, 1.90, 1.93, 1.96	
5.15.3 to 5.15.7	VRA G1 Ingatestone and Fryerning: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(b) Table 4.20, 6.61	(a) The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
5.15.8 to 5.15.12	VRA G2 Billericay West: a) The LPA requests an additional viewpoint on footpath Billericay 11. b) The LPA considers that major effects would extend up to 1 km from the Project. c) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(a) Table 4.20, Annex 1.14 (in response to Suffolk) (c) Table 4.20, 6.61	(b) The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
5.15.13 to 5.15.16	VRA G3 Brentwood East: a) The LPA considers that major effects would extend up to 1 km from the Project. b) The LPA requests further assessment from footpath Brentwood 76. c) The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	(b) Table 4.20, 4.10.23 (c) Table 4.20, 6.61	(a) The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
5.15.17 to 5.15.21	VRA G4 Ingrave and Herongate: a) The LPA has concerns regarding effects on Dunton Hills Garden Village.	(a) Table 4.20, 6.59 and Appendix B: Dunton Hills Garden	N/A

Paragraph of REP1-161	Summary of Comment from REP1-161	Response in REP2-030 (ID)	Further Information
	b) The LPA consider that significant effects would extend up to 2 km and include Thorndon Country Park. c) The LPA consider that there would be a significant 'cumulative' effect resulting from multiple pylons.	Village Viability – Response to Savills Report (b) Table 4.20, 6.59 (c) Table 4.20, 6.61	
5.15.22 to 5.15.23	VRA G5 Little Burstead: Agreement with the Applicant's assessment.	No	The Applicant notes this is agreed.
5.15.24 to 5.15.25	VRA G6 Basildon: The LPA considers that major effects would extend up to 1 km from the Project.	No	The position of the LPA is noted. The Applicant has reviewed the judgements made in the LVIA and remains comfortable that the matters raised have been considered and that the assessment is fair.
	The LPA considers that there would be a significant 'cumulative' effect resulting from multiple pylons.	Table 4.20, 12.74, 12.200, 12.216, 12.228, 12.234, 12.239, 12.244, 12.249	N/A

Appendix G.

Supplement 8 - PRow

1.7 Supplementary table

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Bracon Ash FP12	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bracon Ash FP16	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bressingham FP39	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bunwell FP10	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bunwell FP12	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bunwell FP14	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bunwell FP16	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bunwell FP17	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bunwell FP18	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bunwell FP8	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Carleton Rode FP27	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Carleton Rode FP28	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Diss BR5	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Diss FP17	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Diss FP20	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Diss FP4	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Diss FP8	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Diss FP9	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Diss RB2	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Flordon FP1	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Flordon FP2	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Flordon FP3	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Flordon FP6	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Forncett FP28	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Forncett FP29	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Forncett FP30	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Mulbarton FP11	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Mulbarton FP12	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Newton Flotman FP1	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Newton Flotman FP2	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Roydon South Norfolk FP1	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Roydon South Norfolk FP23	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Roydon South Norfolk FP3	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Roydon South Norfolk FP5	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Shelfanger FP10	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Shelfanger FP9	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Stoke Holy Cross BR3	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Swainsthorpe BOAT6	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Swainsthorpe BR7	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Swardeston BR12	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Swardeston BR9	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Tacolneston FP10	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Tacolneston FP9	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Tharston BR1	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Tharston FP33	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Tibenham FP14	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Tibenham FP16	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Tibenham FP20	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Tibenham FP26	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Tibenham FP3	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Winfarthing FP22	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Winfarthing FP23	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Winfarthing FP25	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Winfarthing FP26	South Norfolk Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
E-227/059/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
E-227/062/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
E-227/063/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/002/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/003/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/004/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-121/009/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/012/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/015/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/016/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/017/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/019/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/020/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/021/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/023/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/024/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/073/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/097/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-121/108/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/109/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-121/114/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-129/015/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-129/017/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-129/019/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-129/022/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-129/023/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-129/024/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-155/001/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-155/002/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-155/040/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-155/042/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-155/042/A	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-155/043/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-155/047/A	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-155/048/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-155/054/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-172/009/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-172/010/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-172/031/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-172/032/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-172/034/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-172/035/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-203/028/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-203/052/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/007/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/008/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/009/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/010/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/011/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/012/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/015/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/017/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/023/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-209/028/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-246/012/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-246/022/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-265/017/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-267/014/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-267/021/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-267/022/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-370/051/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-370/052/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-370/053/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-392/004/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-392/035/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-392/038/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-392/041/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-392/043/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-392/045/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-392/060/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-392/066/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/013/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/016/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/019/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/021/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/022/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/023/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/027/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-418/028/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/030/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/034/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/035/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/049/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/050/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-418/057/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-426/004/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-426/012/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-426/013/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-426/015/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-426/016/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-426/018/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-449/020/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-449/021/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-449/041/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-449/051/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-449/052/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/001/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/002/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/003/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/004/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/005/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/017/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-472/021/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/022/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/025/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/026/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-472/036/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-499/007/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-499/008/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-499/010/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-499/015/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-499/016/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-522/012/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-563/004/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-563/035/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-563/042/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-563/046/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-566/002/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-566/014/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-566/020/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-566/021/0	Mid Suffolk District	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-155/041/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-174/011/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-174/012/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-185/007/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-185/011/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-185/012/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-185/014/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-185/032/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-284/008/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-284/010/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-284/011/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-284/012/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-284/013/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-315/011/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-318/019/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-323/006/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-323/008/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-323/009/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-323/012/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-323/015/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-323/022/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-381/005/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-381/006/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-438/014/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-438/015/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-438/018/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-438/023/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-438/024/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-438/025/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-438/050/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-486/002/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-486/004/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-486/006/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-486/017/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-486/018/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-486/019/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-486/020/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-503/006/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-543/004/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-543/005/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-543/006/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
W-543/008/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
W-543/047/0	Babergh District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Ardleigh 20	Tendring District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Ardleigh 22	Tendring District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Ardleigh 24	Tendring District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Ardleigh 28	Tendring District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Ardleigh 3	Tendring District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Little Bromley 16	Tendring District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Little Bromley 17	Tendring District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Aldham 15	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Aldham 4	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Aldham 5	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Aldham 7	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Boxted 26	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Boxted 28	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Dedham 4	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Dedham 8	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Fordham 19	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Fordham 21	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Fordham 33	Colchester City Council	Medium	Very Low	Temporary, short-term, negligible adverse and not significant
Fordham 35	Colchester City Council	Medium	Very Low	Temporary, short-term, negligible adverse and not significant
Fordham 41	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great Horkesley 19	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great Horkesley 27	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Great Horkesley 29	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great Horkesley 31	Colchester City Council	Medium	Very Low	Temporary, short-term, negligible adverse and not significant
Great Horkesley 49	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great Tey 44	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great Tey 45	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Langham 15	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Langham 17	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Langham 18	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Langham 20	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Langham 22	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Langham 23	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Langham 3	Colchester City Council	Medium	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Langham 44	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Langham 45	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Langham 54	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Marks Tey 21	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Marks Tey 4	Colchester City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Rivenhall 25	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Silver End 16	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Silver End 17	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Silver End 18	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Silver End 19	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Silver End 20	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Terling 11	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
White Notley 11	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Witham 105	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Coggeshall 30	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Coggeshall 32	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Fairstead 3	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Fairstead 5	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Faulkbourne 5	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Feering 11	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Feering 2	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Feering 4	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Kelvedon 10	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Kelvedon 16	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Kelvedon 29	Braintree District Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Broomfield 27	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Broomfield 30	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Broomfield 4	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Broomfield 7	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Chignall 21	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Chignall 27	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Chignall 31	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Chignall 32	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great And Little Leighs 29	Chelmsford City Council	Medium	Very Low	Temporary, short-term, negligible adverse and not significant
Great And Little Leighs 42	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great And Little Leighs 43	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Great And Little Leighs 44	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great And Little Leighs 52	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great And Little Leighs 61	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great Waltham 75	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great Waltham 77	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Great Waltham 78	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Little Waltham 56	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Little Waltham 7	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Margaretting 15	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Margaretting 16	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Roxwell 42	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Stock 42	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Writtle 13	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Writtle 23	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Writtle 64	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Writtle 67	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Writtle 8	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Writtle 85	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Writtle 97	Chelmsford City Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Basildon 111	Basildon Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Billericay 11	Basildon Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Billericay 183	Basildon Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Little Burstead 16	Basildon Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Little Burstead 17	Basildon Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Little Burstead 21	Basildon Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Little Burstead 55	Basildon Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Little Burstead 56	Basildon Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Brentwood 53	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Brentwood 72	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Brentwood 76	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Brentwood 90	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Brentwood 94	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Brentwood 98	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Ingatestone 27	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Ingatestone 43	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Mountnessing 7	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Herongate And Ingrave 52	Brentwood Borough Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Bridleway 91	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 105	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 106	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 11	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 12	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 224	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 41	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 43	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 45	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 46	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 64	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Receptor	Project Section	Sensitivity	Magnitude of Impact	Residual Construction Effect
Footpath 66	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 78	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 79	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 84	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 95	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant
Footpath 97	Thurrock Council	Low	Very Low	Temporary, short-term, negligible adverse and not significant

