

NORWICH TO TILBURY

EN020027

Answers to Examining Authority Questions Round 1

Suffolk County Council [REDACTED]

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Glossary of Acronyms

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| AC | <i>Alternating Current</i> |
| AIL | <i>Abnormal Indivisible Load</i> |
| AMS-OWSI | <i>Archaeological Mitigation Strategy and Outline Written Scheme of Investigation</i> |
| CNP | <i>Critical National Priority (Infrastructure)</i> |
| DC | <i>Direct Current</i> |
| DCO | <i>Development Consent Order</i> |
| DESNZ | <i>Department of Energy Security and Net Zero</i> |
| DOR | <i>Discharge of Requirement</i> |
| ES | <i>Environmental Statement</i> |
| HGV | <i>Heavy Goods Vehicle</i> |

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| <i>HVDC</i> | <i>High Voltage Direct Current</i> |
| <i>LIR</i> | <i>Local Impact Report</i> |
| <i>NESO</i> | <i>National Energy System Operator</i> |
| <i>NSIP</i> | <i>Nationally Significant Infrastructure Project</i> |
| <i>PEIR</i> | <i>Preliminary Environmental Information Report</i> |
| <i>PPA</i> | <i>Planning Performance Agreement</i> |
| <i>SFRS</i> | <i>Suffolk Fire and Rescue Service</i> |
| <i>SOBR</i> | <i>Strategic Options Backcheck and Review</i> |
| <i>WaLOR</i> | <i>Waveney and Little Ouse Recovery (Project)</i> |

“BDC” refers to Babergh District Council; “MSDC” refers to Mid Suffolk District Council; “BMSDC” refers to BDC and MSDC jointly; “SCC” refers to Suffolk County Council; and “the Councils” refers to BDC, MSDC, and SCC jointly.

Purpose of this Submission

The document has been prepared by Suffolk County Council to answer to the Examining Authority’s First Round of Written Questions (“**ExQ1**”). The response format is based on the template provided by the Planning Inspectorate case team. For ease of reference, questions which are not addressed to Suffolk County Council have been deleted. Where another Local Authority is the lead authority, this has been attributed. Examination Library references are used throughout to assist readers.

Answers to Examining Authority’s First Round of Written Questions (ExQ1)

| ExQ1 | Question to: | Question: | SCC Answer: |
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| 1 GEN General and cross-topic questions | | | |
| GEN 1.1 | <p>The Applicant</p> <p>All interested parties</p> | <p>Responses to submissions by Interested Parties</p> <p>It is essential for the successful delivery of the timetable of the examination that all parties are able to easily interpret the Applicant’s responses to comments made by interested parties (IPs) in their submissions both in writing and orally.</p> <p>The ExA issued a Rule 17 letter on 3 March [PD-012] and responded to the Applicant’s response to that letter on 6 March [PD-013]. The letters set out the ExA’s concerns relating to the lack of detail in the Applicants response to relevant representations (RRs) [REP1-132], and there were similar issues with the Applicants response to submissions to the open floor hearings (OFH) [REP1-140].</p> <p>The ExA accepts that a number of issues are common to a large number of IPs. Nonetheless, those responses which include specific locational detail (for example to a certain natural environment designation, landscape feature, heritage asset, affected business and so on) which is not common to other submissions should be specifically responded and not grouped with the issues which arise from the project as a whole. Submissions by all statutory consultees should also be responded to in appropriate detail. Statutory consultees include parish councils. Responses should not only refer to the relevant section of the Environmental Statement (ES) or</p> | <p>SCC welcomes this approach.</p> <p>SCC would highlight that the Applicant has not responded to post-hearing submissions, other than for the Open Floor Hearings. Whilst, in large part, these submissions from Interested Parties are transcripts of the hearing, they may also contain any information which was to be covered in writing. In particular, SCC raised points in its Issue Specific Hearing 1 post-hearing submission [REP1-177] which the Council believes would benefit from the Applicant’s response.</p> |

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| | | <p>other application document, but should also provide a brief summary so that the Applicants response can be easily interpreted by all parties.</p> <p>The ExA expects this approach to be taken throughout the examination.</p> <p>In doing so, the Applicant and other parties are advised to title issues as they are listed in the initial assessment of principal issues (IAPI) as set out in annex C of the Rule 6 letter [PD-009], and other issues as titled in the categories within these written questions.</p> | |
| GEN 1.2 | <p>The Applicant All parties</p> | <p>Artificial Intelligence</p> <p>The Planning Inspectorate issued updated guidance in relation to the use of artificial intelligence (AI) on 20 March 2026.</p> <p>All parties are asked to review the guidance carefully, and ensure that in any answers to ExQ1 or in other written submissions where AI has been used a short statement is provided. In particular, the ExA requests that you make checks on the submission and take responsibility for the factual accuracy of its content. All parties are directed to the ExA’s procedural decision in annex F(1) of the Rule 6 letter dated 13 January 2026 [PD-009]. The ExA’s position on this was also set out at the preliminary meeting on 10 February 2026 [EV3-001] to [EV3-005].</p> | <p>SCC notes this request and intends to act as indicated. SCC has not used AI in its submissions, nor does it intend to.</p> <p>Suffolk County Council’s AI Policy outlines its framework for the responsible, lawful, and ethical use of generative AI tools. Whilst the Council recognises and encourages the ethical use of AI tools to improve productivity and effectiveness, staff are encouraged to consider the benefits of AI use weighted against the environmental impact and consequences of use of AI when compared to use of non-AI tools.</p> |
| GEN 1.3 | <p>All local authorities in particular: Norfolk CC</p> | <p>National and local planning policy compliance tracker</p> <p>Since the policy compliance document submitted with the application [APP-086] was produced (1 April 2025) a number of local and national planning policies have been</p> | <p>SCC considers that this matter has been covered within the Joint LIR [REP1-178].</p> |

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| | <p>Essex CC Colchester CC Tendring DC Basildon BC Thurrock Council Parish councils: Swainsthorpe Newton Flotman Hintlesham and Chattisham Copdock and Washbrook</p> | <p>updated or newly issued. This includes the energy suite of National Policy Statements (NPS) EN-1, EN-3 and EN-5 (Updated National Policy Statements). The transition provisions set out in section 1.6 of NPS EN-1 (December 2025) apply to the application as it was accepted prior to publication of the revised policy. The updated NPS are capable of being important and relevant considerations in the decision-making process.</p> <p>The Applicant submitted a policy compliance tracker [REP1-133] at deadline 1. It includes an assessment of the updated NPS alongside those which are designated, and a number of new insertions including the consultation draft National Planning Policy Framework (NPPF), local plan policies and neighbourhood plan policies.</p> <p>The listed relevant planning authorities and Parish Councils (PC) who have a newly adopted or emerging local plan and neighbourhood plan are invited to confirm that the policy compliance tracker is an accurate representation of their newly designated and/ or emerging policies and provide any additional comments relating to the Applicant’s regard to those policies.</p> <p>All relevant planning authorities are invited to make comment on the content of the compliance tracker. If you have already dealt with changes to policy in your local impact report (LIR) there is no need to provide a response.</p> | |
| GEN 1.4 | All local authorities | <p>Development plan documents and supplementary planning documents</p> <p>All local authorities are asked to review the listed development plan documents (DPD) and</p> | <p>SCC considers that all relevant planning policies produced and published by Suffolk County Council within the Planning Statement [APP-085] to be sufficiently up-to-date.</p> |

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| | | <p>supplementary planning documents (SPD) (including masterplans) as currently set out in the planning statement [APP-085] (paragraph 2.5.12) and provide any updates, setting out which have been adopted, updated, or are emerging since production of the planning statement.</p> | |
| <p>GEN 1.5</p> | <p>The Applicant Norfolk CC Suffolk CC Ipswich BC Colchester CC Thurrock Council</p> | <p>Local government reorganisation</p> <p>Local elections are to take place in a number of the host local authorities on 7 May 2026, and many will be undergoing local government reorganisation and/ or devolution.</p> <p>The listed local authorities are asked to set out:</p> <ul style="list-style-type: none"> a. any implications for their continuing involvement in the examination and how a consistent approach to their responses can be assured b. any implications for their role as a discharging authority post-consent, and whether any changes to the draft Development Consent Order (DCO) would be necessary <p>The Applicant: explain any changes to its ongoing dialogue with the affected local authorities and how it intends to deal with any changes in the draft DCO.</p> | <p>(a) The examination will have concluded before the planned timetable for local government reorganisation takes effect, so SCC does not envisage that process impacting on the examination, or on SCC’s ability to participate in it or assure a consistency of approach. SCC does not anticipate any implications for continuing involvement in the examination process as a result of the electoral moratorium prior to 7 May 2026. Following the election, SCC officers will engage with elected members to ensure that they are sufficiently trained and briefed on their portfolios, during this same period the Council would expect that a cabinet will be formed. Whether any existing SCC policies relevant to the subject matter of the examination will be continued, reviewed, or revised after the local elections will be a matter for elected members to determine, and is not a matter SCC can address at the present time. As a result of the secured Planning Performance Agreement (“PPA”) and its obligations of performance standards on the Council, SCC anticipates that a consistent</p> |

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| | | | <p>approach to responses will be assured (subject to the potential of any revised policy decisions as above).</p> <p>(b) SCC is still processing the implications of the Government’s 25 March 2026 decision for Local Government Reorganisation in Suffolk. For clarity, the decision set out that there will be three unitary councils for Suffolk. SCC considers that the statutory role of host authority under the Planning Act 2008 will sit with the relevant unitary authority. Further, however, there are discussions ongoing regarding the disaggregation of services. SCC will continue and intensify engagement with the District and Borough Councils to ensure a smooth establishment of the three unitary authorities in April 2028. Whilst there will be challenges such as agreeing and integrating administrative systems and processes for the discharges of requirements, SCC would expect that these challenges to be resolved without delay to the discharge of requirements.</p> <p>Finally, as the DCO refers to the “relevant discharging authority” and other statutory roles and functions (such as the “relevant planning authority”, “highway authority”, “traffic authority”, or “street authority”), SCC would expect these requirements to transfer to the relevant successor organisation(s).</p> |

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| | | | <p>However, SCC can envisage that it is possible that some discharging functions which are currently the responsibility of a single authority (such as SCC as local highway authority) might become a matter for two or more authorities where a highway or street subject to the provisions of the DCO was affected by a new administrative boundary. SCC would therefore ask the Applicant to review whether any amendments are needed to the text of Schedules 3 and 4 of the draft DCO to ensure that the discharging arrangements would still operate effectively if functions were to be split in future between two or more successor bodies.</p> |
| <p>GEN 1.6</p> | <p>All local authorities MOD Natural England Environment Agency Any IPs who wish to make comment</p> | <p>Critical national priority</p> <p>The planning statement [APP-085] references the need for the proposed development in the context of the urgent need for renewable energy generation within the UK, and in doing so, it refers to the presumption specifically in relation to critical national priority (CNP) infrastructure. Paragraph 4.2.7 of NPS EN-1 (2023) makes it clear that the CNP policy does not create an additional or cumulative need case or weighting for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. It will be given consideration by the ExA when making its recommendation to the Secretary of State, who will apply the CNP policy in its decision making specifically in reference to any residual impacts that have been identified.</p> | <p>As an introductory and over-arching point, SCC does not agree with the Applicant’s approach to the CNP policy or with the Applicant’s conclusions that the residual effects on matters of human health, public safety, irreplaceable habitats, and flood risk, after the mitigation proposed by the Applicant, are in all cases not significant adverse effects and/or not unacceptable risks or interference.</p> <p>SCC agrees with the ExA’s introductory comments that the CNP policy applies <i>after</i> the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. The CNP policy is not, therefore, a justification for not providing full</p> |

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| | | <p>NPS EN-1 paragraph 4.1.7 notes that for projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. Paragraphs 7.2.7 to 7.2.28 of the planning statement [APP-085] sets out a summary of the potential residual impacts (non Habitats Regulations Assessment (HRA) impacts) which may remain after the mitigation hierarchy has been applied. These relate to the relevant exceptions listed in the CNP policy at NPS EN-1 paragraph 4.2.15: human health and public safety, defence, irreplaceable habitats, the achievement of Net Zero, and flood risk.</p> <p>Paragraph 4.2.17 of NPS EN-1 sets out that the Secretary of State will also take as a starting point that CNP infrastructure will meet a number of policy tests including in relation to green belt, sites of special scientific interest (SSSI), nationally designated landscapes and heritage assets.</p> <p>IPs are invited to review the Applicant’s consideration of CNP in the planning statement [APP-085] (in particular paragraphs 7.2.52 to 7.2.257) and the policy compliance tracker [REP1-133] (tables 1.4 and 1.5), and state if they agree with its approach, including in respect of the updated NPS published in December 2025 (which the ExA considers to be an important and relevant consideration in decision making)</p> <p>In particular the ExA requests all local authorities and the listed statutory consultees to provide comment on the policy tests on matters of human health and public safety, defence, irreplaceable habitats, flood risk, green belt, sites of special scientific interest, nationally designated landscapes and heritage assets, as well as the HRA.</p> | <p>mitigation to address impacts so far as reasonably practicable or for providing compensatory or offsetting measures for impacts that cannot reasonably be mitigated (or further mitigated). The CNP policy only applies to any residual impacts remaining <i>after</i> that exercise has been conducted. As set out in the Joint Suffolk LIR [REP1-178] SCC has several concerns about the adequacy of the Applicant’s proposed mitigation and/or failure to provide compensatory or offsetting measures. SCC does not therefore accept that the Applicant has, in all cases, followed the mitigation hierarchy as regards the proposals as currently formulated.</p> <p>SCC disagrees with the apparent suggestion in para 7.2.6 of the Planning Statement [APP-085] that <i>“it is unlikely that consent will be refused on the basis of these residual impacts”</i> (affecting matters falling within the exceptions to the CNP policy). In terms of the exceptions, the issue to be determined (but only after the full application of the mitigation hierarchy) is whether any remaining residual impacts are such that they present an unacceptable risk to or unacceptable interference with the receptor in question. What is ‘unacceptable’ is a matter of planning judgment having regard to the specific</p> |

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| | | | <p>circumstances. These matters are considered below.</p> <p>Green Belt</p> <p>SCC has no comment.</p> <p>SSSIs</p> <p>SCC queries the medium judgment for Natural Heritage value when part of an SSSI and a Ramsar site are in the Wooded Valley Meadowlands LCT. Please refer to the Joint Suffolk LIR [REP1-178].</p> <p>Designated landscapes</p> <p>SCC defers to the National Landscape Partnership and the measures necessary for the SoS to discharge the statutory duty to further the purpose of the designation.</p> <p>Heritage assets</p> <p>SCC considers that further information to demonstrate how embedded mitigation informed final design choices, whether alternative alignments or pylon locations were fully explored and how the Applicant will guarantee that LoD will not result in operational impacts beyond those assessed is required.</p> <p>Human health and public safety</p> <p>SCC maintain concerns regarding long term impacts on public health and safety, including</p> |

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| | | | <p>mental health and wellbeing. SCC does not agree that the impacts of the project (and the cumulative impacts with other projects) would have no significant impacts on human health and well-being (as stated in para 7.2.7 of [APP-085]) nor that the residual impacts are not an unacceptable interference with (human) receptors (as stated in para 7.2.29 of [APP-085]). In particular, SCC has outstanding concerns in relation to the impacts on human health from the proposed construction hours and from the effects on the public rights of way network, highway network, and access to healthcare, social infrastructure, nature and open spaces.</p> <p>Please refer to the Joint Suffolk LIR [REP1-178].</p> <p>Defence</p> <p>SCC defers to the Ministry of Defence and other relevant bodies on the matters related to defence.</p> <p>Irreplaceable habitats</p> <p>The AIA should be used to inform the detailed design stage and micro-siting of all works, to further reduce impacts on trees, in particular irreplaceable habitats, such as veteran trees</p> <p>Flood risk</p> |