Appendix H.

Supplement 9 - PRow

1.9 Supplementary table

Receptor	Project Section	Sensitivity
Ashwellthorpe FP5	South Norfolk Council	Low
Bracon Ash FP12	South Norfolk Council	Low
Bracon Ash FP16	South Norfolk Council	Low
Bressingham FP39	South Norfolk Council	Low
Bunwell FP10	South Norfolk Council	Low
Bunwell FP12	South Norfolk Council	Low
Bunwell FP14	South Norfolk Council	Low
Bunwell FP16	South Norfolk Council	Low
Bunwell FP17	South Norfolk Council	Low
Bunwell FP18	South Norfolk Council	Low
Bunwell FP8	South Norfolk Council	Low
Carleton Rode FP27	South Norfolk Council	Low
Carleton Rode FP28	South Norfolk Council	Low
Diss BR5	South Norfolk Council	Low
Diss FP17	South Norfolk Council	Low
Diss FP20	South Norfolk Council	Low
Diss FP4	South Norfolk Council	Low
Diss FP8	South Norfolk Council	Low
Diss FP9	South Norfolk Council	Low
Diss RB2	South Norfolk Council	Low
Flordon FP1	South Norfolk Council	Low
Flordon FP2	South Norfolk Council	Low

Receptor	Project Section	Sensitivity
Flordon FP3	South Norfolk Council	Low
Flordon FP6	South Norfolk Council	Low
Forncett FP25	South Norfolk Council	Low
Forncett FP26	South Norfolk Council	Low
Forncett FP28	South Norfolk Council	Low
Forncett FP29	South Norfolk Council	Low
Forncett FP30	South Norfolk Council	Low
Mulbarton FP11	South Norfolk Council	Low
Mulbarton FP12	South Norfolk Council	Low
Newton Flotman FP1	South Norfolk Council	Low
Newton Flotman FP2	South Norfolk Council	Low
Roydon South Norfolk FP1	South Norfolk Council	Low
Roydon South Norfolk FP14	South Norfolk Council	Medium
Roydon South Norfolk FP2	South Norfolk Council	Low
Roydon South Norfolk FP23	South Norfolk Council	Low
Roydon South Norfolk FP3	South Norfolk Council	Low
Roydon South Norfolk FP4	South Norfolk Council	Low
Roydon South Norfolk FP5	South Norfolk Council	Low
Shelfanger FP10	South Norfolk Council	Low
Shelfanger FP9	South Norfolk Council	Low
Stoke Holy Cross BR3	South Norfolk Council	Low
Swainsthorpe BOAT6	South Norfolk Council	Low

Receptor	Project Section	Sensitivity
Swainsthorpe BR7	South Norfolk Council	Low
Swardeston BR12	South Norfolk Council	Low
Swardeston BR9	South Norfolk Council	Low
Tacolneston FP10	South Norfolk Council	Low
Tacolneston FP9	South Norfolk Council	Low
Tharston BR1	South Norfolk Council	Low
Tharston FP33	South Norfolk Council	Low
Tibenham FP14	South Norfolk Council	Low
Tibenham FP16	South Norfolk Council	Low
Tibenham FP20	South Norfolk Council	Low
Tibenham FP26	South Norfolk Council	Low
Tibenham FP3	South Norfolk Council	Low
Winfarthing FP22	South Norfolk Council	Low
Winfarthing FP23	South Norfolk Council	Low
Winfarthing FP25	South Norfolk Council	Low
Winfarthing FP26	South Norfolk Council	Low
E-227/059/0	Mid Suffolk District	Low
E-227/062/0	Mid Suffolk District	Low
E-227/063/0	Mid Suffolk District	Low
W-117/013/0	Mid Suffolk District	Low
W-117/023/0	Mid Suffolk District	Low
W-121/002/0	Mid Suffolk District	Low

Receptor	Project Section	Sensitivity
W-121/003/0	Mid Suffolk District	Low
W-121/004/0	Mid Suffolk District	Low
W-121/006/0	Mid Suffolk District	Low
W-121/009/0	Mid Suffolk District	Low
W-121/012/0	Mid Suffolk District	Low
W-121/015/0	Mid Suffolk District	Low
W-121/016/0	Mid Suffolk District	Low
W-121/017/0	Mid Suffolk District	Low
W-121/019/0	Mid Suffolk District	Low
W-121/020/0	Mid Suffolk District	Low
W-121/021/0	Mid Suffolk District	Low
W-121/023/0	Mid Suffolk District	Low
W-121/024/0	Mid Suffolk District	Low
W-121/073/0	Mid Suffolk District	Low
W-121/097/0	Mid Suffolk District	Low
W-121/108/0	Mid Suffolk District	Low
W-121/109/0	Mid Suffolk District	Low
W-121/114/0	Mid Suffolk District	Low
W-129/015/0	Mid Suffolk District	Low
W-129/016/0	Mid Suffolk District	Low
W-129/017/0	Mid Suffolk District	Low
W-129/018/0	Mid Suffolk District	Low

Receptor	Project Section	Sensitivity
W-129/019/0	Mid Suffolk District	Low
W-129/022/0	Mid Suffolk District	Low
W-129/023/0	Mid Suffolk District	Low
W-129/024/0	Mid Suffolk District	Low
W-129/025/0	Mid Suffolk District	Low
W-155/001/0	Mid Suffolk District	Low
W-155/002/0	Mid Suffolk District	Low
W-155/040/0	Mid Suffolk District	Low
W-155/042/0	Mid Suffolk District	Low
W-155/042/A	Mid Suffolk District	Low
W-155/043/0	Mid Suffolk District	Low
W-155/047/A	Mid Suffolk District	Low
W-155/048/0	Mid Suffolk District	Low
W-155/054/0	Mid Suffolk District	Low
W-172/009/0	Mid Suffolk District	Low
W-172/010/0	Mid Suffolk District	Low
W-172/022/0	Mid Suffolk District	Low
W-172/027/0	Mid Suffolk District	Low
W-172/031/0	Mid Suffolk District	Low
W-172/032/0	Mid Suffolk District	Low
W-172/034/0	Mid Suffolk District	Low
W-172/035/0	Mid Suffolk District	Low

Receptor	Project Section	Sensitivity
W-172/036/0	Mid Suffolk District	Low
W-203/028/0	Mid Suffolk District	Low
W-203/048/0	Mid Suffolk District	Low
W-203/052/0	Mid Suffolk District	Low
W-203/054/0	Mid Suffolk District	Low
W-209/006/0	Mid Suffolk District	Low
W-209/007/0	Mid Suffolk District	Low
W-209/008/0	Mid Suffolk District	Low
W-209/009/0	Mid Suffolk District	Low
W-209/010/0	Mid Suffolk District	Low
W-209/011/0	Mid Suffolk District	Low
W-209/012/0	Mid Suffolk District	Low
W-209/014/0	Mid Suffolk District	Low
W-209/015/0	Mid Suffolk District	Low
W-209/017/0	Mid Suffolk District	Low
W-209/023/0	Mid Suffolk District	Low
W-209/028/0	Mid Suffolk District	Low
W-246/011/0	Mid Suffolk District	Low
W-246/012/0	Mid Suffolk District	Low
W-246/022/0	Mid Suffolk District	Low
W-265/017/0	Mid Suffolk District	Low
W-267/014/0	Mid Suffolk District	Low

Receptor	Project Section	Sensitivity
W-267/021/0	Mid Suffolk District	Low
W-267/022/0	Mid Suffolk District	Low
W-370/051/0	Mid Suffolk District	Low
W-370/052/0	Mid Suffolk District	Low
W-370/053/0	Mid Suffolk District	Low
W-370/054/0	Mid Suffolk District	Low
W-389/002/0	Mid Suffolk District	Low
W-392/004/0	Mid Suffolk District	Low
W-392/035/0	Mid Suffolk District	Low
W-392/038/0	Mid Suffolk District	Low
W-392/041/0	Mid Suffolk District	Low
W-392/043/0	Mid Suffolk District	Low
W-392/045/0	Mid Suffolk District	Low
W-392/046/0	Mid Suffolk District	Low
W-392/059/0	Mid Suffolk District	Low
W-392/060/0	Mid Suffolk District	Low
W-392/066/0	Mid Suffolk District	Low
W-418/013/0	Mid Suffolk District	Low
W-418/016/0	Mid Suffolk District	Low
W-418/019/0	Mid Suffolk District	Low
W-418/021/0	Mid Suffolk District	Low
W-418/022/0	Mid Suffolk District	Low

Receptor	Project Section	Sensitivity
W-418/023/0	Mid Suffolk District	Low
W-418/027/0	Mid Suffolk District	Low
W-418/028/0	Mid Suffolk District	Low
W-418/030/0	Mid Suffolk District	Low
W-418/031/0	Mid Suffolk District	Low
W-418/034/0	Mid Suffolk District	Low
W-418/035/0	Mid Suffolk District	Low
W-418/049/0	Mid Suffolk District	Low
W-418/050/0	Mid Suffolk District	Low
W-418/057/0	Mid Suffolk District	Low
W-418/058/0	Mid Suffolk District	Low
W-426/003/0	Mid Suffolk District	Low
W-426/004/0	Mid Suffolk District	Low
W-426/012/0	Mid Suffolk District	Low
W-426/013/0	Mid Suffolk District	Low
W-426/015/0	Mid Suffolk District	Low
W-426/016/0	Mid Suffolk District	Low
W-426/018/0	Mid Suffolk District	Low
W-449/020/0	Mid Suffolk District	Low
W-449/021/0	Mid Suffolk District	Low
W-449/041/0	Mid Suffolk District	Low
W-449/051/0	Mid Suffolk District	Low

Receptor	Project Section	Sensitivity
W-449/052/0	Mid Suffolk District	Low
W-472/001/0	Mid Suffolk District	Low
W-472/002/0	Mid Suffolk District	Low
W-472/003/0	Mid Suffolk District	Low
W-472/004/0	Mid Suffolk District	Low
W-472/005/0	Mid Suffolk District	Low
W-472/017/0	Mid Suffolk District	Low
W-472/021/0	Mid Suffolk District	Low
W-472/022/0	Mid Suffolk District	Low
W-472/025/0	Mid Suffolk District	Low
W-472/026/0	Mid Suffolk District	Low
W-472/027/0	Mid Suffolk District	Low
W-472/036/0	Mid Suffolk District	Low
W-499/007/0	Mid Suffolk District	Low
W-499/008/0	Mid Suffolk District	Low
W-499/010/0	Mid Suffolk District	Low
W-499/015/0	Mid Suffolk District	Low
W-499/016/0	Mid Suffolk District	Low
W-522/012/0	Mid Suffolk District	Low
W-563/001/0	Mid Suffolk District	Low
W-563/003/0	Mid Suffolk District	Low
W-563/004/0	Mid Suffolk District	Low

Receptor	Project Section	Sensitivity
W-563/035/0	Mid Suffolk District	Low
W-563/042/0	Mid Suffolk District	Low
W-563/046/0	Mid Suffolk District	Low
W-566/002/0	Mid Suffolk District	Low
W-566/014/0	Mid Suffolk District	Low
W-566/020/0	Mid Suffolk District	Low
W-566/021/0	Mid Suffolk District	Low
W-155/039/A	Babergh District Council	Low
W-155/041/0	Babergh District Council	Low
W-174/011/0	Babergh District Council	Low
W-174/012/0	Babergh District Council	Low
W-185/007/0	Babergh District Council	Low
W-185/011/0	Babergh District Council	Low
W-185/012/0	Babergh District Council	Low
W-185/014/0	Babergh District Council	Low
W-185/032/0	Babergh District Council	Low
W-284/006/0	Babergh District Council	Low
W-284/008/0	Babergh District Council	Low
W-284/010/0	Babergh District Council	Low
W-284/011/0	Babergh District Council	Low
W-284/012/0	Babergh District Council	Low
W-284/013/0	Babergh District Council	Low