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| | | | <p>Please refer to the Joint Suffolk LIR [REP1-178].</p> <p>Habitats Regulation Assessment</p> <p>SCC has no comment.</p> |
| <p>GEN 1.16</p> | <p>Colchester City Council South Norfolk DC Suffolk CC Babergh DC Mid Suffolk DC</p> | <p>Local impact reports (LIR) – navigation</p> <p>Colchester City Council [REP1-156] and South Norfolk DC [REP1-176] are asked to provide a contents page for their LIRs, for easier navigation. This should include electronic page numbers against each section of the report and the list of appendices with corresponding page numbers.</p> <p>Suffolk CC/ Babergh DC/ Mid Suffolk DC are asked to insert page numbers against their list of annexes and appendices on pages 5 and 6 of their LIR [REP1-178].</p> | <p>When producing the Suffolk Joint LIR, the Report, Annex A-C, and its Appendices were created as separate documents and submitted to the Examination as such.</p> <p>As a result, navigation of these documents is independent. The Councils made efforts to ensure that these documents were navigable, and that the Report included references to each Annex and Appendix to direct readers to the separate documents of their interest.</p> |
| <p>GEN 1.17</p> | <p>All local authorities</p> | <p>Local impact reports – cumulative developments and the interrelationship report</p> <p>The LIRs from each local authority include details of other developments in their area to varying degrees of detail.</p> <p>Each local authority is asked to review ES chapter 17 (cumulative effects) appendix 17.2 (long list and short list of other developments) [APP-283] and figure 17.2 [APP-286], and confirm if the details provided by the Applicant are accurate. Only those developments rated green in tables A17.2.2 to A17.2.14 (short listed developments) need to be checked.</p> <ul style="list-style-type: none"> All local authorities are asked to provide an update where relevant, which should include | <p>SCC has reviewed Table A17.2.4 of Appendix 17.2 [APP-283] and Sheets 5-12 of Figure 17.2 [APP-286].</p> <p>Concerning SCC1, application reference SCC/0105/22B has since been granted consent (22 July 2025) and implemented (5 August 2025). However, as the development resides on the opposite side of the A12, SCC does not foresee cumulative impacts for matters other than the impact of Heavy Goods Vehicle (“HGV”) movements.</p> <p>No other major developments have been identified.</p> |

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| | | <p>the current status of the application (whether and when consent has been granted and implemented). If any other major developments in your local authority area are not included, please provide details including planning reference, description, location, relevant dates, and current status (or development plan allocation details).</p> <p>Additionally a report on interrelationship with other infrastructure projects was submitted by the Applicant at deadline 1 [REP1-134].</p> <ul style="list-style-type: none"> All local authorities are also asked to review the non-NSIP projects listed in section 3.3 and table 6.1 of the report and confirm if the application reference details are correct and that the Applicant’s summary of interactions between each project is reasonable, together with any other comments you wish to make on the report. | <p>SCC provided comments on the interrelationship report [REP1-134] within Table 6 of SCC’s Comments on Submissions received at Deadline 2 [REP2-040].</p> |
| <p>GEN 1.19</p> | <p>The Applicant Norfolk County Council Suffolk County Council Essex County Council</p> | <p>Statements of Common Ground - 2</p> <p>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.</p> <ul style="list-style-type: none"> 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. | <p>Suffolk Fire and Rescue Service (“SFRS”) operate as a directorate of Suffolk County Council. Whilst the SoCG does not yet cover matters related to the SFRS, the next revision will do so. SFRS have provided the following comments:</p> <p>Any application needs to ensure that suitable and sufficient arrangements are made to Fire and partner agencies for Water supplies, access for appliances and resources required to deal with the incident at any associated fixed installation or processing area.</p> |

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| | | <ul style="list-style-type: none"> • The Applicant is asked to include such matters in the next version of the SoCG. | <p>Provisions should be made to mitigate environmental and ecological impacts as a result of the preventative FRS operational activity in those areas and these arrangements should minimise the impact on resources post incident.</p> |
| <p>GEN 1.21</p> | <p>The Applicant All local authorities</p> | <p>Legal Agreements</p> <p>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.</p> <p>The Applicant is asked to:</p> <ol style="list-style-type: none"> a. Provide a summary document/ tracker of all requests for agreements with local authorities including the type of agreement, what it relates to and how each would meet the relevant tests. b. Justify its intended use of unilateral undertakings in the instances where a bilateral (section 106) agreement would be preferable. c. Consider whether one local authority’s request for a certain agreement would also be appropriate for the same to be applied in any (or all) of the other local authority areas. <p>All local authorities are invited to provide a list of and their understanding of the current status of any agreements which it has requested, together with a timescale for completion of any agreements which require sign off by the local authority.</p> | <p>Suffolk County Council is coordinating with all host authorities in regard to legal agreements requested.</p> <p>The preferred solution would be to secure a multi-party section 106 agreement between the Applicant and all host authorities, and for all to be agreed in concert prior to the close of the examination.</p> <p>In totality, SCC has proposed the following legal agreements (to be included as schedules):</p> <ol style="list-style-type: none"> i. Biodiversity Net Gain ii. Tree Replacement Planting Programme, to support the delivery of the Applicant’s proposed 3:1 replacement ratio for individual trees (as noted in paragraph 2.6.6 of the Applicant’s Comments on Local Impact Reports [REP2-030]) iii. Waveney and Little Ouse Recovery (“WaLOR”) funding (as compensation |

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| | | | <p>for the impacts on receptors in the Waveney Valley)</p> <ul style="list-style-type: none"> iv. National Landscape Duty (as outlined in section 85 of the Levelling-up and Regeneration Act 2023) funding to support the delivery of programme activities as detailed in the Dedham Vale National Landscape and Stour Valley Management Plan 2026-2031, including a feasibility study for the removal of the UK Power Networks 132kV PJ Line v. Abnormal Indivisible Load (“AIL”) funding to support the operational capacity of the relevant police forces for these AIL movements vi. Strategic Landscaping programme for the screening of Bramford Substation <p>Additionally, the Local Highway Authority is engaged with the Applicant to negotiate a Framework Highways Agreement.</p> |
| <h2>2 DES Design, parameters and other details of the proposed development</h2> | | | |
| DES 1.9 | The Applicant All local authorities | <p>Lighting of new and upgraded substations</p> <p>The ExA notes the rural context of the proposed EACN substation and notes that there is limited detail in relation to operational lighting in relation to this and other upgraded</p> | <p>As the EACN is located in Essex, SCC defers to the Essex Councils.</p> <p>As a matter of principle, SCC considers that external lighting schemes for the operational phase of substations, as well as CSE</p> |

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| | | <p>substations in the Design Approach for Site Specific Infrastructure (DASSI) [APP-354].</p> <ul style="list-style-type: none"> • Provide additional detail in terms of the height and type of any lighting installations and light contour plans. • Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity, and potential effects on ecology. <p>If the Applicant considers that an assessment is not required, provide a detailed explanation of your reasoning.</p> <p>Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not?</p> <p>Affected Local Authorities may also like to comment.</p> | <p>compounds, should be submitted to and approved by the relevant local planning authority, as with any Town and Country Planning Act 1990 application.</p> <p>SCC defers to Babergh and Mid Suffolk District Councils in respect of matters related to Bramford Substation.</p> |
| DES 1.15 | Babergh DC Mid Suffolk DC Suffolk CC | <p>Effectiveness of mitigation - Bramford</p> <p>Are the relevant local authorities (Babergh DC, Mid Suffolk DC, Suffolk CC) satisfied that the Applicant’s approach to mitigating the adverse effects of the Bramford Main substation extension in the wider landscape would be effective. If not, what further design opportunities should the Applicant explore in order to achieve the best possible design outcome?</p> <p>In responding to this question, you may also wish to consider other matters that could potentially influence design.</p> <p>Other IPs are also invited to respond to this question, if they wish to contribute to this topic.</p> | <p>SCC has commented in its Relevant Representation [RR-3520] and in its Joint LIR [REP1-178] and has underlined the need for strategic placemaking around the Bramford substation. While the proposed rationalisation (by undergrounding) of parts of the 132kV network is welcome, SCC considers that this does not go far enough.</p> <p>SCC considers that landscape scale restoration is required, which goes beyond reinstatement of vegetation, that is lost to the scheme, to actively seeking to enhance the landscape around Bramford and Burstall, through connecting habitats, reinstating</p> |

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| | | | <p>historic field boundary patterns and providing effective screening and filtering from views from PROW and residential clusters. SCC considers that a Landscape Masterplan is required in this area. This should be informed by the Suffolk Local Nature Recovery Strategy and consider visual mitigation opportunities.</p> <p>The strategic approach should be holistic in nature and include consideration of public safety, amenity, the resilience of the installations (including those of critical national infrastructure) in terms of safety from incident and provision of secondary access in an emergency, biodiversity and heritage.</p> <p>SCC notes the Applicant’s commitment to work collaboratively with Bramford to Twinstead to deliver appropriate mitigation. The Councils look forward to engaging with the applicant and all other relevant stakeholders, including BMSDC, on this matter.</p> |
| <h3>3 ALT Alternatives</h3> | | | |
| ALT 1.1 | All local authorities | <p>Reasonable alternatives: policy and legislation</p> <p>The local authorities are invited to comment on their understanding of ‘reasonable alternatives’ in the context of NPS EN-1 paragraphs 4.3.22 to 4.3.19, and Regulation 14(2)(d) and paragraph 2 of schedule 4 of the Infrastructure</p> | <p>SCC provided overarching comments on the policy approach to alternatives at section 5 of its Post Hearing Submissions following ISH1 [REP1-177]. Those comments are not</p> |

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| | | <p>Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). The local authorities are also requested to comment on paragraph 3.2.32 of ES chapter 3: 'Where options assessed do not meet the definition of 'reasonable alternatives' (such as certain offshore cable options that conflict with NPS policy preferences), these are included to address specific scoping requirements under Regulation 14(3) rather than as reasonable alternatives under Regulation 14(2)(d)'.</p> <p>The local authorities are asked, where they have suggested alternatives, if they would meet the definition of reasonable alternatives in the context of the policy and the EIA Regulations.</p> <p>Other IPs are also invited to comment on their understanding of reasonable alternatives, if they wish to do so.</p> | <p>repeated but are relevant to the response to this Question.</p> <p>SCC considers that the alternatives proposed to be reasonable as there is (as stated in NPS EN-1 paragraph 4.3.23) <i>“a realistic prospect of the alternative delivering the same infrastructure capacity [...] in the same timescale as the proposed development.”</i></p> <p>Paragraph 4.3.24 cannot be sensibly applied to a linear project for a Grid reinforcement because there is no realistic prospect of other projects for 'energy infrastructure of the type proposed' coming forward in addition to the proposal. The siting and alignment of the proposal does need to consider whether other alignments (and siting for pylons and other components such as substation) would have fewer adverse impacts than what is currently proposed.</p> <p>Paragraph 4.3.25 allows for consideration of any alternatives that the decision makers consider to be important and relevant and thus allows the decision maker to take into account the alternatives that Interested Parties have proposed.</p> <p>Paragraph 4.3.29 sets out how it can be the responsibility of a third party to evidence the suitability of an alternative that is tabled once the application is made. That is not the case here as the Applicant was in possession of the</p> |

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| | | | <p>ESO’s March 2024 report at PEIR stage well before formal submission. SCC made specific reference to this report in its pre-application statutory consultation response.</p> <p>SCC also considers that with regard to the specific elements of the project which it considers should be refined or relocated (as set out in Chapter 13 of the Joint Suffolk LIR [REP1-178], the alternatives put forward by SCC in the LIR and also as set out in section 5 of its Post Hearing Submissions following ISH1 [REP1-177] all constitute reasonable alternatives that the Applicant should address.</p> |
| ALT 1.2 | All local authorities | <p>Approach to options appraisal</p> <p>The local authorities are invited to review section 3.3 of ES chapter 3 [APP-127] and appendices 3.1 [APP-128] and 3.2 [APP-129] in respect of the Applicant’s approach to options appraisal, including the hierarchical assessment. They should provide comments where they disagree with any part of the approach (not the individual options considered; the approach only). This could form part of the SoCG.</p> | <p>SCC does not take issue with the methodological structure of the Applicant’s approach to option appraisal as outlined in section 3.3 of Chapter 3 of the ES [APP-127]. SCC’s concern is with the judgments that have been reached when applying that methodology and in particular to the scoping out or discarding of options.</p> <p>Paragraph 4.3.23 of NPS EN-1 (2023) states that the Secretary of State (the decision maker) should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale</p> |

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| | | | <p>as the proposed development (which in this case is 2030-2031).</p> <p>Paragraph 4.3.28 of NPS EN-1 (2023) states alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State’s decision.</p> <p>Paragraph 4.3.28 of NPS EN-1 (2023) also states that alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State’s decision.</p> <p>The application includes an ES chapter specifically on ‘alternatives’ [APP-127]. This chapter does not consider an exhaustive list of every theoretical alternative but focuses on so called “reasonable” alternatives consistent with Paragraph 4.3.22 of NPS EN-1 2023. The chapter clarifies that reasonable alternatives exclude “options with substantially different capacities, delivery timelines, or those that do not meet the Project’s strategic objectives are not considered reasonable alternatives for the purposes of this chapter.”</p> <p>Document [APP-127] (Alternatives) sets out that all options are assessed against criteria</p> |

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| | | | <p>including National Grid's statutory duties under the Electricity Act 1989 (including Section 9(2) duties to develop and maintain an efficient, co-ordinated and economical system of electricity transmission, and Section 38 and Schedule 9, duties to preserve natural beauty and mitigate environmental effects), the industry-standard Holford Rules for overhead line routing and Horlock Rules for substation siting, and the then-current policy framework including the 2011 versions of National Policy Statements EN-1 and EN-5.</p> <p>As part of the initial assessment of the routing, the Applicant reportedly considered other available options including inter alia increasing operating voltage, Alternating Current (“AC”) underground cable for the whole route, Direct Current (“DC”) underground cable and Offshore connections. However, these other options were discounted at an early stage for various reasons, but predominantly due to higher costs (relative to traditional pylons with targeted undergrounding as currently proposed).</p> <p>SCC acknowledges that, in accordance with NPS EN1, any alternative schemes would need to be delivered within a similar timescale to the proposed development. However, this must also be considered against the timescale</p> |

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| | | | <p>of the actual need for network reinforcement. This is an issue addressed in the Hiorns report and further comments were made on the timescale for meeting the need in SCC’s Post Hearing Submissions following ISH1 [REP1-177].</p> <p>SCC also recognises that there are cost options associated with the alternative schemes, but this too needs to be seen in the context of the timing of delivery of the separate generating projects which underpin the case for capacity improvements. This matter is also addressed in SCC’s Post Hearing Submissions following ISH1 [REP1-177].</p> <p>SCC considers that alternative schemes to the proposed lattice pylons scheme, such as off-shore and High Voltage Direct Current (“HVDC”) undergrounding, should be explored in more detail to ascertain whether they would achieve better environmental outcomes overall than the current submitted scheme.</p> <p>SCC reiterate that its preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include overhead lines and pylons. SCC recognises that this option would need to be delivered in a timely manner, and without risk to national net zero, renewable energy</p> |

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| | | | <p>generation and decarbonisation targets and energy security</p> <p>SCC further notes that the approach undertaken regarding Options Appraisal is mainly based on the Applicants guidelines, rather than a specific Government based appraisal method.</p> <p>Preliminary Environmental Impact Report (“PEIR”) or other early environmental appraisal tools were not used to help to inform the acceptability of other alternative options.</p> <p>The reliance on national, as opposed to local designations, means that the proposals do not allow for local distinctiveness, nor consider the cumulative effects of the siting of a number of locally designated features within close proximity to each other.</p> <p>This approach goes against the grain of general planning policy where proposals are considered on a case by case basis according to the best fit for their location.</p> <p>Further commentary will be provided within the SoCG as required.</p> |
| ALT 1.3 | <p>The Applicant</p> <p>All local authorities</p> | <p>Strategic options: Offshore 1</p> <p>Many of the local authorities and a large number of IPs have expressed that they would prefer the offshore option as an alternative to OHL infrastructure between Norwich and Tilbury.</p> | <p>SCC confirms that it has reviewed the Strategic Options Backcheck and Review (“SOBR”) 2024, Appendix B, and the August 2025 update, alongside the applicant’s</p> |

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| | | <p>Could the local authorities please clarify if they have reviewed the strategic options appraisal and the 2025 updates to the Strategic Options Backcheck and Review (SOBR) (including Appendix B: 2024 version, section 14) [APP-355] in relation to ‘Offshore 1’. The ExA is aware of the local authorities’ assessment of cost and timing as set out in the Hiorns Report as appended to the RR from Norfolk CC [RR-2753]. However the ExA seeks the views of local authorities in relation to the constraints (environmental, social and technical) which may affect the delivery of this option as set out in the SOBR (as set out in section 14 and summarised in table 15.2 of the SOBR). An update to this is provided in section 6 of the August 2025 SOBR [APP-355].</p> <p>Other IPs are also invited to provide comment should they wish to do so.</p> <p>In doing so, could the local authorities and any other IPs provide any additional comments they may have in relation to the Applicant’s reasoning for discounting Offshore 1 as a reasonable alternative.</p> <p>The Applicant is asked to provide an update on the constraints noted in section 6 of the SOBR since August 2025 relating to Offshore 1 and connection at Tilbury.</p> | <p>alternatives assessments within ES Chapter 3 and the Design Development Report.</p> <p>These documents identify a series of environmental, technical and socio-economic constraints associated with Offshore Option 1, including the requirement for a long offshore HVDC cable route, associated marine ecological considerations, and challenges relating to landfall and converter station siting at Tilbury amidst wider Freeport and port-related development pressures.</p> <p>While SCC recognises these strategic-level constraints, it also notes that the appraisal of Offshore 1 remains relatively high-level, particularly when compared to the scale and permanence of the impacts that the proposed onshore overhead line would generate within Suffolk as noted in Chapter 13 of the Joint Suffolk LIR [REP1-178].</p> <p>The Council further notes findings from the Hiorns Report indicating significant uncertainty in the generation background and suggesting that the need for reinforcement may be deferrable by up to five years without constraining offshore wind development, which raises questions over whether strategic offshore alternatives (including Offshore 1) have been explored with sufficient depth prior to dismissal.</p> |

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| | | | <p>In light of this, and given the potential for offshore options to reduce or avoid extensive onshore environmental and community impacts, SCC considers that further justification and updated sensitivity testing should be provided before concluding that Offshore 1 is not a reasonable alternative. The Council therefore invites the Examining Authority to seek additional evidence from the applicant and the National Energy System Operator (“NESO”) regarding the need case, offshore feasibility and converter station siting, consistent with the proportionate alternatives requirements of EN-1 and EN-5.</p> |
| <p>ALT 1.7</p> | <p>Norfolk CC Suffolk CC South Norfolk Council Mid Suffolk Council Natural England The Applicant</p> | <p>Waveney Valley alternative</p> <p>Reasonable alternatives considered in ES chapter 3 [APP-127] as part of the 2024 (table 3.16 p.89-90) and 2025 (table 3.17 p.106) preferred draft alignments set out the Applicant’s reasoning for rejection of the use of an underground cable through the Waveney Valley instead of an OHL and pylons. This includes the presence of sensitive peat habitats and paleoenvironmental remains, and hydrological impacts on Wortham Ling SSSI.</p> <ul style="list-style-type: none"> • The local authorities are asked to provide comment, as these issues do 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) | <p>SCC accepts the Applicant's reasoning for the rejection of the Waveney Valley Alternative (undergrounding the powerline through this sensitive valley), as noted in 6.3 ES Chapter 3 - Alternatives [APP-127]. The technical challenges of delivering undergrounding through the Waveney Valley, in particular because of the complex and difficult geology proved incompatible with the use of horizontal directional drilling, this has meant that this option could not, according to the Applicant, be delivered.</p> <p>SCC was, however, disappointed by the subsequent position assumed by the Applicant (in its Comments on Relevant Representations [REP1-132]) that since there are no formal</p> |

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| | | <p>alternative as set out in ES chapter 3. This should include comment on whether potential effects on peaty soils would constitute irreplaceable habitat loss.</p> <ul style="list-style-type: none"> The Applicant is asked to signpost the ExA to any pre-application consultation responses on such matters which led to its rejection of the Waveney Valley alternative. | <p>landscape designations, this landscape does not warrant additional measures for mitigation.</p> <p>SCC has provided detailed comments on this matter in Annex B (Waveney Valley, Rationale for additional Matters) to its Joint LIR [REP1-178]. To summarise the position of the Council, a brief version is included below:</p> <p>The Council considers, given that all parties have recognised and sought to work constructively together to respond to the additional sensitivities of the Waveney valley but have been unable to secure mitigation through either avoidance or embedded mitigation, that other options must be considered.</p> <p>The Council considers that an appropriate package of measures to enhance landscape quality, improve access and amenity, and remove visual detractors, would be appropriate and proportionate given the sensitivity of the receiving landscape and the visual receptors who use it. As such, a package of costed measures is included in an emerging planning obligation with the Applicant. This would provide funding for the Waveney and Little Ouse Recovery (“WaLOR”) Project. This aims to, amongst other things, restore fen and woodland habitats across the Waveney</p> |

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| | | | <p>Valley floor and to restore previous human interventions to the course of the River Waveney by reducing meanders.</p> <p>SCC recognises that the Applicant is in discussion with the Waveney and Little Ouse Recovery (“WaLOR”) project to acquire biodiversity units (as noted in its Comments on Local Impact Reports [REP2-030]).</p> |
| ALT 1.9 | All local authorities | <p>Limits of Deviation (LoD)</p> <p>A number of the local authorities’ LIRs refer to the limits of deviation and the potential for the OHLs and pylons to move closer to sensitive receptors and listed buildings.</p> <p>Paragraph 3.2.28 of ES chapter 3 [APP-127] refers to the limits of deviation, noting that they retain flexibility to allow for necessary adjustment during detailed design and construction phases. It is stated that minor variations in specific pylon positioning or precise alignment within these limits are not treated as separate alternatives, as the assessment considers a worst-case scenario within the established parameters.</p> <p>The local authorities are invited to comment on this paragraph.</p> | <p>SCC acknowledges the Applicant’s need for engineering flexibility. Yet the limits of deviation allow a pylon to be sited anywhere within the red line.</p> <p>SCC is not currently able to accept the Applicant’s contention that in all of its assessments it has assumed a worst-case scenario within the Limits of Deviation (“LoD”), so that no further control is needed in sensitive locations on the siting of the works within the LoD.</p> <p>To illustrate SCC’s concerns, it refers to the example of Roydon Hall, which is a Grade II* listed building in the close vicinity of Pylons RG157, 158, and 159 to the north east of Creting St Peter in Mid Suffolk (as shown on Sheet 11 of Section B of the Works Plans [APP-018]).</p> <p>The Applicant has stated in Table 11.6 of the replacement Chapter 11 of the ES [AS-068] that:</p> |

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| | | | <p><i>“The Study Areas for Historic Environment are set from the Order Limits and therefore the baseline accounts for this LoD. The assessment in this chapter and its appendices has considered the potential effects of locating pylons or conductors anywhere within the LoD, typically up to 50 m either side of the proposed overhead line.”</i></p> <p>The Applicant has stated in Table A11.2.2 of replacement Appendix 11.2 of the ES [AS-070]</p> <p><i>“The construction phase of the Project would alter the wider rural setting of the asset through the introduction of pylons RG156-158, a pulling location associated with pylon RG157, three SuDS basin locations, overhead line mitigation works, and the temporary haul road.</i></p> <p><i>These works would introduce plant noise and movement into the rural setting of the asset. These works are, at their closest, 100 m to the south-east of the asset and would be occasionally visible through and above the tree cover within the asset’s grounds. The magnitude of impact is considered to be medium adverse.”</i></p> <p>The stated minimum distance of 100m would seem to relate to the siting of only the low level works rather than any of the pylons or overhead lines.</p> |

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| | | | <p>SCC finds it difficult to understand how an assessment of a medium adverse impact was reached if it was also assumed that the pylons could be sited “anywhere” within the LoD and so, potentially, as close as about 220m from Roydon Hall. SCC also notes that the vertical LoD for the pylons would allow them to be up to 6m higher than a standard lattice pylon (typically 15m). SCC would welcome clarification from the Applicant as to how the exercise of assuming the pylons in this location could be “anywhere” within the LoD and how that assumption informed the assessed impact of medium adverse on the GII* heritage asset at Roydon Hall. SCC would stress that it has used Roydon Hall and the topic of heritage simply as an example to explain its concerns on the Applicant’s approach to the assessment of effects within the LoD, but the concern applies more generally, including the assessment of landscape and visual impacts, as set out in the Joint Suffolk LIR [REP1-178].</p> <p>The Applicant states that only minor changes would take place, but there is no definition of ‘minor’ and changes and movement closer to a sensitive receptor or listed building would not be perceived by the occupant to be of a ‘minor’ change, irrespective of whether it has been</p> |

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| | | | <p>considered within the Environmental Statement on a worse case basis.</p> <p>It is not clear how many pylons within the route would need to be moved within the red line boundary, but cumulatively, if a high number of pylons were moved, this may not be considered to be a non-material change.</p> <p>A requirement for checking the movement of pylons within the limits of deviation route is needed to ensure that any repositioning of pylons does not cause material harm to affected receptors. This issue is addressed further in the Joint Suffolk LIR (in particular in Chapters 8 and 13 of [REP1-178]).</p> |
| <h2>4 AQ Air quality and emissions</h2> | | | |
| AQ 1.4 | All local authorities | <p>Air Quality - Development Plan documents and adopted standards/ expectations related to air quality that exceed Government targets?</p> <p>ES Chapter 7 at paragraph 7.2.19 lists the names of the key regional and local plan documents relevant to each individual county and local authority area. Each local authority is asked whether their development plan documents contain any standards or expectations related to air quality that exceed government targets? If so the ExA would ask for the relevant authority to confirm what those standards are and what formal consultation/</p> | <p>Documents referred to in ES Chapter 7 [APP-147] at paragraph 7.2.19, relating to Suffolk, are the Babergh and Mid Suffolk Joint Local Plan – Part 1 (Babergh and Mid Suffolk District Councils, 2023) and the Ipswich Local Plan 2018-2036, adopted 2022 (Ipswich Borough Council, 2022).</p> <p>To confirm, neither document sets out specific standards which exceed Government targets.</p> <p>Both plans have an objective ‘To maintain and where possible improve air quality’.</p> |

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| | | <p>adoption processes those air quality standards/ expectations have been subject to.</p> | <p>From a Suffolk County Council Public Health perspective there is no safe level of air pollution.¹ Evidence² shows that both long-term exposure (over years) and short-term exposure (over hours) to low levels of air pollution can impact health with poor air quality linked to a range of conditions from asthma and lung cancer to heart disease and dementia.³</p> <p>SCC (Public Health) would therefore welcome consideration being given to the World Health Organisation’s updated guidance⁴ which recommends pollution levels up to four times lower than the statutory legal limits currently set in the UK, to protect public health.</p> <p>Whilst the Council acknowledges that these guidelines are not statutory in the UK, they do highlight a shift in understanding around the levels at which air pollution can harm</p> |

¹ <https://theconversation.com/air-pollution-science-shows-theres-no-safe-limit-heres-how-laws-must-change-167223>

² Guidance, Health Matters: Air Pollution. Available from: <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

³ Every breath we take: the lifelong impact of air pollution. Royal College of Physicians; 2016. Available from: <https://www.rcplondon.ac.uk/projects/outputs/every-breathwe-take-lifelong-impact-air-pollution>

⁴ <https://www.who.int/publications/i/item/9789240034228>

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| | | | <p>health and the growing body of available evidence⁵ to support this.</p> <p>SCC would also like to draw the Applicant’s attention to The Clean Air Strategy 2019⁶ which sets out Government plans for dealing with sources of air pollution: <i>“An aim is to shift the focus towards prevention, promoting greater action to avoid exceedances, rather than tackling air pollution only when limits are surpassed.”</i></p> <p>With this in mind, SCC (Public Health) would like to see an emphasis, from the Applicant, on bringing air pollution levels down as low as possible for the health and wellbeing of our residents.</p> |
| <h2>5 BIO Biodiversity, ecology and natural environment</h2> | | | |
| <p>BIO 1.49</p> | <p>Suffolk CC Babergh DC Mid Suffolk DC</p> | <p>BNG and mitigation for breeding birds</p> <p>In your joint LIR [REP1-178] Suffolk CC, Babergh DC and Mid Suffolk DC have commented that mitigation for impacts on breeding bird populations should be provided in addition to</p> | <p>Further to our previous comments, SCC have received additional clarification on the wording within the ES chapter, in the Comments on the LIR provided by the Applicant [REP2-030], which has shown that the BNG environmental</p> |

⁵ World Health Organisation Air Quality Guidelines. List of references to evidence the update available from page 201:

<https://iris.who.int/server/api/core/bitstreams/551b515e-2a32-4e1a-a58c-cdaecd395b19/content>

⁶ <https://assets.publishing.service.gov.uk/media/5c3b9debe5274a70c19d905c/clean-air-strategy-2019.pdf>

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| | | <p>BNG habitat creation or enhancement. Further to the Applicant’s response on page AB8 of the Applicant’s Comments on Relevant Representations [REP1-132], set out what, if any, additional mitigation you would wish to see in this regard?</p> | <p>areas would off additional enhancement to breeding and wintering bird populations rather than providing required compensation for habitat loss. It is therefore not considered necessary that additional mitigation be provided beyond that proposed within the current OLEMP.</p> |

6 DCO Draft Development Consent Order

Articles

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| <p>DCO 1.A2</p> | <p>The Applicant Local Authorities Relevant statutory undertaker Other relevant determining body</p> | <p>Articles (general) - 2</p> <p>Throughout the articles contained in the draft DCO [APP-056] the Applicant has specified time periods within which a response is required from a determining body. That time period tends to be 28 days. A number of the local authorities have raised concerns in regard to the time period specified, but there does not appear to be a consensus as to an appropriate alternative time period. The ExA is also concerned as to such a short period being imposed, especially where a deemed consent is triggered where a determining body has failed to respond in the period specified.</p> <p>Applicant: Explain how you have reached the time period chosen (generally 28 days), including an explanation of your understanding of any processes the relevant determining bodies have to/ or are required go through. For example, your understanding of: any application</p> | <p>For an understanding of SCC’s process for the discharge of requirements (“DOR”) in detail, please find SCC’s process guidance for DOR in APPENDIX 1.</p> <p>In brief, upon receipt of the discharge documents and formal application for the DOR, SCC will consider the consultees required, the timeframe, and any deeming clause (2 days). Following this, SCC will provide statutory consultee with 21 days (as standard) for consultees to respond, providing additional time where required (including for bank holidays). SCC will consult the relevant service areas within the Council (timeframe as above) to ensure full consideration of the Requirement and request feedback on whether any amendments are required for determination. SCC will also consult the</p> |
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| | | <p>validation period; any minimum consultation periods required with statutory or other bodies; any report writing periods; any committee or delegated cycles; and any decision issuing periods that may apply.</p> <p>All local authorities, relevant statutory undertaker and or other relevant determining body: provide a summary of any processes you are required to go through, including any time period in the number of days required to undertake that process. For example, any application validation process; any minimum consultation periods required with statutory or other bodies; any report writing periods; any committee or delegated cycles relevant; and any decision issuing periods that may apply.</p> | <p>relevant District or Borough Council, regardless of whether this is specified in the Requirement. Following the receipt of feedback, and resolution if any changes are required (up to 20 days), SCC will write an Officer Delegated Summary (3 days) detailing the determination and the rationale. This document is then sent through a review and approval process (3 days).</p> <p>The DOR may specify a short time period in which “further information” may be requested. In the experience of the Council, in each subsequent DCO this time period shortens and has become a threat to the timely determination of DOR applications. In the National Grid (Bramford to Twinstead Reinforcement) Order 2024, this period is 7 working days following receipt of the application. This effectively elongates the initial consideration of the relevant Requirement, as the relevant discharging authority must consider whether any further information is required as a matter of priority and hence results in a substantive delay for the consultation period (as such SCC includes additional time, if such a clause is included in the DCO).</p> <p>In the experience of the Council, the DOR process typically requires between 29 and 54 days.</p> |

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| | | | <p>As such, SCC cannot sufficiently consider any DOR application within 28 days. The Bramford to Twinstead Reinforcement Order specifies a period of 35 days, which has been tested. In practice, the period of 35 days has been counterproductive to prompt delivery with insufficient time for objections to be resolved resulting in extensions (agreed for 85-90% of DOR applications) or rejections (5 occurrences).</p> <p>Therefore, SCC considers that a decision period of 56 days to be more conducive than 28 or 35 days to the delivery of critical energy infrastructure.</p> <p>Further detail on this matter can be found in SCC’s Deadline 2 submission in Table 5, item 5.43 [REP2-040].</p> |
| <p>DCO 1.A7</p> | <p>The Applicant All local authorities APs and IPs</p> | <p>Article 2 (Interpretation) (order land) The definition of ‘Order land’ is not sufficiently clear to ensure that land not required/ intended to be subject to CA or TP is appropriately excluded from articles pursuant to CA (articles 24 and 25) and TP (articles 27, 28 and 29). The consequence of the definition being unclear could result in allowing for the acquisition or temporary use of such land unintentionally.</p> <p>Should ‘Class 8’ (Uncoloured (White) Land), as set out in the SoR [APP-059] at Table 5.1 (Powers related to land acquisition and use being sought by the Project) be</p> | <p>The definition of “Order land” in the draft DCO [REP2-005] is “the land shown on the land plans and described in the book of reference.” [Emphasis added].</p> <p>The land plans [AS-005] to [AS-012] define the uncoloured (white) land as “Class 8 – land not subject to powers of acquisition nor temporary use” and, in Sheet 1 of 13 of [AS-005] that land is shown <u>outside</u> the Order limits (i.e. outside the redline). Owing to this, SCC does not consider the uncoloured (white) land on that</p> |