Receptor	Project Section	Sensitivity
W-284/014/0	Babergh District Council	Low
W-315/011/0	Babergh District Council	Low
W-318/019/0	Babergh District Council	Low
W-323/006/0	Babergh District Council	Low
W-323/008/0	Babergh District Council	Low
W-323/009/0	Babergh District Council	Low
W-323/010/0	Babergh District Council	Low
W-323/012/0	Babergh District Council	Low
W-323/015/0	Babergh District Council	Low
W-323/022/0	Babergh District Council	Low
W-381/005/0	Babergh District Council	Low
W-381/006/0	Babergh District Council	Low
W-438/007/0	Babergh District Council	Low
W-438/014/0	Babergh District Council	Low
W-438/015/0	Babergh District Council	Low
W-438/018/0	Babergh District Council	Low
W-438/023/0	Babergh District Council	Low
W-438/024/0	Babergh District Council	Low
W-438/025/0	Babergh District Council	Low
W-438/050/0	Babergh District Council	Low
W-486/002/0	Babergh District Council	Low
W-486/003/0	Babergh District Council	Low

Receptor	Project Section	Sensitivity
W-486/004/0	Babergh District Council	Low
W-486/006/0	Babergh District Council	Low
W-486/017/0	Babergh District Council	Low
W-486/018/0	Babergh District Council	Low
W-486/019/0	Babergh District Council	Low
W-486/020/0	Babergh District Council	Low
W-503/006/0	Babergh District Council	Low
W-543/002/0	Babergh District Council	Low
W-543/003/0	Babergh District Council	Low
W-543/004/0	Babergh District Council	Low
W-543/005/0	Babergh District Council	Low
W-543/006/0	Babergh District Council	Low
W-543/008/0	Babergh District Council	Low
W-543/047/0	Babergh District Council	Low
Ardleigh 2	Tendring District Council	Low
Ardleigh 20	Tendring District Council	Low
Ardleigh 22	Tendring District Council	Low
Ardleigh 24	Tendring District Council	Low
Ardleigh 28	Tendring District Council	Low
Ardleigh 3	Tendring District Council	Low
Little Bromley 16	Tendring District Council	Low
Little Bromley 17	Tendring District Council	Low

Receptor	Project Section	Sensitivity
Aldham 12	Colchester City Council	Low
Aldham 15	Colchester City Council	Low
Aldham 18	Colchester City Council	Low
Aldham 20	Colchester City Council	Low
Aldham 3	Colchester City Council	Low
Aldham 4	Colchester City Council	Low
Aldham 5	Colchester City Council	Low
Aldham 7	Colchester City Council	Low
Boxted 26	Colchester City Council	Low
Boxted 28	Colchester City Council	Low
Boxted 38	Colchester City Council	Low
Dedham 4	Colchester City Council	Low
Dedham 8	Colchester City Council	Low
Fordham 16	Colchester City Council	Low
Fordham 19	Colchester City Council	Low
Fordham 21	Colchester City Council	Low
Fordham 22	Colchester City Council	Low
Fordham 24	Colchester City Council	Low
Fordham 33	Colchester City Council	Medium
Fordham 35	Colchester City Council	Medium
Fordham 36	Colchester City Council	Low
Fordham 41	Colchester City Council	Low

Receptor	Project Section	Sensitivity
Great Horkesley 19	Colchester City Council	Low
Great Horkesley 27	Colchester City Council	Low
Great Horkesley 29	Colchester City Council	Low
Great Horkesley 30	Colchester City Council	Low
Great Horkesley 31	Colchester City Council	Medium
Great Horkesley 49	Colchester City Council	Low
Great Tey 36	Colchester City Council	Medium
Great Tey 38	Colchester City Council	Low
Great Tey 42	Colchester City Council	Medium
Great Tey 44	Colchester City Council	Low
Great Tey 45	Colchester City Council	Low
Great Tey 46	Colchester City Council	Low
Great Tey 50	Colchester City Council	Low
Great Tey 59	Colchester City Council	Low
Langham 1	Colchester City Council	Medium
Langham 15	Colchester City Council	Low
Langham 16	Colchester City Council	Low
Langham 17	Colchester City Council	Low
Langham 18	Colchester City Council	Low
Langham 20	Colchester City Council	Low
Langham 21	Colchester City Council	Low
Langham 22	Colchester City Council	Low

Receptor	Project Section	Sensitivity
Langham 23	Colchester City Council	Low
Langham 3	Colchester City Council	Medium
Langham 44	Colchester City Council	Low
Langham 45	Colchester City Council	Low
Langham 54	Colchester City Council	Low
Marks Tey 21	Colchester City Council	Low
Marks Tey 4	Colchester City Council	Low
Rivenhall 11	Braintree District Council	Low
Rivenhall 25	Braintree District Council	Low
Silver End 14	Braintree District Council	Low
Silver End 15	Braintree District Council	Low
Silver End 16	Braintree District Council	Low
Silver End 17	Braintree District Council	Low
Silver End 18	Braintree District Council	Low
Silver End 19	Braintree District Council	Low
Silver End 20	Braintree District Council	Low
Terling 11	Braintree District Council	Low
White Notley 11	Braintree District Council	Low
White Notley 12	Braintree District Council	Low
White Notley 15	Braintree District Council	Medium
White Notley 22	Braintree District Council	Low
Witham 105	Braintree District Council	Low

Receptor	Project Section	Sensitivity
Coggeshall 30	Braintree District Council	Low
Coggeshall 32	Braintree District Council	Low
Cressing 19	Braintree District Council	Low
Fairstead 20	Braintree District Council	Low
Fairstead 3	Braintree District Council	Low
Fairstead 5	Braintree District Council	Low
Faulkbourne 1	Braintree District Council	Low
Faulkbourne 5	Braintree District Council	Low
Feering 11	Braintree District Council	Low
Feering 2	Braintree District Council	Low
Feering 4	Braintree District Council	Low
Kelvedon 1	Braintree District Council	Low
Kelvedon 10	Braintree District Council	Low
Kelvedon 16	Braintree District Council	Low
Kelvedon 2	Braintree District Council	Low
Kelvedon 29	Braintree District Council	Low
Kelvedon 4	Braintree District Council	Low
Kelvedon 5	Braintree District Council	Low
Broomfield 1	Chelmsford City Council	Medium
Broomfield 27	Chelmsford City Council	Low
Broomfield 3	Chelmsford City Council	Low
Broomfield 30	Chelmsford City Council	Low

Receptor	Project Section	Sensitivity
Broomfield 31	Chelmsford City Council	Low
Broomfield 4	Chelmsford City Council	Low
Broomfield 5	Chelmsford City Council	Low
Broomfield 7	Chelmsford City Council	Low
Broomfield 9	Chelmsford City Council	Low
Chignall 21	Chelmsford City Council	Low
Chignall 26	Chelmsford City Council	Low
Chignall 27	Chelmsford City Council	Low
Chignall 30	Chelmsford City Council	Low
Chignall 31	Chelmsford City Council	Low
Chignall 32	Chelmsford City Council	Low
Great And Little Leighs 29	Chelmsford City Council	Medium
Great And Little Leighs 40	Chelmsford City Council	Medium
Great And Little Leighs 42	Chelmsford City Council	Low
Great And Little Leighs 43	Chelmsford City Council	Low
Great And Little Leighs 44	Chelmsford City Council	Low
Great And Little Leighs 45	Chelmsford City Council	Low
Great And Little Leighs 52	Chelmsford City Council	Low
Great And Little Leighs 61	Chelmsford City Council	Low
Great Waltham 74	Chelmsford City Council	Low
Great Waltham 75	Chelmsford City Council	Low
Great Waltham 76	Chelmsford City Council	Low