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| | | <p>specifically defined and excluded in these articles or through the definition of ‘Order land’?</p> | <p>Sheet could be unintentionally acquired or temporarily used.</p> <p>Similarly, in the Book of Reference [AS-019], the uncoloured (white) land is described as “Class 8 – Land that is not subject to powers of acquisition nor temporary use”. In respect of Sheet 1, since the land is not to be subject to those powers, SCC does not consider they could be used unintentionally.</p> <p>SCC would stress it has only considered this question in the context of Sheet 1 of 13 of [AS-005] and reserves its right to consider this question again in the light of the Applicant’s reply to it.</p> <p>If the ExA remains concerned by the prospect of the inadvertent acquisition or use of the uncoloured (white) land, it could propose that the definition of “Order land” is recast as “the land shown on the land plan which is within the limits of land to be acquired or used temporarily and described in the book of reference”</p> <p>Similar wording was used in article 2(1) of the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 (SI 2024/393), though that</p> |

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| | | | definition did not include the words “or used temporarily.” |
| DCO 1.A10 | The Applicant All local authorities | <p>Article 2 (Interpretation) (Relevant Planning Authority) Norfolk CC in its RR [RR-2753] and its LIR [REP1-173], as well as a number of other local authorities have raised concern over the definition of 'Relevant Planning Authority'. As the proposed development is a long linear scheme there will be multiple authorities involved. A number of requirements proposed use the phrase 'No stage of the authorised development may be commenced until... has been submitted to and approved by the relevant planning authority'. The ExA seeks greater clarity from both the Applicant and all local authorities on the following:</p> <ul style="list-style-type: none"> a. What constitutes a 'stage' of the authorised development. The ExA in asking this question notes the 'Works' are defined in schedule 1 and the proposed development has been divided into Sections A to H, covering a geographical split. It also notes image 4.1 of [APP-130] provides an indicative construction programme for the various sub-elements and there are different stages of the proposed development (the definition of have construction, operation and (potentially) decommissioning). Would these adequately cover the definition of a 'stage'? b. Which local authorities would be the relevant planning authorities for a particular stage, bearing in mind the length and size of the proposed development at that stage? For example what | <p>(a) SCC considers the Applicant is best placed to explain what constitutes a “stage” of the authorised development and looks forward to the Applicant’s response. SCC notes neither the draft DCO [REP2-005] nor the Explanatory Memorandum [REP2-007] provide an explanation.</p> <p>SCC notes paragraph 1(1) of Schedule 3 (requirements) to the draft DCO [REP2-005] defines “<u>stage</u>”, for the purposes of that schedule as (unless the context requires otherwise) “a defined stage of the authorised development, the extent of which is shown in a scheme submitted to the relevant planning authority pursuant to requirement 3”.</p> <p>By requirement 3(2), the authorised development may not commence “until a written scheme setting out all <u>stages</u> of the authorised development has been submitted to the relevant planning authority”.</p> <p>There is no timeframe for providing this scheme and so, as drafted, the relevant planning authority could be provided with it</p> |

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| | | <p>happens if more than one authority (such as a County Council and a Local Authority) is involved in discharging a requirement/ plan/ scheme for a particular stage and they disagree that the submission is adequate to allow for the development to commence?</p> <p>c. Consider a requirement for a ‘stages plan’ to be submitted in writing prior to commencement, for the written approval of the relevant determining body (similar to the provisions set out on the Brechfa Forest Connection Project DCO, the Brechfa Forest West Wind Farm DCO and the Richborough connection Project DCO), to approve the staging plan prior to commencement of works.</p> <p>The ExA invites suggestions as to any alternative wording and/ or solutions that would address the ExA’s concerns in regard to the above-mentioned matters.</p> | <p>very shortly before commencement, even the day before. The written scheme is merely submitted to the relevant planning authority; the relevant planning authority has no role in determining whether it is satisfactory. Moreover, as drafted, no notice would be served on SCC.</p> <p>SCC would therefore invite the Applicant to revisit the drafting of requirement 3(2) to ensure a reasonable timeframe for the submission of the written scheme is included in the requirement and to make it clear that SCC will receive a copy of the scheme at the same time as the relevant planning authority.</p> <p>This is addressed further in the reply to part (c) of this question.</p> <p>(b) Again, SCC considers the Applicant is best placed to explain which local authority would be the relevant planning authority for a particular stage.</p> <p>It seems to SCC that, if more than one authority is involved in discharging a requirement for a particular stage and they disagree that the submission is adequate to allow for the development to commence, the refusal would have to prevail and the Applicant</p> |

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| | | | <p>would either have to resubmit the application to discharge in a form that was satisfactory to both authorities or it would have to be appeal the refusal under paragraph 4 (appeals) of Schedule 4 (discharge of requirements) of the draft DCO [REP2-005].</p> <p>(c) Requirement 4(1) (stages of authorised development) of the Brechfa Forest Wind Farm Connection Order 2016 (SI 2016/987) states – “No authorised development may commence until a written scheme setting out all the stages of the authorised development has been submitted to and approved by the relevant planning authority, after consultation with the relevant highway authority”.</p> <p>Requirement 4(1) of the National Grid (Richborough Connection Project) Development Consent Order 2017 is identical.</p> <p>SCC considers a provision the same of Requirements 4(1) of Brechfa and Richborough would be acceptable here because it allows the relevant planning authority to approve the scheme.</p> <p>An alternative approach was followed in the Gatwick Airport (Northern Runway Project)</p> |

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| | | | <p>Development Consent Order 2025 (SI 2025/1054) which includes the following requirement, where a “stage” is referred to as a “phase” –</p> <p>“The authorised development must not commence unless, <u>no less than four months</u> prior to the anticipated date of commencement, a phasing scheme setting out the anticipated phases for construction of the authorised development has been submitted to the <u>host authorities</u> and National Highways”. (Requirement 2(1) (phasing scheme) of Schedule 2 (requirements). [Emphasis added].</p> <p>In Gatwick, there is not an approval mechanism; however, there is a reasonable time frame (no less than 4 months) between date of submission of the phasing scheme and commencement.</p> <p>Absent an approval provision, SCC considers no less than four months’ notice would be reasonable because it would allow the affected local authorities to ensure their resources are arranged appropriately in advance of having to discharge any requirement. The reasonableness of the time</p> |

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| | | | <p>period is reinforced by the scale of the indicative construction programme included in image 4.1 of [APP-130].</p> <p>Based on the Gatwick DCO precedent, SCC considers requirement 3(2) could be amended as follows –</p> <p>“(2) The authorised development may not commence <u>unless, no more than four months prior to the anticipated date of commencement, until</u> a written scheme setting out all stages of the authorised development has been submitted to the <u>host authorities relevant planning authority</u>”.</p> <p>If “host authorities” is only used in this sub-paragraph, it should be defined in requirement 3 as follows –</p> <p>“(6) In this requirement “host authorities” means</p> <p>Mid Suffolk District Council, Babergh District Council, Suffolk County Council, Braintree District Council, Chelmsford City Council, Brentwood Borough Council, Basildon Borough Council, Thurrock Council, Essex County Council, South Norfolk Council and Norfolk County Council.”</p> |

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| DCO 1.A16 | The Applicant Relevant local authorities | <p>Article 5 (Limits of deviation) - 2</p> <p>Provide an update with regards to the potential for pylons TB140 to TB142 (inclusive) and TB238 to TB243 (inclusive) and whether an 18 metre vertical limit of deviation will be required, should a change from low height pylons to standard height pylons be required.</p> <p>The explanatory memorandum (EM) [APP-057] suggests the change will be known following consultation feedback and engagement with statutory stakeholders. Please provide an indication of when that consultation and engagement concludes and when a decision on these pylons being low height or standard height pylons will be finalised.</p> <p>In addition, the following wording has been used multiple times in this article “... to such extent the undertaker considers necessary or convenient”, with two of those instances also including the word ‘downwards’. In terms of precision and enforceability, the ExA raises concerns with the Applicant in regard to the wording used and ask it be reviewed and amended, as may be necessary.</p> <p>In regard to the above concerns, the local authorities are invited to submit their views on this matter and request they submit alternative wording for consideration, should they wish.</p> | <p>SCC notes that the listed pylons are not located in Suffolk.</p> <p>Regarding the words “... to such extent the undertaker considers necessary or convenient”, SCC assumes, if challenged, the Applicant would have to demonstrate why a particular extent was necessary or convenient. Convenient, of course, provides the Applicant with great flexibility and SCC will reserve its position on this point until it sees the Applicant’s amended drafting.</p> <p>On a point of detail, the words “... to such extent the undertaker considers necessary or convenient”, include the word “downwards” on three occasions: article 5(1)(b)(ii), 5(1)(d)(ii) and 5(3)(b).</p> |
| DCO 1.A19 | All local authorities statutory undertakers | <p>Article 11 (Street Works); Article 12 (Application of the Permit Schemes); Article 13 (Application of the 1991 Act)</p> <p>The ExA notes the explanation provided by the Applicant in its EM [APP-057] with regard to these articles but seeks whether the relevant Street/ Highway</p> | <p>The Joint Suffolk LIR [REP1-178] refers to article 11 in paragraphs 12.138 and 14.17 to 14.26, article 12 in paragraph 14.27 and article 13 in paragraph 14.28.</p> |

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| | | <p>Authorities and/ or any statutory undertakers have any further comments, as relevant to these articles beyond the submissions in their RRs, WRs, LIRs and Deadline 1 submissions. In responding to this question, a relevant street/ highways authority or statutory undertaker should list any relevant examination library reference and paragraph numbering of their former submissions that responded to these articles.</p> | <p>SCC considers its concerns with the street works provisions of the draft DCO [REP2-005] can largely be addressed if a satisfactory highways agreement is entered into.</p> |
| <p>DCO 1.A35</p> | <p>The Applicant All local authorities</p> | <p>Article 48 (Defence to proceedings in respect of statutory nuisance)</p> <p>The DASSI [APP-354] is noted, however, the ExA is concerned with regard to this article in the absence of any finalised design of the proposed substations, especially in the light of ES chapter 14 (noise and vibration). The ExA seeks certainty that the resultant noise impacts arising from the substations will be adequately mitigated within the design of those substations.</p> <p>Explain how that certainty can be provided in the absence of any finalised design of the substations.</p> <p>All local authorities are also invited to provide their views in relation to article 48.</p> | <p><u>Article 48(1)(a)(ii)</u> applies to the construction and maintenance of the authorised development, and it is not clear to SCC that <u>maintenance</u> would be covered by “relevant code of <u>construction</u> practice or the relevant <u>construction</u> traffic management plan approved under Schedule 3.” In the light of this, SCC considers the reference to “maintenance” should be deleted from the provision, which should be amended as follows –</p> <p>“relates to premises used by the undertaker for the purposes of or in connection with the construction or maintenance of the authorised development and that the nuisance is attributable to the carrying out of the authorised development in accordance with the controls and measures relating to noise as described in the relevant code of construction</p> |

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| | | | <p>practice or the relevant construction traffic management plan approved under Schedule 3 (Requirements) in accordance with the noise levels set out in an environmental permit relating to the operation of the authorised development; or”</p> <p>This amendment would make the provision consistent with the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) (i.e. article 45(1)(a)(ii)).</p> <p><u>Article 48(1)(b)(i)</u> concerns a nuisance which is attributable to the use of the authorised development which is being used in accordance with the relevant code of construction practice approved under Schedule 3. It is not clear to SCC that use of the authorised development could be controlled by the relevant code of construction practice and so SCC considers this provision should be deleted.</p> <p><u>Article 48(2)</u> should be amended as follows –</p> <p>“For the purposes of paragraph (1) above, <u>in relation to the construction of the authorised development only</u>, compliance with the controls and measures relating to</p> |

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| | | | <p>noise described in the code of construction practice will be sufficient, but not necessary, to show that an alleged nuisance could not reasonably be avoided”.</p> <p>The purpose of this amendment is to make explicit the fact the code of construction practice is related to the construction of the authorised development.</p> <p>This amendment would make the provision consistent with the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) (i.e. article 45(2)).</p> |
| <p>DCO 1.A42</p> | <p>All local authorities, high way authorities and statutory undertakers</p> | <p>Article 58 (Application, disapplication and modification of legislative provisions)</p> <p>The ExA would ask for comments in regard to the disapplication and modification of certain public general legislation (See provisions set out in article 58(1) and the public general legislation listed at schedule 17 of the draft DCO), especially in regard to the Highways Act 1980 and the Land Drainage Act 1991.</p> | <p>In the first instance, SCC considers the Applicant should justify each instance of application, modification or exclusion of the statutory powers referred to in article 58 of, and Schedule 17 to, the draft DCO [REP2-005] and notes the relevant paragraphs of the Explanatory Memorandum [REP2-007] (see paragraphs 3.62 and 4.18) do not do this. (Instead, paragraph 3.62 states that similar provisions are included in the model provisions and other (named) orders).</p> <p>In the first instance, SCC considers the Applicant should justify each instance of</p> |

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| | | | <p>application, modification or exclusion of the statutory powers referred to in article 58 of, and Schedule 17 to, the draft DCO [REP2-005] and notes the relevant paragraphs of the Explanatory Memorandum [REP2-007] (see paragraphs 3.62 and 4.18) do not do this. (Instead, paragraph 3.62 states that similar provisions are included in the model provisions and other (named) orders)).</p> <p>Notwithstanding the above, regarding the Land Drainage Act 1991, SCC confirms that, at this time, the disapplication of these provisions is not agreed.</p> <p>Regarding the Highways Act 1980 –</p> <p>1.1 Section 141: SCC does not agree with the disapplication of this provision because section 141 is an important tool in aiding road safety by preventing trees being planted in such a way that would (i) interfere with visibility / sight lines (ii) obstruct the highway corridor and (iii) interfere with highways assets. In the event of unlawful planting, section 141 provides a straightforward enforcement regime, requiring removal of the unlawfully planted trees within 21 days.</p> |

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| | | | <p>1.2 Section 169: SCC does not agree with the disapplication of this provision because it sets out a clear licensing and safety control regime for scaffolding. In particular, SCC values the ability to impose conditions on any licence which ensures scaffolding is erected safely.</p> <p>1.3 Section 171: SCC does not agree with the disapplication of this provision because it provides a straightforward regime for controlling the temporary deposit of materials, rubbish, etc. or other things in the street.</p> <p>SCC would be concerned if any of these provisions were disapplied because doing so would risk compromising the safe operation of highways in SCC’s area.</p> <p>Parliament would not have introduced these provisions if it did not consider they were necessary and SCC objects to their disapplication which is unjustified and largely unprecedented in DCOs. For example, paragraph 3.62 of the Explanatory Memorandum [REP2-007] (which concerns article 58 (application, disapplication and modification of legislative provisions)) refers to three precedents: National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI</p> |

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| | | | <p>2024/958), A303 (Amesbury to Berwick Down) Development Consent Order 2023 (SI 2023/834), and Southampton to London Pipeline Development Consent Order 2020 (SI 2020/1099). None of these seeks to disapply any provision of the Highways Act 1980.</p> |
| Schedules | | | |
| <p>DCO 1.S5</p> | <p>The Applicant All local authorities</p> | <p>Schedule 3 – Requirement 1 (Interpretation) – Terms “discharging authority” and “start-up and close down activities”</p> <p>a. “discharging authority”: There are multiple examples throughout the draft DCO where terms such as ‘discharging authority’; ‘relevant planning authority’ and ‘relevant highways authority’ appear to be used interchangeably. This could lead to confusion and would ask the Applicant and relevant local authorities for their views on this matter, including any suggestions, alternative wording or definitions within the interpretations section, that would prevent any such confusion.</p> <p>b. “start-up and close down activities”: Reference is made to the safety checking of plant and machinery, under (g), whilst reference to ‘safety</p> | <p>(a) “discharging authority”: in paragraph 14.43 of its LIR [REP1-178], SCC summarised its concern with this term as follows -</p> <p>“Schedule 3 (requirements) (paragraph 1 (interpretation)) – paragraph 1(1) defines “discharging authority” as “the body responsible for giving any consent, agreement or approval required by a requirement included in this Order ...”. The definition is circular and unhelpful. Requirement 4 (construction management plans) provides for the involvement of the “other discharging authority” in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions and one of the six tests for conditions is precision. SCC consider the inclusion of</p> |

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| | | <p>checks’ is listed in (c). Are they not the same thing? Clarify and amend as necessary.</p> | <p>“discharging authority” in requirement 4 creates imprecision and requests that the Applicant recasts requirement 4 so that the body they want to be involved in requirement 4 is named. A similar drafting approach has been followed in the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (SI 2024/958) and that drafting has already caused confusion post-consent. SCC is keen to avoid any confusion in respect of this Order”.</p> <p>SCC considers the best way forward would be for the Applicant and host authorities to meet to discuss how the Applicant wants to make the term “discharging authority” work. That might be more fruitful than the parties responding to each other’s submissions on this point.</p> <p>(b) SCC will await the Applicant’s response to part (b) of this question and may respond to that; however, it seems to SCC that the reference to “safety checks” in (c) is in the context of the site and, in (g), in relation to plant and machinery.</p> |
| DCO 1.S7 | The Applicant | Schedule 3 – Requirement 3 (stages of the authorised development) | In paragraph 14.46 of its LIR [REP1-178] , SCC explained that requirement 3(1) (and the 7-day |

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| | <p>All local authorities</p> | <p>requirement 3(1) specifies “...written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out...” The ExA would ask all local authorities, as well as any relevant discharging authorities whether seven days is an adequate period for such written notice and whether such written notice should be approved in writing by the relevant planning authority/ discharging authority?</p> <p>In addition to the above, should requirement 3(5) refer to subparagraph (2) and/ or (3)?</p> | <p>limit) is included in the equivalent requirement of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) and that SCC’s experience of dealing with pre-commencement operations under that Order has shown the time period to be too short. One of the reasons 7 days is too short is because, by requirement 4(3) of the Bramford Order, “all pre-commencement operations must be carried out in accordance with the outline construction environmental management plan, the outline materials and waste management plan, the outline construction traffic management plan, the outline landscape and ecological management plan and the outline public right of way management plan ...”. Seven days is not enough time for the relevant planning authority (or the relevant highway authority) to check whether the Applicant has done everything it must do under the relevant control document (let alone consult with another body). SCC considers a longer period is required and requests that the 7-day period be increased to 35 days.</p> <p>Regarding the cross-reference in requirement 3(5), SCC considers the current drafting (which</p> |

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| | | | cross-refers to sub-paragraph (2) or (3)) is correct. |
| DCO 1.S8 | The Applicant All local authorities | <p>Schedule 3 – Requirement 5 (archaeology)</p> <p>Braintree DC in its LIR [REP1-148] (section 10.9) has recommended changes to requirement 5, whilst Chelmsford City Council, Colchester City Council, and Essex CC in their LIR (LIRs [REP1-153]; LIR [REP1-156] and [REP1-161] respectively) all recommended amendments to the wording of requirement 5 and the inclusion of a new sub-paragraph.</p> <p>Additionally, Norfolk CC in its LIR [REP1-173] recommends amending the wording of requirement 5(1) and (4) and article 23 (Removal of human remains) so notification is required to be made to the relevant County/ Local Authority. In their joint LIR [REP1-178] Suffolk CC, Mid Suffolk DC and Babergh DC have recommended amendments to article 23 and to requirement 5 of the draft DCO.</p> <p>Historic England in its WR [REP1-191] has proposed an amendment to requirement 5 of the draft DCO and H04 of the outline CoCP to refer to consultation with Historic England.</p> <p>All local authorities, as well as the Applicant, are invited to comment on all of these proposed changes (amendment to article 23 and schedule 3, requirement 5 of the draft DCO and to H04 of the outline CoCP).</p> <p>In addition, the Applicant is requested to provide, for discussion purposes, a new draft of requirement 5 that, as far as possible, takes into account all of these requested</p> | <p>SCCAS requests that a joint meeting (consisting of all Local Authority Archaeological Advisors, Historic England and the Applicant) be arranged to agree the amendments to the DCO requirement wording.</p> <p>Article 23 (removal of human remains)</p> <p>SCCAS recommends that article 23 is amended as follows –</p> <p>“(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.</p> <p>(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.</p> <p>(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</p> |

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| | | <p>changes and also is requested to provide a commentary on whether any of these proposed amendments sought by the various organisations would be incompatible with each other.</p> | <p>investigation approved in accordance with requirement 5 (archaeology), and best practice documents”.</p> <p><u>Requirement 5 (archaeology)</u></p> <p>Suffolk County Council Archaeological Service (“SCCAS”) have grave concerns regarding the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] (“OAMS-OWSI”) and the way the OAMS-OWSI works with requirement 5. In this answer, we set out SCCAS’ concerns with the OAMS-OWSI (and the way it works with requirement 5) and provide revised drafting for requirement 5.</p> <p><u>Background to SCC’s concerns with OAMS-OWSI</u></p> <p>In November 2025, SCCAS provided extensive comments, including detailed suggested rewording of the OAMS-OWSI, to bring it up to an acceptable standard. These comments were then included in Annex A to SCC’s Joint LIR [REP1-178]. As of Deadline 3, we have had no revised OAMS-OWSI supplied for review and have been informed by the applicant that it will not be available until the end of April 2026, which is after the issue specific hearings.</p> |

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| | | | <p>In the light of this, SCC are unable to further comment on the OAMS-OWSI and stand by the comments and advice given in Annex A to the Joint LIR [REP1-178]. It is essential that the OAMS-OWSI is revised and brought into line, to closely reflect SCCAS’ comments, in order to provide a clear process to deliver the necessary programme of archaeological works without causing unnecessary delay to the delivery of this critical infrastructure.</p> <p>It is also important that requirement 5 is robust and enforceable and includes a “tick box” approach to delivery of the archaeological project, which must include a programme of archaeological evaluation, mitigation, post-excavation assessment reporting, updated project design, publication, archive deposition and public dissemination of results.</p> <p>SCCAS is concerned that the drafting of requirement 5 is substantively similar to requirement 6 (archaeology) of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) where neither the Outline Written Scheme of Investigation (OWSI) nor the Archaeological Framework Strategy (AFS) was approved by Historic England or the Local Planning Authority Archaeological</p> |

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| | | | <p>Advisors. Notwithstanding the fact the OWSI and AFS contradict one another, the OWSI fell well short of providing adequate protections for the historic environment or a coherent approach to further archaeological evaluation and archaeological mitigation. This approach has led to programme delays because of having to accommodate the necessary archaeological works, which were not clearly defined in the OWSI but were required by the DCO requirements.</p> <p>The mitigation strategy in the OWSI did not follow the well-tested approach of archaeological evaluation to inform and target a programme of archaeological mitigation. Had this approach been adopted in the OWSI it would have provided significant benefits to the construction programme as it has been proven over the past 40+ years to successfully deliver the necessary archaeological mitigation whilst facilitating timely release of land back to projects to allow development to commence where archaeological trial trenching shows low value to no archaeology present. This evaluation-led approach along with robust “tick box” requirement wording has been adopted successfully on other DCO projects, including</p> |

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| | | | <p>the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853). SCCAS are keen to see such an approach followed here.</p> <p>In the light of SCCAS’ negative experience with the Bramford control documents, it is essential those deposited with this application pass muster.</p> <p>Proposed drafting of requirement 5</p> <p>SCC officers have considered the amended requirement 5 and the drafting proposed by the other local authorities and Historic England. Subject to some minor amendments, SCC considers the drafting proposed by the Essex local authorities is satisfactory. The text below is taken from the latest version of the draft DCO [REP2-005] and includes amendments consistent with those sought by the Essex authorities. An explanation for the amendments is set out below.</p> <p>(1) No stage of the authorised development may commence until either a preservation in situ management plan, or and a detailed written schemes of investigation of areas of archaeological interest relevant to that stage (if any), as identified within the outline archaeological mitigation strategy and outline written scheme of investigation or identified</p> |

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| | | | <p>through evaluation work as set out in the outline archaeological mitigation strategy and outline written scheme of investigation, has been submitted to and approved by the discharging authority.</p> <p>(2) Any detailed archaeological works must be carried out in accordance with the any approved detailed written scheme of investigation for that stage.</p> <p>(3) Each detailed written scheme of investigation must be substantially in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation and must identify areas where archaeological works are required and the measures to be taken to protect, record or preserve any significant archaeological remains that may be found and must include—</p> <ul style="list-style-type: none"> (a) an assessment of significance and research questions; (b) the programme and methodology of site investigation and reporting; (c) the programme for post-investigation assessment; |

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| | | | <p>(d) proposals for providing for the analysis of site investigation and recording;</p> <p>(e) proposals for providing archive deposition of the analysis and records of the site investigation;</p> <p>(f) nomination of a competent person or persons/organisation to undertake the works set out within the detailed written scheme of investigation; and</p> <p>(g) an implementation timetable.</p> <p>(4) All pre-commencement operations must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, unless otherwise agreed with the relevant discharging authority in consultation with Historic England.</p> <p><u>(4) Intrusive preparation works must not take place until an archaeological or geoarchaeological detailed written scheme of investigation, produced in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, has been submitted to and approved by the discharging authority. The</u></p> |

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| | | | <p><u>archaeological or geoarchaeological detailed written scheme of investigation referred to in this sub-paragraph must be implemented as approved.</u></p> <p><u>(5) Unless otherwise agreed with the discharging authority –</u></p> <p><u>(a) no later than one year following the completion of the fieldwork specified in each detailed written scheme of investigation, a site-specific post excavation assessment (PXA) for each site must be completed in accordance with the detailed written scheme of investigation and submitted to the discharging authority for approval.</u></p> <p><u>(b) no later than one year following the approval of the final site-specific post excavation assessment, an archaeological updated project design (UPD) for all applicable sites, must be submitted to the discharging authority for approval. The UPD must be in general accordance with the detailed written scheme(s) of investigation for each stage and the outline archaeological mitigation strategy and outline written scheme of</u></p> |

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| | | | <p><u>investigation and include details of the scope of post-excavation analysis, publication and archiving and have regard to the site-specific research agendas set out in the detailed written schemes of investigation.</u></p> <p><u>(c) post-excavation analysis and publication must be carried out in accordance with the approved UPD and provision made for the full archive to be submitted to the appropriate museum.</u></p> <p>(6) In this requirement –</p> <p><u>(a) where any document is to be approved by a discharging authority, it must be approved by that authority in consultation with Historic England,</u></p> <p><u>(b) “commence” includes pre-commencement operations,</u></p> <p><u>(c) “outline archaeological mitigation strategy and outline written scheme of investigation” means that document as amended by Annex A to Suffolk County Council’s Local Impact Report [REP1-178].</u></p> |

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| | | | <p><u>(d) in Suffolk, the reference in sub-paragraph (5)(c) to “the appropriate museum” means the Suffolk County Council Archaeological Archive, which is located in Bury St Edmunds, and</u></p> <p><u>(e) in Suffolk, any reference in this requirement to “discharging authority” means Suffolk County Council.</u></p> <p>Justification for amendments</p> <p>In paragraph (1) “either ... or” has been replaced with “and” because SCCAS would expect there to be intrusive archaeological investigation at every stage, not just preservation in situ. It is highly unlikely that preservation in situ would be appropriate on a scheme of this scale. Moreover, the areas the stages cover are of considerable size and there will need to be different approaches to the archaeology along those stages.</p> <p>In paragraph (2), “the” has been replaced with “any” because “the” implies a single approved scheme; in reality, there could be more than one.</p> <p>Subject to minor changes, paragraphs (4) and (5) are consistent with the drafting proposed by the Essex authorities.</p> |

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| | | | <p>Regarding sub-paragraph (6)(a): amended requirement 5 requires several approvals by the relevant discharging authority. To make the drafting as succinct as possible, sub-paragraph (a) has been included to obviate the need to say “in consultation with Historic England” after each reference to “approved by the relevant discharging authority”.</p> <p>Regarding sub-paragraph (6)(b): as currently drafted, requirement 5(4) of the draft DCO [REP2-005] requires pre-commencement operations to be “carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, unless otherwise agreed with the relevant discharging authority in consultation with Historic England”. The outline documents are not fit for this purpose because they do not define what or where the pre-commencement operations are. Owing to this, the pre-commencement operations need to be subject to the approved control documents and this amendment has that effect.</p> <p>Regarding sub-paragraph (6)(c), as mentioned above, as currently drafted, the outline archaeological mitigation strategy and outline written scheme of investigation is not fit for</p> |

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| | | | <p>purpose. SCC has suggested amendments to that document to make it fit for purpose. Until such time as a satisfactory outline archaeological mitigation strategy and outline written scheme of investigation is produced, SCC’s version of that document should be referred to in the requirement.</p> <p>Sub-paragraph (6)(d) clarifies where the full archaeological archive must be deposited.</p> <p>Sub-paragraph (6)(e) clarifies SCC is the discharging authority for Suffolk. This is consistent with the amendment sought by SCC (and Mid Suffolk and Babergh Councils) in their Joint LIR [REP1-178] (paragraph 7.78). In Suffolk, SCC should be the discharging authority because archaeology is a county function. This approach is precedent. For instance, requirement 3 (project wide: archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) names SCC as the approving authority for archaeological matters. Similar clarification ought to be provided for Essex and Norfolk.</p> |
| DCO 1.S19 | The Applicant | Schedule 4 – (Discharge of requirements) - 1 | <u>(a) post-consent discharge functions</u> |

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| | <p>All local authorities</p> <p>All discharging authorities</p> | <p>The government published its response to the Nuclear Regulatory Review 2025 on 13 March 2025, in its document ‘Building our nuclear nation: government response to the Nuclear Regulatory Review 2025’. The ExA draws attention to: i) it is seeking to accelerate “...efforts to ensure the planning system more effectively enables both low-carbon energy projects and infrastructure as a whole...”; and ii) its response to Recommendation 30, where it indicates this includes “...establishing a new unit within DESNZ to coordinate post-consent discharge functions for nuclear power and electricity network projects.”</p> <p>In the light of the above document and a clear statements from the government regarding its intention in related to post-consent discharge, the Applicant and discharging authorities are asked to:</p> <ol style="list-style-type: none"> a. Provide comments on the above publication in respect of post-consent discharge functions. b. Consider if the current drafting of schedule 4 in the draft DCO [APP-056] is an appropriate approach to the post-consent discharge of requirements, or whether schedule 4 of the draft DCO [APP-056] should take a similar approach to that set out in schedule 2, Part 2 of The A122 (Lower Thames Crossing) Development Consent Order 2025? | <p>It is not clear how the proposed unit will operate. However, it appears that the Department for Transport National Case Unit may be the preferred model, and this could be established within the Department for Energy Security and Net Zero (“DESNZ”) Infrastructure Planning Delivery Team.</p> <p>Given the number of electricity connection projects and the need for such schemes to discharge the same requirement multiple times, it appears that this may pose a significant challenge for the new unit, in terms of scale, pace, and the availability of expertise.</p> <p>The Council suggests therefore that the existing approach should be maintained in the DCO wording, and that this should be a matter for the Secretary of State to use their discretion, prior to issuing a consent, to make any modifications to the process that they see fit in light of the emerging role, scope, and capacity of the new unit.</p> <p>The Council anticipates that it is reasonable to expect a period of engagement between local authorities, transmission operators, and DESNZ to take place prior to the formation of the new unit.</p> <p>Further, DESNZ may issue guidance on this matter prior to the close of the examination which may change the Council’s position.</p> |

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| | | | <p><u>(b) appropriate approach to the post-consent discharge of requirements</u></p> <p>By section 120(2)(b) of the Planning Act 2008, the requirements imposed by a DCO may include “requirements to obtain the approval of the Secretary of State or any other person ...”.</p> <p>By Schedule 4 (discharge of requirements) applications made under Requirements are made to the “relevant authority”. Since the “relevant authority” is any other person, the drafting is clearly an appropriate approach to the post-consent discharge of requirements.</p> <p>It will be remembered that the Lower Thames Crossing DCO was promoted by National Highways and that applications made under requirements in National Highways DCOs are discharged by the Secretary of State.</p> <p>While (per section 120(2)(b) of the Planning Act) it would be lawful for the Secretary of State to determine applications, SCC considers the usual practice for the determination of applications should apply to the instant application, with the “relevant authority” being responsible.</p> |

7 HE Historic environment

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| HE 1.9 | All local authorities | <p>Applicant’s assessments:</p> <p>Unless you have provided agreement or otherwise in your LIR, for your area of jurisdiction please state whether you are in agreement with the Applicant’s assessment of:</p> <ul style="list-style-type: none"> a. Designated and Non-Designated Heritage Assets to be scoped out of further assessment as set out in ES Appendix 11.1 - Historic Environment Baseline Report [APP-209]. b. The levels of harm assessed, for the construction phase and the operation and maintenance phase, as described in ES Appendix 11.7 – Assessment of Harm to Designated Heritage Assets [APP-215]. c. The levels of harm assessed in relation to Non-Designated Heritage Assets (NDHA), as described in ES Chapter 11 [AS-068]. | <p><i>SCC Archaeological Service</i></p> <p>a. BMSDC and, where required, Historic England will provide comments on Historic Buildings that have been Scoped Out of further assessment.</p> <p>For archaeology, the proposals for Scoped Out Walkover survey are acceptable.</p> <p>b. BMSDC and, where required, Historic England will provide comments on Historic Buildings that have been Scoped Out of further assessment.</p> <p>c. For archaeology, the criteria used to assess harm to non-designated heritage assets are broadly acceptable as an initial appraisal. However, SCCAS advises that evaluation would be required to provide an appropriate understanding of the presence, absence, significance, character, extent and state of preservation of any archaeological heritage assets within the Order Limits (areas of project impact) and thereby quantify the schemes impact upon those assets and inform an appropriate mitigation strategy.</p> <p>The Applicant must acknowledge that the archaeological heritage assets currently mapped by the project does not represent the full archaeological record, as archaeological heritage assets that are currently unknown will be identified by the project. Additionally,</p> |