Receptor	Project Section	Sensitivity
Great Waltham 77	Chelmsford City Council	Low
Great Waltham 78	Chelmsford City Council	Low
Little Waltham 13	Chelmsford City Council	Low
Little Waltham 21	Chelmsford City Council	Low
Little Waltham 56	Chelmsford City Council	Low
Little Waltham 7	Chelmsford City Council	Low
Little Waltham 8	Chelmsford City Council	Low
Margaretting 13	Chelmsford City Council	Medium
Margaretting 15	Chelmsford City Council	Low
Margaretting 16	Chelmsford City Council	Low
Margaretting 38	Chelmsford City Council	Low
Roxwell 42	Chelmsford City Council	Low
Stock 37	Chelmsford City Council	Low
Stock 42	Chelmsford City Council	Low
Writtle 13	Chelmsford City Council	Low
Writtle 23	Chelmsford City Council	Low
Writtle 64	Chelmsford City Council	Low
Writtle 66	Chelmsford City Council	Low
Writtle 67	Chelmsford City Council	Low
Writtle 68	Chelmsford City Council	Low
Writtle 69	Chelmsford City Council	Low
Writtle 8	Chelmsford City Council	Low

Receptor	Project Section	Sensitivity
Writtle 83	Chelmsford City Council	Low
Writtle 85	Chelmsford City Council	Low
Writtle 97	Chelmsford City Council	Low
Basildon 111	Basildon Council	Low
Basildon 161	Basildon Council	Low
Billericay 11	Basildon Council	Low
Billericay 183	Basildon Council	Low
Little Burstead 15	Basildon Council	Low
Little Burstead 16	Basildon Council	Low
Little Burstead 17	Basildon Council	Low
Little Burstead 19	Basildon Council	Low
Little Burstead 21	Basildon Council	Low
Little Burstead 54	Basildon Council	Low
Little Burstead 55	Basildon Council	Low
Little Burstead 56	Basildon Council	Low
Brentwood 53	Brentwood Borough Council	Low
Brentwood 72	Brentwood Borough Council	Low
Brentwood 76	Brentwood Borough Council	Low
Brentwood 90	Brentwood Borough Council	Low
Brentwood 94	Brentwood Borough Council	Low
Brentwood 96	Brentwood Borough Council	Low
Brentwood 98	Brentwood Borough Council	Low

Receptor	Project Section	Sensitivity
Ingatestone 23	Brentwood Borough Council	Low
Ingatestone 27	Brentwood Borough Council	Low
Ingatestone 43	Brentwood Borough Council	Low
Mountnessing 7	Brentwood Borough Council	Low
Herongate And Ingrave 52	Brentwood Borough Council	Low
West Horndon 61	Brentwood Borough Council	Low
West Horndon 62	Brentwood Borough Council	Low
West Horndon 68	Brentwood Borough Council	Low
West Horndon 69	Brentwood Borough Council	Low
Bridleway 223	Thurrock Council	Low
Bridleway 63	Thurrock Council	Low
Bridleway 91	Thurrock Council	Low
Footpath 10	Thurrock Council	Low
Footpath 105	Thurrock Council	Low
Footpath 106	Thurrock Council	Low
Footpath 107	Thurrock Council	Low
Footpath 11	Thurrock Council	Low
Footpath 12	Thurrock Council	Low
Footpath 224	Thurrock Council	Low
Footpath 41	Thurrock Council	Low
Footpath 42	Thurrock Council	Low
Footpath 43	Thurrock Council	Low

Receptor	Project Section	Sensitivity
Footpath 45	Thurrock Council	Low
Footpath 46	Thurrock Council	Low
Footpath 64	Thurrock Council	Low
Footpath 66	Thurrock Council	Low
Footpath 67	Thurrock Council	Low
Footpath 78	Thurrock Council	Low
Footpath 79	Thurrock Council	Low
Footpath 84	Thurrock Council	Low
Footpath 91	Thurrock Council	Low
Footpath 95	Thurrock Council	Low
Footpath 97	Thurrock Council	Low

Appendix I.

Supplement 10 - SET

1.15 WMEL

Community Benefit

Survey

Community benefit survey

June 2025

National Grid Electricity Transmission (National Grid) is consulting on proposals to build approximately 60 kilometres (km) of new 400,000 volt (400 kV) electricity transmission line between Weston Marsh and East Leicestershire, two new substations, and the upgrade (reconductoring) of approximately 55 km of existing overhead transmission line.

More information on our proposals for Weston Marsh to East Leicestershire can be found on our project website – nationalgrid.com/wmel.

Communities should benefit from hosting new electricity transmission infrastructure. To help us deliver community benefit programmes that work for your area, we are keen to hear your views. We want to understand what is important to you, and where community benefit funds could deliver long-lasting benefits, including through community grant schemes and investment in community groups or via regional partnerships.

The way we deliver community benefit funding is informed by government guidance¹ published in March 2025. This sets out the types of infrastructure projects that should deliver community benefit funds, and the level of funding that should be made available. This is based on:

- **£530,000 for new substations, converter stations and switching stations**
- **£200,000 per kilometre of new overhead line***

The responses to this survey will help us understand the priorities of the local community. It will form part of a series of engagement with communities and stakeholders as we develop our plans for community benefit associated with Weston Marsh to East Leicestershire.

This form is specifically intended to understand views on community benefits. Please do not use this form to provide feedback on Weston Marsh to East Leicestershire or any other National Grid project proposals.

We are not seeking views on the government's emerging proposals for energy bill discounts. The legislation that government is proposing to introduce energy bill discounts is not yet in place. This consultation is therefore only focussing on community funds in line with the current guidance.

If you would prefer to complete this survey on-line, please scan the QR code or visit our project website – nationalgrid.com/wmel.



¹ [Community Funds for Transmission Infrastructure: Guidance](#)

* This includes changes to some existing network infrastructure, such as upgrading existing overhead power cables and extensions to existing substations as defined within the government guidance.

We want to understand what is important to you, to help us deliver genuine long-lasting benefits in the areas hosting Weston Marsh to East Leicestershire project.

Q1. These are some of the areas we believe could be supported through community benefit funds in your community. Which of these are important to you?

☐

Delivering environmental enhancements

☐

Alleviating fuel poverty and enhancing energy efficiency

☐

Supporting employment, education and skills development

☐

Supporting communities to decarbonise

☐

Promoting health and wellbeing in the community

☐

Other
(please specify in the text below)

☐

Investing in community infrastructure and facilities

Q2. Do you have any views on the types of projects or programmes that would be most beneficial to your community?