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| | | | <p>recorded archaeological heritage assets heritage value may change following intrusive archaeological evaluation, and the areas beyond the recorded assets and sites may contain as yet unidentified archaeological heritage assets. SCCAS considers that the absence of an archaeological potential assessment within the 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] is a missed opportunity for the project, however, SCCAS believe that an appropriate programme of post-consent work can be secured by an approved 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p> |
| HE 1.12 | All local authorities Historic England | <p>Heritage visualisations - 1</p> <p>A range of heritage visualisations are provided [APP-350] and [APP-351].</p> <p>All local authorities and Historic England are asked to confirm:</p> <ol style="list-style-type: none"> a. Agreement with the viewpoints chosen to reflect any potential impacts on heritage assets. b. In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from? | <p>SCC defers to Babergh and Mid Suffolk District Councils in respect of matters related to above-ground heritage assets.</p> |

8 LUS Land use and soils, green infrastructure

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| LUS 1.2 | The Applicant Natural England Pylons East Anglia Limited All local authorities | <p>Best and most versatile agricultural land (BMV) and soils - 1</p> <p>It would appear from Paragraph 6.4.7 of the ES that detailed Agricultural Land Classification (ALC) survey was undertaken on approximately 1,011 ha (representing 54% of the proposed survey areas within the Order Limits). Predictive ALC grading was then carried out where it was not possible to undertake a detailed ALC survey. Given the coverage of actual survey work how much confidence can be placed on the Applicants response on acid soils in document 8.4.6 page 22 that ‘the detailed surveys did not identify the presence of jarosite in the soil and in locations where desk-based information suggested a potential for acid sulphate soils some of the soils were found to be moderately calcareous. There is no evidence to indicate the presence of actual or potential sulphate soils within the surveyed areas’. As being a representative conclusion that can be applied across the whole Order Limits as they are not all ‘surveyed areas’.</p> | SCC defers to Babergh and Mid Suffolk District Councils in respect of matters related to soils. |
| LUS 1.4 | Natural England All local authorities Pylons East Anglia Limited | <p>BMV and soils - 3</p> <p>To what extent are the mitigation measures proposed by the Applicant in the outline CoCP (measures GH02 and GH08) sufficiently robust to address issues should acid sulphate soils be encountered during construction.</p> | SCC defers to Babergh and Mid Suffolk District Councils in respect of matters related to soils. |
| LUS 1.8 | The Applicant Suffolk CC | <p>BMV and soils - 7</p> <p>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</p> | SCC notes that AS02 of the oCoCP [REP2-014] is satisfactory in relation to soil quality, however, the Council seeks further certainty regarding the mitigation for affected land drainage as detailed in AS05 of the oCoCP. |

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| | | <p>should be replaced as required after construction and decommissioning.</p> <ul style="list-style-type: none"> • Suffolk CC: confirm if the mechanisms in the draft DCO and 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. | <p>There does not appear to be any provision within the management plans for mitigation or compensation of operational agricultural land that would be severed or sterilised as a result or either construction or operation of the development. The Council requests further information in this regard.</p> <p>Provided that information is contained within the final management plans then the Council considers that Requirement 4 would be sufficient to secure the appropriate mitigation or compensation.</p> |
| LUS 1.14 | All local authorities | <p>Green infrastructure and open space - 1</p> <p>Appendices B1, B2 and B3 to the Applicant’s Planning Statement [APP-085] contain tables and assessment of the projects impact on open spaces.</p> <ul style="list-style-type: none"> • Do the host local authorities agree with the assessment and conclusions reached in table B.1, if not explain your reasoning and justification for your conclusions. • Do Colchester City Council agree with the conclusions and assessment of fishing provision within Ardleigh and if not explain your reasoning and justification. • Do Thurrock Council agree with the Applicant’s assessment of the impacts of pylons in Maple Park and if not explain your reasoning and justification. | <p>SCC agrees with the assessment and conclusions of the impacts on Open Spaces in Suffolk within Appendices B1, B2 and B3 of the Planning Statement [APP-085].</p> |

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| 9 LV Landscape and visual | | | |
| LV 1.14 | All local authorities | <p>ES Appendix 13.5 National Landscape assessment study - 2</p> <p>The study [APP-235] concludes that: <i>"In conclusion, the Project would result in significant adverse effects on the special qualities of the Dedham Vale National Landscape during construction. However, during operation (and maintenance) the adverse effects on the special qualities of the National Landscape are judged to be minor and not significant (adverse)"</i> (paragraph 13.3.8)</p> <p>The local authorities are asked whether they agree with this conclusion and provide reasoning if you do not.</p> | <p>SCC defers to the National Landscape Partnership and endorses its comments.</p> <p>Further, SCC remarks that there will be a lasting change within the cable corridor where trees cannot be replaced.</p> |
| LV 1.16 | The Applicant Suffolk CC | <p>National Landscapes - duty to seek to further the purposes report - 2</p> <p>Appendix A of the report [APP-120] proposes a sum of £2,426,752 to be paid to the County Council to deliver benefits and to enhance the NL and its setting. To both parties:</p> <ol style="list-style-type: none"> 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? | <p>SCC defers to the National Landscape Partnership and endorses its comments.</p> <p>Further, SCC would state in regard to point c that this sum relates to the National Landscape only and cannot be considered to cover the entire/wider project area, not even within Suffolk.</p> |
| LV 1.17 | Suffolk CC Essex CC | <p>National Landscapes - duty to seek to further the purposes report - 3</p> | <p>SCC defers to the National Landscape Partnership and endorses its comments.</p> |

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| | | <p>The Report [APP-120] concludes that the mitigation hierarchy has been applied in accordance with national policy. Please confirm whether you agree with this conclusion and provide reasoning if not.</p> | |
| LV1.22 | All local authorities | <p>Landscape visualisations – 1</p> <p>The local authorities are asked whether:</p> <ul style="list-style-type: none"> You agree with the viewpoints in the visualisations [APP-343] to [APP-349] chosen to reflect any potential impacts on landscape. In your opinion are additional visualisations required, and if so from which assets and where should the visualisations be taken from? | <p>SCC considers that it would be difficult for the Applicant of a linear and tall project such as this to provide visualisations reflecting any potential impacts on landscape, other than in a representative manner.</p> <p>SCC welcomes the additional visualisations, which have been supplied for Mellis and the Waveney Valley.</p> <p>However, the overall density of viewpoints along the route alignment remains sparse. SCC would have welcomed, if there could have been two or three visualisations (or at least one) from key viewpoints for each affected parish to help local communities understand the level of impact of the scheme on their locality.</p> <p>SCC provided the Applicant with detailed comments on viewpoints during pre-examination stage (APPENDIX 2).</p> <p>Given the latest proposals to cross the Waveney Valley with pylon towers rather than undergrounding the power line, and given the sensitivity of the area, I consider that additional viewpoints are required from within the Waveney Valley, for example from two</p> |

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| | | | <p>viewpoints on the PROW, looking along the valley in either direction, and from Wortham Ling to appropriately represent and assess the expected changes to the landscape and effects on visual receptors.</p> |
| <p>LV 1.26</p> | <p>Babergh DC Mid Suffolk DC Suffolk CC</p> | <p>Babergh DC, Mid Suffolk DC and Suffolk CC’s Local impact report - 2</p> <p>Your LIR [REP1-178] states that there is only one viewpoint outside of 3km in Suffolk and that potential exists for more than this. Please provide further information over possible locations.</p> | <p>SCC has provided the Applicant with comments on viewpoints in January 2025 (APPENDIX 2), which also contain suggestions for additional viewpoints.</p> <p>With regards to viewpoints beyond 3km, SCC considers that west of the route, additional viewpoints would be useful between Bacton Green and Haughley Green, looking south-west (VRA B4 Finningham and Gissingham, page 4 of Figure 13.7 [REP1-066]); from Jack’s Lane, west of Coombs south of Boyton Hall, looking north-east (VRA B8 Stowmarket, page 4 of Figure 13.7 [REP1-066]); east of Battisford Tye, from Straight Road, west of Stowmarket Road, looking north-east and south-east (VRA B10 Great Bricett, page 5 of Figure 13.7 [REP1-066]); from New Road, south-east of Naughton, looking north-east, east, and south-east (VRA B12 Elmsett, page 5 of Figure 13.7 [REP1-066]). East of the route, SCC would welcome additional viewpoints from Dial Cottage at Coddenham Green, looking west, (east of VRA B 9 Needham Market, page 4 of Figure 13.7 [REP1-066]); from Thwaite Road, south-west of Thorndon and south of Five</p> |

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| | | | <p>Cross Ways, looking south-west (VRA B5 Wickham Skeith and Mendlesham, page 5 of Figure 13.7 [REP1-066]).</p> |
| <p>LV 1.34</p> | <p>The Applicant All local authorities</p> | <p>ES Appendix 13.6 – arboricultural impact assessment – replacement planting</p> <p>Paragraph 13.5.13 of ES Appendix 13.6 [APP-236] states that National Grid has committed to a 3:1 tree replacement ratio for individual trees and small groups of trees. It further notes that you would prioritise such replanting within the Order limits, although offsite provision may be required.</p> <p>The outline LEMP [AS-046] states (paragraph 9.3.6) that discussion is ongoing with landowners and third parties regarding the provision of offsite tree planting and that an offsite planting delivery scheme will be provided to the relevant Local Planning Authorities for their information, which provides details of the offsite provision.</p> <ul style="list-style-type: none"> • Applicant - What constraints are there to replanting within the Order limits and under what circumstances may the need for offsite provision be triggered? • All local authorities – Is the provision of an offsite planting delivery scheme document acceptable to you? Do you have any comments on what it should contain and/or when it should be provided to be most useful to you? How could such details be secured? | <p>SCC, alongside the other host authorities, are engaging with the Applicant regarding their commitment to provide an offsite planting delivery scheme at a ratio of 3:1 for the replacement for individual trees.</p> <p>SCC finds the proposed approach to be acceptable.</p> <p>The Council is seeking to secure this commitment through a schedule to the legal side agreement between the Applicant and host authorities, as detailed in answer to question GEN 1.21 above.</p> |

10 MW Minerals and Waste

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| MW 1.1 | Norfolk CC Suffolk CC Essex CC Thurrock Council | <p>Minerals safeguarding - 1</p> <p>Taking account of the impact of the project on existing and proposed mineral sites, do you consider:</p> <ul style="list-style-type: none"> the proposed development has sufficiently taken account of the need to safeguard mineral resources the proposed development complies with your current and/ or emerging plans. If not, what further mitigation measures do you consider are required. | SCC will consider this matter further and respond at the next deadline. |
| 11 NV Noise and vibration | | | |
| NV 1.5 | The Applicant Relevant local authorities | <p>Use of use of triple Araucaria conductors or alternative technology</p> <p>Throughout ES Chapter 14 [APP-256] reference is made to the use of triple Araucaria conductors (or alternative technology that performs to the same or better standard in relation to noise on standard lattice pylons).</p> <p>In the event of alternative technology being used, as opposed to the use of the use of triple Araucaria conductors on part or all of the route, should a mechanism be included to ensure that alternative technology is of the same or better standard in relation to noise on standard lattice pylons. In the event a mechanism should be used, what form should the mechanism take (ie should it be a requirement within the DCO), should there be a need to agree to the alternative technology and should there be a discharging and appeal authority?</p> | SCC notes that the listed pylons are not located in Suffolk. |

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| | | <p>In addition to the above, the ExA notes ES Chapter 7 paragraph 7.9.4 Refers to pylons TB140 to TB142 (inclusive) to the south of River Chelmer being low height pylons. However, this paragraph also refers to feedback that was received during consultation in 2025 and certain technical details being refined. This paragraph states " as a result, flexibility has been retained to allow for the installation of standard lattice pylons in this area instead." However, the ExA notes ES Chapter 14 (Noise and vibration) states a low noise conductor system will be used. Can the Applicant confirm, should the design change in relation to pylons TB140 to TB142 (inclusive) to standard lattice pylons, or any other form of pylon, be necessary the low noise conductor system will be used as part of those pylons?</p> | |
| NV 1.7 | <p>The Applicant Relevant local authorities</p> | <p>Compaction activities and potential for damage due to construction vibration</p> <p>ES Chapter 14 [APP-256] paragraph 14.7.27 to 14.7.30 (inclusive) indicates there are five structures or buildings where there is potential for damage due to construction vibration from potential compaction activities. It also indicates: i) the identified locations will be reviewed by the main contractor in their specific detailed assessments, prior to the start of work with mitigation measures put in place, where required, to avoid potential significant effects; and ii) will review all works locations to determine whether any other buildings or structures may be affected by vibration from construction activities. However, no further details are provided.</p> <p>The ExA is concerned in regard to the absence of the further details in regard to both i) and ii) above and seeks the views of</p> | <p>SCC defers to Babergh and Mid Suffolk District Councils in respect of Noise and Vibration matters.</p> |

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| | | <p>both the Applicant and Relevant County/ Local Authorities in this regard. Should there be a formal mechanism requiring the further details and mitigation to be submitted and approved. What form should such a mechanism take (ie should it be a requirement within the DCO)? Should there be a need to agree the additional mitigation measures to avoid potential significant effects.</p> | |
| <p>NV 1.13</p> | <p>The Applicant All local authorities</p> | <p>EACN and Tilbury North Substations operational noise assessment</p> <p>ES Appendix 14.3 (EACN Substation Operational Noise Assessment) [APP-259] and ES Appendix 14.4 (Tilbury North Substation Operational Noise Assessment) [APP-260].</p> <p>The ExA is concerned with the reference to ‘reasonably practicable’ (also referred to as Best Available Technique Not Entailing Excessive Cost (BATNEEC)) in both documents. This is due to ‘reasonably practicable’ and BATNEEC including an element of cost within the assessment. The ExA considers any mitigation used must achieve the outcome intended, as set out in tables a 14.3.8 and 14.4.8 respectively, and Best Available Technique (BAT), not BATNEEC, should be employed and secured within the DCO.</p> <p>The ExA seeks the views of both the Applicant and local authorities in this regard. Should there be a formal mechanism requiring BAT? What form should such a mechanism take (ie should it be a requirement within the DCO) and, if so, who should the details be submitted to and who is responsible for discharging those conditions?</p> | <p>With the EACN being located in Essex, SCC defers detailed comments to Essex councils.</p> |

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| 12 PRow Public Rights of Way | | | |
| PRow 1.1 | Norfolk CC Suffolk CC Essex CC Thurrock Council | <p>PRow general - 1</p> <p>Please provide a schedule of proposed amendments to the outline PRow Management Plan, highlighting matters that you consider are not acceptable and require amending and what you consider those amendments should be.</p> | <p>Paragraph 3.4 states that surveys were carried out late September 2024 and October 2024 also spring 2025. These dates do not appear to have included summer school holidays which would potentially record recreational use by locals and holiday makers. However, the PRow MP goes on to state the routes have all been assessed equally and routes managed regardless of PRow user trips.</p> <p>Paragraph 4.1.3 - Ensure temp surfacing is suitable for all user types. For example, road plate and horse etc.</p> <p>Paragraph 4.1.4 - SCC (PRow) welcomes the inclusion of phased closures and diversions to avoid diversions on diversion routes.</p> <p>Paragraph 5.1.3 should include a statement to say that routes should be reinstated in no less condition than before construction.</p> <p>Paragraph 5.2.5 - Signage to be prior agreed with the Local highway authority PRow and the local highway authority PRow should be advised in a timely manner prior to closures.</p> <p>Paragraph 5.2.15 - Shared access routes should be avoided for safety reasons of all user types and should be separated with fencing</p> |