Q3. Do you have any other ideas about community benefits that you want to share with us?

Please do not use this form to provide feedback on our proposals for Weston Marsh to East Leicestershire.

About you

We would be grateful if you could answer the following, optional, demographic questions. We will use the information we receive to help understand whether our consultation has been useful to people of different backgrounds and requirements, and only in accordance with our Data Privacy Statement, as set out later in this form.

We may publish a summary of the results, but no information about an individual would be revealed. The answers you provide to some of these questions are defined as 'special category data'. If you agree to provide this information, you can withdraw your permission for us to use it in our reports at any time. To withdraw your consent, please contact us via email at ContactWMEL@nationalgrid.com.

Q4. How would you describe your interest in community benefits associated with Weston Marsh to East Leicestershire?

☐

Local resident

☐

Regular visitor

☐

Local representative (e.g. Councillor, MP)

☐

Local interest group member
(please specify in the text box below)

☐

Landowner or tenant/occupier within the preferred corridor

☐

Statutory organisation
(please specify in the text box below)

☐

Local business owner

☐

Other
(please specify in the text box below)

Q5. What is your gender?

☐

Male

☐

Non-binary

☐

Female

☐

Prefer not to say

Q6. Do you consider yourself a person with a disability?

☐

Yes

☐

Prefer not to say

☐

No

Q7. How would you describe your ethnic background?

Asian or Asian British

☐	Indian
☐	Pakistani
☐	Bangladeshi
☐	Chinese
☐	Any other Asian background (please state)

Black, Black British, Caribbean or African

☐	Caribbean
☐	African
☐	Any other Black, Black British, or Caribbean background (please state)

Other ethnic group

☐	Arab
☐	Any other ethnic group (please state)

Mixed or multiple ethnic groups

☐	White and Black Caribbean
☐	White and Black African
☐	White and Asian
☐	Any other Mixed or multiple ethnic background (please state)

White

☐	Scottish, English, Welsh, Northern Irish or British
☐	Irish
☐	Gypsy or Irish Traveller
☐	Roma
☐	Any other White background (please state)

☐	Prefer not to say

Q8. What is your age?

☐	Under 16	☐	35-44	☐	65+
☐	16-24	☐	45-54	☐	Prefer not to say
☐	25-34	☐	55-64		

Data privacy statement

We will use your personal data collected via this survey for a number of purposes, including:

- to analyse your responses
- to write to you with updates about the development of our community benefit plans (if you do not wish to be contacted, you can submit the form anonymously by clicking the box at the top of the final page)
- to keep up-to-date records of our communications with individuals and organisations.

Any personal information you include in this form will be handled and used by (or made available to) the following recipients, to record, analyse and report on the feedback we receive:

- National Grid
- our legal advisers
- consultants working on behalf of National Grid.

Next steps

We will take account of responses to this survey and continue to engage with the community and stakeholders to develop a plan tailored to meet the needs of the community. We will be clear about how community involvement has shaped the development of the plan.

Contact us

Please get in touch if you have any questions:



Call us:

0800 138 9191

(lines are open 9am–5:30pm)



Email us:

ContactWMEL@nationalgrid.com



Write to us: **FREEPOST WM TO EL**

(no stamp or further address details are required)

Contact us

Please get in touch if you have any questions.

0800 138 9191

(lines are open Monday to Friday, 9am–5:30pm).
Please note, we do not accept feedback over the phone.
Please complete a feedback form or write to us.

ContactWMEL@nationalgrid.com

FREEPOST WM TO EL

(no stamp or further address details are required)



Appendix J.

Supplement 11 - LV

1.33 Supplementary table

The content of the table has been informed by the impacts on TPO trees as a result of the proposed alignment. The information reflects impacts as currently anticipated and does not preclude further refinement. In accordance with 7.2 Code of Construction Practice (Revision C), the Applicant will, at the detailed design stage and within the approved Limits of Deviation, seek to reduce the impacts on trees wherever reasonably practicable, including through micro-siting, refinement of construction methodologies and detailed layout design.

In relation to the request to provide details of the size of the trees within the table, the Applicant has provided three measurements to assist, these include height, stem diameters (measured as per BS5837 guidance) and spread. Where a TPO covers multiple trees, the Applicant has reported on the largest size dimensions within the group.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
South Norfolk									
SN0697	Individual TPO, Oak	T65	12	2200	21	A3 Veteran	East of Flordon Road Section A Sheet 3	Managed	Potential encroached buffer zone from haul road required for construction of haul road.
SN0739	Individual TPO, Oak	T91	13	1560	17	A3 Veteran	North of Stickfer Lane Section A Sheet 5	Managed	Encroached buffer zone from scaffold and stringing position. Required to erect scaffolding and allow stringing of overhead line.
SN0737	Group TPO, Mixed Species	Various T106, T107, T108, T1170,	20	2500	24	A3 Veteran, B2	Within and up to 30 metres beyond the Order limits, Land East of Fen Road, Bunwell, Norfolk Section A, Sheet 8	Managed/Removed	Various 11 kV, permanent access, haul road. Required for haul road construction,

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
		T1171, T1172, T1173, T1174, T1175, T1176, T1177, T1178, T1179, T1180, T1181, T1182, T1183, T1184, T1185, T1186, T1187, T1188, T1189, T1190 G37, G401, G402, G403, VG404, G405, VG406, G407, G409							works to existing infrastructure, construction of overhead line and for permanent access.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
Babergh and Mid Suffolk									
MS66/W1	Woodland TPO consisting of various species but mainly Oak, Ash, Elm, Maple, Thorn and Hazel	N/A	N/A	N/A	N/A	C	Within and up to 30 metres beyond the Order limits, south of Palgrave Farm. Section B Sheets 9 and 10	Managed	11 kV working area Required for works to existing infrastructure. The northern tip of this TPO enters into the working area of the 11 kV which is to be undergrounded further to the north and outside of the TPO.
ES92/W1	Woodland TPO, Several trees consisting of mainly Oak, Ash Hornbeam and Hazel	N/A	N/A	N/A	N/A	C	Beyond the Order Limits, southern boundary of Little Newton Wood. Section B Sheet 13	Managed	Adjacent to UK Power Networks' tower access. Hill House Lane is to be used for access by UK Power Networks.
ES92/W2	Woodland TPO, Several trees consisting of mainly Oak,	W127	16	450	8	B2	Beyond the Order Limits, southern boundary of Great Newton Wood. Section B Sheet 13	Managed	Adjacent to an existing track to be utilised as permanent access.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
	Ash Hornbeam and Hazel								Required for permanent access track for operational maintenance of infrastructure.
MS59/W1	Woodland TPO, Mixed hardwoods consisting mainly of Oak, Ash, Field Maple, Sycamore, Hazel and Hawthorn	Various T416, G145, G146	16	800	12	B2	Within and up to 30 metres beyond the Order Limits, south of Tye Lane. Section B Sheet 19	Managed/Removed	Northern end by T416 is next to a permanent access point off Tye Lane. Woodland strip is dissected in two locations by 11 kV and 33 kV overhead lines. Required for permanent access track for operational maintenance of infrastructure and for works to existing infrastructure.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
Tendring									
23/00006/T PO	Individual TPO Tree, Oak	T646	23	1830	31	A3 Veteran	Northwest of Ardleigh, adjacent to A137. Section C Sheet 12	Managed	The working area for the 11 kV and the proposed 11 kV undergrounding impacts on the buffer zone. Need for UK Power Networks to undertake works to existing infrastructure and proposed undergrounding of 11 kV.
23/00009/T PO	Individual TPO Tree, Oak	T632	10	1450	13	A3 Veteran	Northwest of Ardleigh, adjacent to A137. Section C Sheet 13	Managed	Located outside of Order Limits with buffer zone encroached by stringing position. Required for stringing of overhead lines.
23/00010/T PO	Individual TPO Tree, Oak	T634	9	1510	16	A3 Veteran	Northwest of Ardleigh, adjacent to A137. Section C Sheet 13	Managed	Located outside of Order Limits with buffer zone

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
									encroached by stringing position. Required for stringing of overhead lines.
23/00011/T PO	Individual TPO Tree, Oak	N/A	N/A	N/A	N/A	C	Northwest of Ardleigh, adjacent to A137. Section C Sheet 13	Managed	Located outside of Order Limits with root protection area encroached. Required for stringing of overhead lines.
23/00012/T PO	Individual TPO Tree, Oak	T637	14	1120	20	B2	Northwest of Ardleigh, adjacent to A137. Section C Sheet 13	Managed	Located outside of Order Limits with root protection area encroached. Required for stringing of overhead lines.
23/00013/T PO	Individual TPO Tree, Oak	N/A	N/A	N/A	N/A	C	Northwest of Ardleigh, adjacent to A137. Section C Sheet 13	Managed	Located within Order Limits in stringing position. Required for stringing of overhead lines.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
91/00021/T PO	Group TPO Oak, Ash	Various G249 T724	14	840	17	B2	Within and up to 30 m beyond the Order Limits, Bentley Road, near little Bromley Section C sheet 16	Managed/Removed	TPO covers different locations along Bentley Road with the northern end of the group located within the Order Limits. Required for visibility splays due to bends in the road. The northern end of group and T724 identified for removal.
20/00001/T PO	Multiple individual TPO trees. Oak, Ash, Holly.	Various T638, T639,	16	900	20	B2 Various C grades	Land at Junction of Ipswich Road and Wick Lane, Ardleigh, Essex. Section C Sheet 18	Managed/Removed	C grade trees along Wick Lane are directly below the overhead lines. Required for stringing operations and future line clearance.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
Braintree									
17/2010 - W1	Woodland TPO, Mixed broadleaf species containing Ash, Hornbeam, Hazel, Oak	W298	22	500	12	A3	Within and up to 30 m beyond the Order limits, west of Church Road, Rivenhall. Section E Sheet 4	Managed	The most northern tip of Rivenhall Thicks is located next to 33 kV overhead lines. Required for existing infrastructure.
Chelmsford									
TPO/2024/021	Two Single Tree TPOs. Oak	N/A	N/A	N/A	N/A	C2	Land north and west of 3 Cole Hill Cottages Boreham Road Boreham Chelmsford. Section F Sheet 1	Removed	Two of approximately 13 C grade trees adjacent to Boreham Road and within a visibility splay. Assessed as requiring removal for the visibility splay associated with temporary haul road.
TPO/1990/024	Woodland TPO, Mixed broadleaf	W330	15	650	12	B2	Within and up to 30 m beyond the Order limits, Land South of Chignal St	Managed	Canopy and root protection area extend into Order

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
	species containing Ash, Hornbeam, Hazel, Oak.						James, Chelmsford, Essex. Section F Sheet 6		Limits. Required for Overhead line clearance.
TPO/1998/011	Group TPO, contains 11 Ash, 1 English Oak and 1 English Elm	N/A	N/A	N/A	N/A	C2	Within and up to 30 m beyond the Order Limits, and to the north of The Causeway Highwood Road, Writtle, Chelmsford, Essex. Section F Sheet 8	Managed	TPO contains a number of C grade trees surrounding a land parcel north of The Causeway with one group of roadside trees being adjacent to the Order Limits.
TPO/2000/044	Group TPO, Various species	Various T1002, T1003, T1004	18	1250	22	B2	Within and up to 30 m beyond the Order Limits, Land at Furze Hill, Ivy Barn Lane & Ivy Hill Hotel, Writtle Road Margaretting, Ingatestone, Essex. Section F Sheet 10	Managed	Near to a potential passing place and road widening of Ivy Barns Lane. Facilitation pruning of T1002 and T1004 may be required to maintain visibility splays.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
Basildon									
TPO/14/83	Area TPO, Various Species	Various T1088, T1090, T1091, T1092, T1093, T1094, T1095, T1096, T1097, T1099, T1100, T1101, G376	19	1075	20	B2 and C	Within and up to 30 m beyond the Order Limits, between Sudburys Farm Road and Dunton Road. Section G Sheet 5-6	Managed/Removed	The area covered by this TPO is predominantly arable cultivated land. Impacts are associated with the temporary haul road, drainage locations and proximity to proposed overhead lines. Required removals include: T1088 for bellmouth construction on Sudburys Farm Road, T1091, T1092 and T1094 due to proximity to overhead lines. T1095, T1099 may require facilitation pruning for the haul road.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
TPO/08/83	Multiple Individual tree TPO, Oak	Various T1089, G375	1150	17	20	B2	North of Botney Hill Road. Section G Sheet 5	Managed/Removed	Impacts due to proximity to proposed overhead lines. Required removal of T1089 due to proximity to overhead lines with future potential operational pruning required to maintain line clearance for part of G375
TPO/02/71	Area TPO, Various Species	N/A	N/A	N/A	N/A	C	Within and up to 30 m beyond the Order Limits, Fords Dunton Technical and Research Centre. Section G Sheet 6	Managed/Removed	The Ford Research and Engineering Centre is covered by this Area TPO. Impacts are considered minimal to an area of scrub adjacent to Lower Dunton Road. A permanent access point is proposed off Lower Dunton Road with localised widening required. This area contains scrub.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
TPO/05/08	Individual TPO Tree, Oak	N/A	N/A	N/A	N/A	C	Land North of Dunton Wayletts, Brentwood Road, Duton, Basildon, Essex. Section G Sheet 6	Managed	Located adjacent to an existing track to be used for access for a temporary haul road. One tree south of the junction and adjacent to Dunton Road may require facilitation pruning for visibility splay.
Thurrock									
TPO/04/19 95	Multiple Individual tree TPO, Oak	Various T1155, T1156	13	570	11	B2	Adjacent to Hoford Road Section H Sheet 4	Managed/Removed	Impacts for road widening of Hoford Road and UK Power Networks' works to infrastructure. Removal required for T1155 and T1156 due to road widening and works to existing infrastructure.