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| | | | <p>with adequate set back. where this is not possible all surfacing during and after construction must be kept to a safe and suitable standard for all users.</p> <p>Paragraph 5.2.2 - The Local Highway Authority should be advised, in its PROW function, in a timely manner prior to temp diversions or closures.</p> <p>Regarding paragraph 6.1.1, it would be preferable if the text read existing widths of PROW (as per definitive map statement) or this ensures that the existing widths are taken from the definitive statement (if available) and not from walked widths on the ground.</p> |
| <p>PRoW 1.2</p> | <p>Norfolk CC Suffolk CC Essex CC Thurrock Council</p> | <p>PRoW general - 2 ES Chapter 16 [APP-039] paragraph 16.4.15 details the PRoW user surveys carried out. Confirm that these baseline surveys are accepted and if not, why not.</p> | <p>Paragraph 3.4 states that surveys were carried out late September 2024 and October 2024 also spring 2025. These dates do not appear to have included summer school holidays which would potentially record recreational use by locals and holiday makers. However, the PROWMP goes on to state the routes have all been assessed equally and routes managed regardless of PROW user trips.</p> |
| <p>13 SET Socio-economics, tourism and recreation</p> | | | |
| <p>SET 1.5</p> | <p>The Applicant</p> | <p>Mitigation measures - 2</p> | <p>SCC shares the Examining Authority’s concern regarding the repeated use of the term “where practicable” in relation to mitigation measures</p> |

| ExQ1 | Question to: | Question: | SCC Answer: |
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| | <p>Relevant local authorities</p> | <p>The ExA notes the use of the term ‘where practicable’ in relation to proposed mitigation and is concerned as to the vagueness of this term.</p> <p>Applicant - justify the use of this term in each instance or amend the proposed mitigations accordingly.</p> <p>Relevant County and Local Authorities – The ExA seeks your views in regard to the use of this term and your suggestions in regard to any alternative forms of wording.</p> | <p>set out in Chapter 15 of the Environmental Statement. SCC considers this term to be insufficiently precise for mitigation relied upon within the ES and therefore problematic in the context of a Development Consent Order.</p> <p>The phrase “where practicable” is not defined, is not bounded by objective criteria, and is open to subjective interpretation by the Applicant or its contractors once consent is granted. In the absence of a clear definition or decision-making framework, it is not possible to determine under what circumstances mitigation would not be delivered, nor how any decision to depart from mitigation would be justified, documented or monitored. This lack of certainty undermines confidence in the robustness of the assessment at the ES stage and creates clear risks in relation to enforcement and compliance post-consent.</p> <p>From SCC’s perspective, mitigation which is relied upon to support conclusions of non-significant effects must be specific, certain, enforceable and capable of monitoring, in line with established EIA and DCO principles. The continued use of “where practicable” risks reducing mitigation to an aspiration rather than a secured commitment, which in turn weakens the evidential basis on which those conclusions have been reached.</p> |

| ExQ1 | Question to: | Question: | SCC Answer: |
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| | | | <p>SCC therefore recommends that “where practicable” is replaced with the following wording:</p> <p>“Will be implemented except where it can be demonstrated, to the satisfaction of the relevant local authority, that it is not feasible, in which case an alternative measure providing equivalent mitigation will be delivered.”</p> <p>SCC considers this wording to provide the necessary clarity and accountability. It establishes implementation of mitigation as the default position, requires the Applicant to justify any departure, requires oversight and agreement from the relevant local authority, and ensures that mitigation is not omitted but replaced by measures delivering equivalent outcomes. This approach is consistent with established DCO practice and ensures that mitigation relied upon within the ES is clear, enforceable and capable of effective monitoring.</p> <p>For mitigation measures that address significant or potentially significant effects, SCC further considers that such commitments should be secured through a Requirement or approved management plan, rather than being qualified by open-ended caveats.</p> |

14 TT Traffic and transport

| ExQ1 | Question to: | Question: | SCC Answer: |
|---------|-----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| TT 1.20 | National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council Suffolk Constabulary Essex Police | <p>Cumulative impacts</p> <p>Are there any specific impacts from other projects which you consider could cause additional impacts and risk to the proposed development and do you consider these have these been addressed adequately by the Applicant?</p> | <p>SCC has previously commented on cumulative effects in its Joint LIR [REP1-178], paragraph 12.170 – 12.173.</p> |
| TT 1.28 | National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council | <p>Walking, cycling and horse-riding – 1</p> <p>Please confirm if you consider there are any outstanding parts of your highway network that require a Walking, Cycling and Horse-riding assessment review. If so, please list these and give the status of discussions with the Applicant regarding this.</p> | <p>SCC will consider this matter further and respond at the next deadline.</p> |
| TT 1.36 | National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council | <p>Outline construction traffic management plan - 2</p> <p>For the avoidance of doubt, please detail any matters in the outline CTMP [APP-309] which you consider requires amending and your proposed amendment. This could be in the form of a schedule or tracked changed version of the outline CTMP.</p> | <p>SCC does not propose to respond at this deadline but reserves right to future deadline.</p> |

| ExQ1 | Question to: | Question: | SCC Answer: |
|---------|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| TT 1.38 | National Highways Suffolk CC Essex CC Norfolk CC Thurrock Council | <p>Statements of common ground</p> <p>In the SoCG with National Highways [REP1-048] a number of statements suggest that you are awaiting further information following requests to allow you to further consider the Applicant submission. Please can you state if this additional information is now available to you and if not, what timescales you require to ensure an adequate response to any outstanding matters or concerns. Please can all local highway authorities address this same question.</p> | <p>SCC has yet to receive the information, however it is expected and the Council intends to respond by Deadline 4 if practicable.</p> |

NORWICH TO TILBURY

EN020027

Appendix 1 (Suffolk County Council NSIP Process Guidance for Post-Consent Discharge of Requirement)

Suffolk County Council 

Discharge of Requirement Process Guidance for Officers

Glossary of Acronyms

| | |
|---------------|------------------------------------------------------------------------|
| <i>DCO</i> | <i>Development Consent Order</i> |
| <i>DOR</i> | <i>Discharge of Requirements</i> |
| <i>HRA</i> | <i>Habitats Regulations Assessment</i> |
| <i>LPA</i> | <i>Local Planning Authority</i> |
| <i>ODS</i> | <i>Officer Delegated Summary</i> |
| <i>RAMSAR</i> | <i>[Environmental Designation] Ramsar Site</i> |
| <i>SPA</i> | <i>[Environmental Designation] Special Protected Area</i> |
| <i>SSSI</i> | <i>[Environmental Designation] Site of Special Scientific Interest</i> |

“The Council” / “SCC” refers to Suffolk County Council

County Council as the Discharging Authority

- 1** SCC receives the Discharge of Requirement (“DOR”) application from the Applicant
- 2** Check the Development Consent Order (“DCO”) - What are the details of the Requirement? What is the deadline date? Is there a deeming clause to be aware of? Who needs to be consulted?
 - 2a** *Experience:* The DCO may have specified that named consultees are to receive consultation (by the applicant) prior to submission of the DOR application prior to SCC involvement (i.e. Natural England, Historic England)
- 3** Request for Planning Admin Team to set up a new MasterGov matter on County Planning section
- 4** Write Consultee Letter and Parish Council Notification Letter (utilising templates)
 - 4a** Provide 21 days as standard, and add extra time where required for Bank Holidays etc.
- 5** Request for Planning Admin Team to send out consultation letter to Consultees
 - 5a** *Advice:* Service areas may be an extensive list based on specific requirement; however, best practice is to consult wider and include ‘no comment’ in Officer Delegated Summary (“ODS”) if appropriate
 - 5b** *Advice:* Always include the District Council, whether set out in DCO or not
- 6** Request for Planning Admin Team to send out Notification Letter to relevant Parish Councils and SCC Councillors
- 7** Share consultation with Ecology team, seeking advice on whether a Habitats Regulations Assessment (“HRA”) will be required to discharge the requirement
 - 7a** *Experience:* Usually HRA will not be required, however, occasionally HRA will be required if the location is near SPA/RAMSAR/SSSI designations
 - 7b** Include in the ODS
- 8** Receive comments from Service Area consultees and consider whether any changes are required in order to discharge the requirement

- 8a** If NO then, Discharge of Requirement can be approved
- 8b** If YES then, respond to applicant with Service Area/Consultee feedback, and seek further information (*Experience*: DCOs may set out a timeframe for when requests for further info must be submitted, i.e. within 10 working days of the submission of the DOR application). When further information and/or amendments are received, send these to the relevant Service Area/Consultee for their approval. If amendments are approved, the Discharge of Requirement can be approved.
- 8c** *Experience*: Subject to outcome, if the ongoing issue is significant enough to impact the approval of the Requirement, then consider alternative discharge options (i.e. such as a Partial DOR)
- 9** Write the Officer Delegated Summary
 - 9a** *Advice*: To ensure that all matters are included, write as though you are answering ‘*how did I come to this decision?*’
 - 9b** Include details of what was submitted, any emails or comments received, any correspondence sent, and calls or meetings held (including dates)
- 10** ODS checked by Senior Officer/Manager
- 11** Write the Decision Letter
- 12** Decision Letter checked by Senior Officer/Manager alongside ODS
- 13** Send Decision Letter to Director alongside ODS for final sign-off
- 14** Return Signed Decision Letter sent to the Applicant
- 15** Upload the Signed Decision Letter (redacted) and the ODS to MasterGov and publish to the website
- 16** Upload the Signed Decision Letter to SharePoint for internal records

District Council as the Discharging Authority

- 1** District Council receives the Discharge of Requirement (“DOR”) application from the Applicant
- 2** District Council consults the SCC Planning Team
- 3** Check the consultation for the deadline date (typically 21 days)
- 4** Check the Development Consent Order (“DCO”) - What are the details of the Requirement? Which functions need to be consulted internally (i.e. Local Highway Authority)?
- 5** Request for Planning Admin Team to set up a new MasterGov matter on Application Response section
- 6** Send notice of consultation (via email) to the relevant Service Areas
- 7** Receive comments from Service Area consultees
 - 7a** If issues are raised by Service Areas, then discuss with the Local Planning Authority (“LPA”) and note their preferred approach (*Experience*: The LPA may request that you raise the issues with the Applicant directly or they may prefer to raise the issues themselves)
- 8** Respond to the District Council with Service Area comments (utilising templates)
- 9** Upload the Response Letter to MasterGov

NORWICH TO TILBURY

EN020027

Appendix 2 (Suffolk County Council Proposed LVIA Viewpoints Comments)

Suffolk County Council [REDACTED]

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|-----------------|-----------------|------------|-----------------|--------------------|
| VP added May 23 | VP added Aug 23 | VP removed | VP added Dec 23 | VP added August 24 |
|-----------------|-----------------|------------|-----------------|--------------------|

| ES Photo montage | ES Wireline | ES Baseline Photo | PEIR Wireline | Viewpoint Number | Viewpoint Name | X (microsites) | Y (microsites) | General Orientation of View | Reason for Selection / Notes | County | Post VP Meeting Notes | Reason for Viewpoint Removal | Reason for Proposed Visualisation Type | SCC comment |
|------------------|-------------|-------------------|---------------|--------------------|----------------------------------------------------------------------|----------------|----------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Section A | | | | | | | | | | | | | | |
| Yes | No | No | No | 1.22 | Doit Lane, near Roydon | 609225 | 280385 | East and west | Representative of people travelling on Doit Lane, south-west of Roydon. | Norfolk | | N/A | | SCC considers that there should be an additional viewpoint from Doit Lane, just north of the bridge, looking east/north-east across the Waveney Valley, and also from a suitable point looking north/north-west to where the pylon towers will climb the northern valley side. |
| Section B | | | | | | | | | | | | | | |
| | | | N/A | 2.01 | Worham Ling | 609513 | 279314 | West | Views from Worham Ling Common Land which has public parking areas and is visited for recreation. Also represents views from the Angles Way long distance footpath and NCR 30. | Suffolk | | Alternative location identified which is more representative of views from Worham Ling (VP2.01). | | |
| Yes | No | No | Yes | 2.01 | Ling Road, Worham Ling | 609517 | 279304 | East | Alternative location for VP 2.01 based on possible alignments. Area visited for recreation and also representative of NCR 30 users. | Suffolk | | N/A | | Given that the project is not now proposed to underground through the Waveney Valley, SCC considers that one viewpoint in this area is insufficient to represent the changes that is expected to occur, and would ask that this area is reconsidered for additional viewpoints. |
| | | | N/A | 2.02 | Wigwam Hill War Memorial and Church of St Mary the Virgin | 608333 | 278730 | West / South-west / South | Representative of people visiting the Wigwam Hill War Memorial and Church of St Mary the Virgin (Grade I listed), living and moving around the local community and local road network and using Angles Way long distance footpath. Local lane is also registered Common Land. | Suffolk | | Limited visibility towards the site noted during field work due to layers of existing vegetation. Alternative location identified at Worham Ling with closer views towards the Project (VP2.01). | | Needs to be agreed with Cultural Heritage team. |
| Yes | No | No | Yes | 2.03 | PRoW Palgrave (Palgrave 5 / 6) | 610757 | 278747 | West | Representative of people living and moving around the community of Palgrave and using PRoW in the area. | Suffolk | | N/A | | This may be acceptable, but may need to be moved south towards Millway Lane where ZTV indicates greater visibility. |
| Yes | No | No | Yes | 2.04 | Burgate Road, Burgate | 608063 | 275530 | South-east | Representative of people living and moving around the community of Burgate and using the local PRoW and road network. Close to Burgate Hall moated site scheduled monument and Church of St Mary Grade II* listed church. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | Yes | 2.05 | Mellis Road, Mellis Green | 608980 | 274021 | North-west | Representative of people living and moving around the community of Mellis. Mellis Common Land and Mellis Conservation Area. | Suffolk | | N/A | | The ZTV indicates that at the chosen location there will be little visibility. It may therefore be necessary to move the viewpoint to a location on Mellis Common with greater visibility. |
| No | Yes | No | Yes | 2.06 | Mill Street, west of Gislingham | 605419 | 271826 | East | Representative of people living and moving around the community of Gislingham and using the local road network. | Suffolk | | N/A | Wireline proposed due to distance (approximately 2.1km) and layers of vegetation likely to filter views of the Project (see PEIR Figure 13.9.19). | Acceptable. |
| | | | N/A | 2.07 (Alternative) | Gislingham | 607938 | 271782 | East | Representative of people living and moving around the community of Gislingham and using the local road network. | Suffolk | | Alternative location identified which is more representative of views from Gislingham (VP2.07). | | |

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|-----|-----|----|-----|------|------------------------------------------------------------|--------|--------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|--|-----|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Yes | No | No | No | 2.07 | PRoW south of Gislingham (Gislingham 25) | 607580 | 271152 | East | Representative of people living and moving around the community of Gislingham and using the local road network. | Suffolk | | N/A | | This viewpoint may need to be moved further east along the PROW, where the ZTV suggests greater visibility. |
| Yes | No | No | Yes | 2.08 | Wickham Street | 608585 | 269597 | West | Representative of people living and moving around the community of Wickham Street and using the local PRoW network. | Suffolk | | N/A | | This may not be the best location to to represent the visual effects on Wickham Skeith Parish. Visibility is suggested to be much higher to the south of the parish, for example along the PROW north-west of Surwood Farm. |
| No | Yes | No | Yes | 2.09 | PRoW Dandy Corner (Cotton 18) | 607677 | 268025 | East | Representative of people living and moving around the community and using PRoW in the area. | Suffolk | | N/A | Wireline proposed as photomontages proposed from closer VPs 2.23 and 2.34. | Acceptable. |
| Yes | No | No | No | 2.10 | Whiteup's Lane, north of Mendlesham Green | 609424 | 264198 | West | Representative of people living and moving around the community of Mendlesham Green and using the local PRoW network. Close to the Middy Railway Footpath. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | Yes | 2.11 | Middy Railway Footpath near Stonham Road | 607973 | 264836 | East | 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. | Suffolk | | N/A | | This viewpoint should be moved south-east along the Middy Railway footpath, where ter ZTV indicates highervisibility and where there would be no (or fewer) detracting features within the view and the sensitivity would be higher. |
| Yes | No | No | Yes | 2.12 | Mid Suffolk Footpath / Gipping Road, west of Saxham Street | 607840 | 261787 | East | 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. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | Yes | 2.13 | PRoW south of Stowupland (Stowupland 28) | 606904 | 259685 | East | Representative of people living and moving around the community of Stowupland and using the local PRoW and road network, including the A1120. | Suffolk | | N/A | | Why is this viewpoint not located further south-east, where several PROW meet and visibility is indicated to be higher? |
| Yes | No | No | Yes | 2.14 | Creeting Lane, Creeting St Peter | 607847 | 258449 | East | Representative of people living and moving around the community of Creeting St Peter and using PRoW in the area. View towards Roydon Hall Grade II* listed buildings and beyond. | Suffolk | | N/A | | There is low visibity of the scheme from the choses viewpoint. |
| Yes | No | No | Yes | 2.15 | PRoW, north-west of Needham Market (Needham Market 5) | 607930 | 255291 | North-west | Representative of people living and moving around the community of Needham Market and using PRoW in the area. Long Distance views afforded from here. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | Yes | 2.16 | PRoW near Badley Hall Farm (Badley 21) | 606285 | 255982 | South-east | Representative of people using local PRoW network at Badley, including Badley Walk. Within Badley Church Green Conservation Area and adjacent to Church of St Mary (Grade I listed) and nearby Chantry (site of) scheduled monument. | Suffolk | | N/A | | Acceptable. But additional viewpoint from Badley Lane further east would be desirable to assess the approach to Badley Church and Hall from the east. Please clarify with Cultural Heritage team. |
| Yes | No | No | Yes | 2.17 | B1078 Barking Road, Barking Tye | 606590 | 252289 | West | Representative of people living and moving around the community of Barking Tye and using local road and PRoW network and Common Land in the area. | Suffolk | | N/A | | Acceptable in principle as an illustrative viewpoint, but visibility would again be greater from nearby public footpaths. Please clarify why they were not used instead. |
| Yes | No | No | Yes | 2.18 | B1078, Great Bricett | 603967 | 250293 | East | Representative of people living and moving around the community of Great Bricett and using local road and PRoW network. | Suffolk | | N/A | | Why not from bridleway with greater visibility? |
| Yes | No | No | Yes | 2.19 | PRoW near Castle Farm, Offton (Offton 27) | 606380 | 249212 | West | Representative of people using local PRoW network around Offton. Near to Offton Castle scheduled monument. | Suffolk | | N/A | | Acceptable. |