TPO reference	Tree, Group or Woodland	Project reference	Size Height (m)	Size Stem Dia (mm)	Size Spread (m)	BS5837 Category	Location as shown on Trees and Hedgerows to be Removed and/or Managed Plans [APP-048 to APP-055]	Managed or Removed based on current alignment	Reason for Potential Impact and Justification
TPO/02/2003 TPO/08/2003 TPO/02/2004	Woodland TPO	N/A	N/A	N/A	N/A	C	Within and up to 30 m beyond the Order Limits, adjacent to Hoford Road. Section H Sheet 4	Managed/Removed	Impacts for road widening of Hoford Road and UK Power Networks' works to infrastructure around Orsett Golf Club. Selective tree removal and facilitation pruning is required for road widening and works to existing infrastructure.
TPO/07/1990	Woodland TPO	G400	18	1010	15	B2	Within and up to 30 m beyond the Order Limits, adjacent to Hoford Road. Section H Sheet 4	Managed	Interface with Lower Thames Crossing. Selective facilitation pruning may be required

**Appendix K.
Supplement 12 - TT
1.15 - AIL Route
Structures Summary
Table (External -
Examination Support)**

AIL Route	Total no. of structures identified along route (bridges, culverts, level crossings)	No. of structures confirmed acceptable based on asset owner response	No. of structures confirmed as requiring structural review / assessment (confirmed with asset owner; excludes structures where confirmation of height clearance required only)	No. of structures awaiting confirmation (see comments)	Current Status (April 2026)	Comments
Crane AIL Route:						
H01-A1	0	0	0	0	Closed	-
H01-A2	2	2	0	0	Closed	-
H02-A1 / H03-A1	3	3	0	0	Closed	-
H03-A2 / H04-A1	3	2	1	0	Ongoing	1no. Level crossing - Track paneling currently being assessed, detailed topographic survey required of OLE to confirm if current arcing assessment is acceptable.
H04-A2 / H05-A1	2	2	0	0	Closed	-
H04B-A2 / H05B-A1	3	3	0	0	Closed	-
H05-A2	7	6	1	0	Ongoing	1no. Assessment required. Archive information reviewed but awaiting further drawings.
H06-A1	5	4	1	0	Ongoing	1no. Assessment required. Archive information reviewed but awaiting further drawings.
H06-A2	3	2	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H07-A1	3	2	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H07-A2 / H08-A1	0	0	0	0	Closed	-
H09-A1	2	1	1	0	Ongoing	1no. Assessment required. Archive information reviewed but awaiting further information.
H10-A1	4	3	1	0	Ongoing	1no. Archive information reviewed. Structural Assessment complete. Approval in Principle (AiP) and associated mitigations TBA with LHA.
H10-A2 / H11-A1	3	3	0	0	Closed	-
H11-A2	2	0	1	1	Ongoing	1no. Structural Assessment underway. 1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H12-A1	4	1	2	1	Ongoing	2no. Structural Assessments underway. 1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H12-A2 / H13-A1	0	0	0	0	Closed	-
H14-A1	2	0	1	1	Ongoing	1no. Structural review required. Structural record information received April 2026. 1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H15-A1	1	0	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H16-A1	0	0	0	0	Closed	-
H17-A2	0	0	0	0	Closed	-
H18-A1	1	0	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H19-A1	1	0	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H19-A2 / H20-A1	2	1	1	0	Ongoing	1no. Structural review required. Awaiting structural records.
H20-A2	2	0	1	1	Ongoing	1no. Structural review required. Awaiting structural records; 1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H21-A1 / H22-A1	1	0	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H23-A1	0	0	0	0	Closed	-
H24-A1	0	0	0	0	Closed	-
H24-A2	0	0	0	0	Closed	-
H25-A1	1	0	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H25-A2 / H25B-A2 / H26-A1 / H27-A1	5	4	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H28-A1	6	4	1	1	Ongoing	2no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H28-A2	8	2	5	1	Ongoing	1no. Structural Assessment underway. 1no. Structural review required. Structural record information received April 2026; 4no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H29-A1	9	2	6	1	Ongoing	1no. Assessment underway. 1no. Structural review required. Structural record information received April 2026; 3no. Assessment required but awaiting structural records; 2no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H29-A2 / H30-A1	8	1	6	1	Ongoing	3no. Structural record information received April 2026. Review of information required; 4no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H30-A2	2	1	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H31-A1	1	0	1	0	Ongoing	1no. Structural assessment ongoing.
H32-A1	2	0	2	0	1 Complete 1 Ongoing	1no. Structural Assessment completed - Superstructure confirmed unsuitable for Crane AIL. Alternative route proposed via Billerica and Mountnessing Road. 1no. Structural review completed - further AiP recommended as a result.
H32-A2	7	1	5	1	1 Complete 5 Ongoing	1no. Assessment completed - superstructure confirmed suitable for Crane AIL, but recommended mitigation dependent on backing level over the abutments. Intrusive investigations required to confirm level of backing over the abutments. Formal AiP to be agreed. 1no. Assessment underway. Awaiting Form BA approval from asset owner; 1no. Structural review completed - assessment recommended as a result; 1no. Structural record information received March 2026. Review of information required; 1no. Structural inspection required. Awaiting structural records; 1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H33-A1	2	0	2	0	Ongoing	1no. Assessment underway. Signed AiP received from asset owner. Assessment report undergoing finalisation; 1no. Additional structure flagged through Local Impact Reports. Awaiting record information.
H33-A2	0	0	0	0	Closed	-
H34-A1	0	0	0	0	Closed	-
H35-A1	0	0	0	0	Closed	-
H36-A1	0	0	0	0	Closed	-
H36-A2	0	0	0	0	Closed	-
H37-A1A	0	0	0	0	Closed	-
H37-A1B	0	0	0	0	Closed	-
H38-A1A	1	0	0	1	Ongoing	1no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H38-A1B	0	0	0	0	Closed	-
Cable Drum / Transformer AIL Route:						
H11-AiL1	15	2	2	11	Ongoing	2no. Structural Assessments underway. AiP and any associated mitigations TBA. 11no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H13-AiL1	14	1	0	13	Ongoing	13no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H13-AiL2	16	1	3	12	Ongoing	1no. Structural Assessment underway. AiP and any associated mitigations TBA. 1no. Awaiting AiP sign-off. 1no. Assessment required. Structural record information received April 2026; 12no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H14-AiL1	24	1	2	21	Ongoing	1no. Structural Assessment underway. AiP and any associated mitigations TBA. 1no. Structural review required. Structural record information received April 2026; 21 no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H14-AiL2	12	0	4	8	Ongoing	1no. Structural Assessment underway. AiP and any associated mitigations TBA. 1no. Awaiting AiP sign-off. 2no. Structural reviews required. Structural record information received April 2026; 8no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H16-AiL1	23	1	1	21	Ongoing	1no. Structural Assessment underway. AiP and any associated mitigations TBA. 21no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.
H16-AiL2	21	1	3	17	Ongoing	1no. Structural Assessment underway. AiP and any associated mitigations TBA. 1no. Awaiting AiP sign-off. 1no. Assessment required. Structural record information received April 2026; 17no. Awaiting confirmation of ownership, records and weight limits, to inform if structural assessment is required.

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