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|-----|-----|----|-----|-----------------------------------------------|---------------------------------------------------------------|-------------------|-------------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Yes | No | No | No | 2.20 | Tye Lane, east of Flowton | 609892 | 247086 | South-east | Representative of people living and moving around the community and people using the local PRoW in this area. | Suffolk | | N/A | | Acceptable, although more representative of residential receptor rather than local PRoW network, where greater visibility is suggested further north-west. |
| Yes | No | No | Yes | 2.21 | Offton Road, north of Elmsett | 606031 | 247201 | North-east | Representative of people living and moving around the community of Elmsett and using the local PRoW and road network. Located adjacent to Church of St Peter (Grade I listed). | Suffolk | | N/A | | Acceptable, but again limited visibility. |
| Yes | No | No | Yes | 2.22 | Lion Road near St John's House / Goodrich Park | 609841 | 277657 | North-west | Representative of recreational users of a local PRoW which connects Goodrich Park with Wortham Ling. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | No | 2.23 | Road south of Elm Pollard, west of Wickham Skeith | 607931 | 269020 | North | Representative of community travelling around Wickham Street and Wickham Skeith using the local PRoW and road network. Note lane to the south is Common Land. | Suffolk | | N/A | | It appears that there would be greater visibility from PRoW further south. |
| Yes | No | No | Yes | 2.24 | PRoW near Mendlesham Hall, west of Mendlesham (Mendlesham 55) | 608983 | 265990 | West | Representative of people using the local PRoW network to the west of Mendlesham and scattered local community. Also to consider interaction between the existing 400kV OHL and the project. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | Yes | 2.25 | Nettlestead Road, Nettlestead | 609437 | 249463 | South-west | Representative of people using the local PRoW and scattered local community to the north of Somersham. | Suffolk | | N/A | | Should be micro-sited along PRoW to get clearest visibility. |
| Yes | No | No | No | 2.26 | Ipswich Road, Somersham | 607851 | 248918 | South-west | Representative of local community and people using the local PRoW and road network to the west of Somersham, near Offton. | Suffolk | | N/A | | Acceptable. |
| | | | N/A | 2.27 | St Mary's Church, Flowton | 608216 | 246840 | South | Representative of people living and moving around the village of Flowton and visiting St Marys Church (Grade I Listed). | Suffolk | | Following design changes viewpoint was removed as the focus of the view is south of Flowton, whereas the Project is to the north of the settlement and views towards it would be screened and filtered by buildings and vegetation. | | Acceptable. |
| No | Yes | No | No | 2.28 | All Saints Road, Creeting Hills | 609333 | 255971 | North | Representative of people using NCR51 and the local road network at Creeting Hills and Needham Market. | Suffolk | | N/A | Wireline proposed due to layers of vegetation likely to filter views of the Project and photomontages proposed from closer VPs 2.44 and 2.15. | Acceptable. |
| Yes | No | No | No | 2.29 | Gipping Valley Path near Creeting Hall | 607488 | 256779 | South East | Representative of people using the PRoW network and the Gipping valley River Path. | Suffolk | | N/A | | VP2.29 should be taken from a location where Creeting Hal can be seen in contexts with the proposed pwerline, for example from the Mill Lane to the north-east. |
| | | | N/A | 2.30 (viewpoint removed - number not used) | Slade Lane, Wortham | 607434 | 270357 | East | Representative of people using Angles Way, the local PRoW network and local road network. | Suffolk | | Limited visibility towards the site noted during field work due to layers of existing vegetation. Alternative location identified at Wortham Ling with closer views towards the Project (VP2.01). | | While reason for removal of viewpoint is acceptable, it is considered there are not enough viewpoints in this area for appropriate representation and this reduction adds to this. |
| No | Yes | No | No | 2.31 | New Road / PRoW north-east of Thrandeston (Thrandeston 5) | 612127 | 277044 | West | Representative of people using the local PRoW and road network near Thrandeston. | Suffolk | | N/A | Wireline proposed due to layers of vegetation likely to filter views of the Project and photomontages proposed from closer VPs 2.03 and 2.33. | Acceptable. |

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|-----|-----|----|-----|------|-------------------------------------------------------------|--------|--------|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------|--|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| No | Yes | No | No | 2.32 | PRoW north of Wortham (Wortham 39) | 607632 | 277666 | North-east | Representative of people within Wortham and using the local PRoW network. | Suffolk | | N/A | Wireline proposed due to distance (approximately 2.5km) and layers of vegetation likely to filter views of the Project. | Wireline acceptable, but why no go further north-west for greater visibility? |
| Yes | No | No | No | 2.33 | Mellis Road, south of Thrandeston | 611087 | 275936 | West | Representative of people using the local road and PRoW network and living and moving around Thrandeston and Mellis. Also on NCR 30 | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | No | 2.34 | Mendlesham Road / Potters Lane, Cotton | 608381 | 266445 | East | Representative of people living and moving around Cotton and using the local road and PRoW network. | Suffolk | | N/A | | Acceptable. |
| No | Yes | No | No | 2.35 | Mid Suffolk Footpath north of Tan Office | 611067 | 263590 | West | Representative of people along the Mid Suffolk Footpath to the north of Tan Office. | Suffolk | | N/A | Wireline proposed due to distance (approximately 2.4km) and layers of vegetation likely to filter views of the Project. Photomontages proposed from closer VPs 2.10 and 2.41. | VP2.35 should be moved to fothpath north-west, for greater visibility. |
| | | | N/A | 2.36 | PRoW off Creeting Lane | 607932 | 259741 | East | Representative of people along the local road and PRoW network to the south-east of Stowupland | Suffolk | | Alternative location identified which is more representative of views from Stowupland | | Acceptable. |
| Yes | No | No | No | 2.37 | PRoW near The Causeway, west of Needham Market (Barking 14) | 607678 | 254082 | West | Representative of people using the PRoW network near The Causeway to the south of Needham Market. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | No | 2.38 | B1078, Ringshall Stocks | 605301 | 251484 | East | Representative of people living and moving around Ringshall Stocks and using the local road and PRoW network. | Suffolk | | N/A | | From the viewpoint map provided it is impossible to tell, whether the viewpoint is in the best location. It should be considered moving it slightly north to the PROW which appears to have significant exposure to the development. |
| Yes | No | No | No | 2.39 | Thornham Road, Thornham Park | 609750 | 271537 | West | Representative of people travelling along the local road network around Thornham Magna and visiting Thornham Park. | Suffolk | | N/A | | Acceptable. |
| No | Yes | No | No | 2.40 | A1120, Forward Green | 610146 | 259555 | West | Representative of people travelling along the Earl Stonham Blue Circular Route, using the local road network and living and moving within Forward Green. | Suffolk | | N/A | Wireline proposed due to layers of vegetation likely to filter views of the Project. Photomontages proposed from closer VPs 2.43 and 2.44. | Acceptable. |
| Yes | No | No | No | 2.41 | Mid Suffolk Footpath near Mendlesham Green | 609117 | 262692 | West | Representative of people travelling along the Mid Suffolk Footpath long distance route and using the local PRoW network south of Mendlesham Green. | Suffolk | | N/A | | Why not from further south-east, at PROW crossing, with greater indicated visibility? |
| Yes | No | No | No | 2.42 | PRoW south of Finningham (Finningham 16) | 606690 | 268797 | East | Representative of users of the PRoW network and properties south of Finningham. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | No | 2.43 | PRoW, Middlewood Green (Earl Stonham 8) | 609488 | 261632 | West | Representative of users of the PRoW network and properties on the northern edge of Middlewood Green. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | No | 2.44 | Fen Lane, near Woolney Hall, north of Creeting St Mary | 609480 | 257802 | West / South-west / South | Representative of users of the local road and PRoW networks between Creeting St Peter and Creeting St Mary. | Suffolk | | N/A | | SCC disagrees that this viewpoint location is representative of the local PROW network between Creeting St Peter and Creeting St Maty with regards to the visibility of the proposed scheme |
| Yes | No | No | No | 2.45 | Church Road, Battisford | 605520 | 254241 | East | Representative of residents and users of the local road and PRoW networks at Battisford. | Suffolk | | N/A | | Again, a viewpoint with relatively limited visual exposure to the scheme has been chosen. Not considered representative. |
| Yes | No | No | No | 2.46 | Tye Lane, Flowton | 608648 | 246862 | North and East | Representative of residents and users of the local road network at Flowton. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | No | 2.47 | Bullen Lane, Bramford | 610511 | 246197 | West | Representative of users of the local road and PRoW networks east of Bramford Substation. | Suffolk | | N/A | | Acceptable. |

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| Yes | No | No | No | 2.48 | PRoW south of Flowton (Burstall 7) | 608980 | 246201 | North, east and south | Representative of users of the PRoW network west of Bramford Substation. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | No | 2.49 | Burgate Road, south of Little Green | 607338 | 274570 | South-east | Representative of the local community and local road network south of Little Green. | Suffolk | | N/A | | This does not appear to be the worst affected location of local roads in this location. That would be Burgate Lane where the scheme crosses twice. |
| Yes | No | No | No | 2.50 | Wickham Road, south of Wickham Skeith | 610198 | 268154 | West | Representative of the local road and PRoW networks south of Wickham Skeith. | Suffolk | | N/A | | Again a viewpoint location has been chosen, which does not appear representative in its visual exposure to the scheme. |
| Section C | | | | | | | | | | | | | | |
| Yes | No | No | Yes | 3.01 | Church Hill, near Burstallhill | 609279 | 245170 | East | View towards Bramford sub-station. Representative of people living and moving around the community and people using the local PRoW and road network in this area. | Suffolk | | N/A | | Micro-site VP to most exposed location. |
| Yes | No | No | Yes | 3.02 | Burstall Lane, Burstall | 610221 | 244401 | North-east / East | Representative of people living and moving around the community of Burstall and using local PRoW and road network. | Suffolk | | N/A | | Acceptable, but would have preferred VP form PROW west of Burstall Hall. Greater visual exposure to this scheme and cumulative effect of other schemes. |
| | | | No | 3.03 | Holton St Mary | 606234 | 236674 | North-east | Representative of people living and moving around Holton St Mary. Potential view of CSEC. | Suffolk | | Following relocation of CSE compound further north, viewpoint was removed due to distance from nearest above ground element of the Project (3.5km) and limited theoretical visibility of the Project. | | It would have been useful to still be able to see, where the viewpoint was removed. It is considered that there are not enough viewpoints around the CSE compound to aid understanding of the assessment of landscape impacts and visual effects. |
| Yes | No | No | Yes | 3.04 | Church Lane, Washbrook | 610769 | 241968 | West | Representative of people living and moving around the community of Washbrook and using local PRoW network. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | Yes | 3.05 | The Street / NCR 1, Chattisham | 608868 | 242088 | South-east | Representative of people living and moving around the community of Chattisham and using local PRoW and NCR 1 on the local road network. | Suffolk | | N/A | | Why not further north-east along Lower Barn Road. |
| No | Yes | No | Yes | 3.06 | PRoW, Hintlesham (Hintlesham 27) | 608699 | 243286 | South-east | Representative of people living within the community of Hintlesham and using local PRoW network. | Suffolk | | N/A | Wireline proposed as photomontage proposed from closer VPs 3.02 and 3.05. | Acceptable. |
| Yes | No | No | No | 3.07 | Pigeon's Lane, Washbrook Street | 610488 | 243000 | North-east | Representative of people using the local PRoW and road network in this area. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | Yes | 3.08 | NCR 1, Woodlands Road | 606804 | 241405 | South-east | Representative of people using the local PRoW and road network in this area and cyclists along NCR 1. | Suffolk | | N/A | | Why not further along the road to north-east, past settlement to greater visual exposure? |
| No | Yes | No | Yes | 3.09 | PRoW, Little Wenham (Wenham Parva 14) | 608072 | 239179 | North / West | Representative of people living within scattered community and using local PRoW network. Cluster of listed buildings including Grade I listed Church of St Lawrence, formally Church of All Saints and Little Wenham Castle. | Suffolk | | N/A | Wireline proposed as photomontage proposed from nearby heritage VP HE3 (at top of tower). | Acceptable. |
| | | | No | 3.10 | Raydon | 605315 | 238844 | North-east | Representative of people living and moving around the community of Raydon and using local PRoW and road network. Potential view of CSEC. | Suffolk | | Following relocation of CSE compound further north, viewpoint was removed due to limited theoretical visibility of the Project. | | Acceptable. |

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| | | | No | 3.16 | Raydon Airfield Memorial | 606147 | 230602 | South | Representative of people visiting Raydon Airfield Memorial and using the local road network. | Suffolk | | Following relocation of CSE compound further north, viewpoint was removed due to limited theoretical visibility of the Project (viewpoint is focused south across the airfield). | | Acceptable (subject to plans). |
| Yes | No | No | No | 3.17 | Great Wenham | 606983 | 238225 | South and North-west | Representative of people living and moving around Great Wenham and using the local PRoW and network. Potential view of CSEC. | Suffolk | | N/A | | Why not from PROW with greater visual exposure? |
| | | | N/A | 3.18 | Bridleway near Holton St Mary | 606023 | 237303 | North and East | Representative of people using the PRoW network near Holton St Mary. Potential view of CSEC. | Suffolk | | Following relocation of CSE compound further north, viewpoint was removed due to distance from nearest above ground element of the Project (3km) and limited theoretical visibility of the Project. | | It would have been useful to still be able to see, where the viewpoint was removed. It is considered that there are not enough viewpoints around the CSE compound to aid understanding of the assesment of landscape impacts and visual effects. |
| Yes | No | No | Yes | 3.20 | Fenbridge Lane | 606997 | 234286 | South | Representative of people living, moving and using the local road network within East Bergholt and within Dedham Vale National Landscape. Locally promoted viewpoint with bench, also close to locations where Constable painted. Close to the edge of East Bergholt Conservation Area. | Suffolk | | N/A | | Acceptable? |
| | | | No | 3.20 (A) | B1070, East Bergholt | 607219 | 235419 | North | Located on the junction of Moor Lane and the B1070 on the northern edge of East Bergholt and representative of people living and moving around East Bergholt and using the local road network. | Suffolk | | Following relocation of CSE compound further north, viewpoint was removed due to distance from nearest above ground element of the Project (4.7km) and limited theoretical visibility of the Project. | | It would have been useful to still be able to see, where the viewpoint was removed. It is considered that there are not enough viewpoints around the CSE compound to aid understanding of the assesment of landscape impacts and visual effects. |
| Yes | No | No | No | 3.22 | PRoW near Sproughton (Sproughton 20) | 611903 | 243771 | West | Representative of people using the PRoW and road network near to Sproughton. | Suffolk | | N/A | | Acceptable. |
| No | Yes | No | Yes | 3.24 | Higham Hill, south of Lower Raydon | 603429 | 237356 | North-east | Representative of people using NCR1 and living, moving and using the local road network within Dedham Vale National Landscape and using Sully Hills Quiet Lane. | Suffolk | | N/A | Wireline proposed due to distance (approximately 4.2km) and layers of intervening vegetation likely to filter views towards the Project (see PEIR Figure 13.9.49) | Acceptable. |
| Yes | No | No | Yes | 3.25 | PRoW near Woodlands Hall (Raydon 5) | 606157 | 240067 | East | Representative of users of the PRoW network near Woodland Hall. | Suffolk | | N/A | | Acceptable. |
| Yes | No | No | No | 3.28 | PRoW near Capel St Mary (Copdock 19) | 610186 | 239724 | North-west | Representative of users of the PRoW network north-east of Capel St Mary | Suffolk | | N/A | | Please move VP to location with greater visual exposure, slightly south-west. |
| No | No | Yes | No | 3.29 | Hadleigh Road, near Chantry Park | 613344 | 244029 | West | Representative of residents and users of the road network at Chantry Park, on the edge of Ipswich. | Suffolk | | N/A | Baseline photo proposed due to layers of intervening vegetation likely to filter views towards the Project. Photomontage proposed from closer VP3.22. | Acceptable, provided annotations are given. |